



HilLand Environmental

Environmental Assessment Practitioners

PRE-APPLICATION
BASIC ASSESSMENT REPORT (BAR)
FOR
THE PROPOSED CONSENT USE AND AGRICULTURAL ACTIVITIES
ON PORTION 8 OF FARM 223, PLETTENBERG BAY



Compiled by	HilLand Environmental
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**Western Cape
Government**

Department of Environmental Affairs and
Development Planning

BASIC ASSESSMENT REPORT

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

APRIL 2024



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(For official use only)	
Pre-application Reference Number (if applicable):	
EIA Application Reference Number:	
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

GENERAL PROJECT DESCRIPTION

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

Portion 8 of the farm 223 Uplands is located along the Uplands road, R340 north of Plettenberg Bay. The property is currently agricultural, is used for dryland grazing and has been used for dryland grazing since prior to 1958 and has building plan approval from the Bitou Municipality for a primary dwelling, managers home, store, stables, workers accommodation and associated infrastructure as primary rights activities on agricultural land. These primary right activities do NOT trigger any NEMA listed activities on their own – however, DEADP regard the works as potentially being "in furtherance" of a listed activity in terms of "clearance of vegetation". As such, DEADP advise that clearance does not commence for the building of the approved building plans, until the EA has been issued in terms of NEMA, that will cover all vegetation clearing. The Primary rights (approved building plans) fall below any NEMA thresholds and are NOT linked to the future application for clearing. Clearing for the primary home, stable, managers home, storeroom and worker accommodation is required in order to continue with the current farming activities on the property – dryland grazing. This clearing is NOT "required for" or "in furtherance of" the application for consent uses or the new cultivation. If and when, the consent uses are approved, after the NEMA application process and consent use application process, then the clearing required for those uses will continue. That future clearing is dependent on the outcome of the legislated processes. As DEADP appear to be of a differing viewpoint, this will be clarified during the pre-application BAR consultation process. Consent use application - The proposed Consent Use application (described below) results in the triggering of various NEMA listed activities on the property that require Environmental Authorisation. The proposed cultivation of portions of the property results in the triggering of a NEMA listed activity on the property that requires Environmental Authorisation.



Figure 1 Location plan of portion 8 of 223 in relation to the N2 and R340.

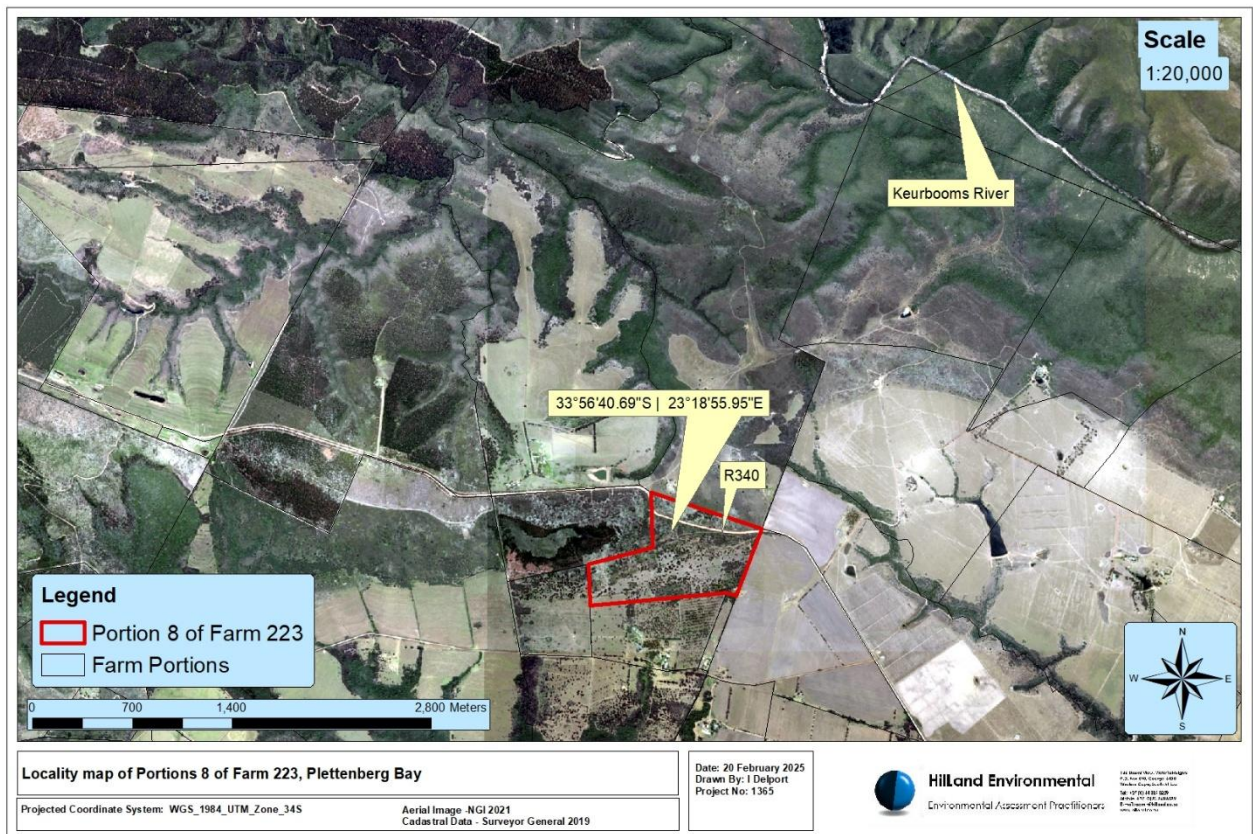
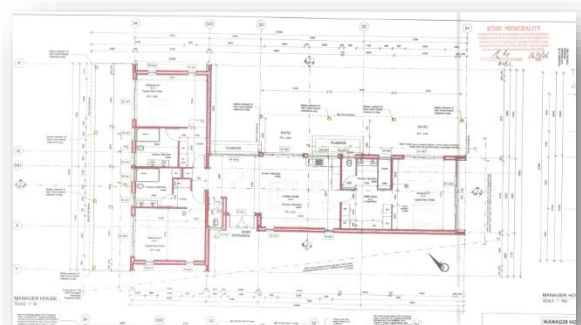


Figure 2 Locality plan of portion 8 of 223 Uplands, Plettenberg Bay, along the R340.

Figure 3 Adjusted property boundary indication - where the portion north of the DR 340 will be consolidated with portion 14/223.



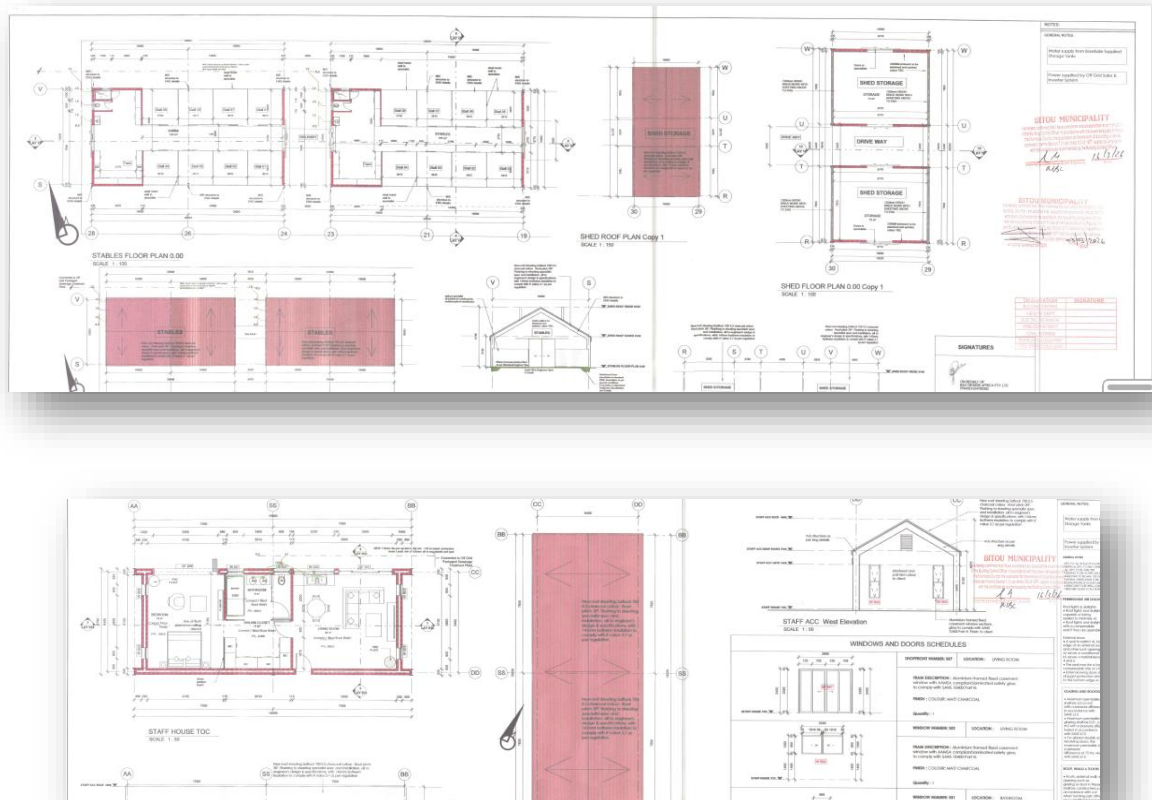


Figure 5 Approved building plans for primary rights

Current approved plans which will require clearing of vegetation amount to the following:

- Main house – 6366m²
- Stables – 657m²
- Storeroom - 212m²
- Worker's accommodation – 1331m²
- Managers house 540m²
- Pump house – 20m²

Total vegetation clearing approved (including all associated disturbed areas around the buildings and all non-linear services) = 9 126m²

The above confirms that **no listed activities in terms of NEMA** are directly associated with the approved primary rights for the site. As indicated above, DEADP regard the "clearance of vegetation" as being part of the larger clearing that will be required and as such advise that clearing not commence as it will be seen as being done "in furtherance" of a listed activity which requires authorisation. Clarity is being sought in this regards as the owner would like to build their home according to the approved building plans and this is viewed as being unrelated to the NEMA application for the new cultivation and various consent uses – and not have to wait until an EA is issued in order to build their primary rights approved infrastructure.

Activity 27 – clearance of vegetation more than 1ha (please note the exclusion which applies to linear clearing) – with the planned activities which form part of the consent use application and agricultural use, clearing of vegetation will exceed 1ha.

For this application - The owners are making a **consent use application** and they propose cultivation of areas that were previously cultivated but which have not been ploughed in the last 10 years.

The following activities will trigger various Listed Activities and will require NEMA authorisation prior to being undertaken:

Vegetation clearing (areas not ploughed in the preceding 10 years – excluding linear activities)

- All primary rights (main house, managers house, worker accommodation, stables and storeroom)
- All consent uses (see below)
- Cultivation activities (see below)

Consent Use Application – Accommodation, market, farm stall and private grass landing strip:

- Additional dwellings (eco-pods) x 5 (110m² each) plus parking = 1013m²
- Camping area (10 camping stands), ablution and parking 6822m²
- Farmers market with a farm stall = 1.5ha
- Firebreak to be used as grass landing strip

Additional Farming Activities:

- cultivation of previously cultivated lands (8.66ha + 6.98ha = 15.6ha)

Summary of the Proposed Consent Use Application

The proposed consent use application seeks approval from the Bitou Municipality for a mixed-use agricultural and tourism development on Portion 8 of Farm Le Grange No. 223. The application includes both land use consents and approval of a site development plan (SDP) to formalize a long-term development framework.

The main objectives are to:

- Establish a commercially viable regenerative farming operation (dryland pastures, livestock, conservation, and rehabilitation of indigenous vegetation).
- Diversify income streams through low-impact, rural tourism and local commerce, supporting the economic viability of the farm and the broader rural area.

Specific Consent Uses Requested

The application requests consent for the following uses (in addition to existing approved primary agricultural rights):

- Five Additional Dwellings (Eco Cabins): For tourist accommodation, offering farm-stay experiences in eco-friendly cabins.
- Guest Accommodation: To allow short-term lodging and meals for transient guests, supporting rural tourism.
- Campsite (10 stands): A small, off-grid campsite for nature-based tourism, designed to have minimal environmental impact.
- Farmers' Market: A community-oriented market for local producers to sell fresh produce and artisanal goods, strengthening local food systems and rural livelihoods.
- Farm Shop: A small shop (under 150 m²) selling farm produce and goods from local producers, providing a daily outlet for local products.
- Private Airfield: A grass runway for private light aircraft, which also serves as a firebreak and emergency firefighting base.

Rationale and Benefits

- **Environmental Rehabilitation:** Ongoing alien vegetation clearing and restoration of indigenous fynbos, reducing fire risk and improving biodiversity.
- **Economic Diversification:** Introducing tourism and local commerce to supplement agricultural income, ensuring long-term sustainability.
- **Employment Creation:** Permanent and seasonal jobs in farming, tourism, hospitality, and market operations.
- **Community Support:** Providing outlets for local farmers, supporting short supply chains, and creating a social hub in a rural area.
- **Self-Sufficiency:** The development will be off-grid for water, sanitation, and energy, reducing reliance on municipal services.
- **Alignment with Policy:** The proposal is consistent with local, district, and provincial spatial development frameworks, which encourage agri-tourism and rural economic diversification.

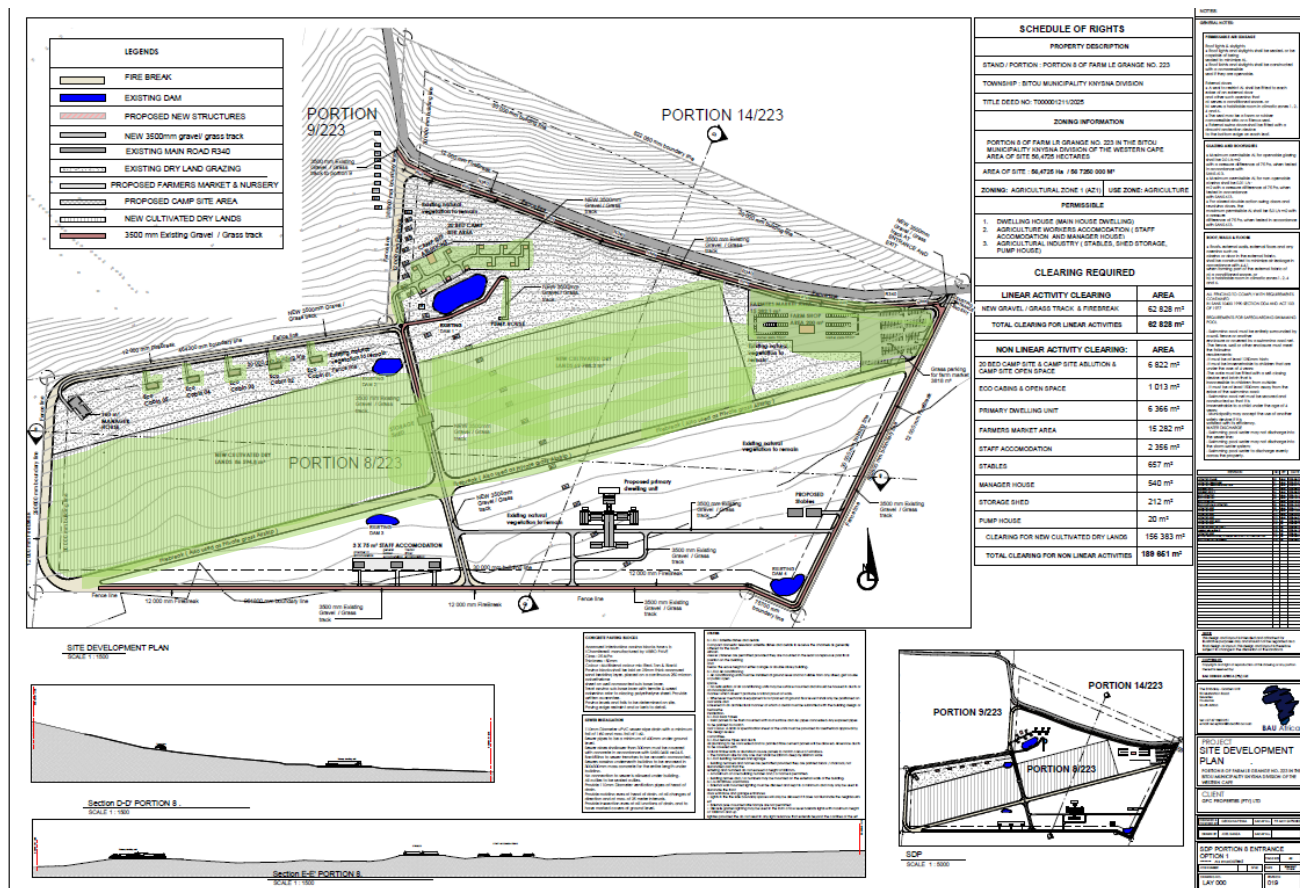
Implementation

- The development is designed to be clustered, with all new structures placed on previously disturbed or low-sensitivity areas to minimize environmental impact.
- The application includes a comprehensive site development plan (SDP) and is supported by specialist studies (agricultural, biodiversity, aquatic, and engineering assessments).

In order to **confirm the NEMA applicability** and to determine if any additional thresholds have been met it is important to take into account the **cumulative totals** in terms of vegetation clearing.

The NEMA threshold for vegetation clearing will not have exceeded 20ha and as such a Basic Assessment Process is applicable and not a Scoping EIA process.

Consent Use Activities	area
Farmers market area	1.5ha
New cultivated land (west)	8.66ha
New cultivated land (east)	6.98ha
Eco pods x 5	0.1ha
Camping site area 10 sites	0.68ha
Total new clearance proposed	17.92ha
Clearing for primary rights - under NEMA threshold	0.91ha
Total cumulative clearing	18.83ha



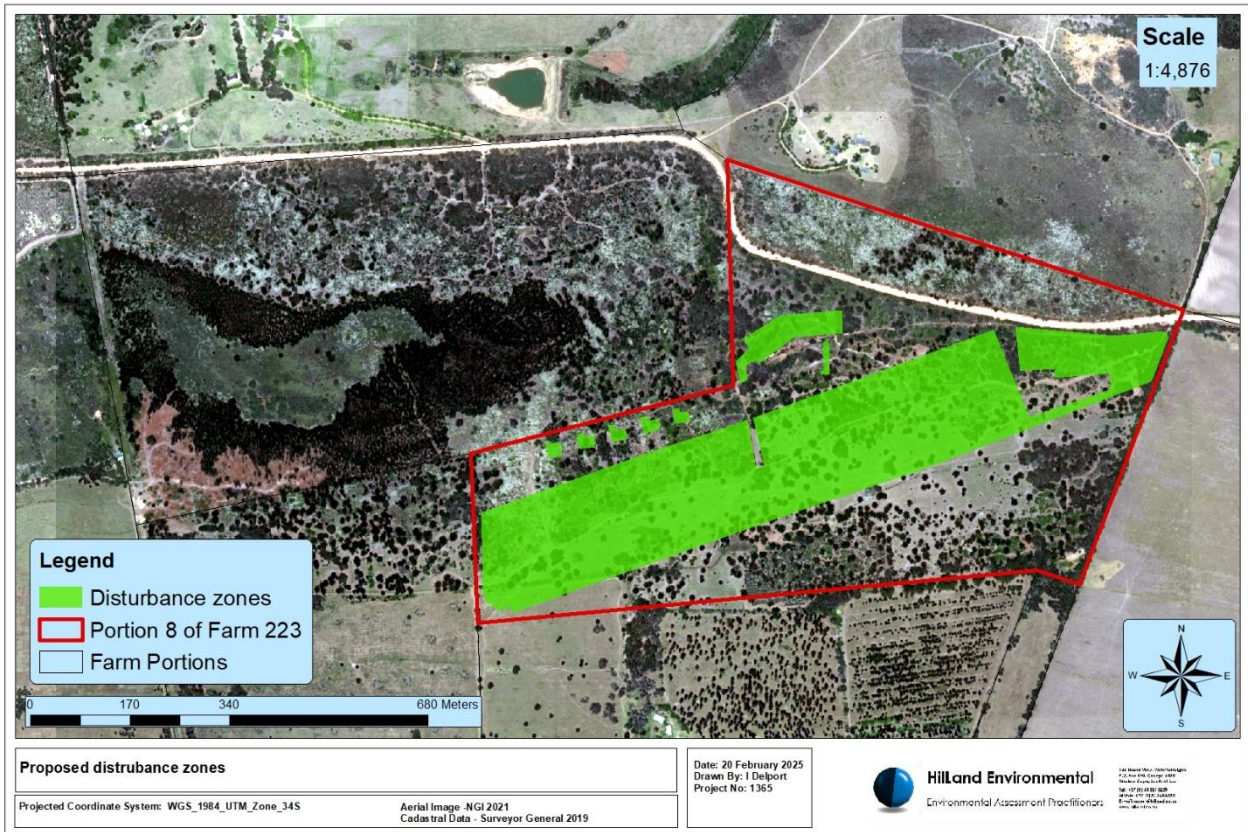


Figure 7 Proposed consent use and agricultural cultivation areas applicable to this NEMA application – new clearing areas.

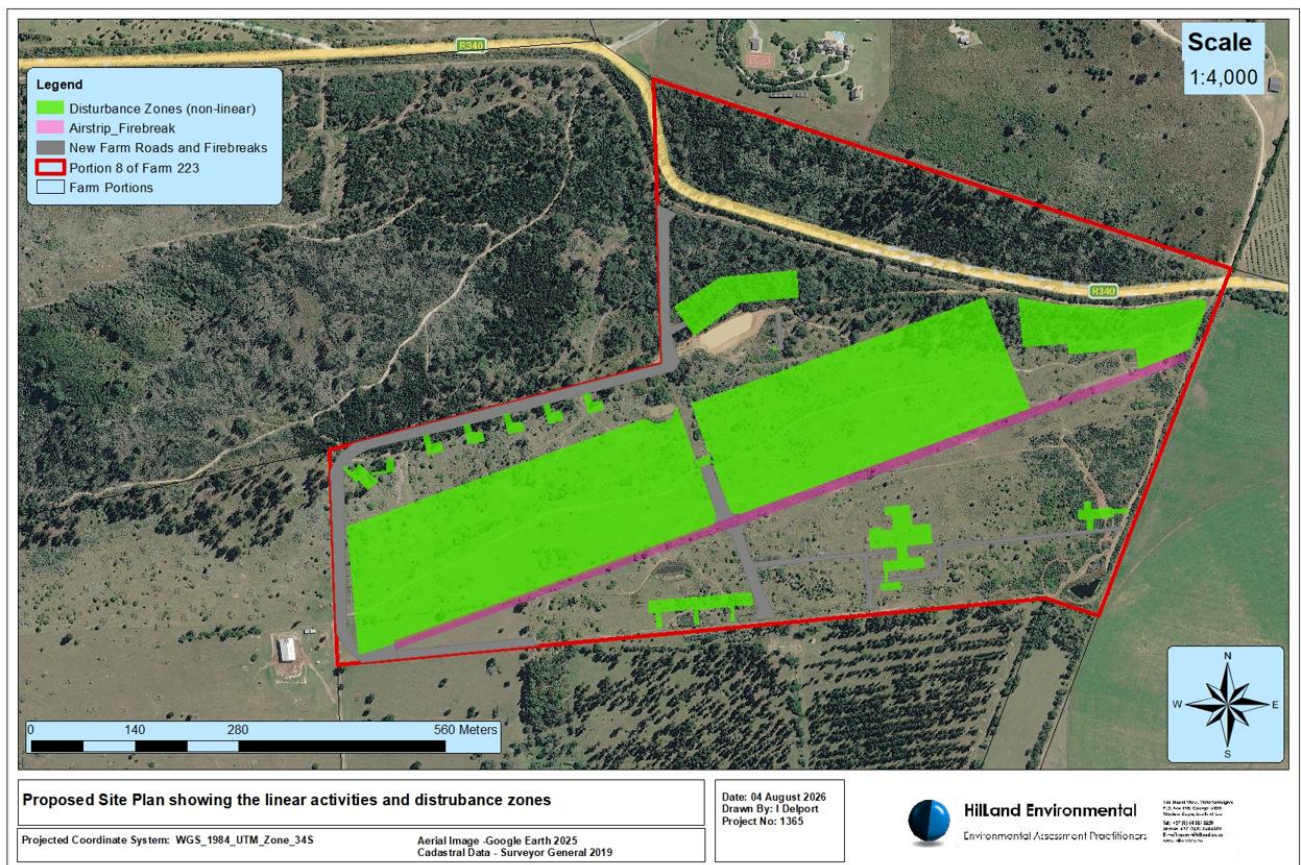


Figure 8 Areas requiring clearing cumulative totals – primary rights and new cultivation and future consent uses.

NEMA applicability

The proposal will trigger NEMA listed activities relating to tourism facilities (eco-pods and camping) which will sleep 15 or more people within 5km of a Protected Area, the creation of a grass airstrip and the clearance of more than 1ha of indigenous vegetation, where the vegetation has not already been lawfully transformed (farmers market and farm stall, and potentially the cultivation of existing agricultural grazing areas).

The Primary rights (approved building plans) fall below any NEMA thresholds and are NOT linked to the future application for clearing. Clearing for the primary home, stable, managers home, storeroom and worker accommodation is required in order to continue with the current farming activities on the property – dryland grazing.

This clearing is NOT required for or “in furtherance of” the application for consent uses or the new cultivation. If and when the consent uses are approved, after the NEMA application process and consent use application process, then the clearing required for those uses will continue. That future clearing is dependant on the outcome of the legislated processes.

As DEADP appear to be of a differing viewpoint, this will be clarified during the pre-application BAR consultation process

NEMA activities

- **Listing Notice 1 activity 27 – clearance of more than 1ha but less than 20ha of indigenous vegetation – for the farmers market area and parking, the camp sites, the eco-cabins and the cultivation of agricultural land not physically “cultivated” in the past 10 years. Please note this does not include clearing required for roads, airstrip and firebreaks which are excluded as linear activities.**
- **Listing Notice 1 activity 28 – mixed commercial development of land used for agriculture exceeding 1ha outside an urban area – for the tourism facilities proposed.**
- **Listing Notice 3 activity 4 – development of new farm roads that may be wider than 4m in areas containing indigenous vegetation.**
- **Listing Notice 3 activity 6 – development of tourism facilities sleeping 15 or more people outside an urban area within 5km of a protected area**
- **Listing Notice 3 activity 7 – development of an airstrip outside an urban area**
- **Listing Notice 3 activity 18 – the potential widening of existing internal farm roads by 4m or more to accommodate passing and entry.**

The consent use application is as follows: (Planning Space 2026)

“In terms of the Bitou Municipality: Standard Municipal Land Use Planning By-law (2016), the following land use applications will be submitted to give effect to the proposed development on Portion 8 of Farm 223:

1. Applications for Consent use in terms of Section 15 (o) for
 - i. Five Additional Dwellings (eco cabins)
 - ii. Guest Accommodation
 - iii. A Campsite with 10 camping stands
 - iv. A Farmers' Market
 - v. A Farm Shop
 - vi. A Private Airfield
2. Approval of a Site Development Plan (SDP) for all approved primary uses and consent-use components, as required by the Zoning Scheme.

Airfield

The owner of the land owns a small private light aircraft and would like to have the ability to land and take off from the farm. The airfield is planned in the low-lying area of the farm used as cultivated land. The airfield stretches diagonally over the length of the farm north easterly/southwesterly directions, to align with the contours of the land and the prevailing winds. The landing strip will need minimal grading due to the even nature of the topography. The planned strip will be approximately 800m in length and 12, width and will be grassed, and will also function as a firebreak between the cultivated drylands and the rehabilitated natural vegetation. The topography and elongated shape of the property make this site uniquely ideal for an airstrip. The Bitou Zoning Scheme makes provision for an airfield as a consent use in the “Agriculture 1” zone. In terms of the 2011 South African Civil Aviation Regulations Part 139, Aerodromes are either licensed or registered. The former applies only to commercial aerodromes, and the latter applies to private use aerodromes. There is NO requirement to license an airfield which is for private use; the only requirement is to have the airfield registered on the SACAA database. The zoning scheme does not distinguish between commercial and private use airfields. The airfield will only be used for private purposes and has been registered as a private aerodrome with the South African Civil Aviation Regulations. Southern Cape Fire Protection Agency has requested and further motivated for the need for the airstrip as an emergency firefighting base in the event of a runaway wildfire.

Additional Dwellings

As part of the tourist accommodation offering within the proposed development, the construction of five permanent eco cabins, each measuring approximately 110m², is planned. The units will be placed along the slightly elevated area on the northern boundary of the property and will gain access from a planned road along the northern boundary that will also serve as a firebreak. It is the intention to rent these units out to tourists seeking a farm stay experience. Each will have one bedroom (Max 10 guests). The cabins are placed at the foot of the southern slopes overlooking the farm and surroundings. This area forms part of the rehabilitation footprint and is more treed and vegetated. The architecture of

the units will make use of natural elements and colours and will completely blend in with the natural surroundings. These cabins can qualify as "additional dwelling", which are permitted in the "Agriculture 1" zone as a consent use.

Guest Accommodation

Land use description: "guest accommodation" means a dwelling unit that is used for the purpose of supplying lodging and meals to transient guests for compensation who have permanent residence elsewhere. To permit the owner to rent out additional dwellings as guest accommodation to guests on a short-term bases, additional consent for Guest accommodation is required.

Campsite

A camping site is proposed to broaden the affordability and diversity of tourism accommodation facilities offered on the farm. The 10-site campsite is located on a slightly elevated area in the north-eastern section of the farm, offering panoramic views to the south across the agricultural lands and an existing farm dam. Its position provides a natural separation from the main farming activities, ensuring that the campsite does not interfere with day-to-day agricultural operations or reduce the productivity of the working farm.

The campsite will have a minimal environmental footprint, with all structures and amenities designed to integrate naturally with the landscape. Each site will include a small wooden shelter constructed over a level timber deck, providing a shaded area for tent placement.

A gravel parking bay will accompany each deck to accommodate a caravan or 4x4 camping trailer, avoiding the need for paved surfaces or intrusive infrastructure.

No power or water connections will be provided at individual stands to encourage self-sufficiency and support an off-grid, nature-based experience.

A central ablution block will be provided, containing toilets, showers, and wash-up areas. Based on the Tourism Grading Council of South Africa (TGCSA) standard of one male and one female toilet, shower, and washbasin per four camping sites, the 10 sites require a minimum of three toilets and three showers. The proposed ablution block will include separate male and female facilities, each with two toilets and two showers, thereby exceeding the minimum standard.

A campsite is permitted as a consent use within the "Agriculture Zone 1". The zoning by-law defines a campsite as:

"Land set aside for camping where tents or caravans are used for short-term accommodation of transient guests, and which may include facilities for outdoor food preparation, a resort shop, vehicle access, picnic facilities, raised platforms for tents or caravans, ablution facilities, communal scullery and laundry facilities, and waste-disposal facilities, and excludes permanent tents or caravans."

In terms of the development parameters, the use requires the approval of a Site Development Plan (SDP)"

Farmers Market

A long-term vision of the proposed development is the establishment of a low-impact, community-oriented farmers' market. There is currently no weekly producer market in the Uplands–Wittedrift– Redford–Kurland area. The farm is situated along the R340, a scenic rural route connecting Plettenberg Bay with Wittedrift, Uplands, Union Uniondale, Avontuur, The Craggs, Kurland Village and onward to Nature's Valley and Tsitsikamma. This market is envisioned as a vibrant, inclusive space that supports local producers, allows social connection, and promotes sustainable living through the farm-to-plate philosophy. The proposal forms part of the landowner's broader rural-tourism vision, which includes low-impact visitor activities that are compatible with the agricultural character of the property.

The Bitou Zoning Scheme By-law allows a "farmers' market" as a consent use in the "Agriculture 1 Zone". The By-law describes a "farmers' market" as:

"A predominantly fresh food market where farmers and food producers sell, directly to consumers, farm origin and associated value-added speciality foods and plant products inter alia including;

- (i) primary food products;
- (ii) seafood, game and foraged foods;
- (iii) value-added foods;
- (iv) speciality food products;
- (v) garden inputs; and
- (vii) small livestock;

A farmers' market–

- (i) operates regularly within a community;
- (ii) is located at a focal public location that provides a suitable environment for farmers to conduct trade;
- (iii) typically consists of booths, tables or stands, outdoors or indoors, where farmers sell farm produce, meats, and sometimes prepared foods and beverages;
- and
- (iv) may include:
 - (aa) a subservient component of stalls for the sale of locally produced handmade crafts and arts;
 - and
 - (bb) live family entertainment, outdoor recreation activities and a children's play area."

Development parameters:

The development parameters applicable to "agriculture" apply, together with the following additional parameters:

- (a) The Municipality may stipulate conditions with regard to the layout, building design, open space, landscaping, parking, access and environmental management; and

(b) The development must occur in accordance with an approved site development plan.

The market will be located on a levelled grassed area near the entrance to the farm, providing easy access and visibility. This area has been previously disturbed and is separated from the main cultivation/operational areas, ensuring no disruption to agricultural productivity.

For future planning, a basic layout indicates about 110 stalls and 120 public parking bays. Parking areas will not be paved and will not require intrusive earthworks. A series of permanent stalls will be erected, constructed from natural timber, gum poles, and recycled black wattle harvested from the farm. Final layout designs will be submitted as a separate SDP. (The current SDP set a footprint for the market, which includes stalls, parking and circulation).

Farm Store

A farm shop is another consent use in "Agriculture Zone I". The Bitou Zoning Scheme By-law defines a farm shop as a building or structure not exceeding 150 m² of floor area, located on a farm, from where the farmer sells produce grown on the farm and other goods to the public.

The landowner proposes a permanent farm shop located within the market precinct, sized to remain below the 150 m² threshold. The shop will operate daily and will offer:

- Fresh produce grown on the farm and by participating local producers;
- A selection of goods from regular weekend-market vendors (preserves, dairy, baked goods, crafts and indigenous plants from the farm), ensuring continuity of access to local products even when vendors are absent;
- A small coffee and light-meals counter to serve passing tourists, mountain-bikers and residents using the R340 scenic route.

The farm shop will utilise the market's existing access and parking arrangements, and no additional footprint or new access points are required. The permanent structure will be modest and farm-appropriate in scale and design, using natural materials and low-impact finishes to maintain visual compatibility with the rural landscape.

Services required for the consent uses

Water supply for the proposed consent uses:

- camping & eco pods
- farmers market & farm stall
- agricultural lands (will be dryland – no irrigation required)

Borehole Supply

- The primary water supply to the site will be from an existing borehole on the site (yield 86 kilolitres per day).
- The water will require filtration and chemical dosing to ensure potable standards.
- In terms of the National Water Act General Authorization for the Taking and Storage of Water, Clause 3 and Clause 7.2 a Water Use Licence will not be required and registration with the Water Authority will not be required.

Rainwater Harvesting

- As a secondary source roof rainwater harvesting will be implemented for most of the buildings where practical.
- Harvested roof runoff will be pre-treated by means of gutter guards and first flush diverters before being stored in the rainwater tank for each structure.
- Toilet supply will be directly from the rainwater storage tanks, and washbasin and kitchen supply will be from the tank through a filtration system.
- The reservoir supply will also top up to the rainwater storage tanks as and when required.

Water Demand

- Average Maximum Daily Water Demand (AMDD) is calculated at 5.78Kilolitres (including adjustment for occupancy rates and taking the primary rights into account).

Unit	No	AMDD Litres	Total AMDD Kilolitres
Existing Approved Buildings			
Farmhouse Residence	1	1000	1.0
Farm Managers House	1	800	0.80
Staff Cottages	3	600	1.80
New Buildings and Facilities			
Eco Cabins	5	300*	1.50
Camp Sites	10	200*	2.00
Farmers Market and Farm Stall	1	3000*	3.00
Total			10.10
Reduced Total ADD Adjusted for Occupancy			5.78

* Occupancy: Eco Cabins 50%, Camp Sites 50%, Farmers Market 14.3%

Water Distribution

- Water will be distributed from the 15 kilolitre elevated storage tank from where it will be gravity fed to the camp site, farmers market and eco pods.
- The minimum residual pressure will be 10Kpa at the camp site ablution block, sufficient to ensure efficient operation of the gas geysers. The minimum residual pressure will exceed 20Kpa at all other buildings

Sewage treatment for the proposed consent uses:

- There is no municipal sewer connection available on the farm as such the farm will be self-sufficient and make use of package sewerage treatment plants.
- Camping & Eco pods (will drain to and be treated at the sewage treatment plant at the Managers home)
- Farmers market & farm stall (own sewage treatment plant)
- The treatment plants will be regulated under the National Water Act 36 of 1998 and any requirements of the Bitou Municipality.

Sewer Reticulation

- The sewer reticulation system will be of 110mm and 160mm Class 34 UPVC sewer pipes. Manholes will be of precast concrete ring structures, in accordance with SABS 1200D standards. Manholes will be provided at a maximum of 80 meter intervals.
- Maintenance of the sewer reticulation system will be the responsibility of the landowner.

Sewerage Treatment Package Plants (STPs)

- Sewerage for the proposed farmers market and farm stall which will operate once a week will be treated at a separate STP with the capacity of 2.4 kilolitres
- Sewage for the proposed Eco cabins and camp sites will be treated at the STP installed at the farm managers house with a capacity of 3.44 kilolitres
- Sewerage Treatment Plants and the discharge of effluent must comply with the requirements as set out in Section 34 of the National Water Act of 1998. The development falls under the jurisdiction of the Bitou Municipality and will comply with the requirements of that Authority.
- The package plants will be procured from a reputable supplier and must be environmentally friendly, reliable and simple and easy to maintain, and must meet the relevant DWAS Section 21 effluent quality specification.

Two alternatives are being considered:

BioRock:

- The BioRock Package Plant is supplied and installed by BioRock Africa. BIOROCK is an international company which has been operating worldwide since 1988.
- The BioRock plants incorporate a pretreatment anaerobic tank which clarifies the raw sewage by dividing fats, oils, greases and organic solids. The sewage then passes through an effluent filter, before discharging into the aerobic BioRock reactor.
- The Bioreactor purifies further the pretreated wastewater with a biological process. To naturally treat the wastewater, the systems use a unique BIOROCK Media, an exclusive and efficient carrier material for bacteria.
- BioRock Sewage Plants operate under gravity and no electrical supply is required.
- The BioRock Plant can be sized to capacity of up to 4.5 kilolitres per day

Eco Tanks Big Red

- The Eco Tanks Big Red Package Plant is supplied by Eco Tanks, a South African Company established in 2004. The Big Red Plant was launched in 2021.
- The plant also incorporates pretreatment in an anaerobic tank followed by an aerobic biological reactor.
- The system requires a modest power supply and can economically be powered by a solar system.
- The Big Red plant capacity is on the basis of modular units of up to total 2.5 kilolitres per day. Additional units can be installed in parallel if required.

Other Sewerage Package Plant options may be considered, subject to meeting the required output specifications - to be determined in the detailed design phase.

Plant Effluent: Quality

- Both The BioRock and the Big Red systems produce effluent quality superior to the irrigation standard as set out in the National Water Act General Authorisations Section 21e.
- The Big Red System claims to treat domestic waste to comply with the Section 21f General Limit and have submitted test results indicating such compliance.
- BioRock do not claim to meet the Section 21f General Limit but claim to target compliance in conjunction with disposal through evapotranspiration/filtration beds.

Plant Effluent: Disposal

- The treated discharge from each of the plants will be gravitated to a designated shallow subsurface distribution bed with disposal by primary enhanced evapotranspiration and secondary infiltration.
- The disposal bed will comprise a network of perforated irrigation pipes in a 300mm aggregate layer, bidim lined, underlying a 150mm topsoil layer planted with Buffalo Grass or similar appropriate evapotranspiration vegetation / reedbed medium.

Plant Maintenance

- Regular plant maintenance must be undertaken annually by a Professional Service Provider in accordance with the product Maintenance Guidelines.

- Annual maintenance inspections will monitor sludge accumulation which must not be allowed to exceed 30 percent of the volume of the anaerobic chamber. Sludge will be removed by a privately contracted vacuum tanker for disposal at a licenced disposal site.

Refuse requirements:

- Camping & eco pods
 - Farmers market and farm stall
- Owner to collect and dispose of at the municipal waste transfer site. Recycling will be done at source.

Energy supply to the proposed consent use:

- Camping & eco pods
 - Farmers market and farm stall
- The property is OFF Grid in its entirety.
 - Energy supplied on the following basis:
 - Hot Water Geysers Gas Powered
 - Ovens and Hobs Gas Powered
 - Heating Gas or Wood Burner
 - All Domestic Appliances except kettles Solar Powered

Unit	Inverter Capacity kW	Battery Storage kWh	Solar Panels kWp
Eco cabins	5	5	4
Camp Sites Ablutions	5	5	4
Farm Stall	8	15	6

Access and internal roads

- Camping – access from existing internal farm track
- Eco pods – access from existing internal farm track
- Farmers market and farm stall

The site access will be off Divisional Road R340.

The average max daily trips generated by the development is projected at less than 20.

One day per week the farmers market is expected to generate a further maximum of 300 trips over a period of 5 hours. The delays for traffic exiting the market will be well within the acceptable level of service.

The minimum required Gap Sight distance for vehicles turning right out of Portion 8, onto R340, with a regulatory speed limit of 60 kilometers per hour is 125 meters. The existing gap sight distance for traffic turning out of the farm is approximately 150m to the right and 200m to the left. Regular clearance of existing vegetational overgrowth in the R340 Divisional Council Road Reserve will continue to be required.

Internal Roads and Stormwater Management

There are currently a number of grass and gravel surfaced tracks traversing the site, providing access to various areas on the farm.

There are also extensive areas where low berms have been constructed parallel to the contour (historic farming contours). These berms detain stormwater runoff and facilitate surface absorption and guide flow towards the existing farm dams where possible.

There is no evidence of erosion of any significance throughout the site.

Existing access and driveways for house construction may require the addition of gravel to certain of the grass tracks.

For the proposed consent uses access will be off existing tracks where possible. Improvement will be needed at the entrance to the grass parking at the farmers market as indicated below.

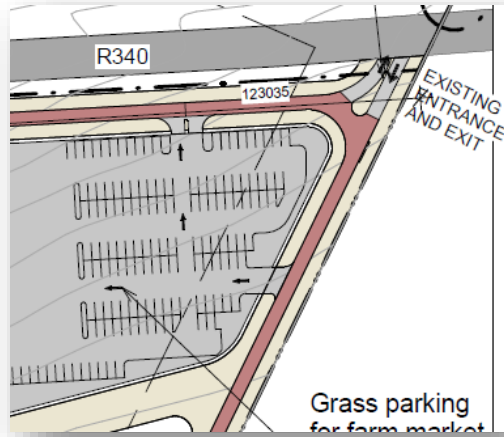


Figure 9 Entrance road requirements at the farmers market and grass parking area.

The gravel surfaced roads will be constructed "on Grade" with the crossfall to the lower natural ground level side, and protected by low grassed berms on the high side where necessary. At essential drainage points the berms will be weired and the road surface depressed to allow controlled cross drainage.

The grassed weired berm will be designed to detain stormwater runoff and discharge it to the road crossing at very low velocity of less than 0.5 meters per second. The overall road drainage system will ensure minimum maintenance and no erosion at points of discharge.

No expansion of an existing road will be more than 4m.





Figure 10 Photos of existing farm tracks and the divisional road.

Light Aircraft Landing Strip

- The Site Development Plan makes provision for a light aircraft landing strip running parallel to the contour, diagonally across the site in a southwest to north easterly direction within a planned firebreak.
- The air strip will be 12 meters wide and approximately 800 meters long and will be grass surfaced.
- The natural crossfall of the airstrip is approximately 7 to 8 percent and some levelling of the cross-section will be required. It is proposed that as proposed for the gravel roads, the airstrip be protected from erosion by a low berm to be constructed on the higher side of the crossfall.

Historically the property has been used for agriculture and plantations dating back since before 1958.



1958 – agricultural cultivation evident on the level portion of the property



1972 - Cultivation ongoing.



1990 – Cultivation ongoing



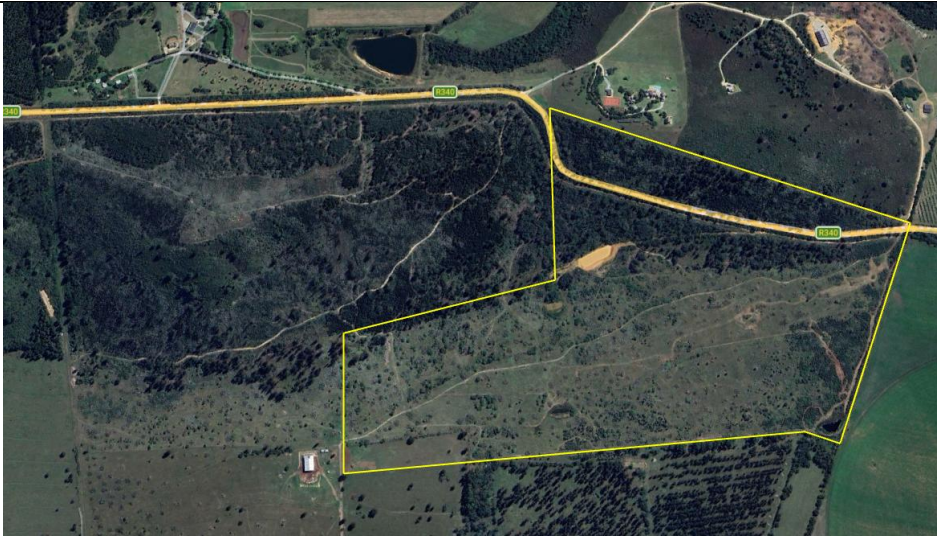
1998 - the use had changed to afforestation with Pine.



2004 - The Pine plantation appears to have all been harvested and the area was back to cultivation.



2022 - grazing on the property



2025 – Agricultural use grazing with alien infestation in the process of being managed.



2026 – photo showing the alien clearing progress and grazing areas within the agricultural zone area.



2026 – photo showing the grazing areas, alien clearing and existing farm tracks.



2026 – agricultural area showing two of the 4 farm dams.



2026 – area where the farmers market is proposed – grass parking and pine currently being harvested.



2026 – Pine harvesting in and adjacent to the area where the farmers market is proposed.



2026 – Area between the farm dam and the main road where camping is proposed – pine still to be harvested and alien clearing to continue. This area will be restored to natural vegetation surrounding the camping sites.

The site-specific biodiversity sensitivity and land use of the site is mapped as follows:

- Existing cultivated area (brown) LOW
- Existing dryland grazing (yellow) LOW
- Disturbed areas of dense aliens (green) LOW
- Existing dams (blue) LOW



Figure 11 Habitat and land use (Hoare, 2026)



Figure 12 Endangered Ecosystem Remnant Mapping - SANBI

There are no mapped remnants of the Least Concern South Outeniqua Sandstone Fynbos remaining on site – confirmed by the specialist.

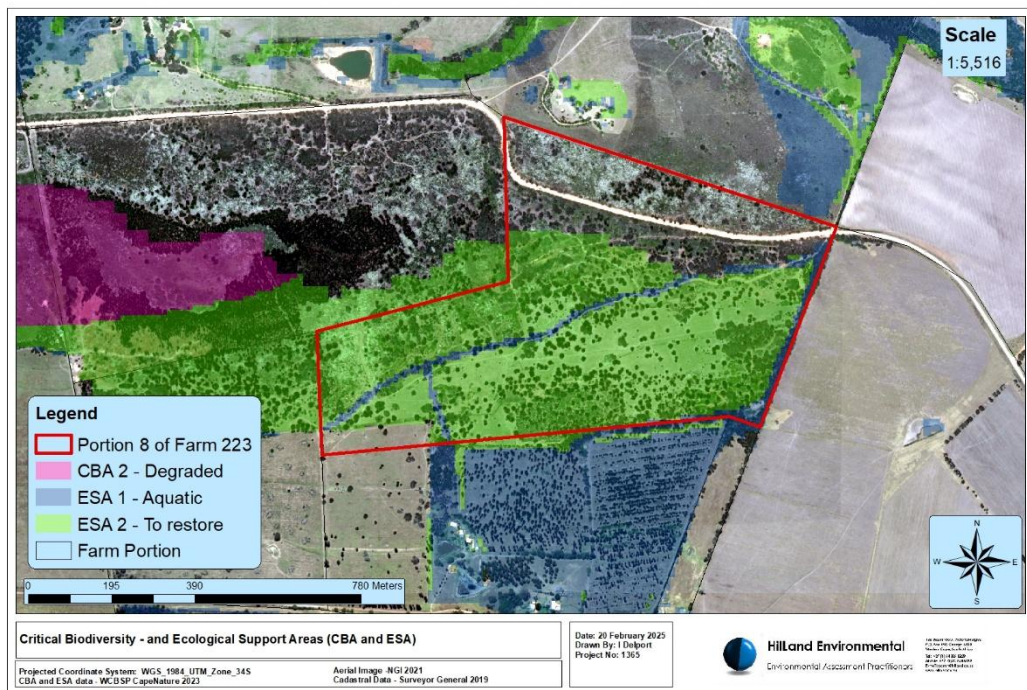


Figure 13 CBA and ESA mapping WCBSP

The CBA and ESA mapping shows 2 ESA's on the property. Green = ESA2 – restore and blue = ESA 1 watercourse – which is incorrectly mapped (it is a farm road, **not** a watercourse).

The mapping of the ESA areas does not correspond with the areas that have restoration potential – ecologically corridors that can function and which have restoration potential are located to the north on the property, while the agricultural potential and use areas are located in the south.

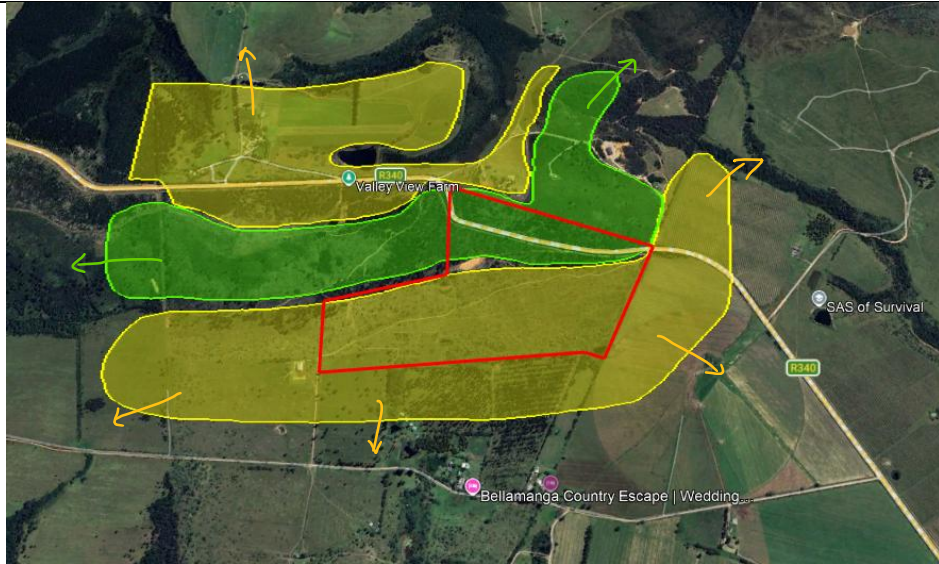
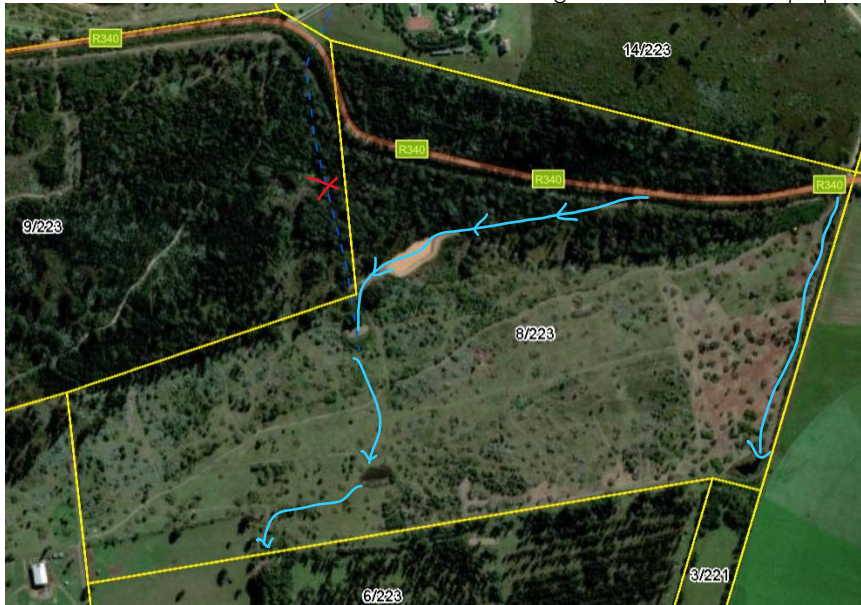


Figure 14 Functional ecological corridors (green) between the larger scale agricultural production in the areas (yellow)

The freshwater specialist has disputed the presence of any aquatic features on site. The road on site is not an ESA 1 aquatic feature and the non-perennial drainage line indicated on portion 9 is non-existent. The water for the existing farm dams is derived from road runoff water directed to the first dam along a farm contour and then overflowing to the second and third dam via site contours. Dam four receives its water from the existing farm road down the property boundary.



Direction of road stormwater runoff diversion over the farm through the existing farm dams and along the contour berms until it leaves the site in the south entering the neighbour's property.





Direction of overflow from the farm dams.



Figure 15 Land use map of the farm – Yellow areas: existing agricultural use, primary rights, newly re-cultivated areas and farmers market area. Green areas: restoration and tourism focus areas.

Based on the proposal approximately 16.5 ha of the farm will be geared towards habitat restoration and limited tourist accommodation, while the remaining 35.5 ha of the farm will continue to be farmed (existing dryland grazing) and will be improved (new cultivation and farmers market together with the primary rights for the homestead, stables and workers accommodation). The proposed land uses allow for ecological connectivity to surrounding natural areas and protect the productive agricultural land for agricultural uses.

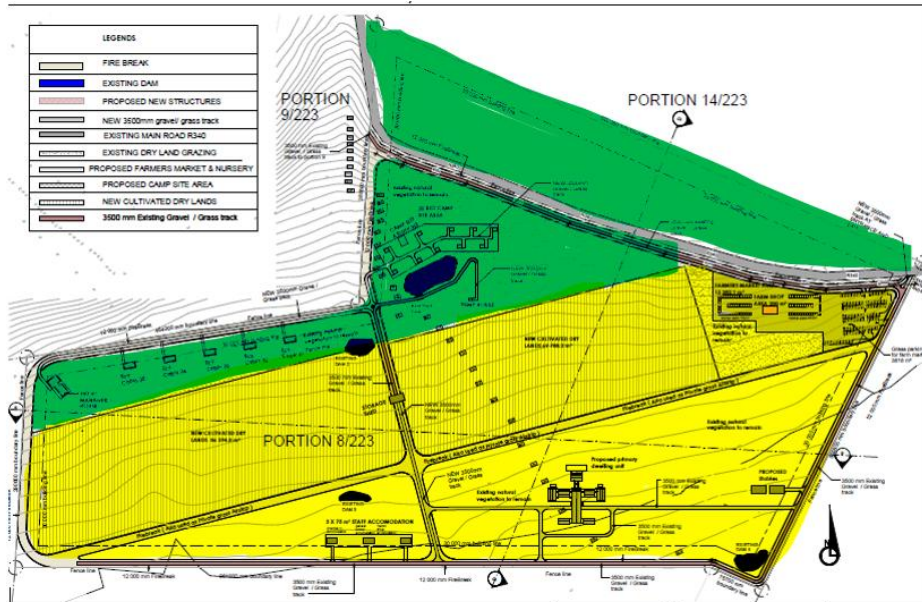


Figure 16 Ongoing agricultural use (yellow) and rehabilitation and tourism use (green).

Visual impact and mitigation measures: The proposed development is expected to have a low visual impact due to its modest scale, clustered layout and location within existing vegetated areas. The eco-cabins and campsite are positioned as compact nodes on vegetated slopes, allowing natural screening to reduce visibility from surrounding areas. Although the agricultural buildings, farm shop and farmers' market may be visible from the main road, these elements are considered compatible with the rural agricultural character and are not expected to be out of scale with the receiving environment. Visual mitigation will be achieved through retaining and rehabilitating indigenous vegetation, limiting the development footprint, avoiding unnecessary new access routes and paved surfaces, using natural materials and low-impact finishes, and maintaining a farm-appropriate architectural style. These measures will help ensure that the development remains visually unobtrusive and integrated with the rural landscape.



Figure 17 Indicative style of the farm shop



Figure 18 Indicative style of the eco-cabins



Figure 19 Approximate camping area on the gentle slope with screening vegetation remaining between alien trees that are being removed.



Figure 20 Approximate eco-cabin area overlooking the agricultural lands – indigenous tree planting screening around the cabins to replace alien trees.



Figure 21 Extract from Planning report on visual location of the eco-pods (Planning Space, 2026)



Figure 22 View of the existing farm gate off the DR340 – note the elevation difference and the screening vegetation along the road in the road reserve - (note alien clearing still needs to be undertaken by District Roads in the road reserve).

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

1. **The purpose** of this template is to provide a format for the Basic Assessment report as set out in Appendix 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in order to ultimately obtain Environmental Authorisation.
2. The Environmental Impact Assessment ("EIA") Regulations is defined in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") hereinafter referred to as the "NEMA EIA Regulations".
3. *Submission of documentation, reports and other correspondence:*

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

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

DEADPEIAAdmin@westerncape.gov.za

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

DEADPEIAAdmin.George@westerncape.gov.za

Directorate: Development Management (Region 3):
Garden Route District Municipal area and Central Karoo District Municipal area

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

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

4. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.
5. All applicable sections of this BAR must be completed.
6. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.
7. This BAR is current as of **April 2024**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at <http://www.westerncape.gov.za> to check for the latest version of this BAR.
8. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an environmental authorisation in terms of the NEMA EIA Regulations when the Western Cape Government Department of Environmental Affairs and Development Planning ("DEA&DP") is the Competent Authority.
9. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.
10. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.
11. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.
12. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"), the "One Environmental System" is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department's Circular EADP 0028/2014: One Environmental Management System.
13. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA") is triggered, a copy of Heritage Western Cape's final comment must be attached to the BAR.

14. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link <https://screening.environment.gov.za/screeningtool> to generate the Screening Tool Report. The screening tool report must be attached to this BAR.
15. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA'), the submission of the Report must also be made as follows, for-
- Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

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

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

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	
Site Plan:	Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following: • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale.

	- The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. - On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. - The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. - The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. - Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development must be clearly indicated on the site plan. - Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. - Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): - Watercourses / Rivers / Wetlands - Flood lines (i.e., 1:100 year, 1:50 year and 1:10 year where applicable); - Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): - Ridges; - Cultural and historical features/landscapes; - Areas with indigenous vegetation (even if degraded or infested with alien species). - Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. - North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as Appendix C . The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as Appendix D .
Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as Appendix A3 .

ACRONYMS

DAFF:	Department of Forestry and Fisheries
DEA:	Department of Environmental Affairs
DEA& DP:	Department of Environmental Affairs and Development Planning
DHS:	Department of Human Settlement
DoA:	Department of Agriculture
DoH:	Department of Health
DWS:	Department of Water and Sanitation
EMPr:	Environmental Management Programme
HWC:	Heritage Western Cape
NFEPA:	National Freshwater Ecosystem Protection Assessment
NSBA:	National Spatial Biodiversity Assessment
TOR:	Terms of Reference
WCBSP:	Western Cape Biodiversity Spatial Plan
WCG:	Western Cape Government

ATTACHMENTS

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

The following checklist of attachments must be completed.

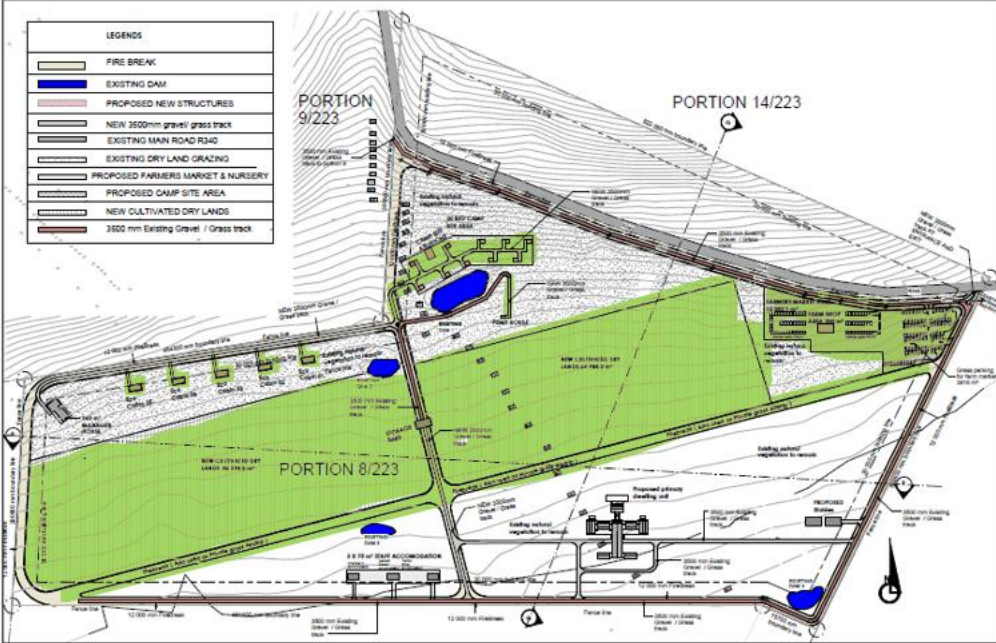
APPENDIX			✓ (Tick) or x (cross)
Appendix A:	Maps		
	Appendix A1:	Locality Map	✓
	Appendix A2:	Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning	N/A
	Appendix A3:	Map with the GPS co-ordinates for linear activities	✓
Appendix B:	Appendix B1:	Site development plan(s)	✓
	Appendix B2	A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;	✓
Appendix C:	Photographs		In the report
Appendix D:	Biodiversity overlay map		✓
Appendix E:	Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.		
	Appendix E1:	Final comment/ROD from HWC <i>NID has been submitted to HWC and awaiting comments</i>	x
	Appendix E2:	Copy of comment from Cape Nature	x
	Appendix E3:	Final Comment from the DWS	x
	Appendix E4:	Comment from the DEA: Oceans and Coast	N/A
	Appendix E5:	Comment from the DFFE (Forestry)	x
	Appendix E6:	Comment from WCG: Transport and Public Works	x
	Appendix E7:	Comment from WCG: DoA	x
	Appendix E8:	Comment from WCG: DHS	x
	Appendix E9:	Comment from WCG: DoH	x
	Appendix E10:	Comment from DEA&DP: Pollution Management	x

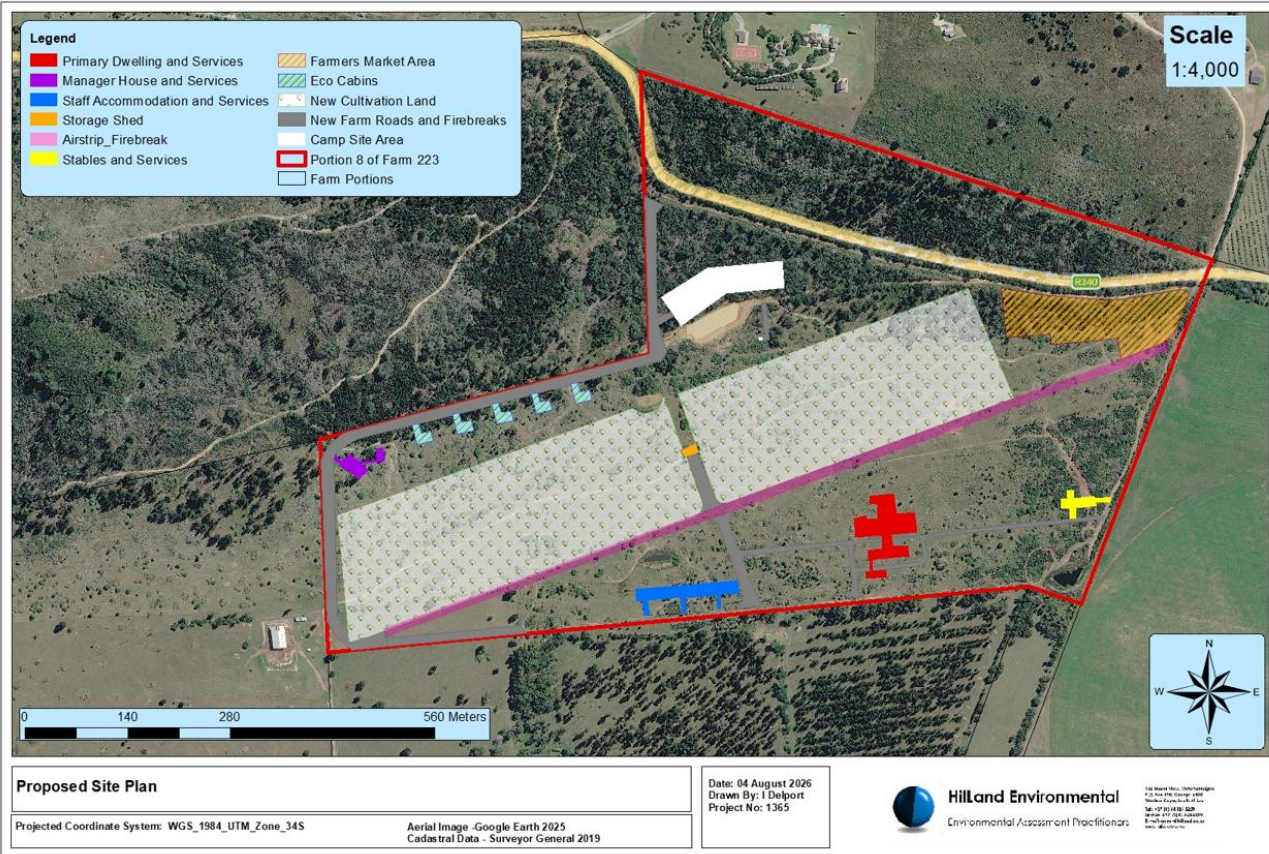
	Appendix E11:	Comment from DEA&DP: Waste Management	x
	Appendix E12:	Comment from DEA&DP: Biodiversity	x
	Appendix E13:	Comment from DEA&DP: Air Quality	x
	Appendix E14:	Comment from DEA&DP: Coastal Management	N/A
	Appendix E15:	Comment from the local authority	x
	Appendix E16:	Confirmation of all services (water, electricity, sewage, solid waste management)	x
	Appendix E17:	Comment from the District Municipality	x
	Appendix E18:	Copy of an exemption notice	N/A
	Appendix E19:	Pre-approval for the reclamation of land	N/A
	Appendix E20:	Proof of agreement/TOR of the specialist studies conducted.	x
	Appendix E21:	Proof of land use rights	✓
	Appendix E22:	Proof of public participation agreement for linear activities	N/A
Appendix F:	Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.		X Will be available with future draft BAR
Appendix G:	Specialist Report(s)		✓
Appendix H:	EMPr		X Will be available with future draft BAR
Appendix I:	Screening tool report		✓
Appendix J:	The impact and risk assessment for each alternative		✓
Appendix K:	Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline		In report
Appendix L:	Planning report		✓
Appendix M:	Engineering report		✓

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE: REGION 1		GEORGE OFFICE: REGION 3
	(City of Cape Town, West Coast District)	(Cape Winelands District & Overberg District)	(Central Karoo District & Garden Route District)
Duplicate this section where there is more than one Proponent Name of Applicant/Proponent: Name of contact person for Applicant/Proponent (if other): Company/ Trading name/State Department/Organ of State: Company Registration Number: Postal address: Telephone: E-mail:	GPC Property Investments Pty Ltd Craig Boshard GPC Property Investments Pty Ltd 2018/317839/07 PO Box 2659, Knysna Postal code: 6571 N/A +27(0) 63 769 5050 craigboshard@gmail.com Fax: N/A		
Company of EAP: EAP name: Postal address: Telephone: E-mail: Qualifications: EAP registration no:	Hilland Environmental Consultants Cathy Avierinos PO Box 590, George Postal code: 6530 (044) 8890229 Cell: 082 5586589 cathy@hilland.co.za Fax: N/A BSc Hons 2019/1053		
Duplicate this section where there is more than one landowner Name of landowner: Name of contact person for landowner (if other): Postal address: Telephone: E-mail:	Same as proponent Postal code: Cell: Fax: ()		
Name of Person in control of the land: Name of contact person for person in control of the land: Postal address: Telephone: E-mail:	Same as proponent Postal code: Cell: Fax: ()		
Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall: Contact person: Postal address: Telephone: E-mail:	Bitou Municipality Anje Minnie Private Bag X1002, Plettenberg Bay Postal code: 6600 Work: 044 501 3318 Cell: 072 229 6640 aminne@plett.gov.za Fax: N/A		

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

1.	Is the proposed development (please tick):	New	Expansion	x
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.			
Brownfields – consent uses on agricultural land.				
3.	For Linear activities or developments			
3.1.	Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:			
Portion 8 of farm 223				
3.2.	Development footprint of the proposed development for all alternatives.			Approximately 40 000 m ² for linear activities only
Airstrip on firebreak – approximately 800m and 12m wide Internal roads (existing and new) Pipelines for water and sewage Please note this clearing required for roads, airstrip and firebreaks is excluded as linear activities in relation to activity 27 of listing notice 1.				
3.3.	Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.			
Included in the SDP below as part of the development. • Water pipelines • Sewage pipelines • Farm roads • Airstrip.				
 Green highlights indicate the consent use application areas.				



3.4. Indicate how access to the proposed routes will be obtained for all alternatives.

Access to the farm is existing access off the R340

3.5.	Portion 8 of farm 223	C	0	3	9	0	0	0	0	0	0	0	0	0	0	2	2	3	0	0	0	0	8
------	-----------------------	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

3.6. Starting point co-ordinates for all alternatives (airstrip)

33°	56'	53.61"	"
23°	18'	36.44"	"
Middle point co-ordinates for all alternatives			
33°	56.47'	47.16"	"
23°	18'	58.75"	"
End point co-ordinates for all alternatives			
33°	56'	41.52"	"
23°	19'	19.07"	"

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



4.	Other developments	
4.1.	Property size(s) of all proposed site(s):	56.4725 ha
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable): - see approved plans	0.91ha
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:	Approx. 18ha
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).	

Primary rights (as per approved building plans)

- Primary home
- Manager's home
- Worker's accommodation
- Stables
- Storeroom/shed

Consent Use Activities:

- Additional dwellings (eco-pods) x 5 (110m² each) plus parking = 1013m²
- camping area (10 camping stands (average of 2 persons per stand)), ablution and parking 6822m²
- farmers market with a farm stall = 1.5ha
- firebreak to be used as grass landing strip

Farming activities:

- cultivation of previously cultivated lands (8.66ha + 6.98ha = 15.6ha)

In order to confirm the NEMA applicability and to determine if any additional thresholds have been met it is important to take into account the cumulative totals in terms of vegetation clearing. The NEMA threshold for vegetation clearing will not have exceeded 20ha and as such a Basic Assessment Process is applicable and not a Scoping EIA process.

Consent Use Activities	area
Farmers market area	1.5ha
New cultivated land (west)	8.66ha
New cultivated land (east)	6.98ha
Eco pods x 5	0.1ha
Camping site area 10 sites	0.68ha
Total new clearance proposed	17.92ha
Primary rights - clearing under NEMA threshold	0.91ha
Total cumulative clearing	18.83ha

***Please note that clearing for roads, airstrip and firebreaks are excluded as linear activities in terms of activity 27 of listing notice 1 and are not calculated towards the 20ha clearing threshold.**

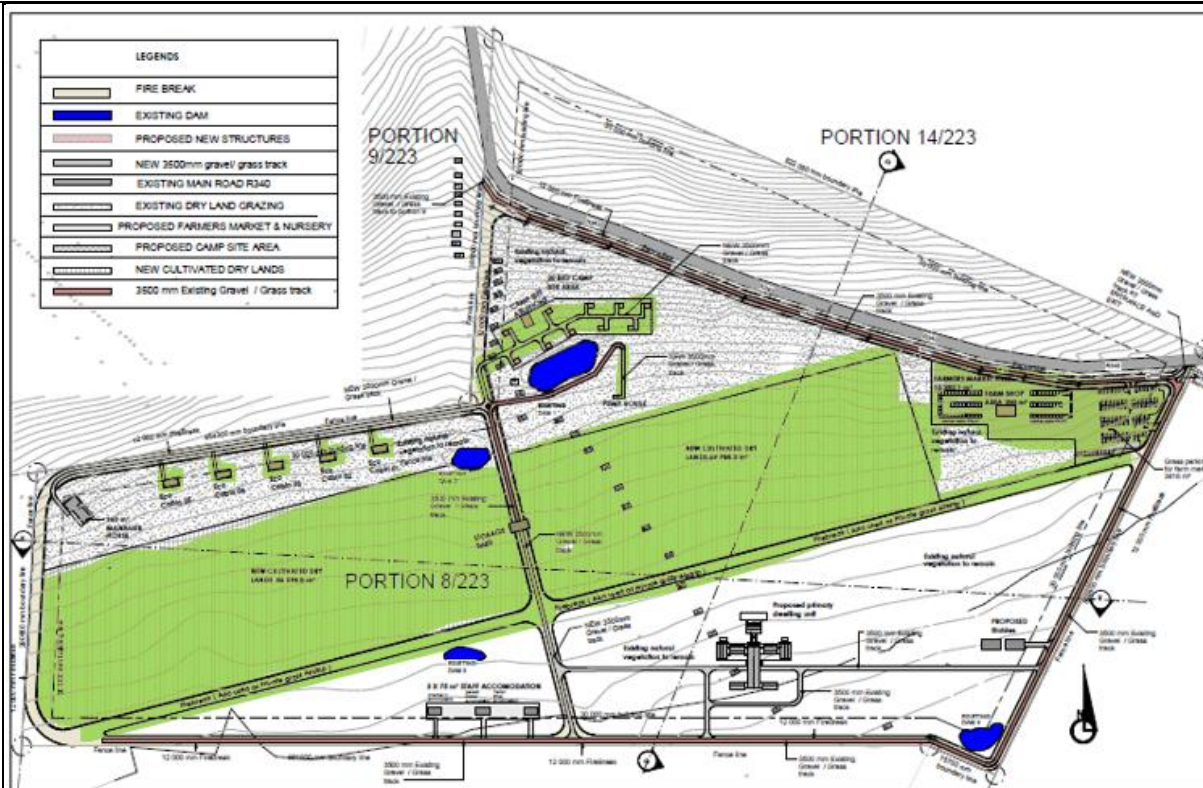


Figure 23 Proposed consent use application plan showing the existing approved buildings and infrastructure and the proposed consent use and cultivation (this application - green highlights)

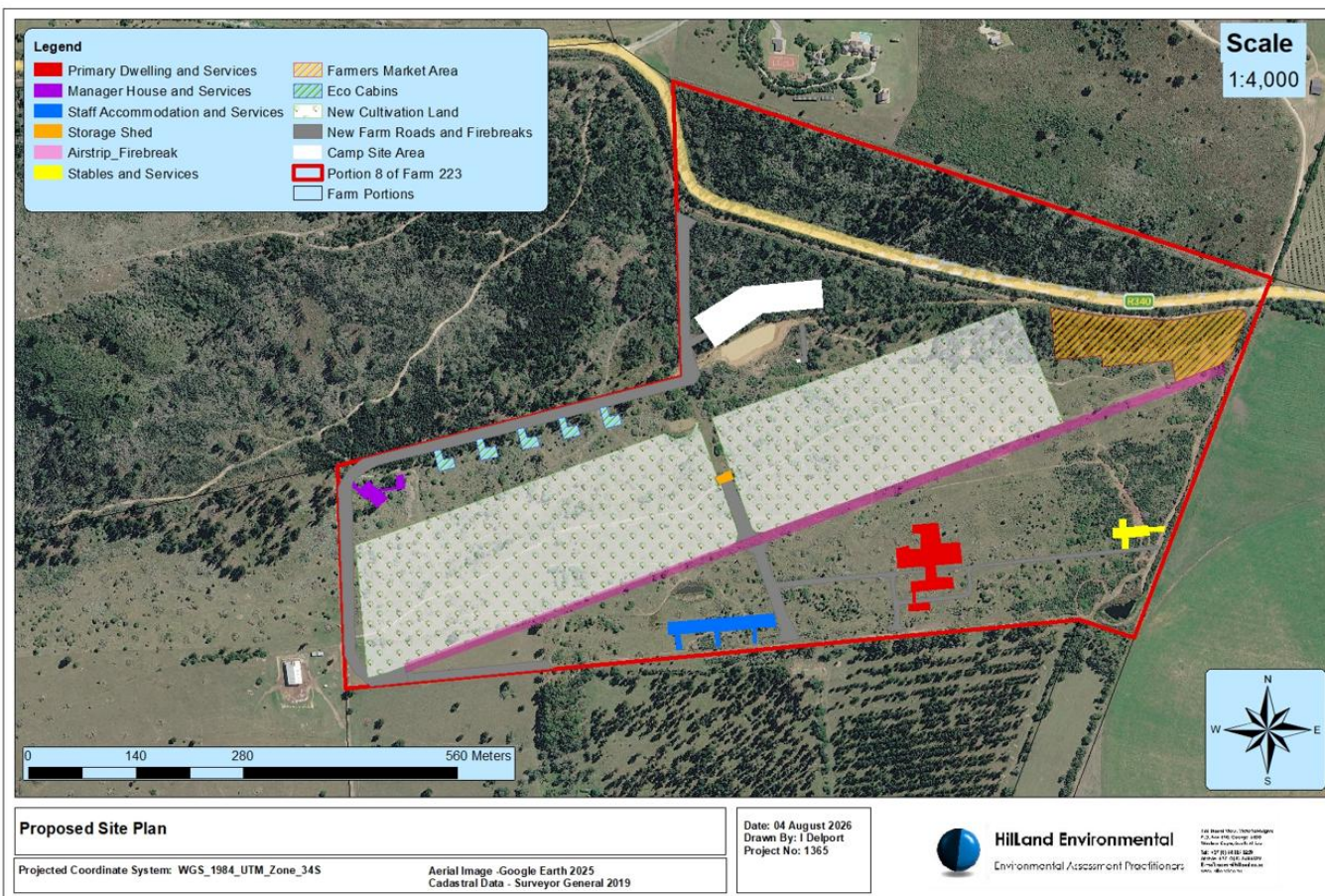


Figure 24 SDP of all uses on the property

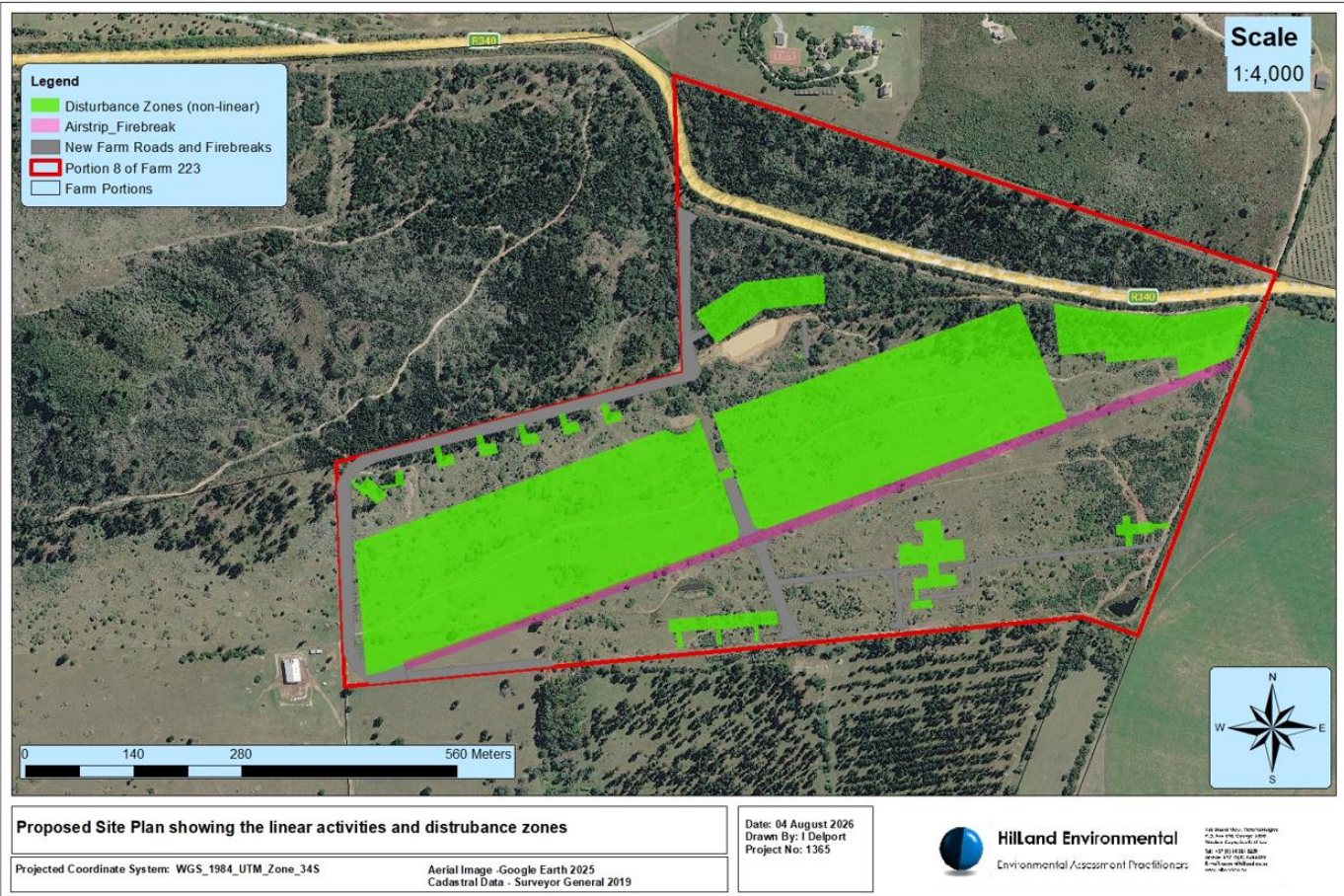


Figure 25 Disturbance zones for clearing required for primary rights, new cultivation and future consent uses and linear utilities

Water supply for the proposed consent uses:

- camping & eco pods
- farmers market & farm stall
- agricultural lands (will be dryland – no irrigation required)

Borehole Supply

- The primary water supply to the site will be from an existing borehole on the site (yield 86 kilolitres per day).
- The water will require filtration and chemical dosing to ensure potable standards.
- In terms of the National Water Act General Authorization for the Taking and Storage of Water, Clause 3 and Clause 7.2 a Water Use Licence will not be required and registration with the Water Authority will not be required.

Rainwater Harvesting

- As a secondary source roof rainwater harvesting will be implemented for most of the buildings where practical.
- Harvested roof runoff will be pre-treated by means of gutter guards and first flush diverters before being stored in the rainwater tank for each structure.
- Toilet supply will be directly from the rainwater storage tanks, and washbasin and kitchen supply will be from the tank through a filtration system.
- The reservoir supply will also top up to the rainwater storage tanks as and when required.

Water Demand

- Average Maximum Daily Water Demand (AMDD) is calculated at 5.78 Kilolitres (including adjustment for occupancy rates and taking the primary rights into account).

Unit	No	AMDD Litres	Total AMDD Kilolitres
Existing Approved Buildings			
Farmhouse Residence	1	1000	1.0
Farm Managers House	1	800	0.80
Staff Cottages	3	600	1.80
New Buildings and Facilities			
Eco Cabins	5	300*	1.50
Camp Sites	10	200*	2.00
Farmers Market and Farm Stall	1	3000*	3.00
Total			10.10
Reduced Total ADD Adjusted for Occupancy			5.78

* Occupancy: Eco Cabins 50%, Camp Sites 50%, Farmers Market 14.3%

Water Distribution

- Water will be distributed from the 15 kilolitre elevated storage tank from where it will be gravity fed to the camp site, farmers market and eco pods.
- The minimum residual pressure will be 10Kpa at the camp site ablution block, sufficient to ensure efficient operation of the gas geysers. The minimum residual pressure will exceed 20Kpa at all other buildings

Sewage treatment for the proposed consent uses:

- There is no municipal sewer connection available on the farm as such the farm will be self-sufficient and make use of package sewerage treatment plants.
- Camping & Eco pods (will drain to and be treated at the sewage treatment plant at the Managers home)
- Farmers market & farm stall (own sewage treatment plant)
- The treatment plants will be regulated under the National Water Act 36 of 1998 and any requirements of the Bitou Municipality.

Sewer Reticulation

- The sewer reticulation system will be of 110mm and 160mm Class 34 UPVC sewer pipes. Manholes will be of precast concrete ring structures, in accordance with SABS 1200D standards. Manholes will be provided at a maximum of 80 meter intervals.
- Maintenance of the sewer reticulation system will be the responsibility of the landowner.

Sewerage Treatment Package Plants (STPs)

- Sewerage for the proposed farmers market and farm stall which will operate once a week will be treated at a separate STP with the capacity of 2.4 kilolitres
- Sewage for the proposed Eco cabins and camp sites will be treated at the STP installed at the farm managers house with a capacity of 3.44 kilolitres
- Sewerage Treatment Plants and the discharge of effluent must comply with the requirements as set out in Section 34 of the National Water Act of 1998. The development falls under the jurisdiction of the Bitou Municipality and will comply with the requirements of that Authority.
- The package plants will be procured from a reputable supplier and must be environmentally friendly, reliable and simple and easy to maintain, and must meet the relevant DWAS Section 21 effluent quality specification.

Two alternatives are being considered:

BioRock:

- The BioRock Package Plant is supplied and installed by BioRock Africa. BioRock is an international company which has been operating worldwide since 1988.
- The BioRock plants incorporate a pretreatment anaerobic tank which clarifies the raw sewage by dividing fats, oils, greases and organic solids. The sewage then passes through an effluent filter, before discharging into the aerobic BioRock reactor.
- The Bioreactor purifies further the pretreated wastewater with a biological process. To naturally treat the wastewater, the systems use a unique BioRock Media, an exclusive and efficient carrier material for bacteria.
- BioRock Sewage Plants operate under gravity and no electrical supply is required.
- The BioRock Plant can be sized to capacity of up to 4.5 kilolitres per day

Eco Tanks Big Red

- The Eco Tanks Big Red Package Plant is supplied by Eco Tanks, a South African Company established in 2004. The Big Red Plant was launched in 2021.
- The plant also incorporates pretreatment in an anaerobic tank followed by an aerobic biological reactor.
- The system requires a modest power supply and can economically be powered by a solar system.
- The Big Red plant capacity is on the basis of modular units of up to total 2.5 kilolitres per day. Additional units can be installed in parallel if required.

Other Sewerage Package Plant options may be considered, subject to meeting the required output specifications - to be determined in the detailed design phase.

Plant Effluent: Quality

- Both The BioRock and the Big Red systems produce effluent quality superior to the irrigation standard as set out in the National Water Act General Authorisations Section 21e.
- The Big Red System claims to treat domestic waste to comply with the Section 21f General Limit and have submitted test results indicating such compliance.
- BioRock do not claim to meet the Section 21f General Limit but claim to target compliance in conjunction with disposal through evapotranspiration/filtration beds.

Plant Effluent: Disposal

- The treated discharge from each of the plants will be gravitated to a designated shallow subsurface distribution bed with disposal by primary enhanced evapotranspiration and secondary infiltration.
- The disposal bed will comprise a network of perforated irrigation pipes in a 300mm aggregate layer, bidim lined, underlying a 150mm topsoil layer planted with Buffalo Grass or similar appropriate evapotranspiration vegetation / reedbed medium.

Plant Maintenance

- Regular plant maintenance must be undertaken annually by a Professional Service Provider in accordance with the product Maintenance Guidelines.
- Annual maintenance inspections will monitor sludge accumulation which must not be allowed to exceed 30 percent of the volume of the anaerobic chamber. Sludge will be removed by a privately contracted vacuum tanker for disposal at a licenced disposal site.

Refuse requirements:

- Camping & eco pods
 - Farmers market and farm stall
- Owner to collect and dispose of at the municipal waste transfer site, together with the normal farm refuse. Recycling will be done at source.

Energy supply to the proposed consent use:

- Camping & eco pods
 - Farmers market and farm stall
- The property is OFF Grid in its entirety.
 - Energy supplied on the following basis:
 - Hot Water Geysers Gas Powered
 - Ovens and Hobs Gas Powered
 - Heating Gas or Wood Burner
 - All Domestic Appliances except kettles Solar Powered

Unit	Inverter Capacity kW	Battery Storage kWh	Solar Panels kWp
<i>Eco cabins</i>	5	5	4
<i>Camp Sites Ablutions</i>	5	5	4
<i>Farm Stall</i>	8	15	6

Access and internal roads

- Camping – access from existing internal farm track
- Eco pods – access from existing internal farm track
- Farmers market and farm stall

The site access will be off Divisional Road R340.

The average max daily trips generated by the development is projected at less than 20.

One day per week the farmers market is expected to generate a further maximum of 300 trips over a period of 5 hours. The delays for traffic exiting the market will be well within the acceptable level of service.

The minimum required Gap Sight distance for vehicles turning right out of Portion 8, onto R340, with a regulatory speed limit of 60 kilometers per hour is 125 meters. The existing gap sight distance for traffic turning out of the farm is approximately 150m to the right and 200m to the left. Regular clearance of existing vegetational overgrowth in the R340 Divisional Council Road Reserve will continue to be required.

Internal Roads and Stormwater Management

There are currently a number of grass and gravel surfaced tracks traversing the site, providing access to various areas on the farm.

There are also extensive areas where low berms have been constructed parallel to the contour (historic farming contours). These berms detain stormwater runoff and facilitate surface absorption and guide flow towards the existing farm dams where possible.

There is no evidence of erosion of any significance throughout the site.

Existing access and driveways for house construction may require the addition of gravel to certain of the grass tracks.

For the proposed consent uses access will be off existing tracks where possible. Improvement will be needed at the entrance to the grass parking at the farmers market as indicated below.

No expansion of an existing road will be more than 4m.

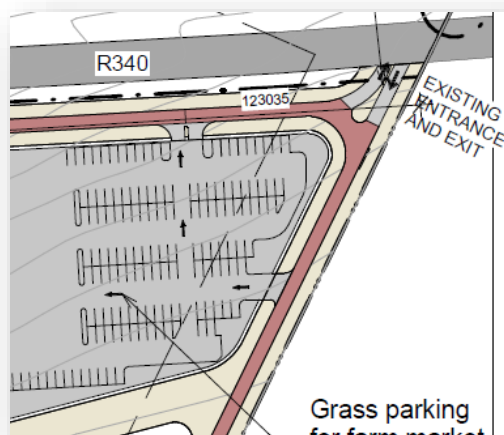


Figure 26 Entrance Road requirements at the farmers market and grass parking area.

The gravel surfaced roads will be constructed "on Grade" with the crossfall to the lower natural ground level side, and protected by low grassed berms on the high side where necessary. At essential drainage points the berms will be weired and the road surface depressed to allow controlled cross drainage.

The grassed weired berm will be designed to detain stormwater runoff and discharge it to the road crossing at very low velocity of less than 0.5 meters per second. The overall road drainage system will ensure minimum maintenance and no erosion at points of discharge.

No expansion of an existing road will be more than 4m.

Light Aircraft Landing Strip

- The Site Development Plan makes provision for a light aircraft landing strip running parallel to the contour, diagonally across the site in a southwest to north easterly direction within a planned firebreak.
- The air strip will be 12 meters wide and approximately 800 meters long and will be grass surfaced.
- The natural crossfall of the airstrip is approximately 7 to 8 percent and some levelling of the cross-section will be required. It is proposed that as proposed for the gravel roads, the airstrip be protected from erosion by a low berm to be constructed on the higher side of the crossfall.
- Airstrip will be for private and emergency use only

Cultivation area

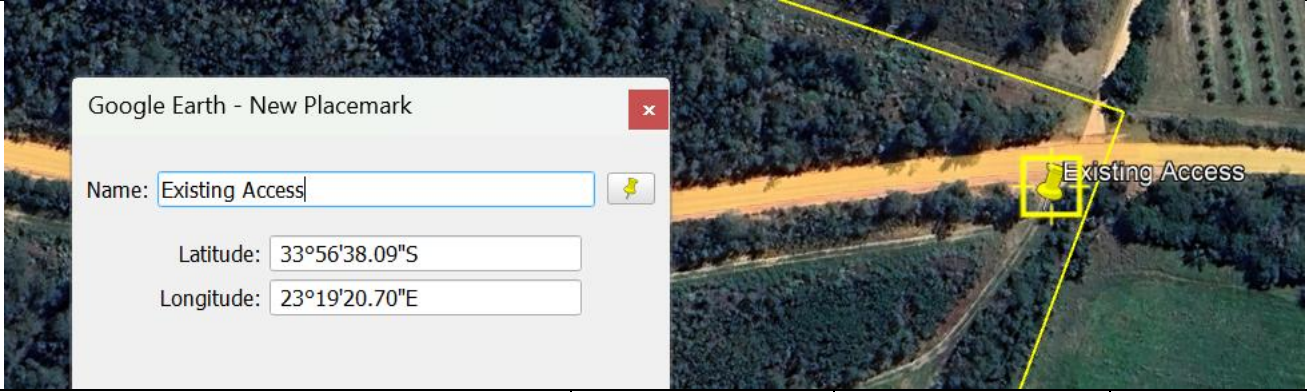
The farm is mostly dryland grazing at the moment, however the new owner would like to formally cultivate two portions of the farm that have not been cultivated in the preceding 10 years. Two areas will be cultivated (8.6ha and 6.9 ha) – this will include soil improvements and regenerative farming in the areas. The existing dryland grazing will continue on the farm in all other areas and there will be restoration and / landscaping around buildings and structures.

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

Access from the existing Divisional road DR340

4.6.	Portion 8 of farm 223	C	0	3	9	0	0	0	0	0	0	0	0	0	2	2	3	0	0	0	0	8
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4.7. Coordinates of the proposed site(s) for all alternatives:

			
Latitude (S)	33°	56'	38.09"
Longitude (E)	23°	19'	20.70"

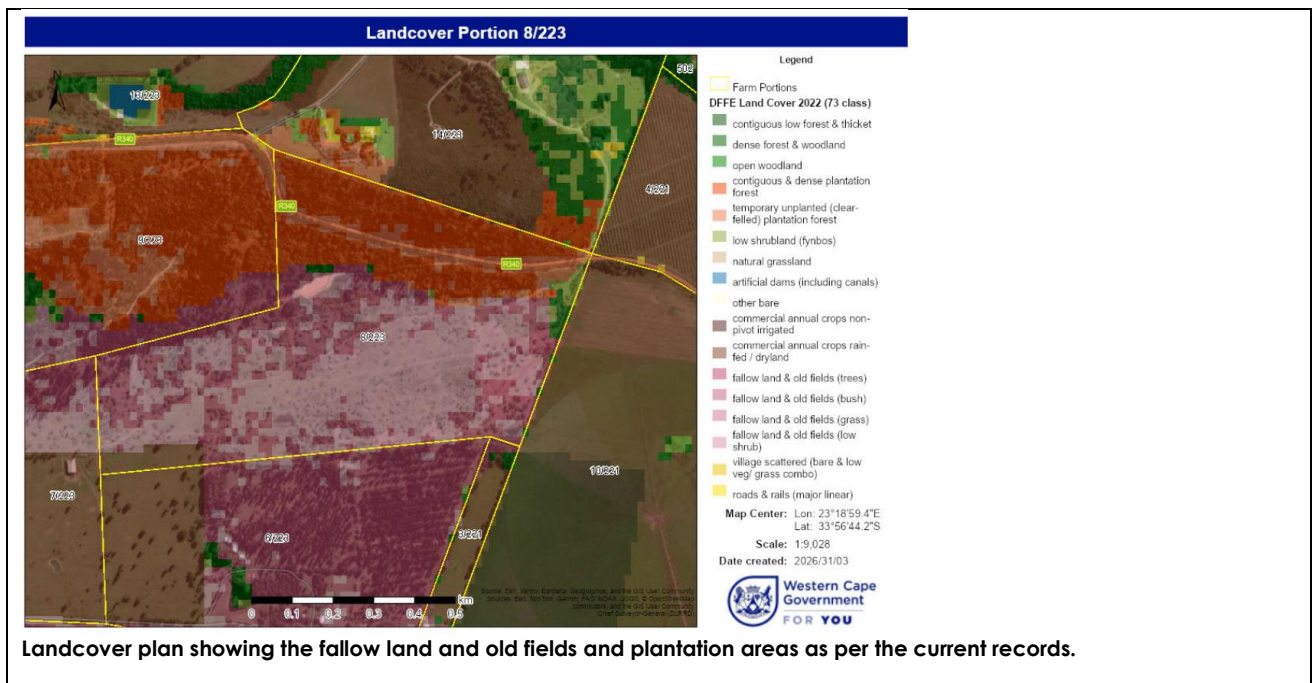
SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS

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

Has exemption been applied for in terms of the NEMA and the NEMA EIA Regulations. If yes, include a copy of the exemption notice in Appendix E18.	YES	NO
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2. Is the following legislation applicable to the proposed activity or development.

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.	YES	NO
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.	YES	NO
HWC to confirm if NID is required or not.		
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3.	YES	NO
BOCMA to confirm if a GA is required for irrigation with treated effluent and for borehole use.		
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	YES	NO
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")	YES	NO
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	YES	NO
Approved ACP in operation in accordance with NEMBA		
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	YES	NO
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.	YES	NO
CARA permit unlikely as the area has been cultivated and in agricultural use since prior to 1958 - Department of Agriculture will comment on the application and confirm if a CARA permit is required for the area to be re-cultivated and not simply retained as dryland pastures.		



3. Other legislation

List any other legislation that is applicable to the proposed activity or development.

In terms of the Bitou Municipality: Standard Municipal Land Use Planning By-law (2016), the following land use applications will be submitted to give effect to the proposed development on Portion 8 of Farm 223:

1. Applications for Consent use in terms of Section 15 (o) for
 - Five Additional Dwellings
 - A Campsite with 10 camping stands
 - A Farmers' Market
 - A Farm Shop
 - An Airfield
2. Approval of a Site Development Plan (SDP) for all approved primary uses and consent-use components, as required by the Zoning Scheme.

4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.

- Western Cape Spatial Biodiversity Plan (CapeNature, 2023) - the proposed development takes the WCBSP into account
- Bitou Spatial Development Framework (SDF) - the proposal is consistent with the Bitou SDF
- Bitou Municipality Integrated Development Plan (IDP) - the proposal is consistent with the Bitou IDP
- Western Cape Provincial SDF (2014) - the proposal is consistent with the Provincial SDF

See planning section E 2 below

5. Guidelines

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

Western Cape Rural Areas Guidelines – 2019

See planning section E 2 below

6. Protocols

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form

Specialist studies have been undertaken in terms of the respective Protocols.

- General
- Terrestrial biodiversity
- Aquatic biodiversity
- Plants
- Animals
- Agricultural

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant Basic Assessment Activities as set out in Listing Notice 1	Describe the portion of the <u>proposed development</u> to which the applicable listed activity relates.																		
	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 an area of more than 1ha and less than 20ha of indigenous vegetation for: • 5 eco-cabins • 10 camp sites and ablution • Farmers market and farm stall • Cultivation of historically cultivated lands <table><tr><th>Consent Use Activities</th><th>area</th></tr><tr><td>Farmers market area</td><td>1.5ha</td></tr><tr><td>New cultivated land (west)</td><td>8.66ha</td></tr><tr><td>New cultivated land (east)</td><td>6.98ha</td></tr><tr><td>Eco pods x 5</td><td>0.1ha</td></tr><tr><td>Camping site area 10 sites</td><td>0.68ha</td></tr><tr><td>Total new clearance proposed</td><td>17.92ha</td></tr><tr><td>Primary rights as per approved plans - clearing under NEMA threshold</td><td>0.91ha</td></tr><tr><td>Total cumulative clearing</td><td>18.83ha</td></tr></table>	Consent Use Activities	area	Farmers market area	1.5ha	New cultivated land (west)	8.66ha	New cultivated land (east)	6.98ha	Eco pods x 5	0.1ha	Camping site area 10 sites	0.68ha	Total new clearance proposed	17.92ha	Primary rights as per approved plans - clearing under NEMA threshold	0.91ha	Total cumulative clearing	18.83ha
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Primary rights as per approved plans - clearing under NEMA threshold	0.91ha																			
Total cumulative clearing	18.83ha																			
	28- Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.	Development of consent use activities on land used previously for agriculture exceeding 1ha outside an urban area for: • 5 x eco cabins • 10 camp sites • Farmers market and farm stall Where the cumulative area will exceed 1ha.																		
Activity No(s):	Provide the relevant Basic Assessment Activities as set out in Listing Notice 3	Describe the portion of the proposed development to which the applicable listed activity relates.																		
	4- The development of a road wider than 4 metres with a reserve less than 13,5 metres. i. Western Cape i.Areas zoned for use as public open space or equivalent zoning; ii.Areas outside urban areas; (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or iii.Inside urban areas: (aa) Areas zoned for conservation use; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority.	Farm roads currently approved are NOT wider than 4m in areas of indigenous vegetation. There may be areas required for passing where the road may need to be wider than 4m – application being made to allow for such changes to the existing roads if necessary. As far as possible all new roads will have a driving surface of less than 4m in width																		
	6-The development of resorts, lodges, hotels, tourism or hospitality facilities that sleeps 15 people or more. i. Western Cape (i) Inside a protected area identified in terms of NEMPAA:	Tourism facilities sleeping 15 or more people within 5km of a protected area. There will be guest accommodation exceeding 15 persons on the farm in the camp sites and eco-cabins.																		

(ii) Outside urban areas: (aa) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; or (bb) Within 5km from national parks, world heritage sites, areas identified in terms of NEMPAA or from the core area of a biosphere reserve; - excluding the conversion of existing buildings where the development footprint will not be increased.		
7. The development of aircraft landing strips and runways 1,4 kilometres and shorter. i. Western Cape (i) All areas outside urban areas		The development of a 12m wide x approximately 800m long grass airstrip along an existing firebreak.
18. The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre. i. Western Cape i. Areas zoned for use as public open space or equivalent zoning; ii. All areas outside urban areas: (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or iii. Inside urban areas: (aa) Areas zoned for conservation use; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority.		The widening of existing farm roads by 4m or more in areas of indigenous vegetation outside is NOT anticipated to be required. Existing entrance to the farm may require widening which should not exceed 4m. Activity applied for to cover any area where widening of an existing road may need to exceed 4m
Activity No(s):	Provide the relevant Scoping and EIR Activities as set out in Listing Notice 2	Describe the portion of the proposed development to which the applicable listed activity relates.
None		
Note: - The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted. - Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.		

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

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Category A	Describe the portion of the proposed development to which the applicable listed activity relates.

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

Activity No(s):	Provide the relevant Listed Activity(ies)	Describe the portion of the proposed development to which the applicable listed activity relates.

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.
For this application - The owners will be making a consent use application and they propose cultivation of areas that were previously cultivated but which have not been ploughed in the last 10 years.	
The following activities will trigger various Listed Activities and will require NEMA authorisation prior to being undertaken:	
Consent Use Application – Accommodation, market, farm stall and private grass landing strip: - Additional dwellings (eco-pods) x 5 (110m² each) plus parking = 1013m² - camping area (10 camping stands (average of 2 persons per stand)), ablution and parking 6822m² - farmers market with a farm stall = 1.5ha - firebreak to be used as grass landing strip	

Additional Farming Activities:

- cultivation of previously cultivated lands (8.66ha + 6.98ha = 15.6ha)

Summary of the Proposed Consent Use Application

The proposed consent use application seeks approval from the Bitou Municipality for a mixed-use agricultural and tourism development on Portion 8 of Farm Le Grange No. 223. The application includes both land use consents and approval of a site development plan (SDP) to formalize a long-term development framework.

The main objectives are to:

- Establish a commercially viable regenerative farming operation (dryland pastures, livestock, conservation, and rehabilitation of indigenous vegetation).
- Diversify income streams through low-impact, rural tourism and local commerce, supporting the economic viability of the farm and the broader rural area.

Specific Consent Uses Requested

The application requests consent for the following uses (in addition to existing approved primary agricultural rights):

- Five Additional Dwellings (Eco Cabins): For tourist accommodation, offering farm-stay experiences in eco-friendly cabins.
- Guest Accommodation: To allow short-term lodging and meals for transient guests, supporting rural tourism.
- Campsite (10 stands): A small, off-grid campsite for nature-based tourism, designed to have minimal environmental impact.
- Farmers' Market: A community-oriented market for local producers to sell fresh produce and artisanal goods, strengthening local food systems and rural livelihoods.
- Farm Shop: A small shop (under 150 m²) selling farm produce and goods from local producers, providing a daily outlet for local products.
- Private Airfield: A grass runway for private light aircraft, which also serves as a firebreak and emergency firefighting base.

Rationale and Benefits

- **Environmental Rehabilitation:** Ongoing alien vegetation clearing and restoration of indigenous fynbos, reducing fire risk and improving biodiversity.
- **Economic Diversification:** Introducing tourism and local commerce to supplement agricultural income, ensuring long-term sustainability.
- **Employment Creation:** Permanent and seasonal jobs in farming, tourism, hospitality, and market operations.
- **Community Support:** Providing outlets for local farmers, supporting short supply chains, and creating a social hub in a rural area.
- **Self-Sufficiency:** The development will be off-grid for water, sanitation, and energy, reducing reliance on municipal services.
- **Alignment with Policy:** The proposal is consistent with local, district, and provincial spatial development frameworks, which encourage agri-tourism and rural economic diversification.

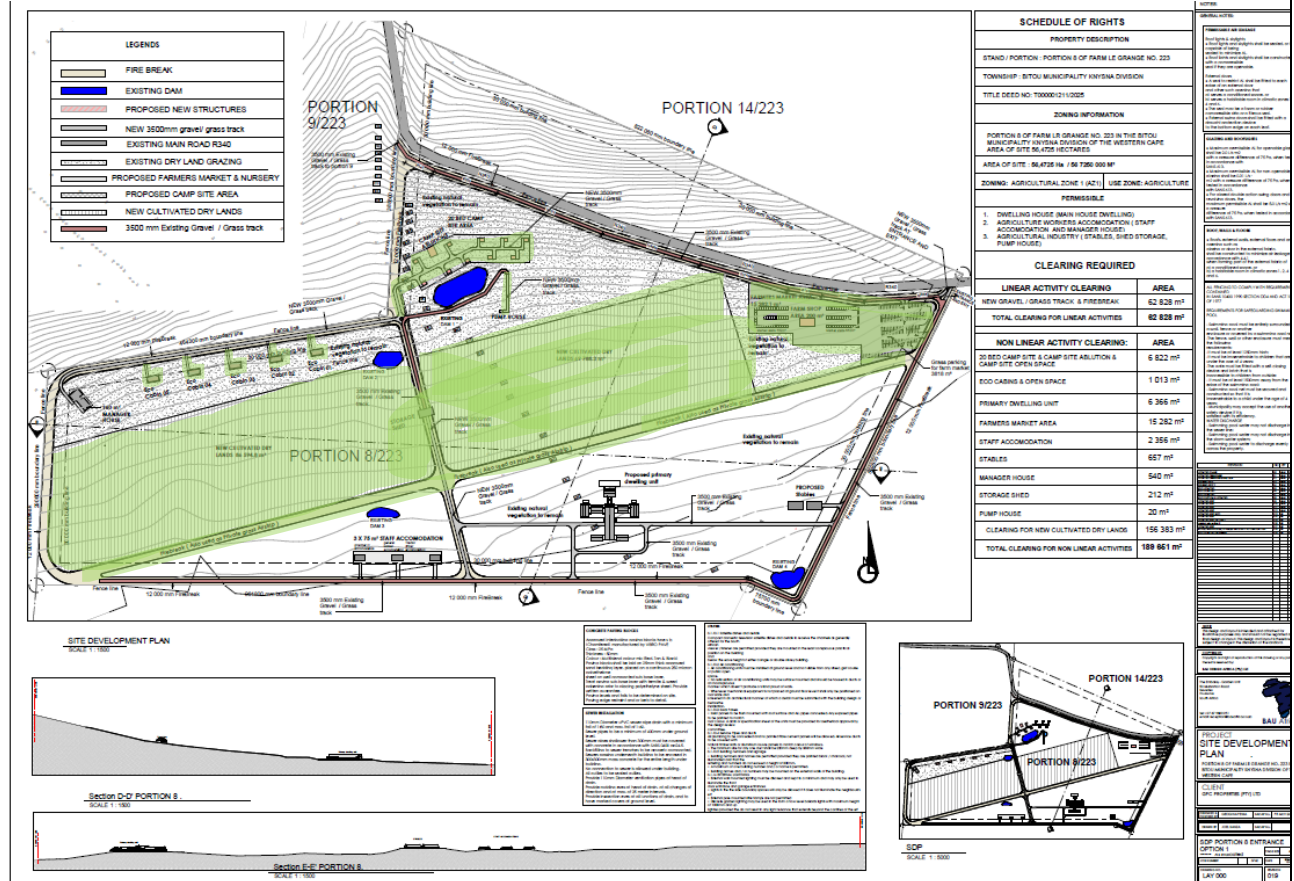
Implementation

- The development is designed to be clustered, with all new structures placed on previously disturbed or low-sensitivity areas to minimize environmental impact.
- The application includes a comprehensive site development plan (SDP) and is supported by specialist studies (agricultural, biodiversity, aquatic, and engineering assessments).

In order to **confirm the NEMA applicability** and to determine if any additional thresholds have been met it is important to take into account the **cumulative totals** in terms of vegetation clearing.

The NEMA threshold for vegetation clearing will not have exceeded 20ha and as such a Basic Assessment Process is applicable and not a Scoping EIA process.

Consent Use Activities	area
Farmers market area	1.5ha
New cultivated land (west)	8.66ha
New cultivated land (east)	6.98ha
Eco pods x 5	0.1ha
Camping site area 10 sites	0.68ha
Total new clearance proposed	17.92ha
Primary right clearing under NEMA threshold (primary rights)	0.91ha
Total cumulative clearing	18.83ha



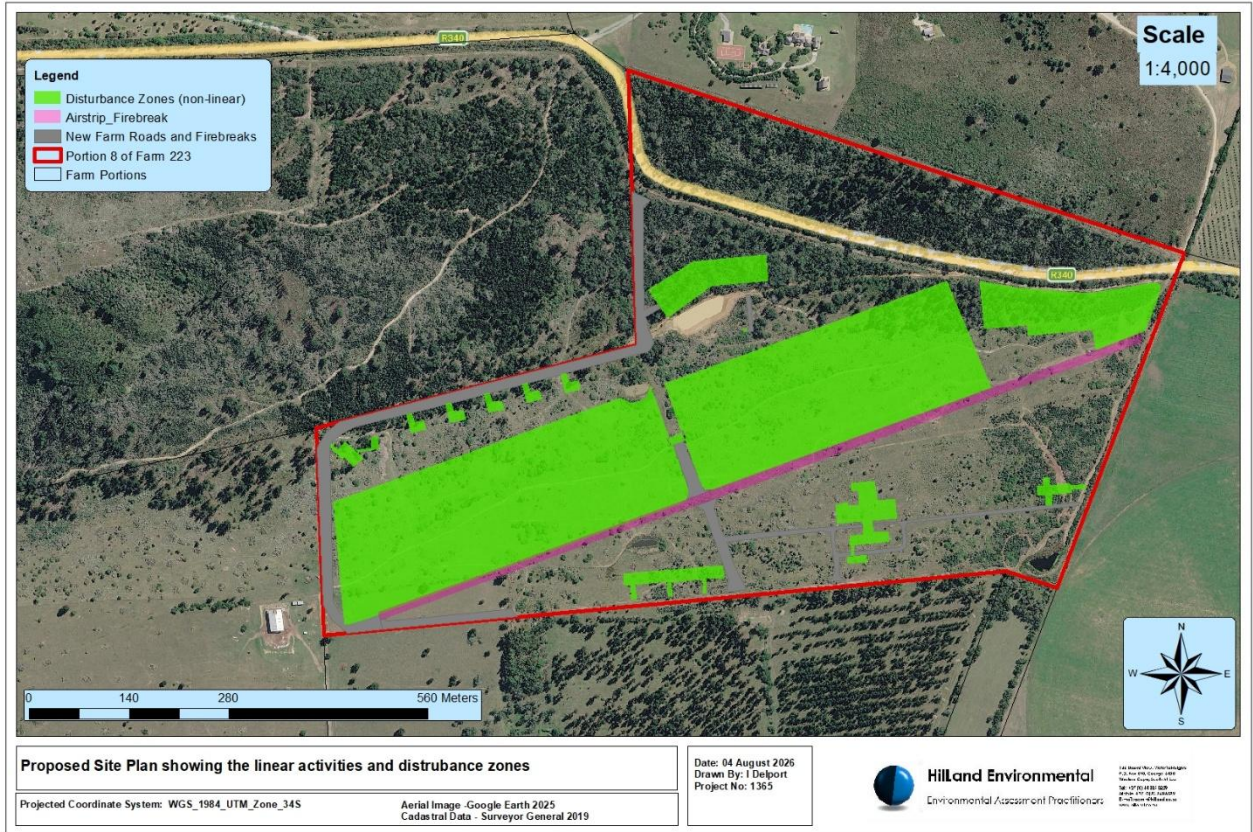


Figure 28 Proposed consent use and agricultural cultivation areas, together with the primary rights.

NEMA applicability

The proposal will trigger NEMA listed activities relating to tourism facilities (eco-pods and camping) which will sleep 15 or more people within 5km of a Protected Area, the creation of a grass airstrip and the clearance of more than 1ha of indigenous vegetation, where the vegetation has not already been lawfully transformed (farmers market and farm stall, and potentially the cultivation of existing agricultural grazing areas).

The Primary rights (approved building plans) fall below any NEMA thresholds and are NOT linked to the future application for clearing. Clearing for the primary home, stable, managers home, storeroom and worker accommodation is required in order to continue with the current farming activities on the property – dryland grazing.

This clearing is NOT required for or “in furtherance of” the application for consent uses or the new cultivation. If and when the consent uses are approved, after the NEMA application process and consent use application process, then the clearing required for those uses will continue. That future clearing is dependant on the outcome of the legislated processes.

As DEADP appear to be of a differing viewpoint, this will be clarified during the pre-application BAR consultation process.

NEMA activities

- Listing Notice 1 activity 27 – clearance of more than 1ha but less than 20ha of indigenous vegetation – for the farmers market area and parking, the camp sites, the eco-cabins and the cultivation of agricultural land not physically “cultivated” in the past 10 years. Please note this does not include clearing required for roads, airstrip and firebreaks which are excluded as linear activities.
- Listing Notice 1 activity 28 – mixed commercial development of land used for agriculture exceeding 1ha outside an urban area – for the tourism facilities proposed.
- Listing Notice 3 activity 4 – development of new farm roads that may be wider than 4m in areas containing indigenous vegetation.
- Listing Notice 3 activity 6 – development of tourism facilities sleeping 15 or more people outside an urban area within 5km of a protected area
- Listing Notice 3 activity 7 – development of an airstrip outside an urban area
- Listing Notice 3 activity 18 – the potential widening of existing internal farm roads by 4m or more to accommodate passing and entry.

The consent use application is as follows: (Planning Space 2026)

"In terms of the Bitou Municipality: Standard Municipal Land Use Planning By-law (2016), the following land use applications will be submitted to give effect to the proposed development on Portion 8 of Farm 223:

1. Applications for Consent use in terms of Section 15 (o) for
 - vii. Five Additional Dwellings (eco cabins)
 - viii. Guest Accommodation
 - ix. A Campsite with 10 camping stands
 - x. A Farmers' Market
 - xi. A Farm Shop
 - xii. A Private Airfield
2. Approval of a Site Development Plan (SDP) for all approved primary uses and consent-use components, as required by the Zoning Scheme.

Airfield

The owner of the land owns a small private light aircraft and would like to have the ability to land and take off from the farm. The airfield is planned in the low-lying area of the farm used as cultivated land. The airfield stretches diagonally over the length of the farm north easterly/southwesterly directions, to align with the contours of the land and the prevailing winds. The landing strip will need minimal grading due to the even nature of the topography. The planned strip will be approximately 800m in length and 12m width and will be grassed, and will also function as a firebreak between the cultivated drylands and the rehabilitated natural vegetation. The topography and elongated shape of the property make this site uniquely ideal for an airstrip. The Bitou Zoning Scheme makes provision for an airfield as a consent use in the "Agriculture 1" zone. In terms of the 2011 South African Civil Aviation Regulations Part 139, Aerodromes are either licensed or registered. The former applies only to commercial aerodromes, and the latter applies to private use aerodromes. There is NO requirement to license an airfield which is for private use; the only requirement is to have the airfield registered on the SACAA database. The zoning scheme does not distinguish between commercial and private use airfields.

Additional Dwellings

As part of the tourist accommodation offering within the proposed development, the construction of five permanent eco cabins, each measuring approximately 110m², is planned. The units will be placed along the slightly elevated area on the northern boundary of the property and will gain access from a planned road along the northern boundary that will also serve as a firebreak. It is the intention to rent these units out to tourists seeking a farm stay experience. Each will have one bedroom (Max 10 guests). The cabins are placed at the foot of the southern slopes overlooking the farm and surroundings. This area forms part of the rehabilitation footprint and is more treed and vegetated. The architecture of the units will make use of natural elements and colours and will completely blend in with the natural surroundings. These cabins can qualify as "additional dwelling", which are permitted in the "Agriculture 1" zone as a consent use.

Guest Accommodation

Land use description: "guest accommodation" means a dwelling unit that is used for the purpose of supplying lodging and meals to transient guests for compensation who have permanent residence elsewhere. To permit the owner to rent out additional dwellings as guest accommodation to guests on a short-term bases, additional consent for Guest accommodation is required.

Campsite

A camping site is proposed to broaden the affordability and diversity of tourism accommodation facilities offered on the farm. The 10-site campsite is located on a slightly elevated area in the north-eastern section of the farm, offering panoramic views to the south across the agricultural lands and an existing farm dam. Its position provides a natural separation from the main farming activities, ensuring that the campsite does not interfere with day-to-day agricultural operations or reduce the productivity of the working farm.

The campsite will have a minimal environmental footprint, with all structures and amenities designed to integrate naturally with the landscape. Each site will include a small wooden shelter constructed over a level timber deck, providing a shaded area for tent placement.

A gravel parking bay will accompany each deck to accommodate a caravan or 4x4 camping trailer, avoiding the need for paved surfaces or intrusive infrastructure. No power or water connections will be provided at individual stands to encourage self-sufficiency and support an off-grid, nature-based experience.

A central ablution block will be provided, containing toilets, showers, and wash-up areas. Based on the Tourism Grading Council of South Africa (TGCSA) standard of one male and one female toilet, shower, and washbasin per four camping sites, the 10 sites require a minimum of three toilets and three showers. The proposed ablution block will include separate male and female facilities, each with two toilets and two showers, thereby exceeding the minimum standard.

A campsite is permitted as a consent use within the "Agriculture Zone I". The zoning by-law defines a campsite as: "Land set aside for camping where tents or caravans are used for short-term accommodation of transient guests, and which may include facilities for outdoor food preparation, a resort shop, vehicle access, picnic facilities, raised platforms for tents or caravans, ablution facilities, communal scullery and laundry facilities, and waste-disposal facilities, and excludes permanent tents or caravans."

In terms of the development parameters, the use requires the approval of a Site Development Plan (SDP)"

Farmers Market

A long-term vision of the proposed development is the establishment of a low-impact, community-oriented farmers' market. There is currently no weekly producer market in the Uplands–Wittedrift– Redford–Kurland area. The farm is situated along the R340, a scenic rural route connecting Plettenberg Bay with Wittedrift, Uplands, Union Uniondale, Avontuur, The Crags, Kurland Village and onward to Nature's Valley and Tsitsikamma. This market is envisioned as a vibrant, inclusive space that supports local producers, allows social connection, and promotes sustainable living through the farm-to-plate philosophy. The proposal forms part of the landowner's broader rural-tourism vision, which includes low-impact visitor activities that are compatible with the agricultural character of the property.

The Bitou Zoning Scheme By-law allows a "farmers' market" as a consent use in the "Agriculture 1 Zone". The By-law describes a "farmers' market" as:

"A predominantly fresh food market where farmers and food producers sell, directly to consumers, farm origin and associated value-added speciality foods and plant products inter alia including:

- (i) primary food products;
- (ii) seafood, game and foraged foods;
- (iii) value-added foods;
- (iv) speciality food products;
- (v) garden inputs; and
- (vii) small livestock;

A farmers' market–

- (i) operates regularly within a community;
- (ii) is located at a focal public location that provides a suitable environment for farmers to conduct trade;
- (iii) typically consists of booths, tables or stands, outdoors or indoors, where farmers sell farm produce, meats, and sometimes prepared foods and beverages;
- and
- (iv) may include:
 - (aa) a subservient component of stalls for the sale of locally produced handmade crafts and arts; and
 - (bb) live family entertainment, outdoor recreation activities and a children's play area."

Development parameters:

The development parameters applicable to "agriculture" apply, together with the following additional parameters:

- (a) The Municipality may stipulate conditions with regard to the layout, building design, open space, landscaping, parking, access and environmental management; and
- (b) The development must occur in accordance with an approved site development plan.

The market will be located on a levelled grassed area near the entrance to the farm, providing easy access and visibility. This area has been previously disturbed and is separated from the main cultivation/operational areas, ensuring no disruption to agricultural productivity.

For future planning, a basic layout indicates about 110 stalls and 120 public parking bays. Parking areas will not be paved and will not require intrusive earthworks. A series of permanent stalls will be erected, constructed from natural timber, gum poles, and recycled black wattle harvested from the farm. Final layout designs will be submitted as a separate SDP. (The current SDP set a footprint for the market, which includes stalls, parking and circulation).

Farm Store

A farm shop is another consent use in "Agriculture Zone I". The Bitou Zoning Scheme By-law defines a farm shop as a building or structure not exceeding 150 m² of floor area, located on a farm, from where the farmer sells produce grown on the farm and other goods to the public.

The landowner proposes a permanent farm shop located within the market precinct, sized to remain below the 150 m² threshold. The shop will operate daily and will offer:

- Fresh produce grown on the farm and by participating local producers;
- A selection of goods from regular weekend-market vendors (preserves, dairy, baked goods, crafts and indigenous plants from the farm), ensuring continuity of access to local products even when vendors are absent;
- A small coffee and light-meals counter to serve passing tourists, mountain-bikers and residents using the R340 scenic route.

The farm shop will utilise the market's existing access and parking arrangements, and no additional footprint or new access points are required. The permanent structure will be modest and farm-appropriate in scale and design, using natural materials and low-impact finishes to maintain visual compatibility with the rural landscape.

Services required for the consent uses

Water supply for the proposed consent uses:

- camping & eco pods
- farmers market & farm stall
- agricultural lands (will be dryland – no irrigation required)

Borehole Supply

- The primary water supply to the site will be from an existing borehole on the site (yield 86 kilolitres per day).
- The water will require filtration and chemical dosing to ensure potable standards.
- In terms of the National Water Act General Authorization for the Taking and Storage of Water, Clause 3 and Clause 7.2 a Water Use Licence will not be required and registration with the Water Authority will not be required.

Rainwater Harvesting

- As a secondary source roof rainwater harvesting will be implemented for most of the buildings where practical.
- Harvested roof runoff will be pre-treated by means of gutter guards and first flush diverters before being stored in the rainwater tank for each structure.
- Toilet supply will be directly from the rainwater storage tanks, and washbasin and kitchen supply will be from the tank through a filtration system.
- The reservoir supply will also top up to the rainwater storage tanks as and when required.

Water Demand

- Average Maximum Daily Water Demand (AMDD) is calculated at 5.78 Kilolitres (including adjustment for occupancy rates and taking the primary rights into account).

Water Distribution

- Water will be distributed from the 15 kilolitre elevated storage tank from where it will be gravity fed to the camp site, farmers market and eco pods.
- The minimum residual pressure will be 10Kpa at the camp site ablution block, sufficient to ensure efficient operation of the gas geysers. The minimum residual pressure will exceed 20Kpa at all other buildings

Sewage treatment for the proposed consent uses:

- There is no municipal sewer connection available on the farm as such the farm will be self-sufficient and make use of package sewerage treatment plants.
- Camping & Eco pods (will drain to and be treated at the sewage treatment plant at the Managers home)
- Farmers market & farm stall (own sewage treatment plant)
- The treatment plants will be regulated under the National Water Act 36 of 1998 and any requirements of the Bitou Municipality.

Sewer Reticulation

- The sewer reticulation system will be of 110mm and 160mm Class 34 UPVC sewer pipes. Manholes will be of precast concrete ring structures, in accordance with SABS 1200D standards. Manholes will be provided at a maximum of 80 meter intervals.
- Maintenance of the sewer reticulation system will be the responsibility of the landowner.

Sewerage Treatment Package Plants (STPs)

- Sewerage for the proposed farmers market and farm stall which will operate once a week will be treated at a separate STP with the capacity of 2.4 kilolitres
- Sewage for the proposed Eco cabins and camp sites will be treated at the STP installed at the farm managers house with a capacity of 3.44 kilolitres
- Sewerage Treatment Plants and the discharge of effluent must comply with the requirements as set out in Section 34 of the National Water Act of 1998. The development falls under the jurisdiction of the Bitou Municipality and will comply with the requirements of that Authority.
- The package plants will be procured from a reputable supplier and must be environmentally friendly, reliable and simple and easy to maintain, and must meet the relevant DWAS Section 21 effluent quality specification.

Two alternatives are being considered:

BioRock:

- The BioRock Package Plant is supplied and installed by BioRock Africa. BIOROCK is an international company which has been operating worldwide since 1988.
- The BioRock plants incorporate a pretreatment anaerobic tank which clarifies the raw sewage by dividing fats, oils, greases and organic solids. The sewage then passes through an effluent filter, before discharging into the aerobic BioRock reactor.
- The Bioreactor purifies further the pretreated wastewater with a biological process. To naturally treat the wastewater, the systems use a unique BIOROCK Media, an exclusive and efficient carrier material for bacteria.
- BioRock Sewage Plants operate under gravity and no electrical supply is required.
- The BioRock Plant can be sized to capacity of up to 4.5 kilolitres per day

Eco Tanks Big Red

- The Eco Tanks Big Red Package Plant is supplied by Eco Tanks, a South African Company established in 2004. The Big Red Plant was launched in 2021.
- The plant also incorporates pretreatment in an anaerobic tank followed by an aerobic biological reactor.
- The system requires a modest power supply and can economically be powered by a solar system.
- The Big Red plant capacity is on the basis of modular units of up to total 2.5 kilolitres per day. Additional units can be installed in parallel if required.

Other Sewerage Package Plant options may be considered, subject to meeting the required output specifications - to be determined in the detailed design phase.

Plant Effluent: Quality

- Both The BioRock and the Big Red systems produce effluent quality superior to the irrigation standard as set out in the National Water Act General Authorisations Section 21e.
- The Big Red System claims to treat domestic waste to comply with the Section 21f General Limit and have submitted test results indicating such compliance.
- BioRock do not claim to meet the Section 21f General Limit but claim to target compliance in conjunction with disposal through evapotranspiration/filtration beds.

Plant Effluent: Disposal

- The treated discharge from each of the plants will be gravitated to a designated shallow subsurface distribution bed with disposal by primary enhanced evapotranspiration and secondary infiltration.
- The disposal bed will comprise a network of perforated irrigation pipes in a 300mm aggregate layer, bidim lined, underlying a 150mm topsoil layer planted with Buffalo Grass or similar appropriate evapotranspiration vegetation / reedbed medium.

Plant Maintenance

- Regular plant maintenance must be undertaken annually by a Professional Service Provider in accordance with the product Maintenance Guidelines.
- Annual maintenance inspections will monitor sludge accumulation which must not be allowed to exceed 30 percent of the volume of the anaerobic chamber. Sludge will be removed by a privately contracted vacuum tanker for disposal at a licenced disposal site.

Refuse requirements:

- Camping & eco pods
 - Farmers market and farm stall
- Owner to collect and dispose of at the municipal waste transfer site. Recycling will be done at source.

Energy supply to the proposed consent use:

- Camping & eco pods
 - Farmers market and farm stall
- The property is OFF Grid in its entirety.
 - Energy supplied on the following basis:
 - Hot Water Geysers Gas Powered
 - Ovens and Hobs Gas Powered
 - Heating Gas or Wood Burner
 - All Domestic Appliances except kettles Solar Powered

Unit	Inverter Capacity kW	Battery Storage kWh	Solar Panels kWp
Eco cabins	5	5	4
Camp Sites Ablutions	5	5	4
Farm Stall	8	15	6

Access and internal roads

- Camping – access from existing internal farm track
- Eco pods – access from existing internal farm track
- Farmers market and farm stall

The site access will be off Divisional Road R340.

The average max daily trips generated by the development is projected at less than 20.

One day per week the farmers market is expected to generate a further maximum of 300 trips over a period of 5 hours. The delays for traffic exiting the market will be well within the acceptable level of service.

The minimum required Gap Sight distance for vehicles turning right out of Portion 8, onto R340, with a regulatory speed limit of 60 kilometers per hour is 125 meters. The existing gap sight distance for traffic turning out of the farm is approximately 150m to the right and 200m to the left. Regular clearance of existing vegetational overgrowth in the R340 Divisional Council Road Reserve will continue to be required.

Internal Roads and Stormwater Management

There are currently a number of grass and gravel surfaced tracks traversing the site, providing access to various areas on the farm.

There are also extensive areas where low berms have been constructed parallel to the contour (historic farming contours). These berms detain stormwater runoff and facilitate surface absorption and guide flow towards the existing farm dams where possible.

There is no evidence of erosion of any significance throughout the site.

Existing access and driveways for house construction may require the addition of gravel to certain of the grass tracks.

For the proposed consent uses access will be off existing tracks where possible. Improvement will be needed at the entrance to the grass parking at the farmers market as indicated below.

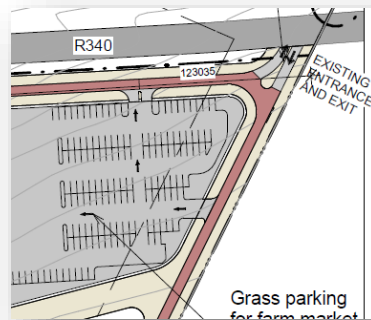


Figure 29 Entrance Road requirements at the farmers market and grass parking area.

The gravel surfaced roads will be constructed "on Grade" with the crossfall to the lower natural ground level side, and protected by low grassed berms on the high side where necessary. At essential drainage points the berms will be weired and the road surface depressed to allow controlled cross drainage.

The grassed weired berm will be designed to detain stormwater runoff and discharge it to the road crossing at very low velocity of less than 0.5 meters per second. The overall road drainage system will ensure minimum maintenance and no erosion at points of discharge.

No expansion of an existing road will be more than 4m.





Figure 30 Photos of existing farm tracks and the divisional road.

Light Aircraft Landing Strip

- The Site Development Plan makes provision for a light aircraft landing strip running parallel to the contour, diagonally across the site in a southwest to north easterly direction within a planned firebreak.
- The air strip will be 12 meters wide and approximately 800 meters long and will be grass surfaced.
- The natural crossfall of the airstrip is approximately 7 to 8 percent and some levelling of the cross-section will be required. It is proposed that as proposed for the gravel roads, the airstrip be protected from erosion by a low berm to be constructed on the higher side of the crossfall.

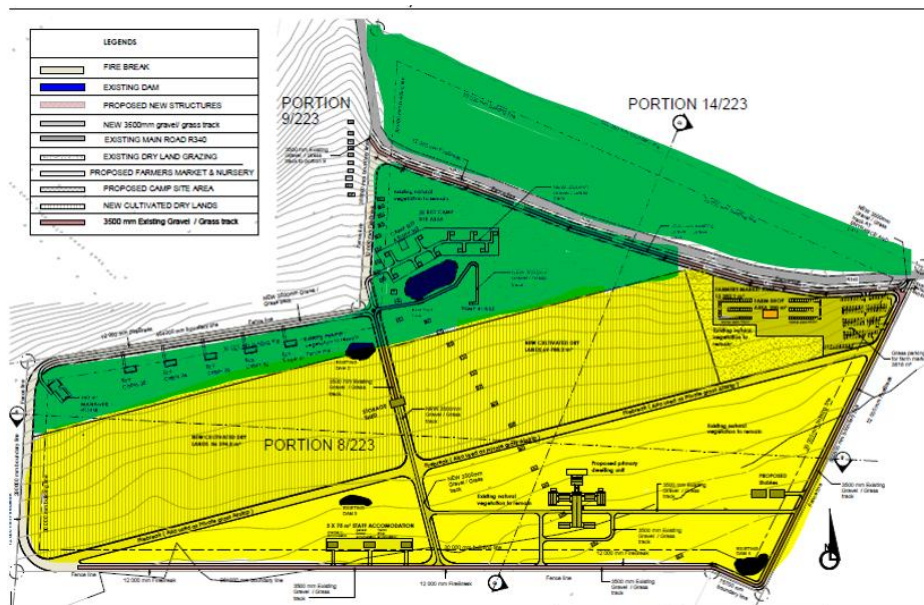


Figure 31 Indicative style of the farm shop



Figure 32 Indicative style of the eco-cabins



Figure 33 Approximate camping area on the gentle slope with screening vegetation remaining between alien trees that are being removed.



Figure 34 Approximate eco-cabin area overlooking the agricultural lands – indigenous tree planting screening around the cabins to replace alien trees.



Figure 35 Extract from Planning report on visual location of the eco-pods (Planning Space, 2026)



Figure 36 View of the existing farm gate off the DR340 – note the elevation difference and the screening vegetation along the road in the road reserve - (note alien clearing still needs to be undertaken by District Roads in the road reserve).

2.	Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21.
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The following extracts from the Planning report (2026) apply to the existing land use rights of the property and the consent use being applied for.

Primary rights are approved and a consent use application on Agricultural Land in terms of the Standard Municipal Land Use Planning By-law (2016) is being made.

Application for Consent use in terms of Section 15 (o) for:

- Five Additional Dwellings (eco cottages)
- Guest accommodation
- A Campsite with 10 camping stands
- A Farmers' Market
- A Farm Shop
- An Airfield

COMPATIBILITY WITH APPLICABLE FORWARD PLANNING DOCUMENTS

1. WESTERN CAPE PROVINCIAL SPATIAL DEVELOPMENT FRAMEWORK 2014

The PSDF 2014 was adopted by the Western Cape Government in March 2014 under the Department of Environmental Affairs and Development Planning and is currently being reviewed. At the time of writing this report, the new PSDF has not yet been adopted. The Western Cape Provincial Spatial Development Framework (WCPSDF) is the province's overarching spatial policy that guides how land should be used, protected and developed across the Western Cape. It sets the "bigger-picture" policy within which all municipalities must align their planning decisions. The main aim of the Western Cape PSDF is to guide sustainable, efficient and resilient land-use patterns across the province by protecting high-value rural and environmental resources, strengthening rural economies, and promoting development that is appropriately scaled and aligned with existing settlement structures. The proposal complies with these objectives by bringing currently unused rural land into productive use through agriculture and low-impact tourism, without compromising the area's rural character or ecological sensitivity. The clustering of buildings, emphasis on environmental rehabilitation, off-grid service solutions and support for local agri-production directly advance the PSDF's goals of sustainable rural development, protection of biodiversity assets, and the creation of diverse, resilient economic opportunities in the provincial hinterland.

2. BITOU SPATIAL DEVELOPMENT FRAMEWORK 2023 /IDP

The property is situated in the Upland area that has been identified in the Bitou SDF as an Agricultural Focus area. The SDF states that the Wittedrift Valley and Uplands are the area with the most extensive commercial agricultural activities. The area comprises about 2,500 ha of cultivated land extending north-westwards along route R340. The Wittedrift-Uplands area around route R340 is suitable for winter grains, oilseed crops, lucerne, cattle and dairy farming.

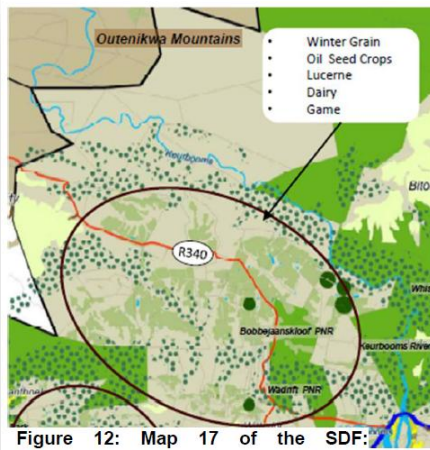


Figure 12: Map 17 of the SDF:
Agriculture and Forestry



Figure 13: Map 54 from the SDF Spatial Vision

The proposal aligns well with the strategic direction of the Bitou Spatial Development Framework, which promotes a balanced rural economy rooted in agriculture, value-addition and low-impact agritourism. The SDF identifies agriculture and tourism as two of the municipality's key economic sectors and specifically encourages diversification through agri-tourism, small-scale rural accommodation, local produce markets and farm-based enterprises (Action 6.5–6.8). The proposed eco-cabins, campsite, farm shop and farmers' market directly support this objective by strengthening the agricultural value chain, creating opportunities for small producers, and offering nature-based tourism experiences that complement the working farm. The development footprint remains modest, clustered and visually unobtrusive, preserving the rural character and enabling continued agricultural production, consistent with the SDF's guidance for managing rural areas.

The SDF further encourages economic initiatives that support emerging farmers, expand rural employment, and enhance local food systems. The farm shop and market contribute to these aims by providing an outlet for local produce and supporting micro-enterprise development.

Although the SDF does not specifically address the need or location of airstrips, the private airstrip is a low-intensity, rural-appropriate use that enhances accessibility and supports emergency response without altering land use patterns. Overall, the proposal is fully consistent with the SDF's rural spatial planning approach, which seeks to protect agricultural land while enabling compatible, low-impact tourism and economic activities that contribute to a resilient rural economy.

The SDF proposed actions to contain development and manage rural areas through the appropriate application of Spatial Planning Categories (SPCs)

The Spatial Planning Category assigned to the area is "Buffer 2" (Other Natural Areas), which at the time correlated with categories identified in the Western Cape Biodiversity Spatial Plan 2017. The SDF states that development in the rural and agricultural landscapes of the Bitou LM should be managed in line with the guidelines provided in Western Cape Province Land Use Planning Guidelines: Rural Areas (2019), which is discussed in detail below.

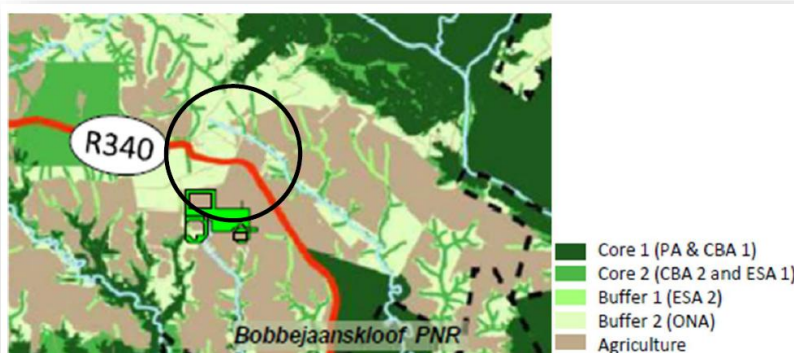


Figure 14: Extract from the SDF

3. RURAL AREAS GUIDELINES 2019

The Rural Areas Guidelines for the Western Cape were published in 2019 by the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP). It provides a framework for sustainable rural development, guiding land use planning while balancing conservation, agriculture, and rural livelihoods.

The Rural Areas Guideline seeks to:

- promote sustainable development in rural locations;
- diversify and strengthen the rural economy;

- protect biodiversity and ecological infrastructure;
- maintain the authenticity of rural landscapes; and
- enable appropriate small-scale tourism in rural areas

The proposed mixed agricultural and eco-tourism development fully supports these objectives because:

- It establishes active agriculture (16 ha dryland pastures, stables, natural grazing), reinforcing the rural economy.
- It introduces low-impact tourism components (eco-cabins, campsite, farm shop, farmers' market), which will strengthen the rural economy, and are explicitly supported in rural zones as long as impacts are minimal.
- It rehabilitates extensive areas of alien-invaded vegetation, consistent with the aim to protection of protecting ecological and biodiversity.

4. GUIDELINES FOR THE BUFFER 2 SPC

The property is identified as situated in a "Buffer 2" Spatial Planning Area. This category includes areas designated as Other Natural Areas, located in an extensive and/or intensive agriculture matrix (i.e. Livestock production) as the dominant land use.

Permitted Activities and uses include any activity directly relating to the primary agricultural enterprise, such as farm buildings and activities associated with the primary agricultural activity and associated structures (e.g., one homestead, agricultural buildings such as barns, agri-worker housing, etc.).

Given the Western Cape's unique rural communities and landscapes, tourism offers realistic prospects to diversify and strengthen the rural economy. Accordingly, the WCG approach to Rural Accommodation is to facilitate the provision of a variety of short-term tourism accommodation across the rural landscape, which is in keeping with the local character.

This policy envisages a wide range of accommodation/residential opportunities in the rural area, which include:

- Additional Dwellings (1 per 10 ha to a maximum of 5)
- Agri worker housing
- Guest house
- Camping sites

Additional land uses to facilitate diversification and "value adding", including:

- restaurant and venue facility;
- farmstall and farm store;
- home occupation;
- local product processing (e.g. cheese-making); and
- tourist and recreational facilities (e.g. hiking trail, 4x4 routes).

The Western Cape Rural Areas Guideline (2019) provides detailed guidance for the establishment of tourist accommodation in rural areas. The tables and narrative below demonstrate full compliance with these provisions for each of the planned land consent uses.

GUIDELINES FOR TOURIST ACCOMMODATION	
GUIDELINE REQUIREMENT	PROJECT COMPLIANCE
Rural accommodation must be small-scale , visually unobtrusive, and appropriate to the SPC.	Only 5 eco-cabins (110 m ² each) and a 10-stand campsite are proposed, which is within small-scale thresholds. Both of these accommodation site is situated on the southern slopes, which are densely vegetated which and will allow screening of the planned structures.

Resort-type units are limited to max 120 m ² and single storey (6.5 m).	All cabins are 110 m ² , single-storey and under the height limit.
No large-scale tourism proposed. All development is small and clustered	Only 5 eco-cabins (110 m ² each) and a 10-stand campsite are proposed, which is within small-scale thresholds.
Tourist accommodation must be clustered and not dispersed across the farm.	Cabins form one node; the campsite is a second consolidated node near existing access.
New buildings should be placed within or adjacent to the farmstead precinct, or on previously disturbed areas.	Cabins and campsite are all placed on historically disturbed / low-sensitivity areas, avoiding natural vegetation and have purposefully been planned away from the primary farming activities.
Avoid CBAs, ESAs, wetlands, river corridors and sensitive habitats.	All tourist facilities are outside CBAs/ESAs, and no wetland or riparian areas are impacted.
No accommodation within 1 km of the high-water mark of the sea or tidal rivers.	The site is far inland (>5 km from the coast).
Buildings must be low, compact and unobtrusive, respecting rural vernacular.	Cabins use timber materials, natural colours, and single-storey forms that will blend with the landscape.
Development must avoid skylines and ridgelines.	Cabins and campsite are placed below ridgelines and screened by topography and vegetation.
Buffers, landscaping and screening are required to reduce visual impact.	Both campsites and Chalets are situated in vegetated areas identified for Fynbos rehabilitation. Natural screening forms part of the design.

GUIDELINES FOR CAMPSITES	
GUIDELINE REQUIREMENT	PROJECT COMPLIANCE
Camp sites may include up to 10 tent or caravan stands on agricultural land.	The proposal includes 10 stands.
Campsites must be low-impact, temporary, and not create permanent structures.	Only tents and temporary ablutions; no mobile homes or permanent chalets.
Must be consistent with the rural landscape and avoid sensitive areas.	Campsite located on gently sloped disturbed land, screened and well away from sensitive habitats.

GUIDELINES FOR AGRI WORKER HOUSING	
GUIDELINE REQUIREMENT	PROJECT COMPLIANCE
Agri worker housing is a recognised and permitted rural use and is allowed in all rural SPCs.	The proposal includes three agri worker units + one manager's house, directly tied to the agricultural activities (pastures, stables, maintenance).
Housing must be for bona fide agricultural workers involved in primary farming activities.	Labourers are responsible for seeding, spraying, baling, grooming horses, and general farm operations, as confirmed by the Agricultural Impact Assessment.
Units must not be alienated (no subdivision / sectional title/share block).	All units are non-alienable and will remain part of the parent agricultural land.
Housing must be clustered, close to existing farmstead precincts and rural movement routes.	Worker units are placed adjacent to the operational farm buildings, like sheds and stables, using existing access and disturbed footprints.
Maximum height: single storey, max 6.5 m; max floor area 175 m ² .	All proposed agri worker dwellings are single-storey and below the maximum footprint threshold. (±75m ²)
Must avoid sensitive areas—100m from rivers, outside 1:100 floodline, >1 km from HWM.	The site is far inland, not within any riparian zone, and above all floodlines.

Housing must not undermine agricultural resources or ecological services.	Dwellings are placed on previously disturbed areas and do not remove agricultural land or natural vegetation.
Seasonal workers should not normally be accommodated; transport is encouraged.	Only permanent labourers will be housed on-site; seasonal labour is limited and can be transported if needed.
A Site Development Plan should be submitted for approval.	A full SDP is included in the BAR, showing footprint, access and services.

RURAL BUSINESS, AGRI-TOURISM & RURAL ECONOMY GUIDELINES	
The Rural Areas Guideline treats local-scale rural commercial activity as part of rural diversification if it remains low-impact and aligned with agricultural production.	
GUIDELINE REQUIREMENT	PROJECT COMPLIANCE
Rural entrepreneurial activity is supported if subservient to rural character, small in scale, and linked to agriculture.	The farm shop (<150 m ²) and small farmers' market are agricultural in nature and entirely linked to onsite and local produce.
Only activities appropriate to the rural context that generate positive socio-economic returns may be allowed.	The market promotes local producers, supports rural economic development, and provides an outlet for agricultural goods.
Facilities must use existing structures or disturbed footprints where possible.	The shop and market area are located on previously disturbed land, adjacent to existing tracks and farm precinct. There is no existing structure that can be used on-site.
Rural business must not urbanise the landscape or create nodes.	The market operates intermittently, with temporary stalls, no paving, and no urban-type structures — no new node is created.
Facilities must be rural in appearance, using vernacular materials and screening.	The market uses wooden stalls and natural materials; the shop is designed in rural farm vernacular with minimal visual impact.
Adequate parking and access must be provided with minimal earthworks.	Parking is grassed, informal, and uses existing access via the farm entrance.
Development must avoid environmentally sensitive areas.	Aquatic and Terrestrial assessments were conducted to inform the layout. No sensitive environmental features were identified.

GUIDELINE PROVISIONS ON ANCILLARY AGRICULTURAL USES (INCL. AIRFIELDS)	
The Rural Areas Guideline includes airfields as one of the listed ancillary agricultural uses allowed in agricultural landscapes (Chapter 8), provided they remain small-scale and do not detract from agricultural activity.	
GUIDELINE REQUIREMENT	PROJECT COMPLIANCE
Airfields are included as ancillary uses associated with agriculture and must not detract from primary farming.	The proposed private 800 m grass runway is used occasionally and doubles as a firebreak, enhancing land management.
Ancillary uses must be integrated into the farmstead precinct or located on disturbed land.	The landing strip is placed on previously cultivated land (historic fields), requiring minimal grading.
Structures and features must be visually unobtrusive and rural in appearance.	The airfield is grass only, with no paved surfaces, lights, or permanent structures, and is visually absorbed by the landscape.
Uses must not fragment agricultural land or lead to urban-type development.	The airfield remains a linear grass strip and does not fragment grazing or cultivated areas.
Infrastructure must avoid sensitive ecosystems (wetlands, river corridors, CBAs, slopes).	The alignment avoids all sensitive areas and lies entirely in a low-sensitivity zone identified in the BAR.
Ancillary uses must remain subservient to agricultural activities.	Airfield use is occasional, privately operated, and does not interfere with dryland cultivation or rehabilitation.

5. SPLUMA DEVELOPMENT PRINCIPLES

This section interprets the development against the five development principles contained in the Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013) (SPLUMA).

5.1 Spatial justice

The principle of spatial justice requires that land-use decisions contribute to redressing past inequalities in access to land and services. This is mostly addressed through policy, rather than on individual development applications. Although the proposal is for a privately owned agricultural property in a rural setting, the development incorporates elements that provide broader public benefit and access to local economic opportunities. The farmers' market and farm shop will create formalised, local supply chains for small producers in the Uplands–Wittedrift area and increase access to fresh produce for surrounding communities. Employment opportunities (permanent and seasonal) associated with farming, tourism services and market operations will support rural livelihoods.

5.2 Spatial sustainability

Spatial sustainability requires that development conserve ecological systems and make efficient use of natural resources. The project has been designed to optimally use the land to its best potential. Areas that have been identified with agricultural potential (drylands) will be used as cultivated land, and areas with ecological value will be rehabilitated. Water- and energy-resilience measures (borehole augmentation, rainwater harvesting, solar generation) and low-impact sanitation systems are proposed. The project will, however, necessitate clearance of natural vegetation in parts of the cultivated and market precincts; these impacts are being addressed via the BAR and specialist assessments. The proposed mitigation hierarchy (avoidance, minimisation, rehabilitation and offset where required) must align with SPLUMA's sustainability objectives.

5.3 Spatial efficiency

The proposal promotes efficient use of land and infrastructure by consolidating economic activity in compact nodes (farmstead, eco-cabin cluster, campsite and market precinct). The development does not depend on new municipal bulk services and therefore avoids the inefficiency of extending urban services into a rural area. By allowing mixed but complementary uses on one land unit (agriculture, small-scale tourism and local commerce), the project supports productive multi-functional land use.

5.4 Spatial resilience

Spatial resilience in SPLUMA is about ensuring that development is responsive to natural hazards and climate variability. The project contains elements of resilience measures: firebreaks, rehabilitation of alien-invaded vegetation to reduce fuel loads, and water-security measures (borehole and rainwater storage). Diversification of income stream also allows economic resilience (e.g. in times of drought/ crop failure, the farm would still be able to generate income through tourist-related activities).

5.5 Good administration

Good administration demands transparent, consistent and reasoned decision-making. The applicant has followed the statutory processes by preparing the BAR, engaging specialists, and identifying the required municipal and national approvals.

Summary

In terms of the Bitou Municipality: Standard Municipal Land Use Planning By-law (2016), the following land use applications must be submitted to give effect to the proposed development on Portion 8 of Farm 223:

1. Applications for Consent use in terms of Section 15 (o) for:

- Five Additional Dwellings
- A Campsite with 10 camping stands
- A Farmers' Market
- A Farm Shop
- An Airfield

2. Approval of a Site Development Plan (SDP) for all primary uses and consent-use components, as required by the Zoning Scheme.

These applications will formalise the long-term development framework for the property and allow phased implementation of both the agricultural and tourism-related uses. We believe that the proposal can be considered for approval based on the following:

- **Supports active agriculture:**
The development will bring currently unused land back into production through dryland pastures, livestock farming and regenerative rehabilitation, in line with the purpose of the Agriculture Zone I.
- **Strengthens the rural economy:**
The additional dwellings (tourist cabins), campsite, farm shop, and market introduce low impact rural tourism that diversifies the income base of the farm. This is consistent with both the Bitou SDF and the Western Cape Rural Areas Guidelines, which identify agri-tourism as an essential rural economic driver.
- **Responds to an identified tourism need in the Wittedrift-Uplands area:**
There is limited small-scale accommodation in this part of the municipal area. The cabins and campsite fill a gap in the market for nature-based, farm-stay tourism experiences, identified as a growing sector.
- **Creates local economic opportunities:**
The farmers' market and farm shop will support small producers, shorten supply chains, and provide a valuable local outlet for fresh produce and artisanal goods.
- **Conservation Outcome:**
All proposed developments are small in scale, clustered, and situated within previously disturbed areas. Although the terrestrial sensitivity study identified no sensitive or vulnerable natural features, substantial portions of the farm are being rehabilitated to indigenous vegetation. This restoration process has been underway for some time and has already had a clear, positive effect on the landscape.
- **Compatible with spatial policy at all levels:**
The proposal fits within the strategic direction of the PSDF, Bitou SDF, and Rural Areas Guidelines, which encourage productive agriculture paired with appropriate, low-impact rural tourism.
- **Efficient and self-sufficient services model:**
No municipal services are required. Water, electricity, and sanitation will be managed on-site, reducing burden on municipal infrastructure.
- **No land use conflicts anticipated.**
The development is appropriate for a rural setting, consistent with neighbouring land uses, and does not introduce urban-style development.

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

There are no conflicts anticipated - See planning explanation above and full planning report appendix L

4. Explain how the proposed development will be in line with the following?

4.1 The Provincial Spatial Development Framework.

The PSDF 2014 was adopted by the Western Cape Government in March 2014 under the Department of Environmental Affairs and Development Planning and is currently being reviewed. At the time of writing this report, the new PSDF has not yet been adopted. The Western Cape Provincial Spatial Development Framework (WCPSPDF) is the province's overarching spatial policy that guides how land should be used, protected and developed across the Western Cape. It sets the "bigger-picture" policy within which all municipalities must align their planning decisions. The main aim of the Western Cape PSDF is to guide sustainable, efficient and resilient land-use patterns across the province by protecting high-value rural and environmental resources, strengthening rural economies, and promoting development that is appropriately scaled and aligned with existing settlement structures. The proposal complies with these objectives by bringing currently unused rural land into productive use through agriculture and low-impact tourism, without compromising the area's rural character or ecological sensitivity. The clustering of buildings, emphasis on environmental rehabilitation, off-grid service solutions and support for local agri-production directly advance the PSDF's goals of sustainable rural development, protection of biodiversity assets, and the creation of diverse, resilient economic opportunities in the provincial hinterland.

4.2 The Integrated Development Plan of the local municipality.

The property is situated in the Upland area that has been identified in the Bitou SDF as an Agricultural Focus area. The SDF states that the Wittedrift Valley and Uplands are the area with the most extensive commercial agricultural activities. The area comprises about 2,500 ha of cultivated land extending north-westwards along route R340. The Wittedrift-Uplands area around route R340 is suitable for winter grains, oilseed crops, lucerne, cattle and dairy farming.

The proposal aligns well with the strategic direction of the Bitou Spatial Development Framework, which promotes a balanced rural economy rooted in agriculture, value-addition and low-impact agritourism. The SDF identifies agriculture and tourism as two of the municipality's key economic sectors and specifically encourages diversification through agri-tourism, small-scale rural accommodation, local produce markets and farm-based enterprises (Action 6.5–6.8). The proposed eco-cabins, campsite, farm shop and farmers' market directly support this objective by strengthening the agricultural value chain, creating opportunities for small producers, and offering nature-based tourism experiences that complement the working

farm. The development footprint remains modest, clustered and visually unobtrusive, preserving the rural character and enabling continued agricultural production, consistent with the SDF's guidance for managing rural areas.

The SDF further encourages economic initiatives that support emerging farmers, expand rural employment, and enhance local food systems. The farm shop and market contribute to these aims by providing an outlet for local produce and supporting micro-enterprise development.

Although the SDF does not specifically address the need or location of airstrips, the private airstrip is a low-intensity, rural-appropriate use that enhances accessibility and supports emergency response without altering land use patterns.

Overall, the proposal is fully consistent with the SDF's rural spatial planning approach, which seeks to protect agricultural land while enabling compatible, low-impact tourism and economic activities that contribute to a resilient rural economy.

The SDF proposed actions to contain development and manage rural areas through the appropriate application of Spatial Planning Categories (SPCs) The Spatial Planning Category assigned to the area is "Buffer 2" (Other Natural Areas), which at the time correlated with categories identified in the Western Cape Biodiversity Spatial Plan 2017. The SDF states that development in the rural and agricultural landscapes of the Bitou LM should be managed in line with the guidelines provided in Western Cape Province Land Use Planning Guidelines: Rural Areas (2019).

4.3.	The Spatial Development Framework of the local municipality.
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see above

4.4.	The Environmental Management Framework applicable to the area.
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There is no specific Environmental Management Framework for Bitou, as such, the Garden Route Environmental Management Framework (2010) was used:

The proposed development will not compromise the integrity of the priorities outlined within the Garden Route Environmental Management Framework (EMF), 2010. It will adhere to good environmental principles as well as following accepted norms and standards through the construction and operational phase of its lifespan.

The EMF was prepared as a decision-support tool to guide development in an area characterised by significant development pressure, high environmental sensitivity, and important visual, cultural and ecological resources. Its purpose is to assist authorities in making consistent and informed decisions by identifying environmental opportunities and constraints, establishing control zones, and promoting a desired state of the environment that balances development with environmental protection.

A small-scale tourism campsite is compatible with the EMF where it supports nature-based and rural tourism without causing urban sprawl, landscape fragmentation or unacceptable disturbance to sensitive environmental features. The Uplands area forms part of the wider Garden Route landscape, where tourism and agriculture are important components of the regional economy, but where development must be carefully planned to avoid adverse impacts on biodiversity, watercourses, steep slopes, scenic quality and rural character. A campsite and eco-cottages that use a limited footprint, avoids sensitive habitats, maintains vegetation buffers and relies on low-impact infrastructure would support the EMF's objective of directing development in a manner that responds to local environmental constraints.

The regenerative farming component linked to a farmers market and shop can further strengthen consistency with the EMF if it is implemented as a restorative land-use practice rather than an intensive agricultural expansion. Regenerative farming practices such as soil cover retention, composting, rotational grazing or low-intensity cultivation, erosion control, alien invasive plant management, water conservation and rehabilitation of degraded areas can contribute to improved soil health, biodiversity support and catchment resilience. Where farming activities avoid unnecessary clearance of indigenous vegetation, protect aquatic features and maintain ecological corridors, they are aligned with the EMF's emphasis on sustainable development and the minimisation of environmental degradation.

The inclusion of a small farmers market and farm shop as part of the application can be motivated as compatible with the Garden Route EMF where these activities remain ancillary to the primary rural, agricultural and nature-based tourism character of the property. A modest farm shop and periodic farmers market would support local food systems, agri-tourism and the economic viability of the regenerative farm without requiring a shift toward urban-scale commercial development. This is consistent with the EMF's broader objective of enabling appropriate rural development while ensuring that land uses remain responsive to environmental sensitivity, landscape character and infrastructure limitations.

The farmers market and farm shop should be positioned and managed so that they do not create a separate destination commercial node or introduce impacts that are disproportionate to the rural setting. The activity should therefore be limited in scale, frequency and operating hours, with preference for the sale of produce grown on the property, locally produced food, crafts and regenerative farming-related products. Parking, pedestrian movement, deliveries, signage, lighting, waste handling, sanitation and noise should be planned to avoid disturbance to neighbouring properties, sensitive habitats, watercourses and the scenic quality of the Uplands landscape.

From an EMF perspective, the compatibility of these components is that they demonstrate that they form part of an integrated low-impact rural enterprise rather than an intensification of commercial land use. The layout uses land already transformed or disturbed areas, avoids new clearance of indigenous vegetation, and relies on resource-efficient infrastructure. The market and shop will be subject to clear management controls in the environmental management programme, including waste separation and removal, wastewater control, fire safety, traffic management, visitor behaviour, limits on amplified sound, and the prohibition of uncontrolled expansion.

On this basis, the proposed land use is defensible under the Garden Route EMF it is a small-scale, nature-based and restorative rural enterprise that avoids sensitive areas, retains ecological processes, supports sustainable agriculture and tourism, and includes enforceable management measures to prevent pollution, habitat loss, visual intrusion and cumulative environmental degradation. The farmers market and farm shop can be included as compatible ancillary uses where they remain subordinate to the regenerative farming and tourism activities, are located within an appropriate development footprint, and are managed to avoid commercial intensification or unacceptable environmental and amenity impacts.

EMF policies and management requirements

1. **EMF aiding decision making:** The proposal demonstrates how it has considered the environmental opportunities and constraints identified for the area, including any applicable sensitivity mapping, control zones and development guidelines.
2. **Avoid and minimise impacts on sensitive environments:** Campsite infrastructure, access tracks, ablution facilities, services, farming areas and visitor activity zones is located outside sensitive biodiversity areas, watercourses, riparian zones, steep slopes and erosion-prone areas.
3. **Maintain ecological functioning and connectivity:** Indigenous vegetation remnants, ecological corridors are retained and buffered. Any disturbed areas will be rehabilitated with appropriate indigenous vegetation.
4. **Protect water resources and catchment health:** Stormwater, wastewater, greywater, potable water abstraction and agricultural water use must be managed so that there is no pollution, erosion, sedimentation or alteration of natural flow paths.
5. **Respect the rural and scenic character of the Garden Route:** Structures will be small-scale, visually recessive and positioned to reduce visual intrusion. Lighting will be limited and downward-facing, and the layout will retain the rural landscape character of the Uplands area.
6. **Prevent cumulative development impacts:** The camp is limited in scale and intensity (10 small sites) so that, together with other development in the area, it does not contribute to incremental habitat loss, traffic pressure, service-demand increases or visual clutter.
7. **Use sustainable service infrastructure:** Energy, sanitation, waste management and water supply systems are designed for low environmental impact, with preference for off-grid or resource-efficient systems where feasible. Waste will be minimised, separated and removed to appropriate facilities.
8. **Manage agricultural activities sustainably:** Regenerative farming avoids overgrazing, excessive tillage, chemical dependency, uncontrolled manure accumulation and expansion into intact indigenous vegetation. Soil conservation, erosion prevention and alien invasive plant control will be incorporated into the farm management system.
9. **Comply with environmental authorisation and land-use requirements:** Listed activities under NEMA, vegetation clearance thresholds, agricultural land-use changes, campsite consent uses, rezoning or building-plan requirements will be confirmed before implementation.
10. **Implement an environmental management programme:** A practical site-specific management plan will guide construction, operation, visitor behaviour, fire management, waste handling, alien plant control, rehabilitation, monitoring and emergency response.

Guidelines for proper process and the prevention, minimisation and mitigation of any negative impact of the development have been set out within the EMPr (Appendix H). The proposed development will, therefore, not compromise the integrity of the existing environmental priorities, but will rather add to the priorities through the selection of a site that is already transformed and disturbed while natural areas will be conserved.

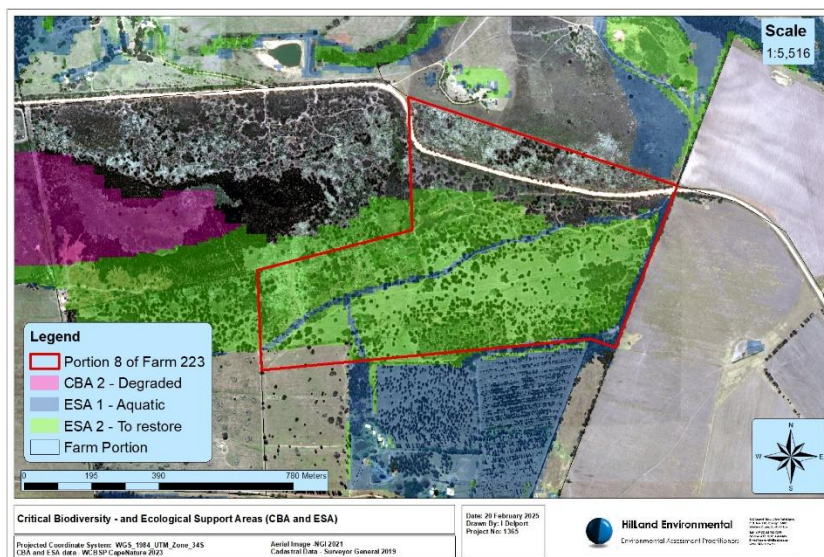
As such, the proposed development is in line with the Garden Route EMF (2010) and NEMA Principles.

5.	Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.
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Application is still awaiting DEADP comment on the NOI (submitted 28 April 2026) and once that has been received, the formal NEMA application will be submitted to DEADP and the draft BAR will go out for comment.

Specialist comments have all been included in the application.

6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development.
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ESA mapping for the area. Green= ESA 2 to restore (cultivated dryland pastures) and Blue = ESA 1 aquatic surface water source – incorrectly mapped farm roads.

The proposal is considered compatible with the Ecological Support Area 2 (ESA 2) category of the Western Cape Biodiversity Spatial Plan 2023, as it is to be implemented in a manner that supports ecological restoration and does not further compromise biodiversity pattern, ecological processes or ecosystem-service delivery. Restoration is proposed outside of the agricultural land use areas within the connecting ecological corridor. ESA mapping should be updated to exclude active agricultural lands where habitat restoration will conflict with agricultural potential and use.

ESA 2 areas are generally areas that are degraded or transformed but remain important because they support the functioning of Critical Biodiversity Areas, Protected Areas, ecological corridors, water-resource areas, riparian systems and broader landscape resilience.

The WCBSP handbook guidance therefore does not require these areas to be excluded from all use, but indicates that land use should be compatible with maintaining or improving ecological functioning, with restoration undertaken where feasible.

In this context, a small-scale campsite, farm shop, periodic farmers market and regenerative farming operation can align with the ESA 2 objectives where the development footprint is restricted to already disturbed or transformed areas, no further unnecessary clearance of indigenous vegetation occurs, buffers are protected, alien invasive vegetation is controlled, erosion and stormwater are managed, and regenerative agricultural practices are used to improve soil health, vegetation cover, water infiltration and ecological connectivity.

The proposal is a low-impact rural land use that contributes to rehabilitation and improved land management, rather than as an intensification of development that would reduce the ESA's ecological support function.

7.	Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.
Property is not coastal, so ICMA does not apply.	
8.	Explain whether the screening report has changed from the one submitted together with the application form. The screening report must be attached as Appendix I.
No change	
9.	Explain how the proposed development will optimise vacant land available within an urban area.
Not applicable – the application is a rural agricultural activity, not within an urban area.	
10.	Explain how the proposed development will optimise the use of existing resources and infrastructure.
The application will build onto the existing agricultural uses on the property through regenerative farming activities and the linked consent use activities relating to small scale agri-tourism and providing local farm produce to the local community through the farmers market and farm shop. The application will make use of existing access roads, existing farm tracks, existing borehole water and existing farm dams. The application will be self-sustainable through the use of solar power, rainwater harvesting, recycled water and regenerative farming methods.	
11.	Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16).
The application proposes to be self-sufficient and will not rely on any local authority services – see engineering services report.	
The Local Authority will comment on the application and give consent for the proposed service requirements.	
12.	In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K.

Overall, the need and desirability of the proposal is consistent with the Department of Environmental Affairs' Integrated Environmental Management Guideline on Need and Desirability (2013), which frames the assessment around whether the activity represents the right use at the right time and in the right place, and whether it promotes the wise and sustainable use of land. The proposal responds to an identified local need for active land stewardship, alien vegetation control, ecological rehabilitation, fire-risk management, rural employment creation and diversification of agricultural income, while retaining the primary agricultural character of the property. It is also desirable in spatial and environmental terms, as the development has been located on a site with demonstrated physical suitability, low identified biodiversity and aquatic sensitivity, existing rural/agricultural compatibility, and no evident conflict with the relevant planning framework. By integrating regenerative agriculture, rehabilitation, low-impact tourism and local market opportunities, the proposal supports socio-economic benefit without undermining ecological functioning or the rural sense of place, and therefore accords with the Guideline's emphasis on sustainable development, informed land-use planning, avoidance of unnecessary environmental impact, and consideration of broader community needs and public-interest outcomes.

The Need and Desirability is described in the Planning Report as follows:(Planning Space, 2026)

Need & Desirability

In terms of the Promotion of Administrative Justice Act, 2000 (Act No. 3 of 2000) ("PAJA"), all administrative action must be based on the "relevant considerations". NEMA and the EIA Regulations highlight specific considerations, which include having to consider "the need for and desirability of the activity."

NEED

The proposal responds to a combination of environmental, economic, agricultural and community based needs within the Wittedrift-Uplands rural area. The site is currently vacant and, if left unmanaged, is likely to regress into an alien-infested landscape dominated by invasive black wattle. This would result in increased fire risk, loss of ecological function, and no meaningful economic or social benefit. Active land management through agriculture, rehabilitation and appropriate diversification is therefore not only desirable but necessary.

ENVIRONMENTAL MANAGEMENT AND LAND REHABILITATION

There is a clear need for proactive land stewardship on the property. Without ongoing management, previously cleared areas are highly susceptible to reinfestation by invasive alien species, particularly black wattle. Such invasion undermines biodiversity, depletes water resources, increases fire intensity, and places a long-term burden on both landowners and public authorities. The proposed regenerative farming and rehabilitation programme ensures continuous alien clearing, restoration of indigenous vegetation and improved ecological functioning.

FIRE MANAGEMENT AND COMMUNITY SAFETY

The Southern Cape is a high fire-risk region, and large uncontrolled wildfires pose a significant threat to rural properties, biodiversity, infrastructure and neighbouring settlements. There is a demonstrable need for improved fire management infrastructure in the area. The proposed grass airstrip serves a dual purpose: it functions as an effective firebreak within the farm layout and provides a strategically located base for firefighting operations, as supported by the Southern Cape Fire Protection Agency. This facility will not only benefit the farm itself but also contribute to broader community safety and regional disaster response capacity.

PROMOTION OF REGENERATIVE AND CLIMATE-RESILIENT AGRICULTURE

Conventional farming practices are increasingly vulnerable to climate variability, soil degradation and rising input costs. There is a growing need for regenerative agricultural models that improve soil health, enhance biodiversity, reduce chemical dependency and increase long-term resilience. The proposed dryland pastures, rehabilitation of natural areas and low-impact farming practices respond directly to this need. The development demonstrates how productive agriculture and environmental restoration can coexist.

EMPLOYMENT CREATION AND RURAL LIVELIHOODS

The rural economy of the Wittedrift-Uplands area offers limited formal employment opportunities. The proposal will create permanent and semi-skilled jobs linked to farming, rehabilitation, tourism accommodation, hospitality services, market operations and land management. On-site worker accommodation further supports stable employment and improves living conditions for agricultural workers. The creation of employment opportunities is a key public-interest consideration and directly addresses socio-economic needs within the local rural context.

SUPPORT FOR LOCAL FARMERS AND SHORT SUPPLY CHAINS

There is a recognised need for accessible, local outlets where small-scale farmers and producers can sell their products directly to consumers. The proposed farm shop and farmers' market respond to this gap by providing a structured platform for local produce, value-added goods and indigenous plants. This strengthens local food systems, reduces transport distances, supports emerging producers and promotes a farm-to-market economy consistent with rural development policy. The market also serves a wider community function by improving access to fresh produce and creating a social gathering space in an otherwise dispersed rural area.

DIVERSIFICATION AND ECONOMIC VIABILITY OF RURAL LAND

Agricultural land in this region often requires supplementary income streams to remain financially viable. The integration of low-impact tourism, local trade and agriculture is necessary to ensure long-term sustainability without compromising rural character. The proposed eco-cabins, campsite, farm shop and market provide complementary income sources that support, rather than replace, primary agricultural activities. This diversified model reduces the risk of land abandonment, degradation or fragmentation through speculative subdivision. In summary, the proposal is needed to transform an underutilised farm into a productive, well managed rural asset that delivers environmental rehabilitation, fire resilience, employment, agricultural innovation and community benefit, while remaining firmly aligned with the agricultural purpose of the land.

DESIRABILITY OF THE SITE TO ACCOMMODATE THIS DEVELOPMENT

Desirability factors relate to place. Is the land physically suitable to accommodate the proposed development? Does the proposed development fit in with the surrounding land uses? Is the proposal compatible with credible spatial plans? Is there perhaps a better land-use alternative for the land parcel?

Another test of the desirability of a project is by considering the broader communities' needs and interests as reflected in credible Spatial Development Frameworks on Local, Municipal, District, Regional, Provincial and National levels. This compatibility with the planning frameworks has been described above under planning.

PHYSICAL SITE CONSTRAINTS AND OPPORTUNITIES

TOPOGRAPHY

The property has an even gradient, gently sloping to the south with an elevation of 320m in the north and 256m in the south. The average gradient of the land is about 5% with the north section somewhat steeper than the rest of the farm. Old agricultural berms are still visible, indicating the position of previous cultivated fields. The planned agricultural activity (cultivate drylands) will be positioned in the central, evenly sloped area. All the planned buildings and facilities will be on the periphery of the farm, not to fragment the main farming activity. Tourist accommodation (eco cabins and camping has been positioned in the slightly elevated northern part, allowing views over the farm. The planned runway follows the contour of the land, which will require minimal grading.

VEGETATION AND WILDLIFE

The site is mapped within one regional vegetation type, South Outeniqua Sandstone Fynbos, according to the National Vegetation Map 2024, which is not listed as a critically endangered ecosystem. To confirm the vegetation sensitivity on site, an Aquatic and Terrestrial biodiversity sensitivity assessments were conducted by specialists. The Plants, Animals and Terrestrial Biodiversity Assessment, prepared by Dr David Hoare from BioCensus (Pty) Ltd, confirmed that much of the vegetation on site is already disturbed or transformed through past human activities such as agriculture and forestry. No flagged, sensitive or listed plant or animal species were found, and none are likely to occur within these areas under current ecological conditions. The study identified the entire property as having a low sensitivity. The Aquatic Assessment prepared by WATSAN Africa also confirm that there are no aquatic features on the site that will be impacted by the proposals.

IMPROVEMENTS

There are currently no buildings or structures on the site, however, primary rights structures have been approved by the local authority and are in the process of being implemented on the property. There are 3 small farm dams and some farm roads. There is also a borehole on site that should be sufficient to cater for the needs of the primary house and tourist accommodation, and facilities. This is confirmed in the Engineering Service Report.

In addition to the above the visual impact and mitigation measures proposed ensure that the proposed development is expected to have a low visual impact due to its modest scale, clustered layout and location within existing vegetated areas. The eco-cabins and campsite are positioned as compact nodes on vegetated slopes, allowing natural screening to reduce visibility from surrounding areas. Although the agricultural buildings, farm shop and farmers' market may be visible from the main road, these elements are considered compatible with the rural agricultural character and are not expected to be out of scale with the receiving environment. Visual mitigation will be achieved through retaining and rehabilitating indigenous vegetation, limiting the development footprint, avoiding unnecessary new access routes and paved surfaces, using natural materials and low-impact finishes, and maintaining a farm-appropriate architectural style. These measures will help ensure that the development remains visually unobtrusive and integrated with the rural landscape which will enhance the rural sense of place and ensure a desirable outcome.

SECTION F: PUBLIC PARTICIPATION

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

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

The linear activities are restricted to the site – airstrip on the firebreak, pipelines for water and sewage. All are covered in the ppp for the general activity and do not span beyond the property in question.

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

PPP will be done in accordance with the requirements of the NEMA EIA Regulations and will include (in addition to the pre-application consultation):

- Notification letters to neighbours, NGO's and authorities
- Site notice
- Legal advertisement
- 30-day comment period on the pre-application and draft BAR
- Full comment and response report included in the Final BAR.
- Any additional requirements which DEADP requests will be included in the ppp.

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

The following State Departments and Organs of State – as indicated in the NOI will be consulted with:

- Provincial Roads Vanessa Stoffels vanessa.stoffels@westerncape.gov.za land.use@westerncape.gov.za
- National Department of Agriculture luahelpdesk@nda.gov.za / luahelpdesk@dalrrd.gov.za
- CapeNature - Marianne De Villiers mdevilliers@capenature.co.za
- DEADP - DEADP-EIAAdmin George DEADPEIAAdmin.George@westerncape.gov.za
- Bitou Municipality Anjé Minne aminne@plett.gov.za Chris Schliemann CSchliemann@plett.gov.za
- Garden Route District Municipality Nina Viljoen nina@gardenroute.gov.za info@gardenroute.gov.za
- BOCMA - Carlo Abrahams cabrahams@bocma.co.za
- SACAA – environment@caa.co.za
- SANParks –Vanessa Weyer Vanessa.Weyer@sanparks.org
- Dept Health – Nathan Jacobs Nathan.Jacobs@westerncape.gov.za
- Heritage Western Cape – hwc.hwc@westerncape.gov.za
- DFFE Forestry – Innocent Mapokgole imapokgole@dffe.gov.za

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

Provincial Department of Agriculture – the new Standard Operating Procedure requires that all communications must go through the National Department of Agriculture first and they will refer cases to the Provincial Department where relevant.

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

**No consultations to date – consultation process to follow the DEADP comment on the NOI and the circulation of the pre-application BAR.
National Department of Agriculture was invited to the NEMA pre-app meeting with DEADP, however no response received to date.**

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

No issues raised to date – ppp still to take place.

- **Pre-application consultation (this pre-application BAR)**
- Draft BAR consultation (to follow)
- Final BAR distribution (to follow)

Note:

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

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

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

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

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

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

- a site map showing where the site notice was displayed, dated photographs showing the notice displayed on site and a copy of the text displayed on the notice;
- in terms of the written notices given, a copy of the written notice sent, as well as:
 - if registered mail was sent, a list of the registered mail sent (showing the registered mail number, the name of the person the mail was sent to, the address of the person and the date the registered mail was sent);

- if normal mail was sent, a list of the mail sent (showing the name of the person the mail was sent to, the address of the person, the date the mail was sent, and the signature of the post office worker or the post office stamp indicating that the letter was sent);
- if a facsimile was sent, a copy of the facsimile Report;
- if an electronic mail was sent, a copy of the electronic mail sent; and
- if a "mail drop" was done, a signed register of "mail drops" received (showing the name of the person the notice was handed to, the address of the person, the date, and the signature of the person); and
- a copy of the newspaper advertisement ("newspaper clipping") that was placed, indicating the name of the newspaper and date of publication (of such quality that the wording in the advertisement is legible).

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. Groundwater

1.1.	Was a specialist study conducted?	YES	NO
1.2.	Provide the name and or company who conducted the specialist study.		
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
The property is in the K60F quaternary catchment The property currently uses a borehole and will continue to make use of the borehole for domestic purposes and livestock water. The application will not impact on the groundwater – use is within the yield - see engineering services report.			
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.		
Extract from the engineering report – Poise April 2026. Depth of the groundwater is unknown – borehole anticipated to be 80m deep. Borehole Supply <i>The primary water supply to the site is from an existing borehole on the site located at position W1 as indicated on Drawing 25G331 S01 The tested borehole yield is 86 kilolitres per day.</i> <i>The borehole quality tests indicate unacceptable levels of turbidity and corrosiveness, and a slightly high coliform count. The borehole water will therefore require filtration and chemical dosing to render the water to potable standards.</i> <i>The water treatment filtration and dosing plant will be positioned adjacent to the borehole. The borehole test results are attached as Annexure D.</i> <i>National Water Act General Authorization limit for the locality of the site, DWAS Drainage Area K60F, for Portion 8 is calculated as follows:</i> • 56.47 Hectares @ 400m³ per annum = 22588 m³ per annum = maximum 61.88m³ average per day • The total borehole abstraction, including for existing approved buildings, will be 10.1 m³ per day, ie less than 50m³ per day. <i>In terms of the National Water Act General Authorization for the Taking and Storage of Water, Clause 3 and Clause 7.2 a Water Use Licence will not be required and registration with the Water Authority will not be required.</i>			

2. Surface water

2.1.	Was a specialist study conducted?	YES	NO
2.2.	Provide the name and/or company who conducted the specialist study.		
Aquatic biodiversity - Dr Dirk van Driel – study completed			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		
There are no watercourses or wetlands that have influenced the proposal. Extract from Watsan, May 2026 <i>"The land previously was a wheat field. Going back in time on Google Earth, the land was ploughed over, with many contour berms to protect the field from flood damage.</i> <i>Not long ago, the land was overgrown with unwanted invasive trees, mainly black wattle, that was removed when the current owner took charge of the property. Uprooted trees are scattered over the land, with the remnants of the mulching process. This</i>			

is a massive undertaking that stands highly to the credit of the landowner. Eventually, there will be no sign left of any invasive tree.

There is nothing left of the original Fynbos, not after many generations of farmers that worked the land.

There was no sign of any wetland indicator plant species either, even after the recent rains. The topography may favour the presence of a historic potential seasonal wetland. The landform is shaped in a wide, sloping valley from northwest to southeast across the property, which may have hosted a valley bottom wetland. Soil profiling, the possible presence of hydromorphic soils and chroma mottles may help to investigate the past.

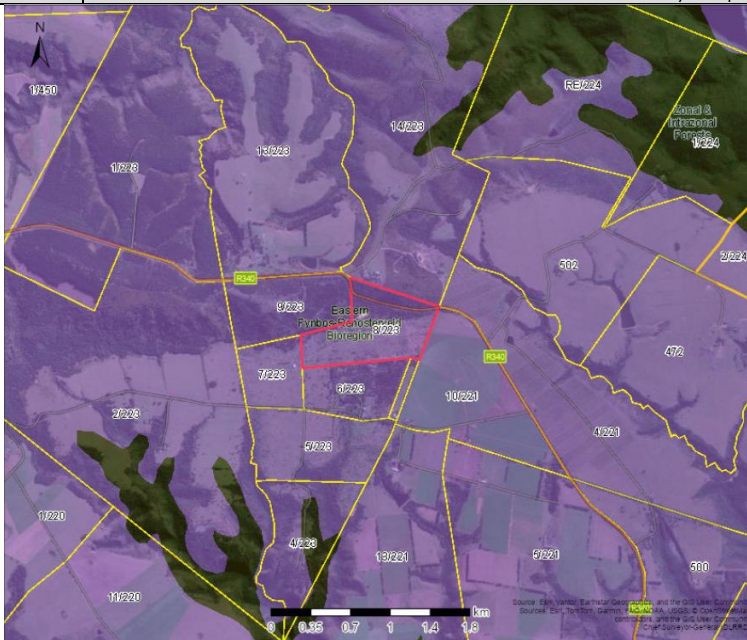
Currently, the land is dry, with no indication of a functional or even a potential wetland. Therefore, the DFFE screening tool listing of an *Outeniqua* wetland on Portion 8 is contested. Because of the current condition of the land, with no chance of restoration, the ecological sensitivity for aquatic biodiversity should be "Low".

According to the Cape Farm Mapper, there is a non-perennial river on the property. This is perhaps another word for a drainage line. It stretches from north to south over Portion 9 and ends in Portion 8. Combined, the properties cover an area of 112ha. During the site visit, there was no sign of this drainage line. Likewise, the presence of this drainage line is contested. If ever there was one, it is now absent."

Coastal Environment

3.1.	Was a specialist study conducted?	YES	NO
3.2.	Provide the name and/or company who conducted the specialist study.		
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
	Not applicable as the property is not coastal.		
3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.		
	Not applicable as the property is not located near to an estuary.		
3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.		
	Not applicable as the property is not coastal.		

4. Biodiversity

4.1.	Were specialist studies conducted?	YES	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		
	Terrestrial biodiversity, plants and animals – Dr David Hoare – study completed		
	Aquatic biodiversity – Dr Dirk van Driel – study completed		
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		
			

The entire site is mapped as occurring within one regional vegetation type, namely South Outeniqua Sandstone Fynbos, which is classified as Least Concern in terms of SANBI Red List of Ecosystems. The original and remnant mapping below shows that the site is on record as transformed.



The specialist has mapped the site-specific biodiversity sensitivity as follows:

- Existing cultivated area (brown) LOW
- Existing dryland grazing (yellow) LOW
- Disturbed areas of dense aliens (green) LOW
- Existing dams (blue) LOW



Dr David Hoare 2026 – habitat and landuse map

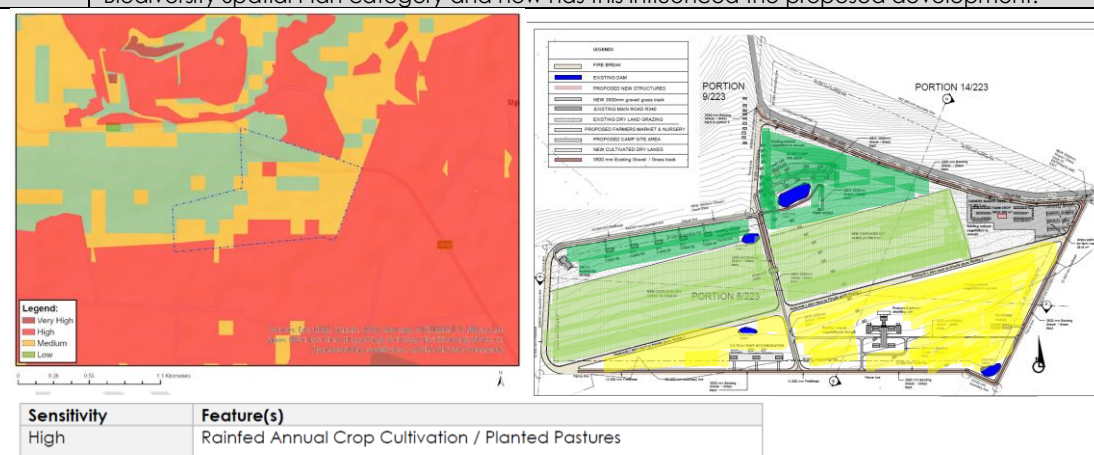
The campsite, farm shop and farmers market are therefore proposed as small-scale, ancillary and controlled uses, with limited infrastructure, restricted operating intensity and management measures to prevent cumulative disturbance and restoration of the non-agricultural lands around these facilities.

The regenerative farming component has also been framed around rehabilitation and improved land management, including soil protection, alien invasive plant control, erosion prevention, stormwater management, water conservation and the restoration of vegetation cover where feasible.

The management guidelines have further informed the proposal by requiring that ecological corridors and sensitive habitats be identified, avoided and buffered where applicable. They have also influenced the inclusion of practical operational controls for waste, wastewater, stormwater, traffic, parking, lighting, signage, visitor behaviour, fire risk and noise. As a result, the proposed development responds directly to the WCBSP objective of maintaining or improving ecological functioning in support areas, while allowing compatible rural livelihood, agri-tourism and nature-based tourism activities to occur within a clearly managed and environmentally responsible footprint.

On this basis, the proposed land use would be most defensible under the Garden Route EMF if it is presented as a small-scale, nature-based and restorative rural enterprise that avoids sensitive areas, retains ecological processes, supports sustainable agriculture and tourism, and includes enforceable management measures to prevent pollution, habitat loss, visual intrusion and cumulative environmental degradation. The farmers market and farm shop can be included as compatible ancillary uses where they remain subordinate to the regenerative farming and tourism activities, are located within an appropriate development footprint, and are managed to avoid commercial intensification or unacceptable environmental and amenity impacts.

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



Combining the site features in terms of Agricultural sensitivity, Biodiversity sensitivity and Aquatic Sensitivity, the development proposal combines all these features to ensure that the Agricultural potential is retained and continues to be utilized for agricultural production, while the marginal areas are restored to a semblance of ecosystem functionality and linking corridors to adjacent sensitive features. In the image above, the yellow and light green areas will remain in agricultural use, while the dark green areas will be restored to a more natural linking ecosystem function.

The agricultural specialist confirmed the following:

"Agricultural sensitivity, as classified by the national web-based screening tool, is directly linked to the capability of the land for agricultural production. The loss of high agricultural capability land will have a larger effect than the same area of low agricultural capability land. The conservation of agricultural land is a national priority since agriculture contributes a large portion to the South African domestic produce and food security. For this reason the gain of productive agriculture land is viewed as a priority as well.

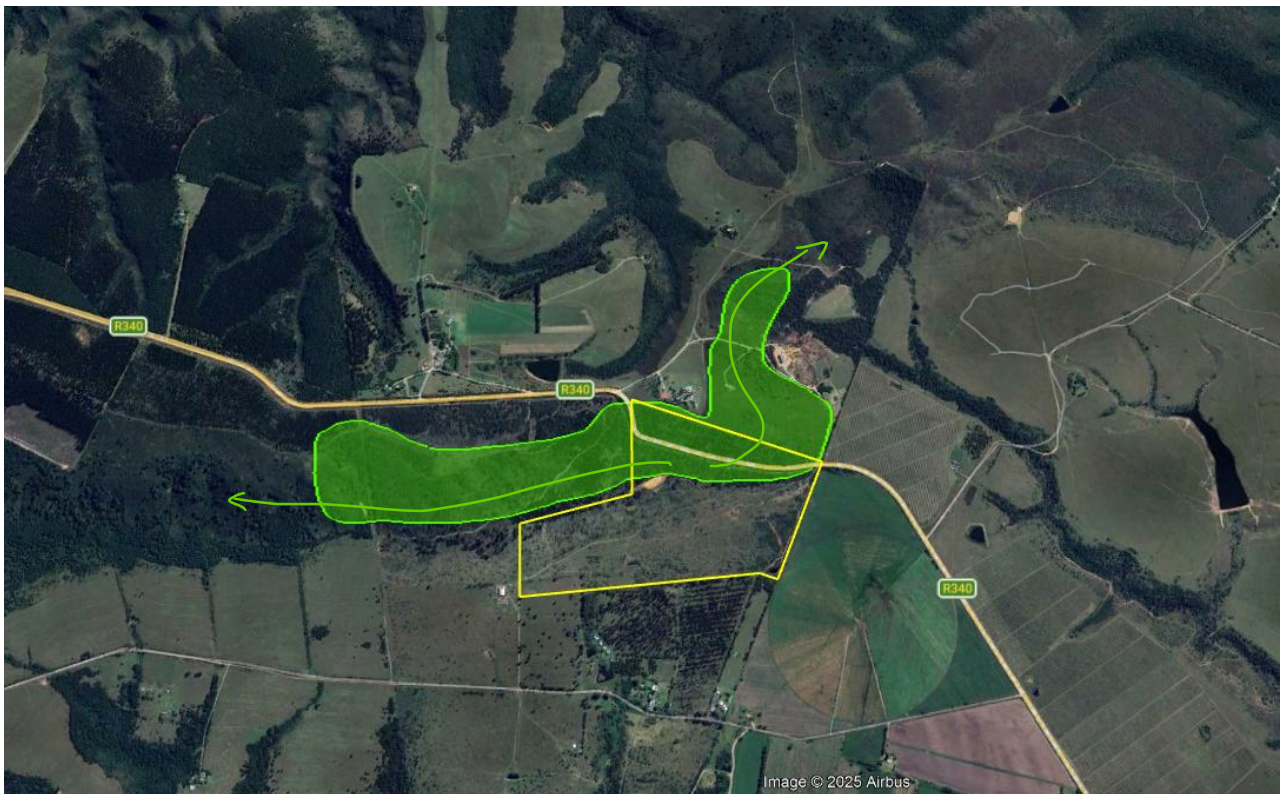
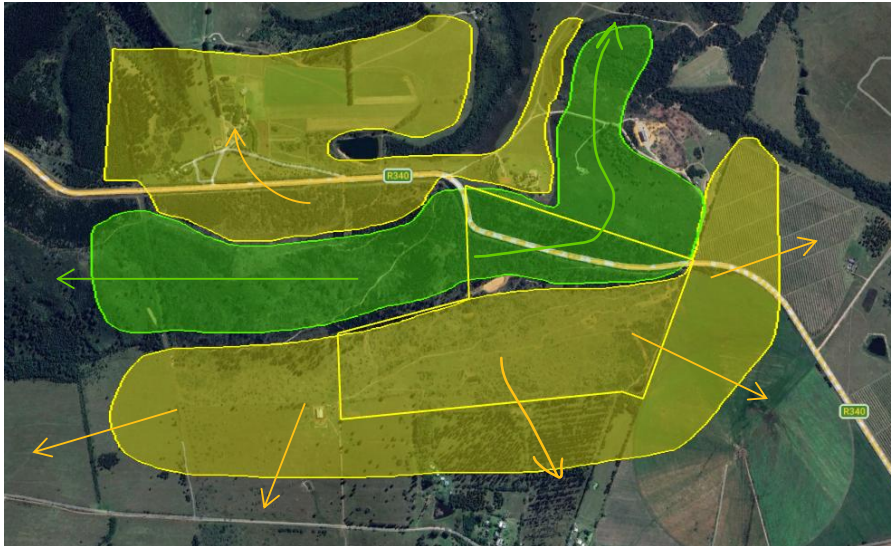
Cultivated land is classified according to the national screening tool as high sensitivity, taking into account the fact that the cultivated land is currently being utilized. This does not take into account the soil, climate and topography. On the other side, uncultivated land is categorized by land capability (DAFF 2017) which takes into account soil, climate and terrain.

The agricultural sensitivity, as identified by the national screening tool, According to the Land Type (Db123) survey, soils are mostly duplex soils on the terrain units 4-5. (valley bottom and foot slopes). Table 4.1 indicates the variability in terms of soil types and potential.

The site was traditionally used for forestry, however some areas have been neglected and not worked in the past few years. Bush encroachment has taken place in some of these areas. An invasive species control plan has been approved and is in progress. Given proper management the soil, climate, terrain combination has the potential for annual crop production such as planted pastures as well as permanent crop production such as macadamia nuts or cutflowers (protea) can be successfully managed on the property.

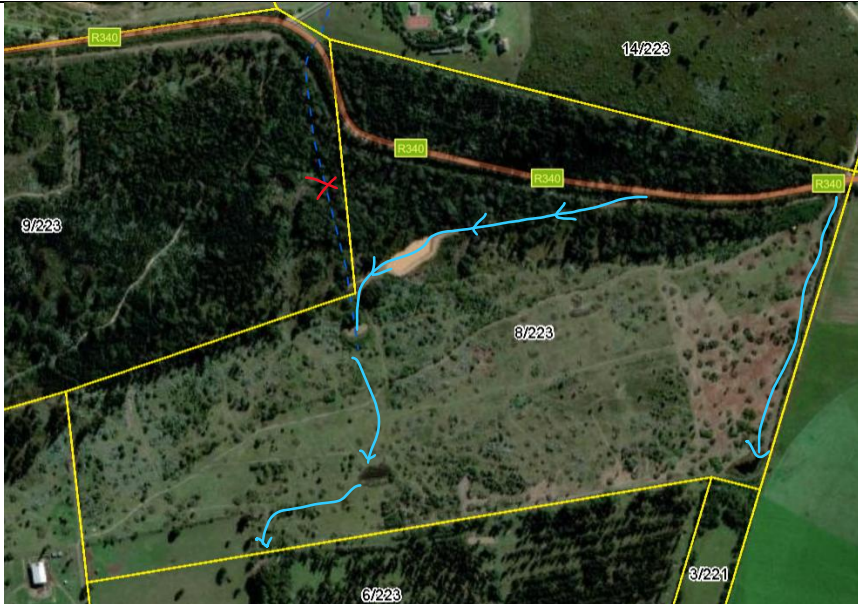
As there are no mapped remnants of the Least Concern South Outeniqua Sandstone Fynbos remaining on site – confirmed by the specialist and the ESA mapping is incorrect. An ecosystem connectivity basis has been used to link the areas of viable ecosystem restoration to areas that have high sensitivity on adjacent land parcels.

The image below shows the agricultural dominant use (yellow) which links with surrounding agricultural uses on neighbouring farms and the more natural remaining corridors indicated in green retaining connectivity across cadastral boundaries.



Potential restoration linking corridor taken into account in the site development layout plan, with only the limited camping sites around the dam being part of this de facto linking corridor across cadastral boundaries.

The freshwater specialist has disputed the presence of any aquatic features on site. The road on site is not an ESA 1 aquatic feature and the non-perennial drainage line indicated on portion 9 is non-existent. The water for the existing farm dams is derived from road runoff water directed to the first dam and then overflowing to the second and third dam. Dam four receives its water from the existing farm road down the property boundary.



Direction of road stormwater runoff diversion over the farm through the existing farm dams and along the contour berms until it leaves the site in the south entering the neighbour's property.





Direction of overflow from the farm dams.

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

No protected areas

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

Fauna linked to the property or likely to occur on the property has been assessed by the specialist

Animal Species Theme

Of the animal species flagged for the site, none are likely to be resident. None were found during the site inspection. The site therefore has LOW sensitivity with respect to the Animal Species Theme. An Animal Species Compliance Statement was therefore required. The following is therefore stated:

1. *The habitat of the proposed footprint area has LOW sensitivity with respect to the Terrestrial Animal Species Theme.*
2. *The proposed development will not have any impacts on any terrestrial animal SCC.*

Faunal activities in the surrounding linking corridors will be unaffected by the proposal.

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.

Geographical aspects have not influenced the proposed activities other than the current proposal to adjust the property cadastral boundaries where the district road R340 currently cuts a portion of the property to the north off from the bulk of the property to the south.

The application with the SG office and Department of Agriculture is to consolidate the northern piece of portion 8/223 with portion 14/223. (separate application in process).



6. Heritage Resources

6.1.	Was a specialist study conducted?	YES	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
Heritage Western Cape will indicate if they require any specialist studies on consideration of the NID (submitted 06 August 2026).			
There are no known heritage features on the property which has been used for agriculture dating back to the 1950's.			
There are no historic buildings on the property.			

7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.

There are no significant cultural or historical features on the property. The consent use agricultural activities are all consistent with the character of the area.

Based on the proposal approximately 16.5 ha of the farm will be geared towards habitat restoration and limited tourist accommodation, while the remaining 35.5 ha of the farm will continue to be farmed (existing dryland grazing) and will be improved (new cultivation and farmers market together with the primary rights for the homestead, stables and workers accommodation). The proposed land uses allow for ecological connectivity to surrounding natural areas and protect the productive agricultural land for agricultural uses.

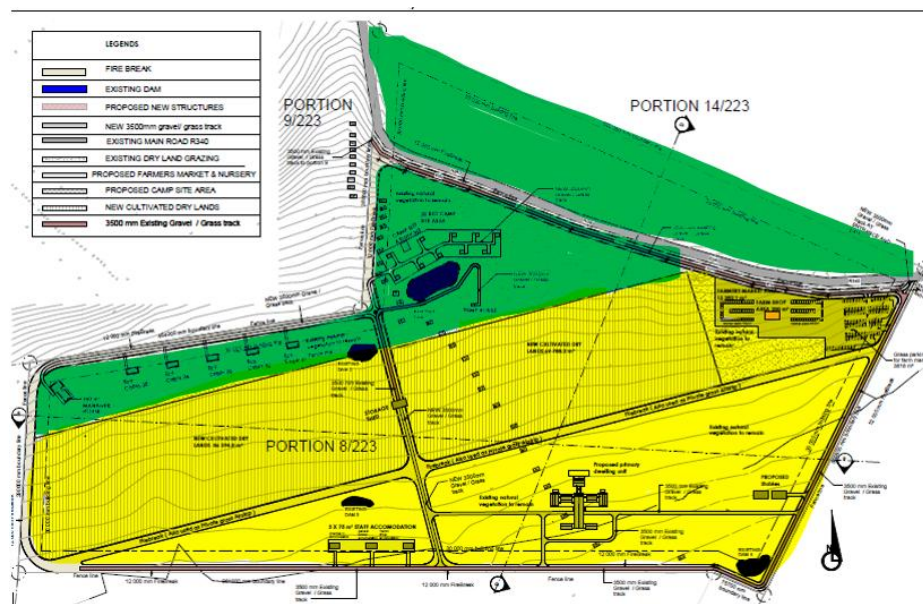


Figure 37 Green - restoration areas, Yellow farming areas

Visual character and mitigation measures: The proposed development is expected to have a low visual impact due to its modest scale, clustered layout and location within existing vegetated areas. The eco-cabins and campsite are positioned as compact nodes on vegetated slopes, allowing natural screening to reduce visibility from surrounding areas.

Although the agricultural buildings, farm shop and farmers' market may be visible from the main road, these elements are considered compatible with the rural agricultural character and are not expected to be out of scale with the receiving environment.

Visual mitigation will be achieved through retaining and rehabilitating indigenous vegetation, limiting the development footprint, avoiding unnecessary new access routes and paved surfaces, using natural materials and low-impact finishes, and maintaining a farm-appropriate architectural style. These measures will help ensure that the development remains visually unobtrusive and integrated with the rural landscape.



Figure 38 Indicative style of the farm shop



Figure 39 Indicative style of the eco-cabins



Figure 40 Approximate camping area on the gentle slope with screening vegetation remaining between alien trees that are being removed.



Figure 41 Approximate eco-cabin area overlooking the agricultural lands – indigenous tree planting screening around the cabins to replace alien trees.



Figure 8: Approximate position of the eco cabins on the southern sloping hills along the northern boundary

Figure 42 Extract from Planning report on visual (Planning Space, 2026)



Figure 43 View of the existing farm gate off the DR340 – note the elevation difference and the screening vegetation along the road in the road reserve - (note alien clearing still needs to be undertaken by District Roads in the road reserve).



Figure 44 View from the Uplands road which would look down over the farm – note that the screening vegetation along the road reserve and on the property completely screen the camping area, eco-cabins and farmers market from the road.

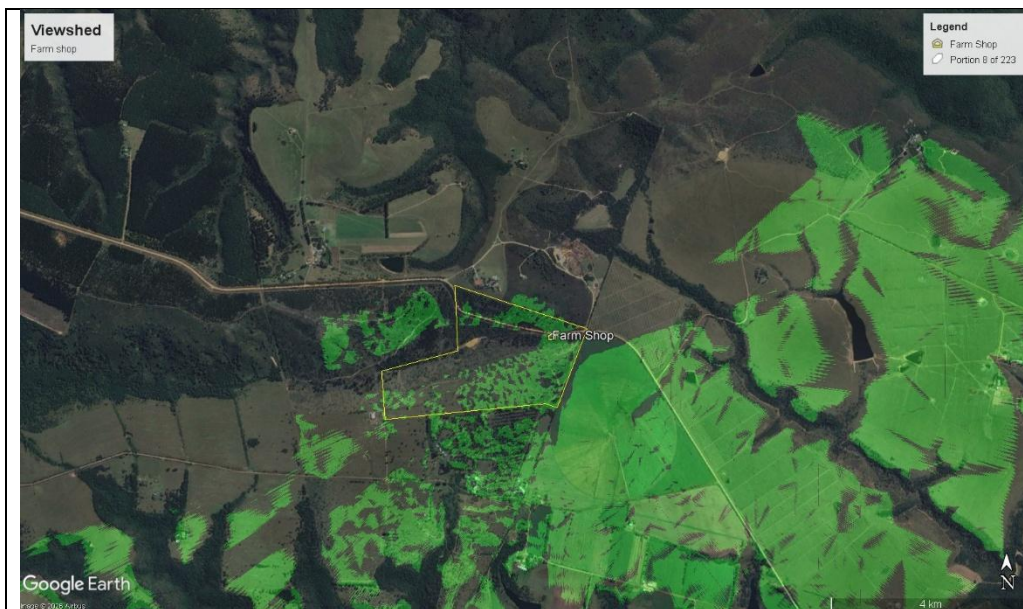


Figure 45 Viewshed analysis of the farm shop - note this does not take screening vegetation into account



Figure 46 Viewshed analysis from the eco-cabins – note this does not take screening vegetation into account.

8. Socio/Economic Aspects

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

Wittedrift is a small rural settlement within the Bitou municipal area, located inland from Plettenberg Bay and characterised by a predominantly agricultural, smallholding and rural-residential landscape. The area supports farming, small-scale rural enterprise, nature-based recreation and eco-tourism activities, while remaining functionally linked to Plettenberg Bay for higher-order services, employment, retail and tourism markets. The broader Bitou economy is strongly influenced by tourism, trade, accommodation, business services and government services, with agriculture also contributing to local livelihoods and land-based economic activity. Socio-economic conditions in the municipal area include relatively high unemployment and poverty levels, which increase the importance of locally appropriate economic diversification, job creation and support for small producers. Within this context, a regenerative farming and small-scale tourism facility in Wittedrift has the potential to support rural economic resilience by strengthening agricultural productivity, creating limited local employment and enterprise opportunities, and broadening nature-based tourism offerings without requiring urban-scale infrastructure or altering the rural character of the area.

Sources used include the [Western Cape Government Socio-Economic Profiles](#), [Bitou Municipality socio-economic profile](#),

The following socio-economic extract from the planning report provides details on the existing socio-economic character of the area.

EMPLOYMENT CREATION AND RURAL LIVELIHOODS

The rural economy of the Wittedrift-Uplands area offers limited formal employment opportunities. The proposal will create permanent and semi-skilled jobs linked to farming, rehabilitation, tourism accommodation, hospitality services, market operations and land management. On-site worker accommodation further supports stable employment and improves living conditions for agricultural workers. The creation of employment opportunities is a key public-interest consideration and directly addresses socio-economic needs within the local rural context.

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

The proposal will contribute to the current farming sector in the area by positioning the proposal as a complementary diversification of an agricultural landholding, together with strengthened regenerative farming, rather than a replacement of farming.

In rural areas such as Wittedrift, where farming, smallholdings and rural-residential uses form part of the local landscape, agricultural enterprises often need to diversify income streams to remain viable, particularly where production may be affected by seasonal demand, input costs, climate variability, drought risk or fluctuating markets.

The regenerative farming component supports the continuation and improvement of productive land use, while the farm shop, farmers' market, eco-cabins and campsite can create additional outlets for farm produce, support small producers, attract visitors to a working agricultural landscape, and strengthen linkages between agriculture and nature-based tourism.

In this way, the proposal can contribute to the resilience of the local farming sector by adding value to agricultural activity, supporting local employment and enterprise opportunities, and maintaining the rural character and productive use of the land.

"PROMOTION OF REGENERATIVE AND CLIMATE-RESILIENT AGRICULTURE

Conventional farming practices are increasingly vulnerable to climate variability, soil degradation and rising input costs. There is a growing need for regenerative agricultural models that improve soil health, enhance biodiversity, reduce chemical dependency and increase long-term resilience. The proposed dryland pastures, rehabilitation of natural areas and low-impact farming practices respond directly to this need. The development demonstrates how productive agriculture and environmental restoration can coexist.

FIRE MANAGEMENT AND COMMUNITY SAFETY

The Southern Cape is a high fire-risk region, and large uncontrolled wildfires pose a significant threat to rural properties, biodiversity, infrastructure and neighbouring settlements. There is a demonstrable need for improved fire management infrastructure in the area. The proposed grass airstrip serves a dual purpose: it functions as an effective firebreak within the farm layout and provides a strategically located base for firefighting operations, as supported by the Southern Cape Fire Protection Agency. This facility will not only benefit the farm itself but also contribute to broader community safety and regional disaster response capacity.

The market promotes local producers, supports rural economic development, and provides an outlet for agricultural goods.

SUPPORT FOR LOCAL FARMERS AND SHORT SUPPLY CHAINS

There is a recognised need for accessible, local outlets where small-scale farmers and producers can sell their products directly to consumers. The proposed farm shop and farmers' market respond to this gap by providing a structured platform for local produce, value-added goods and indigenous plants. This strengthens local food systems, reduces transport distances, supports emerging producers and promotes a farm-to-market economy consistent with rural development policy. The market also serves a wider community function by improving access to fresh produce and creating a social gathering space in an otherwise dispersed rural area.

Agricultural land in this region often requires supplementary income streams to remain financially viable. The integration of low-impact tourism, local trade and agriculture is necessary to ensure long term sustainability without compromising rural character. The proposed eco-cabins, campsite, farm shop and market provide complementary income sources that support, rather than replace, primary agricultural activities. This diversified model reduces the risk of land abandonment, degradation or fragmentation through speculative subdivision.

In summary, the proposal is needed to transform an underutilised farm into a productive, well managed rural asset that delivers environmental rehabilitation, fire resilience, employment, agricultural innovation and community benefit, while remaining firmly aligned with the agricultural purpose of the land". (Planning Space, 2026)

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

The regenerative farming together with the tourism facility and local market will all enable the upliftment of the local community through job creation, sustainable employment and opportunities to showcase and outlet local produce.

The applicant could implement several other practical social initiatives that respond to local community needs while reinforcing the regenerative farming and small-scale tourism objectives of the proposal.

These may include prioritising local labour during construction and operation, offering skills development in regenerative agriculture, hospitality, guiding, maintenance, alien vegetation clearing, fire management and basic business administration, and creating opportunities for local small producers to sell goods through the farm shop or farmers' market.

The facility could also support community upliftment by providing affordable trading space for emerging farmers, crafters and food vendors; partnering with local schools or community organisations for environmental education days, farm visits and practical learning on food gardens, composting, biodiversity and water conservation; and donating surplus produce or seedlings to local food-security initiatives.

Where feasible, the applicant could establish a community liaison mechanism to identify local needs, advertise job and supplier opportunities transparently, and ensure that benefits are accessible to nearby residents. These measures would help broaden the socio-economic benefits of the development beyond the farm itself by supporting employment, skills transfer, food security, local enterprise development and environmental awareness in the wider Wittedrift/Plettenberg Bay area.

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

The proposed development is not expected to result in significant negative impacts on people's health and well-being, provided that the development is implemented and managed as proposed.

The nature and scale of the development are modest, comprising a limited number of eco-cabins, a small campsite, farm shop, farmers' market and associated agricultural activities, all of which are compatible with the existing rural and agricultural character of the area.

Potential health and well-being considerations include occasional noise from visitors, market activity, vehicles and farm operations – there are no anticipated receptors who would be negatively affected due to the rural remote nature of the site and the occasional use of the market (once a week);

Visual character changes to the rural landscape are not expected as the proposal will enhance the rural character.

These factors have influenced the design by encouraging a clustered layout, separation of tourism uses from core farming activities, reliance on existing access and parking areas, limited hard surfaces, off-grid and low-impact campsite infrastructure, and the placement of accommodation units within vegetated areas where natural screening is available.

The retention and rehabilitation of vegetation, use of natural materials and farm-appropriate architectural finishes, and avoidance of unnecessary infrastructure will help maintain the rural sense of place and visual character.

Operational mitigation should include appropriate waste management, regular maintenance of ablution facilities, control of visitor numbers, quiet-hour rules for the campsite, responsible lighting design, and management of traffic and parking during market events.

Overall, the proposal has been shaped to minimise nuisance impacts while supporting outdoor recreation, local enterprise, agricultural diversification and access to nature-based tourism opportunities, which may contribute positively to local well-being

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. Details of the alternatives identified and considered

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

Provide a description of the preferred property and site alternative.

The preferred property is portion 8 of the farm 223 in Uplands, Plettenberg Bay.



The site alternative – Retain the agricultural activities proposed within the area used historically for agriculture since before 1958 (white area) and the camping activities within the area that was used since 1990 for plantation (green node).

The activity proposals are described below.

Provide a description of any other property and site alternatives investigated.
The Terrestrial biodiversity, agricultural and aquatic specialists screened portion 9 in addition to portion 8. This application however only deals with the activities proposed on portion 8.
Provide a motivation for the preferred property and site alternative including the outcome of the site selection matrix.
The preferred property and site alternative is supported by the outcome of the site selection matrix, which indicates that the selected location provides the most balanced and appropriate option when considering agricultural viability, environmental sensitivity, visual integration, access, infrastructure efficiency and compatibility with surrounding land uses. The property has a long-term historical agricultural use, which favours the improvement and continuation of agricultural activity through the proposed regenerative farming approach. The preferred tourism use areas are located mainly within marginal or less productive portions of the farm, allowing ancillary tourism infrastructure, such as the eco-cabins and campsite, to be accommodated without detracting from viable agricultural land or compromising ongoing farming operations. These areas are also situated in locations that do not support high-sensitivity biodiversity features and therefore avoid conflict with biodiversity conservation or rehabilitation objectives. The selected layout further makes use of existing access and parking arrangements, consolidates activities into compact nodes, and benefits from natural vegetation screening, thereby reducing visual, ecological and infrastructure-related impacts. On this basis, the preferred alternative is considered the most suitable option, as it enables agricultural diversification and rural economic upliftment while maintaining the productive function, environmental integrity and rural character of the property.
Provide a full description of the process followed to reach the preferred alternative within the site.
The preferred alternative was reached through an iterative site-planning and environmental screening process that considered the existing land use, approved primary-rights development, agricultural potential, ecological condition, access arrangements, service requirements and the need to avoid or minimise environmental impacts as far as reasonably practicable. The starting point for the process was the recognition that Portion 8 of Farm 223 is an established agricultural property with a long history of agricultural use, including cultivation, plantation use, grazing and associated farm infrastructure. The property already has approved municipal building plans for the primary agricultural rights, including the main dwelling, manager's house, stables, store, workers' accommodation and associated infrastructure. These approved primary-rights components are therefore treated as the existing development baseline and were not regarded as alternatives for the purposes of this application, as they do not trigger listed activities under NEMA based on the current footprint and thresholds. These primary rights will continue irrespective of the consent use application that will now follow. The alternatives assessment within the site focused on how the proposed consent-use components could be accommodated in a manner that supports the agricultural function of the farm while limiting new disturbance. These components include the eco-cabins, campsite, farmers' market and farm shop, re-cultivation of historically cultivated agricultural areas, internal access arrangements, service infrastructure and the proposed grass airstrip within a planned firebreak. The following process was followed: 1. Review of existing approvals and land use rights The existing municipal approvals and the Agriculture Zone I land-use context were reviewed to distinguish between the primary rights already approved on the property and the additional consent-use activities requiring authorisation. This ensured that the preferred layout was aligned with the existing agricultural zoning and the intended municipal consent-use application. 2. Review of historical land use and transformed areas Historical aerial imagery, land-cover information and site observations were considered to understand the extent of historical cultivation, plantation activity, grazing and disturbance on the property. This confirmed that large portions of the southern and central parts of the farm have been used for agriculture over an extended period and that the proposed cultivation areas correspond with historically transformed or agriculturally used land. This informed the decision to locate renewed cultivation within areas with agricultural history and lower ecological sensitivity, rather than in areas with better restoration potential. 3. Site walkovers and assessment of current site condition Site inspections were undertaken to assess the current vegetation condition, alien invasive vegetation, existing farm tracks, dams, grazing areas, contour berms, access points and areas of disturbance. These observations were used to refine the placement of each proposed activity and to avoid unnecessary development in areas where rehabilitation or ecological connectivity could be prioritised. 4. Consideration of biodiversity and freshwater sensitivity Specialist input and available biodiversity mapping were considered, including the Western Cape Biodiversity Spatial Plan, habitat mapping and site-specific terrestrial and freshwater assessments. The assessment confirmed that the mapped freshwater features and ESA information required site-level interpretation, and that some mapped features do not correspond with actual aquatic habitat on the ground. Areas with functional ecological corridor potential and restoration value were identified and retained predominantly in the northern part of the property, while the agricultural and market-related uses were directed towards the more disturbed and agriculturally transformed portions of the site. 5. Application of the mitigation hierarchy The layout was refined by applying the mitigation hierarchy of avoidance, minimisation, rehabilitation and management. Avoidance was applied by keeping development away from areas with better ecological restoration potential where possible. Minimisation was applied by clustering tourism facilities, using existing tracks and disturbed

areas, limiting the scale of accommodation, avoiding unnecessary road widening, keeping services compact, and maintaining the cumulative vegetation clearance below the 20 ha threshold. Rehabilitation is built into the preferred alternative through alien clearing, restoration of selected areas to indigenous vegetation and the retention of ecological connectivity.

6. **Assessment of agricultural functionality**
The preferred alternative was selected to retain and strengthen the primary agricultural character of the property. Productive or potentially productive agricultural areas are retained for grazing and renewed dryland cultivation, while the tourism and market components are positioned so that they complement rather than displace the working farm. The farmers' market and farm shop are located near the entrance for accessibility and visibility, while the cultivation areas are located in historically farmed portions of the site.
7. **Consideration of access and internal movement**
Existing access from the R340 and existing internal farm tracks were prioritised to avoid unnecessary new road creation. The preferred layout uses existing access routes wherever possible, with limited upgrades only where required for safe access, turning, passing or entry to the grass parking area. The internal roads are intended to remain narrow, rural in character and largely gravel or grass surfaced, with no widening of existing roads by more than 4 m anticipated unless specifically required and assessed.
8. **Consideration of services and infrastructure feasibility**
The preferred alternative considered the practical provision of water, sanitation, energy and waste management without reliance on municipal bulk services. The layout was refined around the use of the existing borehole, rainwater harvesting, off-grid solar and gas energy systems, package sewage treatment plants, gravity-fed water distribution where practical, and compact service corridors. This reduced the need for extensive linear infrastructure and avoided unnecessary disturbance across the site.
9. **Consideration of visual and rural landscape character**
The preferred layout was selected to maintain the rural and agricultural sense of place. Built components are modest in scale, clustered and visually compatible with the farm setting. The eco-cabins and campsite are positioned to benefit from the landscape setting while retaining natural screening and allowing rehabilitation around them. The farmers' market and farm shop are located in a farm-appropriate precinct near the entrance and are intended to use natural materials and low-impact finishes.
10. **Comparison of feasible layout options within the property**
Alternative positions for the various components were considered in relation to disturbance, ecological sensitivity, agricultural value, accessibility, visual exposure and service practicality. Areas that would require greater vegetation clearing, new roads, excessive service extensions, intrusion into restoration areas, or unnecessary disturbance of less-transformed parts of the farm were not preferred. The selected layout represents the option that best consolidates development in appropriate nodes, supports continued agriculture, limits infrastructure spread and enables rehabilitation of the remaining portions of the property.
11. **Selection of the preferred alternative**
The preferred alternative is therefore the consolidated on-site layout shown in the Site Development Plan, comprising:
 - the approved primary-rights agricultural buildings and infrastructure;
 - five eco-cabins with associated parking;
 - a 10-stand campsite with ablution facilities and parking;
 - a farmers' market and farm shop near the existing access;
 - renewed cultivation of historically cultivated agricultural areas;
 - use and limited upgrading of existing internal tracks where required;
 - a grass airstrip within the planned firebreak; and
 - associated off-grid water, sanitation, energy and waste-management infrastructure.

This alternative was selected because it best balances the agricultural use of the property with low-impact rural tourism and local economic development, while avoiding sensitive or higher-value restoration areas as far as possible. It also makes use of existing disturbed areas, existing access arrangements and on-site service solutions, and allows for alien clearing and ecological rehabilitation to continue in the portions of the farm with the greatest restoration potential.

The preferred alternative is therefore considered the most appropriate and environmentally responsible layout within the site, as it gives effect to the landowner's development objectives while maintaining the rural agricultural character of the property, supporting biodiversity rehabilitation, minimising new disturbance and ensuring that the impacts can be managed through the EMPr and conditions of authorisation.

Provide a detailed motivation if no property and site alternatives were considered.

No alternative properties were considered for the proposed development because the application is intrinsically linked to Portion 8 of Farm 223, Uplands, Plettenberg Bay. The property is owned by the applicant and the proposal has been developed specifically around the existing land use rights, approved primary-rights development, agricultural history, existing infrastructure, site characteristics and long-term management objectives for this farm. The purpose of the application is not to establish a generic tourism or commercial facility that could reasonably be located elsewhere, but to obtain environmental authorisation for consent-use activities that support, diversify and strengthen the agricultural use of this specific property.

List the positive and negative impacts that the property and site alternatives will have on the environment.

As no alternative properties and no separate formal site alternatives were considered reasonable or feasible, the assessment of impacts is limited to the preferred property and preferred on-site layout, together with the no-go alternative.

The preferred alternative is located on Portion 8 of Farm 223 and has been refined to make use of historically cultivated, disturbed or agriculturally transformed portions of the farm as far as possible, while retaining areas with better ecological connectivity and restoration potential for rehabilitation.

The positive and negative impacts associated with the preferred property and site alternative are as follows:

Preferred property alternative: Portion 8 of Farm 223

Positive impacts

- The proposal enables the productive use of an existing agricultural property that is already zoned Agriculture Zone I and has a long history of agricultural use, cultivation, plantation activity and grazing.
- The proposed development supports the continued agricultural function of the farm by reintroducing cultivation to historically cultivated areas and retaining grazing and farm-related uses.
- The consent-use activities, including the eco-cabins, campsite, farmers' market and farm shop, diversify the agricultural enterprise and strengthen the long-term economic viability of the farm.
- The farmers' market and farm shop provide opportunities for local producers, small-scale suppliers and rural enterprises to sell produce and value-added goods, thereby supporting the local rural economy.
- The use of the existing property avoids the need to develop an unrelated greenfield property elsewhere, where impacts may be less predictable or potentially greater.
- The preferred property already contains existing access from the R340, internal tracks, farm dams, disturbed areas, alien-infested areas and approved primary-rights infrastructure, which reduces the need for extensive new infrastructure.
- The proposal provides an opportunity to continue alien invasive vegetation clearing, particularly in disturbed and plantation-affected areas.
- The proposed rehabilitation of selected areas to indigenous vegetation will improve habitat quality, ecological connectivity and landscape condition over time.
- The retention of the northern parts of the farm predominantly for restoration and ecological connectivity provides a positive biodiversity outcome when compared with continued unmanaged alien infestation or further agricultural expansion.
- The proposed off-grid water, energy, sanitation and waste-management systems reduce reliance on municipal bulk services and support a more self-sufficient rural development model.
- The development is compatible with the rural agricultural character of the surrounding Uplands area and is aligned with agricultural diversification and low-impact rural tourism objectives.
- The proposed grass airstrip within a planned firebreak combines compatible land-management functions and avoids creating a separate disturbance corridor.

Negative impacts

- The proposed consent-use activities will result in the clearance or transformation of vegetation in selected areas, including cultivation areas, the market precinct, campsite and eco-cabin footprints.
- Although the site has a long history of disturbance, some areas may still contain indigenous vegetation or recovering vegetation, and clearance could reduce local habitat availability if not carefully managed.
- Re-cultivation of historically cultivated areas will reduce opportunities for natural vegetation recovery in those specific portions of the farm.
- Construction and operational activities may result in temporary disturbance to fauna through noise, movement, lighting and increased human presence.
- The proposed farmers' market may result in periodic increases in traffic, particularly on market days, with associated noise, dust, safety and access-management considerations.
- Additional visitors to the property may increase the risk of litter, uncontrolled movement, fire ignition, disturbance to rehabilitating areas and pressure on waste-management systems if not properly controlled.
- The installation and operation of sewerage treatment plants and effluent disposal systems may pose a potential pollution risk if systems are poorly maintained or fail.
- Borehole use, while within the stated available yield, may incrementally increase groundwater abstraction and should be monitored to ensure sustainable use.
- Construction of access improvements, service trenches, roads and the airstrip may result in localised soil disturbance, compaction, erosion risk and stormwater concentration if not properly designed and rehabilitated.
- The grass airstrip may require levelling and ongoing maintenance, with associated vegetation disturbance and potential erosion risk on sloping ground.
- The farmers' market, farm shop, eco-cabins and campsite may introduce visual change to the rural landscape, although this is expected to be limited where natural materials, screening and clustering are implemented.
- The development may incrementally increase cumulative transformation on the property, although the cumulative vegetation-clearing threshold remains below the 20 ha threshold for a Basic Assessment process.

Preferred site alternative within Portion 8 of Farm 223

Positive impacts

- The preferred layout concentrates development in areas that are historically transformed, disturbed, agriculturally used or of lower ecological sensitivity.
- The layout avoids directing intensive development into the northern areas of the property that have better ecological corridor and rehabilitation potential.
- The clustering of tourism and market-related infrastructure reduces the spread of infrastructure across the farm and limits unnecessary fragmentation.
- The use of existing access from the R340 and existing internal farm tracks limits the need for new road construction.

- The farmers' market and farm shop are positioned near the entrance, which improves accessibility and reduces traffic movement through the farm.
- The eco-cabins and campsite are located as low-impact accommodation nodes and can be managed to maintain the rural landscape character.
- Service infrastructure is consolidated around planned development nodes, reducing the extent of pipelines, roads and service corridors.
- The cultivation areas correspond with historically cultivated or agriculturally used land, thereby retaining the agricultural logic of the site.
- The layout allows the farm to retain both productive agricultural areas and dedicated restoration areas, providing a balanced land-use outcome.
- The proposed stormwater approach, including use of existing contours, low berms and controlled drainage, provides an opportunity to manage runoff and avoid erosion.
- The preferred layout enables ongoing alien clearing and replacement with indigenous vegetation around the tourism nodes, improving long-term ecological condition and visual screening.

Negative impacts

- Even with the preferred layout, vegetation clearance and land transformation will occur in the selected cultivation, market, campsite and eco-cabin areas.
- The site layout will result in increased human activity in parts of the property that are currently used mainly for grazing, alien clearing or low-intensity agricultural activity.
- Internal access routes and service corridors may create localised disturbance and require careful rehabilitation after installation.
- The campsite and eco-cabins may increase disturbance in the northern or more vegetated parts of the farm if visitor movement is not controlled.
- The farmers' market may create concentrated activity near the entrance, including periodic traffic, parking, noise, dust and waste-generation impacts.
- The airstrip and firebreak may create a linear open corridor across the site, with possible soil exposure, stormwater and visual impacts if not stabilised and maintained.
- Improper management of construction areas could result in erosion, dust, spread of alien invasive species, compaction and disturbance beyond the approved footprint.
- The preferred site layout still requires strict implementation of the EMPr to ensure that disturbance remains within approved footprints and that rehabilitation commitments are achieved.

NO-GO alternative

Positive impacts

- No additional vegetation clearance, cultivation, market infrastructure, tourism accommodation or airstrip-related disturbance would occur.
- There would be no additional traffic, visitor activity, sewage treatment requirement, waste generation or construction-related disturbance associated with the consent-use components.
- The existing visual character of the property would remain largely unchanged, except for the already approved primary-rights development.
- There would be no additional risk of construction-related erosion, dust, noise or accidental pollution from the proposed consent-use activities.

Negative impacts

- The farm would not realise the proposed agricultural diversification and rural economic benefits associated with the farmers' market, farm shop, eco-cabins and campsite.
- Opportunities for local producers, small enterprises and rural tourism linkages would not be created.
- The historically cultivated agricultural areas may remain underutilised, reducing the productive potential of the property and making the agricultural use uneconomically viable.
- The landowner would lose the opportunity to strengthen the financial sustainability of the agricultural enterprise through complementary consent uses.
- Alien clearing and rehabilitation may continue at a slower pace or with less financial support if the proposed diversified land-use model is not implemented.
- The opportunity to formalise and manage restoration, visitor movement, access, waste, sewage, stormwater and service infrastructure through the EMPr and environmental authorisation conditions would be reduced.
- The property may remain less actively managed in parts, which could allow alien regrowth, continued fuel-load accumulation and reduced ecological improvement over time.

Summary

The preferred property and site alternative will result in some negative impacts, primarily associated with vegetation clearance, land transformation, increased human activity, traffic on market days, potential soil disturbance, service infrastructure and the need to manage water, waste and sanitation carefully. However, these impacts are localised, can be managed through the EMPr and have been reduced by selecting disturbed, historically cultivated or lower-sensitivity areas wherever possible. They do not require the loss of any endangered or critically endangered ecosystems nor will there be any loss of currently intact ecosystems as the site is highly transformed and rated as low sensitivity.

The positive impacts include the productive use of an existing agricultural property, agricultural diversification, local economic support, low-impact rural tourism, continued alien clearing, ecological rehabilitation, improved long-term land management and the retention of ecological connectivity in the northern portions of the farm.

On balance, the preferred alternative is considered to provide a more beneficial environmental and land-use outcome than the no-go alternative, provided that all mitigation, rehabilitation and monitoring measures are implemented.

1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
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Provide a description of the preferred activity alternative

The activity alternatives considered for this application relate to the nature, scale, design and management of the proposed consent-use activities on Portion 8 of Farm 223. The proposed development is not a single stand-alone activity, but a combination of agricultural, low-impact tourism, local market and supporting infrastructure components intended to function together as a diversified agricultural enterprise. The activity alternatives therefore focused on whether the proposed development should proceed as a consolidated mixed-use agricultural and agri-tourism model, whether individual components should be excluded or reduced, and whether a no-go alternative should be pursued.

The preferred activity alternative is the implementation of the proposed consent-use activities as set out in the Site Development Plan, comprising five eco-cabins, a 10-stand campsite, a farmers' market, a farm shop, renewed cultivation of historically cultivated areas, a grass airstrip within a planned firebreak, and associated internal access, water, sanitation, energy and waste-management infrastructure. This alternative was selected because it best achieves the applicant's objectives while enabling the avoidance and minimisation of environmental impacts through careful siting, limited development footprints, clustering of infrastructure, use of disturbed areas, off-grid service provision and ongoing alien clearing and rehabilitation. The activity alternatives considered are described below.

Alternative 1: Preferred activity alternative — consolidated agricultural, agri-tourism and market-related consent uses
This alternative entails the implementation of the full suite of proposed consent-use activities, but in a controlled and low-impact manner. The preferred activity alternative includes:

- five eco-cabins of approximately 110 m² each, with associated parking;
- a 10-stand campsite with ablution facilities and parking;
- a farmers' market and farm shop within a defined market precinct near the existing entrance;
- renewed dryland cultivation of historically cultivated agricultural areas;
- continued grazing and agricultural use on the balance of the productive farm areas;
- a grass airstrip located within the planned firebreak;
- use and limited upgrading of existing internal farm tracks where required;
- off-grid water supply, rainwater harvesting, solar and gas energy systems;
- package sewage treatment plants and controlled effluent disposal; and
- continued alien invasive vegetation clearing, indigenous rehabilitation and ecological restoration.

This alternative avoids negative impacts by locating the more intensive activities within areas that are historically transformed, disturbed, agriculturally used or already affected by alien vegetation. It also avoids the unnecessary development of a separate greenfield site elsewhere and avoids extending municipal services into a rural area. Development is clustered into logical nodes, thereby reducing the spread of disturbance across the property. The farmers' market and farm shop are placed near the existing access from the R340, reducing internal traffic movement through the farm. Existing farm tracks are used wherever possible to avoid new road creation.

Unavoidable negative impacts associated with this alternative include vegetation clearance, localised soil disturbance, increased human activity, periodic traffic on market days, waste generation, sewage treatment requirements, visual change and the need for ongoing stormwater and erosion control. These impacts can be mitigated through strict footprint control, construction-phase environmental management, alien-clearing controls, rehabilitation of disturbed areas, erosion protection, responsible waste management, appropriate sewage treatment, groundwater monitoring, traffic management and implementation of the EMPr.

This alternative maximises positive impacts by supporting productive agricultural use, reintroducing cultivation to historically cultivated areas, retaining grazing, creating opportunities for local producers, strengthening the rural economy, diversifying farm income, supporting low-impact nature-based tourism, improving long-term land management, and enabling ecological rehabilitation of selected areas. It also provides a practical mechanism for funding ongoing alien clearing and restoration, which is a significant positive environmental outcome.

Alternative 2: Reduced activity alternative — agricultural use with limited tourism only

A reduced activity alternative would involve implementing only selected components, such as the renewed cultivation, eco-cabins and possibly the campsite, while excluding or substantially reducing the farmers' market, farm shop and airstrip. This alternative would reduce some impacts associated with public access, traffic, parking, market-day waste, noise and visitor concentration near the entrance. It may also reduce the overall intensity of activity on the property.

However, this alternative would also reduce several positive outcomes. It would weaken the economic viability of the diversified agricultural model, reduce opportunities for local producers and small enterprises, and limit the ability of the farm to support a regular local produce market. Excluding the farmers' market and farm shop would remove the component most directly linked to community benefit, local economic participation and farm-to-plate value addition. Excluding the airstrip would avoid a specific activity, but because it is proposed within a planned firebreak, its exclusion would not necessarily avoid the need for vegetation management in that corridor.

This alternative was not preferred because it does not achieve the full project purpose and need. It would reduce some operational impacts, but it would also significantly reduce the positive socio-economic and agricultural-diversification benefits of the project.

Alternative 3: Agriculture-only alternative

An agriculture-only alternative would involve continued grazing and renewed cultivation of historically cultivated areas without the eco-cabins, campsite, farmers' market, farm shop or airstrip. This alternative would avoid the impacts associated with tourism accommodation, market-day traffic, visitor activity, public access, accommodation-related sewage treatment and hospitality-related waste generation.

However, this alternative would not achieve the applicant's intended diversified farm model and would provide fewer opportunities for local economic development, rural tourism, farm-stay accommodation and local producer support. It would also reduce the revenue base available to fund alien clearing, rehabilitation and ongoing environmental management. The farm would remain primarily agricultural, but without the complementary activities that improve resilience, diversify income and support broader rural economic objectives.

This alternative was not preferred because it would not maximise the positive impacts associated with agricultural diversification, value addition, local market access and low-impact rural tourism. It would also provide a less balanced land-use outcome than the preferred alternative.

Alternative 4: No-go alternative

The no-go alternative would entail not proceeding with the proposed consent-use activities. The approved primary-rights agricultural development may still continue, but the eco-cabins, campsite, farmers' market, farm shop, renewed cultivation of the identified areas, airstrip and associated consent-use infrastructure would not be implemented.

This alternative would avoid the additional vegetation clearance, construction disturbance, visitor activity, traffic generation, sewage treatment requirements, waste generation and visual change associated with the proposed consent-use activities. It would therefore avoid certain direct negative environmental impacts.

However, the no-go alternative would also prevent the positive impacts of the proposal from being realised. It would not support the diversified agricultural enterprise, would not provide local market opportunities, would not create additional rural tourism and employment opportunities, and would not strengthen the financial basis for continued alien clearing and rehabilitation. Historically cultivated areas may remain underutilised, and management of alien regrowth and fire risk may proceed more slowly.

The no-go alternative is therefore not preferred because it does not meet the project need and desirability and would result in lost agricultural, economic and rehabilitation opportunities.

Description of the preferred activity alternative

The preferred activity alternative is the implementation of a consolidated, low-impact agricultural and agri-tourism development on Portion 8 of Farm 223, consisting of consent-use activities that complement and support the existing agricultural zoning and approved primary-rights development on the property.

The preferred alternative retains the farm as a working agricultural property while allowing for limited, carefully managed diversification through tourism accommodation, a campsite, a farmers' market, a farm shop and a grass airstrip within a planned firebreak. The proposal is designed to maintain the rural agricultural character of the property, use historically transformed or disturbed areas as far as possible, and retain areas with ecological corridor and rehabilitation potential for alien clearing and indigenous vegetation restoration.

The preferred activity alternative includes the following components:

1. **Eco-cabins**
Five small-scale eco-cabins are proposed as low-impact tourist accommodation. The cabins are limited in size and will be positioned as a compact accommodation node, with associated parking. The cabins will be designed to integrate with the rural setting through modest scale, natural materials, low-impact finishes and surrounding rehabilitation or indigenous planting.
2. **Campsite**
A 10-stand campsite is proposed to provide affordable and nature-based accommodation. The campsite will include ablution facilities and parking, but individual stands will remain low-impact and will not require extensive hard surfacing or urban-style services. Visitor movement will be managed to avoid disturbance of rehabilitation areas and to maintain the rural sense of place.
3. **Farmers' market and farm shop**
The farmers' market and farm shop will be located near the existing R340 access point. This placement avoids unnecessary internal traffic through the farm and makes use of an already accessible and disturbed area. The market and shop will provide an outlet for farm produce, local producers, value-added food products, indigenous plants and compatible rural goods. This component maximises positive socio-economic impacts by supporting local suppliers, small enterprises and rural economic diversification.
4. **Renewed cultivation of historically cultivated areas**
The proposed cultivation areas correspond with historically cultivated or agriculturally used portions of the property. The cultivation will be dryland and will not require irrigation. This activity supports the productive agricultural use of the farm while avoiding the need to open up less-transformed or more ecologically valuable portions of the property.
5. **Grass airstrip within a firebreak**
The proposed grass airstrip will be located within a planned firebreak. This allows a compatible dual land-management function and avoids creating a separate disturbance corridor. The airstrip will remain grassed and rural in character and will require erosion control, stabilisation and ongoing maintenance to prevent soil loss.
6. **Access and internal movement**

Existing access from the R340 and existing internal farm tracks will be used as far as possible. No widening of existing roads by more than 4 m are anticipated, except where specifically required and assessed. The access arrangement limits vegetation clearance, soil disturbance and fragmentation. 7. Water, sanitation, energy and waste management The preferred alternative relies on on-site and off-grid service solutions, including the existing borehole, rainwater harvesting, solar and gas energy, package sewage treatment plants and owner-managed waste disposal with recycling at source. This avoids reliance on new municipal bulk infrastructure and supports a self-sufficient rural development model. 8. Alien clearing and rehabilitation The preferred activity alternative includes continued alien invasive vegetation clearing and rehabilitation of selected areas to indigenous vegetation, particularly in areas with ecological connectivity and restoration potential. This strengthens the long-term ecological condition of the farm and helps offset the localised impacts of the development footprint. The preferred activity alternative was selected because it provides the best balance between environmental protection, agricultural productivity, rural economic development and practical implementation. It avoids sensitive or higher-restoration-potential areas as far as possible, directs development to disturbed and agriculturally appropriate areas, limits new infrastructure, makes use of existing access routes, and allows impacts to be managed through the EMPr. On balance, the preferred activity alternative is considered the most appropriate option because it minimises unavoidable negative impacts while maximising positive impacts relating to agricultural use, local economic participation, low-impact tourism, alien clearing, ecological rehabilitation and long-term land management.	Provide a description of any other activity alternatives investigated.
No other activity alternatives investigated	Provide a motivation for the preferred activity alternative.
As described above	Provide a detailed motivation if no activity alternatives exist.
As described above	List the positive and negative impacts that the activity alternatives will have on the environment.
This alternative includes the five eco-cabins, 10-stand campsite, farmers' market, farm shop, renewed cultivation of historically cultivated areas, grass airstrip within the planned firebreak, and associated internal access, water, sanitation, energy and waste-management infrastructure. Positive impacts • Supports the continued productive use of an existing agricultural property that has a long history of agricultural use, cultivation, plantation activity and grazing. • Reintroduces cultivation to historically cultivated portions of the farm, thereby improving the productive agricultural use of areas that are currently underutilised or used mainly for grazing. • Diversifies the agricultural enterprise through compatible consent uses, including low-impact accommodation, a campsite, farmers' market and farm shop. • Strengthens the long-term financial viability of the farm, which can assist with ongoing land management, alien clearing, erosion control and rehabilitation. • Provides a local outlet for farm produce and locally produced goods through the farmers' market and farm shop. • Creates opportunities for local producers, small enterprises, market vendors and rural employment. • Supports low-impact rural tourism that is compatible with the agricultural and rural character of the Uplands area. • Makes use of existing access from the R340 and existing internal farm tracks, thereby reducing the need for new access infrastructure. • Consolidates development into defined activity nodes rather than dispersing infrastructure across the whole farm. • Uses historically transformed, disturbed or agriculturally used portions of the property as far as possible. • Allows for the retention and rehabilitation of areas with ecological connectivity and restoration potential, particularly in the northern parts of the property. • Provides an opportunity for continued alien invasive vegetation clearing and replacement with indigenous vegetation. • Uses off-grid energy, borehole supply, rainwater harvesting and on-site sewage treatment, thereby reducing reliance on municipal bulk services. • The grass airstrip is located within a planned firebreak, combining compatible land-management functions and avoiding a separate disturbance corridor. • The airstrip provides essential emergency access for fire fighting in the area as supported by the local FPA • The project can formalise environmental management obligations through the EMPr and conditions of authorisation. Negative impacts • Vegetation clearance and land transformation will occur within the cultivation areas, farmers' market precinct, campsite, eco-cabin footprints, parking areas and associated infrastructure. • Some areas proposed for clearance may contain indigenous or recovering vegetation, even where the broader site is disturbed or historically transformed. • Re-cultivation of historically cultivated land may reduce the potential for natural vegetation recovery in those areas. • Construction activities may cause temporary disturbance through noise, dust, vehicle movement, excavation, stockpiling and construction traffic.	

- Soil disturbance may increase the risk of erosion, compaction and sediment movement if not carefully managed.
- Internal access upgrades, service trenches and parking areas may result in localised disturbance and compaction.
- The campsite, eco-cabins and market may increase human activity, lighting, noise and movement in areas that are currently subject to lower-intensity agricultural use.
- Increased visitor activity may create risks of littering, fire ignition, trampling, unauthorised access into rehabilitation areas and disturbance to fauna.
- Market days may generate periodic traffic increases, with associated access, dust, noise and road-safety considerations.
- The sewage treatment plants and effluent disposal areas may pose a pollution risk if incorrectly designed, poorly maintained or overloaded.
- Borehole abstraction, although modest relative to the reported yield, will increase groundwater use and should be monitored.
- The grass airstrip may require levelling, mowing and ongoing maintenance, with potential soil exposure and erosion risk if not properly stabilised.
- The development will introduce visual change to the rural landscape, particularly at the farmers' market, farm shop, eco-cabins and campsite.
- Operational waste generation will increase and must be managed through recycling, secure storage and removal to an appropriate municipal facility.

Alternative 2: Reduced activity alternative — agricultural use with limited tourism only

This alternative would include renewed cultivation and limited tourist accommodation, such as the eco-cabins and possibly the campsite, but would exclude or substantially reduce the farmers' market, farm shop and/or airstrip.

Positive impacts

- Reduces the overall intensity of activity on the property compared with the preferred alternative.
- Reduces market-related impacts such as periodic traffic peaks, parking demand, noise, waste generation and public access pressures.
- Reduces the extent of commercial activity near the entrance to the farm.
- May reduce the scale of service infrastructure required for market operations, including sanitation, water supply and waste-management capacity.
- Retains some agricultural diversification through limited accommodation and renewed cultivation.
- Continues to support low-impact rural tourism at a smaller scale.
- May still provide an income stream to support alien clearing, rehabilitation and long-term land management.
- Limits visitor concentration and potentially reduces operational management complexity.

Negative impacts

- Provides fewer local economic benefits than the preferred alternative because the farmers' market and farm shop would be reduced or excluded.
- Reduces opportunities for local producers, small enterprises and market vendors to sell farm-origin and value-added products.
- Weakens the farm-to-plate and community-oriented rural economy component of the proposal.
- Provides less support for local employment and rural economic participation.
- May reduce the financial viability of the overall farm diversification model.
- May reduce the funding available for ongoing alien clearing, rehabilitation and maintenance.
- Does not maximise the potential use of the accessible entrance area near the R340 for compatible agricultural market activity.
- If the airstrip is excluded but the firebreak remains necessary, some vegetation management within that corridor may still occur, but without the added operational benefit of the airstrip.
- Vegetation clearance, soil disturbance, wastewater management and visual impacts would still occur for the retained accommodation and cultivation components.
- The reduced alternative may not fully achieve the applicant's purpose and need for a diversified agricultural enterprise.

Alternative 3: Agriculture-only alternative

This alternative would include continued grazing and renewed cultivation of historically cultivated areas, but would exclude the eco-cabins, campsite, farmers' market, farm shop and airstrip.

Positive impacts

- Avoids impacts associated with tourism accommodation, campsite use, market activity, public access and hospitality-related operations.
- Reduces traffic generation compared with the preferred alternative, particularly the periodic traffic peak associated with market days.
- Reduces waste generation and sewage treatment requirements associated with visitors.
- Reduces visual change associated with accommodation units, market stalls, parking areas and the farm shop.
- Maintains a more traditional agricultural land-use pattern.
- Limits the number of activity nodes and therefore reduces the operational management burden.
- Avoids potential visitor-related impacts such as litter, noise, trampling and uncontrolled movement into rehabilitation areas.

- Focuses land use on agricultural production and grazing.

Negative impacts

- Does not provide the same level of agricultural diversification and economic resilience as the preferred alternative.
- Removes the low-impact tourism and local market components that support rural economic development.
- Provides fewer employment, small-business and local supplier opportunities.
- Does not create a local market outlet for fresh produce, value-added products, indigenous plants and compatible rural goods.
- Reduces the landowner's potential income base, which may affect the long-term financial sustainability of alien clearing, rehabilitation and environmental management.
- May result in historically transformed areas remaining underutilised if cultivation is not sufficient to support the broader farm model.
- Does not respond as strongly to planning policy support for appropriate agri-tourism and value-adding rural activities.
- Cultivation would still result in vegetation clearance or transformation in areas not cultivated within the preceding 10 years.
- Soil disturbance, compaction, erosion risk and alien regrowth would still require active management.
- Provides fewer opportunities to formalise visitor movement, rehabilitation funding and land-management commitments through a broader integrated farm development model.
- Does not provide the benefit of airstrip access for emergency and fire related management emergency control.

Alternative 4: No-go alternative

The no-go alternative would mean that the proposed consent-use activities are not authorised. The already approved primary-rights agricultural development may continue, but the eco-cabins, campsite, farmers' market, farm shop, renewed cultivation of the identified areas, airstrip and associated consent-use infrastructure would not proceed.

Positive impacts

- Avoids additional vegetation clearance and land transformation associated with the proposed consent-use activities.
- Avoids construction-related disturbance, including dust, noise, excavation, stockpiling and construction vehicle movement.
- Avoids additional traffic and visitor activity associated with the campsite, eco-cabins and farmers' market.
- Avoids additional wastewater treatment requirements and the associated risk of system failure or pollution.
- Avoids additional operational waste generation from visitors, market activities and accommodation use.
- Avoids visual change associated with new tourism, market and farm-shop structures.
- Avoids potential disturbance to fauna from increased human presence, lighting, noise and movement.
- Avoids soil disturbance associated with the airstrip, access upgrades, service trenches and parking areas.

Negative impacts

- Does not realise the agricultural diversification benefits associated with the proposed consent-use activities.
- Does not support the reintroduction of cultivation to the identified historically cultivated areas as part of the proposed land-use model.
- Does not create local market opportunities for farm produce, local producers, value-added goods or compatible rural products.
- Does not provide low-impact rural tourism accommodation or campsite opportunities in the Uplands area.
- Does not create the same level of rural employment and small-enterprise opportunities.
- Does not strengthen the financial sustainability of the farm through diversified income streams.
- May reduce the resources available for ongoing alien clearing, indigenous rehabilitation and long-term land management.
- May allow alien regrowth, unmanaged vegetation and fuel-load accumulation to continue if active management is not sufficiently funded.
- Does not provide an integrated framework for managing access, visitor movement, waste, sanitation, rehabilitation and environmental compliance through the EMPr.
- Represents a lost opportunity to combine productive agriculture, rural tourism, local economic development and ecological rehabilitation within an existing agricultural property.
- Does not provide the benefit of airstrip access for emergency and fire related management emergency control.

Summary of comparative impacts

The preferred activity alternative will result in the greatest level of change on the property because it includes the full range of agricultural, accommodation, market, airstrip and service components. Its main negative impacts relate to vegetation clearance, localised soil disturbance, traffic on market days, visitor activity, wastewater management, visual change and operational waste generation. These impacts are, however, expected to be localised and manageable through careful footprint control, implementation of the EMPr, rehabilitation, stormwater management, alien-clearing controls, responsible waste management, traffic management and maintenance of sewage treatment infrastructure.

The reduced activity and agriculture-only alternatives would reduce some negative impacts, particularly those associated with public access, market activity and tourism operations, but would also substantially reduce the positive socio-economic, agricultural diversification and rehabilitation-support benefits of the proposal. The no-go alternative would avoid the direct

impacts of the consent-use activities, but would also prevent the agricultural, economic, tourism and rehabilitation benefits from being realised.

On balance, the preferred activity alternative is considered to provide the most beneficial overall outcome because it combines productive agricultural use, low-impact rural tourism, local economic participation and ecological rehabilitation, while keeping the development footprint below the applicable thresholds and directing activity to historically transformed, disturbed or agriculturally appropriate areas as far as possible.

1.3.	Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts
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Provide a description of the preferred design or layout alternative.

The design and layout alternatives considered for the proposed development relate to the arrangement, scale, clustering and positioning of the consent-use components within Portion 8 of Farm 223. The design and layout process considered how the proposed eco-cabins, campsite, farmers' market, farm shop, cultivation areas, airstrip, access routes and service infrastructure could be accommodated within the property in a manner that avoids sensitive areas, minimises disturbance and maximises the agricultural, ecological and socio-economic benefits of the project.

The design and layout alternatives considered are described below.

Preferred design and layout alternative — consolidated low-impact layout within disturbed and agriculturally appropriate areas
The preferred layout is the consolidated on-site layout shown in the Site Development Plan. It accommodates the proposed consent-use activities in defined development nodes while retaining the primary agricultural function of the property and allowing for ecological rehabilitation in areas with restoration potential.

The preferred layout includes:

- five eco-cabins positioned as a compact, low-impact accommodation node;
- a 10-stand campsite with ablution facilities and parking;
- the farmers' market and farm shop located near the existing entrance from the R340;
- renewed cultivation of historically cultivated areas;
- use and limited upgrading of existing internal farm tracks;
- a grass airstrip located within a planned firebreak;
- on-site water, sanitation, waste and off-grid energy infrastructure; and
- retention and rehabilitation of areas with ecological connectivity and restoration potential.

This layout avoids negative impacts by directing development towards areas that are historically transformed, disturbed, agriculturally used or affected by alien invasive vegetation. It limits the spread of infrastructure across the farm by clustering the market, farm shop, accommodation, campsite and service components into logical nodes. It also avoids unnecessary disturbance of the northern restoration areas and maintains a balance between productive agricultural land and ecological rehabilitation areas.

Unavoidable impacts associated with this layout include localised vegetation clearance, soil disturbance, construction activity, service installation, limited visual change, increased visitor movement and traffic on market days. These impacts are mitigated by limiting development footprints, using existing access routes, retaining grass and gravel surfaces where possible, avoiding extensive hard surfacing, using natural materials, implementing stormwater controls, rehabilitating disturbed areas and managing all activities through the EMP.

This alternative maximises positive impacts by enabling agricultural diversification, local economic development, rural tourism, productive re-use of historically cultivated land, continued alien clearing, rehabilitation of indigenous vegetation and improved long-term land management. It is therefore the preferred design and layout alternative.

Description of the preferred design or layout alternative

The preferred design or layout alternative is the consolidated, low-impact layout proposed on Portion 8 of Farm 223. The layout has been refined to accommodate the proposed consent-use activities within areas that are suitable from an agricultural, environmental, access, services and visual perspective, while retaining the rural character and ecological restoration potential of the property.

The preferred layout is based on the following design principles:

1. Use of transformed and disturbed areas where possible
The proposed development footprint is directed towards historically cultivated, grazed, plantation-affected or alien-infested areas. This reduces the need to disturb less-transformed areas and ensures that the more intensive activities are placed in parts of the farm with lower ecological sensitivity or existing agricultural use.
2. Retention of agricultural land and farm functionality
The layout retains the working agricultural character of the property. The renewed cultivation areas correspond with historically cultivated areas, while grazing and farm-related uses continue on the balance of productive land. The consent-use components are positioned so that they support rather than displace the agricultural function of the farm.
3. Clustering of development nodes
The layout clusters the farmers' market and farm shop near the entrance, and locates the eco-cabins and campsite as defined tourism nodes. This avoids unnecessary dispersal of infrastructure, limits the extent of internal roads and service corridors, and allows visitor movement to be managed effectively.

4. **Protection and rehabilitation of ecological areas**
Areas with ecological corridor and restoration potential, particularly in the northern parts of the property, are retained predominantly for alien clearing, indigenous rehabilitation and ecological connectivity. The layout therefore allows the farm to function as both a productive agricultural property and a site for long-term biodiversity restoration.
5. **Use of existing access and internal tracks**
Existing access from the R340 and existing internal farm tracks will be used wherever possible. Only limited upgrades are proposed where required for safety, access, passing or entry to the grass parking area.
6. **Appropriate positioning of the farmers' market and farm shop**
The market and farm shop are located near the existing R340 entrance. This position allows visitors to access the market without travelling through the working farm, reduces internal traffic, improves visibility and supports safe traffic management. The market precinct is located on a grassed and previously disturbed area and will avoid unnecessary hard surfacing.
7. **Low-impact accommodation layout**
The five eco-cabins and 10-stand campsite are positioned as small-scale, low-impact tourism nodes. Their layout allows for natural screening, retention of vegetation where possible, rehabilitation around the units, and separation from more active farming and market operations. The accommodation components will remain modest in scale and visually compatible with the rural landscape.
8. **Dual-use grass airstrip and firebreak**
The grass airstrip is located within a planned firebreak, allowing the same linear corridor to serve both aviation and fire-management functions. This avoids the creation of a separate additional disturbance corridor. The airstrip will remain grass surfaced and will require appropriate erosion control, levelling, stabilisation and maintenance.
9. **Compact service infrastructure**
Water, sanitation, energy and waste-management infrastructure has been designed to remain as compact and self-sufficient as possible. The preferred layout uses the existing borehole, rainwater harvesting, off-grid solar and gas energy systems, package sewage treatment plants and controlled waste collection.
10. **Maintenance of rural visual character**
The design approach uses modest-scale structures, natural materials, low-impact finishes, grassed or gravel surfaces and indigenous screening vegetation. The layout avoids urban-style development and maintains compatibility with the surrounding agricultural landscape.

Provide a description of any other design or layout alternatives investigated.

Dispersed layout alternative

A dispersed layout alternative would involve spreading the eco-cabins, campsite, farmers' market, farm shop and service infrastructure more widely across the property. Under this layout, individual accommodation units and activity areas would be located farther apart to provide greater privacy and separation between uses.

This alternative could provide some visual and experiential benefits for visitors by creating more isolated accommodation sites. However, it would increase the overall disturbance footprint by requiring longer access routes, additional service corridors, more extensive water and sewer pipelines, greater vegetation clearance and more disturbance to soil and habitat. It would also increase the risk of fragmented development across the farm and reduce the effectiveness of retaining larger connected restoration areas.

This alternative was not preferred because it would increase the spread of disturbance and infrastructure, reduce spatial efficiency, increase operational complexity and make visitor movement more difficult to manage. It would also undermine the objective of clustering low-impact tourism and market activities within defined nodes.

Market precinct located further into the farm

An alternative layout considered in principle would be to locate the farmers' market and farm shop deeper within the property, closer to the main farm activity areas or central agricultural lands.

This could potentially reduce the visibility of the market from the R340 and provide a more internalised farm experience. However, it would require visitors to travel further into the property, increasing internal traffic movement, dust, noise, disturbance to farming operations and pressure on internal tracks. It may also require additional road upgrades and service extensions, with associated vegetation clearance and soil disturbance.

This alternative was not preferred because the proposed market precinct near the existing entrance provides better access, visibility, traffic management and separation from the main productive agricultural areas. Locating the market near the entrance also reduces internal vehicle movement and confines the higher visitor-use component to the most accessible part of the farm.

Accommodation located closer to the entrance or agricultural core

Another design alternative would be to locate the eco-cabins and campsite closer to the entrance, farm shop, market precinct or main agricultural core.

This layout would consolidate visitor facilities in one area and could reduce some internal access requirements. However, it would also increase activity concentration near the entrance and may reduce the quality of the nature-based tourism experience. It would place accommodation closer to market-day traffic, operational farming activity and public movement,

potentially increasing noise, visual intrusion and user conflict. It would also reduce the opportunity to use the accommodation nodes as part of a broader rehabilitation and low-impact nature-based tourism area.

This alternative was not preferred because the selected accommodation layout provides better separation from market and farming operations while still using existing access routes and maintaining a limited footprint. The preferred layout allows the eco-cabins and campsite to be integrated into the vegetated landscape, with natural screening and rehabilitation around the tourism nodes.

No-Go layout alternative

The no-go layout alternative would mean that the proposed consent-use components would not be implemented. The already approved primary-rights agricultural development may still proceed, but the eco-cabins, campsite, farmers' market, farm shop, cultivation of the identified areas, grass airstrip and associated consent-use infrastructure would not be developed.

This alternative would avoid the direct impacts associated with the proposed design layout, including additional vegetation clearance, construction disturbance, visitor activity, market-day traffic, service installation and visual change. However, it would also prevent the positive impacts of the preferred layout from being realised, including agricultural diversification, local producer support, rural tourism opportunities, renewed productive use of historically cultivated areas, structured alien clearing and rehabilitation, and improved long-term land management.

The no-go alternative was not preferred because it does not meet the project purpose and need and would represent a lost opportunity to combine agricultural productivity, rural economic development and ecological rehabilitation within an existing agricultural property.

Provide a motivation for the preferred design or layout alternative.

The preferred design or layout alternative is therefore considered the most appropriate arrangement for the proposed development. It avoids sensitive and higher-restoration-potential areas as far as possible, limits the spread of infrastructure, makes use of existing access routes, directs activity to disturbed or agriculturally appropriate areas, retains productive farmland, supports ecological rehabilitation and allows unavoidable impacts to be managed through the EMPr.

On balance, the preferred layout provides the best environmental and planning outcome because it minimises negative impacts while maximising positive outcomes related to agricultural productivity, local economic participation, low-impact rural tourism, alien clearing, biodiversity rehabilitation and long-term sustainable land management.

Provide a detailed motivation if no design or layout alternatives exist.

N/A

List the positive and negative impacts that the design alternatives will have on the environment.

The design alternatives considered relate to the spatial arrangement, clustering, scale and positioning of the proposed consent-use components within Portion 8 of Farm 223. These include the preferred consolidated low-impact layout, a more dispersed layout, a market precinct located further into the farm, an accommodation layout closer to the entrance or agricultural core, and the no-go layout alternative. The impacts below should be read together with the specialist recommendations, the Site Development Plan and the EMPr.

Preferred design and layout alternative — consolidated low-impact layout within disturbed and agriculturally appropriate areas
This alternative includes the clustered arrangement of the five eco-cabins, the 10-stand campsite, farmers' market and farm shop, renewed cultivation areas, existing and limited upgraded internal tracks, service infrastructure and grass airstrip within a planned firebreak.

Positive impacts

- Directs development towards historically transformed, disturbed, grazed, plantation-affected or agriculturally used portions of the property.
- Limits the spread of infrastructure across the farm by clustering development into defined nodes.
- Retains the primary agricultural function of the property by placing cultivation in historically cultivated areas and maintaining grazing on suitable land.
- Keeps areas with ecological corridor and restoration potential, particularly in the northern portions of the property, available for alien clearing and rehabilitation.
- Uses existing access from the R340 and existing internal farm tracks as far as possible, reducing the need for new roads.
- Places the farmers' market and farm shop near the existing entrance, limiting visitor movement through the working farm.
- Reduces potential conflict between market visitors, agricultural activities and accommodation users by separating activity nodes according to their function.
- Consolidates service infrastructure, including water, sanitation, energy and waste-management systems, reducing the extent of pipelines, trenches and access routes.
- Allows the eco-cabins and campsite to remain small-scale, visually screened and compatible with the rural landscape.
- Supports the use of natural materials, grassed or gravel surfaces and low-impact finishes, thereby reducing visual intrusion.
- Locates the grass airstrip within the planned firebreak, combining compatible land-management functions and avoiding a separate linear disturbance corridor.
- Supports ongoing alien invasive vegetation clearing and indigenous rehabilitation around the tourism nodes and ecological corridor areas.
- Maintains a balance between productive agriculture, low-impact tourism and ecological restoration.
- Provides the best opportunity to implement footprint control, stormwater management, erosion prevention and rehabilitation through the EMPr.

Negative impacts

- Vegetation clearance and land transformation will still occur within the selected cultivation areas, market precinct, parking areas, campsite, eco-cabin footprints and associated infrastructure.
- Some areas may contain indigenous or recovering vegetation despite historical disturbance, and clearance may reduce local habitat availability.
- Construction of roads, service trenches, parking areas, ablution facilities and accommodation platforms may cause localised soil disturbance and compaction.
- Increased visitor activity may result in noise, lighting, litter, fire risk and disturbance to fauna if not properly managed.
- Market-day activity may result in periodic traffic, dust, noise and waste-management pressures near the entrance.
- The campsite and eco-cabins may increase human movement in parts of the property that are currently used mainly for low-intensity agricultural or rehabilitation purposes.
- The grass airstrip may require levelling, mowing and ongoing maintenance, with potential erosion and soil-exposure risks if not stabilised.
- The layout will introduce some visual change to the rural landscape, particularly at the farmers' market, farm shop, eco-cabins and campsite.
- Wastewater treatment and effluent disposal systems must be properly maintained to avoid pollution risk.
- Strict implementation of the EMPr will be required to prevent disturbance beyond the approved footprints.

Dispersed layout alternative

This alternative would involve placing the eco-cabins, campsite, market, farm shop and associated infrastructure more widely across the property, with greater separation between individual components.

Positive impacts

- Could provide greater privacy and separation between accommodation units.
- Could create a more isolated or nature-based visitor experience for individual eco-cabins.
- May reduce localised concentration of activity in any one node.
- Could spread visual change across the landscape rather than concentrating it in one or two visible locations.
- May allow some accommodation units to be positioned according to views, slope and vegetation screening.

Negative impacts

- Would increase the overall development footprint across the farm.
- Would require longer internal access routes, additional turning areas and more extensive service corridors.
- Would increase vegetation clearance, soil disturbance and habitat fragmentation.
- Would make it more difficult to retain large connected areas for ecological rehabilitation and alien-clearing programmes.
- Would increase the extent of water, sewer, energy and access infrastructure, creating more trenching and maintenance requirements.
- Would increase construction-phase disturbance through a larger working area and more dispersed construction activity.
- Would make visitor movement harder to control and increase the risk of unauthorised access into rehabilitation or agricultural areas.
- Would increase the risk of erosion and stormwater concentration along additional access routes and service corridors.
- Would increase operational complexity and management costs.
- Would reduce the efficiency of emergency access, waste collection, maintenance and environmental monitoring.
- Would not make best use of existing disturbed areas and farm tracks.
- For these reasons, the dispersed layout would have greater environmental impacts than the preferred consolidated layout and was not preferred.

Market precinct located further into the farm

This alternative would locate the farmers' market and farm shop deeper within the property, closer to the main agricultural areas or central farm activity areas.

Positive impacts

- Could reduce the visibility of the market and farm shop from the R340.
- Could create a more immersive farm-market experience for visitors.
- Could potentially place the market closer to some productive agricultural areas.
- May reduce the concentration of activity immediately near the entrance.

Negative impacts

- Would require visitors to travel further into the property, increasing internal traffic, dust, noise and disturbance.
- Would place public activity closer to productive farming operations, increasing the risk of conflict between visitors, vehicles, livestock, farm machinery and agricultural activities.
- Would require additional road upgrades, signage, turning areas and parking infrastructure deeper within the farm.
- Would extend service infrastructure further into the property, increasing the length of water, sewer and energy corridors.
- Would increase vegetation clearance and soil disturbance along internal access routes.

- Would increase the risk of litter, trampling and visitor movement in areas not intended for public access.
- Would reduce the ability to manage traffic efficiently at the entrance and separate market traffic from farm operations.
- Would increase operational complexity on market days.
- Would undermine the benefit of using the existing accessible and disturbed entrance area.
- This alternative was not preferred because it would increase internal disturbance and reduce the functional separation between public market use and working agricultural areas.

Accommodation located closer to the entrance or agricultural core

This alternative would place the eco-cabins and campsite closer to the entrance, market precinct or main agricultural core.

Positive impacts

- Could consolidate all visitor facilities into one broader precinct.
- Could reduce some internal access distances for accommodation guests.
- Could simplify service delivery if accommodation infrastructure is closer to the market and farm shop.
- Could reduce the number of separate visitor nodes requiring management.
- May make check-in, waste collection and maintenance easier from an operational perspective.

Negative impacts

- Would concentrate visitor activity, market activity, accommodation use and farm operations in one area, increasing the potential for user conflict.
- Would reduce the quality of the low-impact, nature-based accommodation experience.
- Would expose accommodation users to market-day traffic, noise and public movement.
- Could increase visual clutter near the entrance and reduce the rural sense of arrival.
- Could result in greater visual impact from the R340 if cabins and campsite infrastructure are placed closer to the road.
- Would reduce the opportunity to use accommodation nodes as part of a broader rehabilitation and indigenous screening strategy.
- Could displace or constrain agricultural activities in the entrance or farm-core area.
- Would not make optimal use of the more naturally screened areas identified for low-impact accommodation.
- Would increase cumulative activity pressure in one part of the property.
- This alternative was not preferred because it would reduce spatial separation between uses and could increase visual, traffic and operational impacts.

No-go layout alternative

The no-go layout alternative would mean that the consent-use components would not be implemented. The approved primary-rights agricultural development may still proceed, but the eco-cabins, campsite, farmers' market, farm shop, renewed cultivation areas, grass airstrip and related consent-use infrastructure would not be developed.

Positive impacts

- Avoids additional vegetation clearance associated with the consent-use layout.
- Avoids construction disturbance, soil compaction, dust, noise and service trenching linked to the proposed layout.
- Avoids additional visitor traffic, market-day activity and accommodation-related movement.
- Avoids additional visual change from the eco-cabins, campsite, market stalls, farm shop and parking areas.
- Avoids wastewater treatment and effluent disposal risks associated with the consent-use components.
- Avoids additional operational waste generation from market and accommodation activities.
- Avoids potential disturbance to fauna from lighting, noise, people and vehicle movement.
- Avoids the need for airstrip levelling and maintenance within the planned firebreak corridor.

Negative impacts

- Does not achieve the preferred spatial arrangement that balances agriculture, tourism and ecological restoration.
- Does not enable renewed cultivation of historically cultivated areas as part of the proposed farm-management model.
- Does not create the farmers' market and farm shop opportunities for local producers and rural economic participation.
- Does not provide low-impact rural tourism accommodation or campsite opportunities.
- Does not strengthen the economic viability of the agricultural enterprise through diversified income streams.
- May reduce the resources available for alien clearing, rehabilitation, erosion management and long-term land stewardship.
- Does not provide the same opportunity to formalise environmental management commitments through the EMPr.
- May allow parts of the farm to remain underutilised or less actively managed.
- Represents a lost opportunity to integrate productive agriculture, low-impact tourism, local economic development and ecological rehabilitation within one planned layout.

Summary of comparative impacts

The preferred consolidated design and layout alternative has the most balanced environmental outcome because it directs development to disturbed, historically cultivated or agriculturally appropriate areas, uses existing access and internal tracks, clusters infrastructure, limits the spread of disturbance and retains ecological restoration areas. Although it will still result in vegetation clearance, soil disturbance, traffic, visual change and operational impacts, these impacts are localised and can be managed through the EMPr.

The dispersed layout would have greater negative impacts because it would spread disturbance across a larger area, increase road and service infrastructure, fragment habitat and complicate environmental management. Locating the market further into the farm would increase internal traffic, disturbance and public access pressure in agricultural areas. Locating accommodation closer to the entrance or agricultural core would reduce separation between uses and could increase visual, traffic and operational conflicts. The no-go layout would avoid the direct impacts of the proposed consent-use layout but would also prevent the agricultural, socio-economic and rehabilitation benefits from being realised.

On balance, the preferred consolidated layout is considered the most appropriate design alternative because it minimises negative environmental impacts while maximising positive outcomes relating to agricultural productivity, rural economic development, low-impact tourism, alien clearing, ecological rehabilitation, service efficiency and long-term land management.

1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
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Provide a description of the preferred technology alternative:

The technology alternatives considered for the proposed development relate primarily to the provision of water, sanitation, energy, waste management, road and stormwater infrastructure, and low-impact construction methods. Because the property is located in a rural agricultural setting with no municipal bulk services, the preferred technology approach is based on self-sufficient, resource-efficient and low-impact systems that reduce water demand, reduce energy demand, minimise pollution risk and support the rural character of the farm.

The technology alternatives considered include:

1. a fully off-grid and resource-efficient services option;
2. alternative sewage treatment technologies; and
3. a no-go technology alternative.

The preferred technology alternative is the implementation of the off-grid, resource-efficient services model described in the Site Development Plan and engineering services information. This includes the use of the existing borehole, rainwater harvesting, gravity-fed distribution where practical, dryland cultivation without irrigation, solar photovoltaic energy with battery storage, gas for high-demand thermal loads, package sewage treatment plants, shallow subsurface evapotranspiration and infiltration beds, source-separated recycling, owner-managed waste removal, and low-impact grass or gravel roads with stormwater control through berms and controlled cross-drainage.

Water supply and water-use efficiency

Water for the proposed consent uses will be supplied primarily from the existing borehole on the property, supplemented by rainwater harvesting where practical. The borehole has a reported yield of approximately 86 kilolitres per day, while the calculated average maximum daily water demand for the proposed consent-use activities and primary-rights components is approximately 5.78 kilolitres per day. The expected water demand is therefore modest in relation to the reported yield, provided that abstraction is monitored and managed responsibly.

Rainwater harvesting will be implemented from roofs of buildings where practical. Harvested roof runoff will be pre-treated using gutter guards and first-flush diverters before storage in dedicated rainwater tanks. Rainwater will be used for non-potable or lower-risk applications where suitable, including toilet supply, with filtration provided where water is used for washbasins or kitchen supply. The reservoir supply can top up the rainwater tanks when required.

The agricultural cultivation component will be dryland cultivation and will not require irrigation. This is an important water-efficiency measure because it avoids creating a significant ongoing agricultural water demand and reduces pressure on groundwater resources.

Water distribution will be from elevated storage, with gravity-fed supply to the campsite, farmers' market and eco-cabins where practical. This reduces energy requirements for pumping and improves operational resilience.

Energy supply and energy-use efficiency

The property will remain off-grid. Energy demand will be reduced by using appropriate energy sources for different functions. Solar photovoltaic systems with inverter and battery storage will supply domestic and operational electrical loads, while gas will be used for high-demand thermal uses such as hot-water geysers, ovens and hobs. Heating may be provided by gas or wood burners where appropriate and controlled.

This approach avoids the need for grid extension, reduces reliance on fossil-fuel-generated electricity, improves energy resilience and supports the low-impact rural character of the development. The use of solar energy and battery storage also allows the eco-cabins, campsite ablutions and farm shop to operate with reduced external service dependency.

Sewage and wastewater treatment

There is no municipal sewer connection available on the farm. The preferred sanitation technology is therefore the use of package sewage treatment plants designed and sized for the specific proposed uses. The campsite and eco-cabins will drain to and be treated at the sewage treatment plant associated with the manager's house, while the farmers' market and farm shop will have a separate sewage treatment plant sized for the weekly market and daily farm-shop operation.

Two sewage treatment plant technology options have been considered:

- BioRock package plant, which operates using pretreatment and an aerobic biological reactor and can operate under gravity without an electrical supply; and

- Eco Tanks Big Red package plant, which also uses anaerobic pretreatment followed by aerobic biological treatment and requires a modest power supply that can be provided by the solar system.

Both systems are intended to produce treated effluent of a quality suitable for controlled disposal through shallow subsurface distribution beds, subject to final design, supplier specifications, water-use requirements and any requirements of the Bitou Municipality and water authority.

The treated effluent will be directed to shallow subsurface evapotranspiration and infiltration beds. These beds will include perforated distribution pipes in an aggregate layer, lining/filter material and a topsoil layer planted with suitable evapotranspiration vegetation such as Buffalo Grass or similar appropriate vegetation. This disposal method avoids surface discharge, reduces odour and contact risk, and supports controlled on-site treatment and assimilation.

Annual maintenance by a professional service provider will be required. Sludge accumulation must be monitored and removed by a licensed or appropriately contracted vacuum tanker before it exceeds acceptable levels. This maintenance requirement is essential to avoid pollution risk and ensure long-term performance.

Waste management and recycling

Operational waste from the campsite, eco-cabins, farmers' market and farm shop will be managed on site through source separation, recycling and secure temporary storage. The landowner will be responsible for collection and disposal of residual waste at the appropriate municipal waste transfer facility. Recycling at source will reduce the amount of waste requiring disposal and will support responsible visitor and market operations.

Market operations should include clearly marked waste and recycling stations, vendor requirements for waste minimisation, and regular removal after market days to prevent litter, odour, animal attraction and windblown waste.

Roads, parking and stormwater technology

The preferred access and internal movement technology is based on retaining the existing rural grass and gravel track system as far as possible. New roads will not be wider than 4 m where possible, and widening of existing roads by more than 4 m is not anticipated unless specifically required and assessed. Parking areas will remain grassed or gravelled where practical, avoiding unnecessary paving and soil sealing and promoting the natural infiltration.

Stormwater will be managed using low-impact rural methods, including existing contour berms, grassed berms, controlled cross-drainage and low-velocity discharge points. Gravel roads will be constructed on grade with crossfall to the lower natural ground level side, with protection by low grassed berms where necessary. At essential drainage points, berms will be weired and the road surface depressed to allow controlled cross-drainage. These measures will reduce erosion risk, maintain infiltration and avoid concentrating runoff.

Construction materials and low-impact building technologies

The preferred technology approach includes modest-scale buildings, natural materials, timber, gum poles and recycled black wattle harvested from the farm where appropriate. The use of local or on-site alien timber has a positive environmental benefit because it links construction material selection with alien invasive vegetation clearing. The eco-cabins, campsite structures, market stalls and farm shop should use low-impact finishes and natural colours to reduce visual intrusion and maintain compatibility with the rural landscape.

Description of the preferred technology alternative

The preferred technology alternative is the implementation of an integrated off-grid, resource-efficient and low-impact services model for the proposed consent-use development on Portion 8 of Farm 223. This model is preferred because it avoids reliance on municipal bulk services, reduces infrastructure expansion, lowers energy and water demand, manages wastewater on site, reduces pollution risk and supports the rural agricultural character of the property.

The preferred technology alternative consists of the following:

1. Water supply from the existing borehole, supplemented by rainwater harvesting
The existing borehole will provide the primary water supply, with harvested rainwater used where practical to reduce demand. Water treatment, filtration and dosing will be implemented as required to meet potable standards.
2. Dryland cultivation with no irrigation requirement
The renewed cultivation areas will be dryland cultivated and will not require irrigation. This avoids significant additional agricultural water demand and supports sustainable use of groundwater resources.
3. Gravity-fed water distribution where practical
Elevated water storage will be used to provide gravity-fed distribution to the campsite, farmers' market and eco-cabins, reducing pumping requirements and energy demand.
4. Off-grid solar and gas energy system
Solar photovoltaic systems with inverter and battery storage will supply electrical loads, while gas will be used for hot water, cooking and other high-energy thermal uses. This combination reduces electricity demand and avoids the need for grid extension.
5. Package sewage treatment plants
On-site package sewage treatment plants will be used to treat wastewater from the campsite, eco-cabins, farmers' market and farm shop. The final technology may include BioRock, Eco Tanks Big Red or an equivalent system that meets the required capacity, effluent quality, reliability, maintenance and regulatory standards.
6. Subsurface evapotranspiration and infiltration beds
Treated effluent will be disposed of through shallow subsurface distribution beds designed to promote evapotranspiration and controlled infiltration. This avoids direct surface discharge and reduces the risk of pollution if correctly designed and maintained.
7. Source separation, recycling and controlled waste removal

Waste will be separated at source, recycling will be encouraged and residual waste will be removed by the landowner to an appropriate municipal waste transfer facility. Market-day waste will be managed through designated waste stations and regular clean-up. 8. Low-impact roads, parking and stormwater infrastructure Existing grass and gravel tracks will be used wherever possible. Roads and parking areas will remain rural in character and will avoid unnecessary paving. Stormwater will be managed through existing and proposed low berms, controlled cross-drainage, grassed surfaces and low-velocity discharge points. 9. Use of natural and locally appropriate materials Structures will use natural materials and low-impact finishes where practical, including timber, gum poles and recycled alien timber from on-site clearing where appropriate. This reduces visual impact and links development with alien invasive vegetation management. The preferred technology alternative is considered the most appropriate option because it minimises resource demand, avoids unnecessary municipal service extensions, reduces energy use, manages wastewater and waste responsibly, limits soil sealing, maintains rural visual character and supports the long-term environmental management of the property. It also maximises positive impacts by improving resilience, enabling responsible low-impact tourism and supporting ongoing alien clearing, rehabilitation and productive agricultural use.
Provide a description of any other technology alternatives investigated.
Alternative sewage treatment technology options The key technology alternative requiring final selection during detailed design is the sewage treatment plant system. The BioRock and Eco Tanks Big Red systems both offer compact on-site treatment solutions, but differ in energy demand, modularity, output specification and operation. The BioRock system has the advantage of operating without electrical supply and is therefore particularly suited to an off-grid rural property. It reduces operational energy demand and can function under gravity where site gradients allow. Its suitability depends on final capacity requirements, site levels, disposal-bed design and confirmation that treated effluent quality and disposal arrangements meet regulatory requirements. The Eco Tanks Big Red system has the advantage of modular sizing and claims compliance with general effluent quality limits, based on supplier information. It requires a modest power supply, but this can be provided by the proposed solar energy system. Its suitability depends on final wastewater load, maintenance requirements, effluent quality verification and approval by the relevant authorities. Either system, or another equivalent package plant, may be acceptable provided that it meets the required effluent quality, capacity, reliability, maintenance and regulatory standards. Final selection should be made during detailed design, based on supplier specifications, hydraulic loading, final occupancy assumptions, soil conditions, disposal-bed design, water-use requirements and any conditions imposed by the competent authority, Bitou Municipality and the water authority. No-go technology alternative The no-go technology alternative would mean that the proposed consent-use components would not proceed. The off-grid services approved for the primary rights would continue.
Provide a motivation for the preferred technology alternative.
The preferred technology alternative is considered the most appropriate option because it minimises resource demand, avoids unnecessary municipal service extensions, reduces energy use, manages wastewater and waste responsibly, limits soil sealing, maintains rural visual character and supports the long-term environmental management of the property. It also maximises positive impacts by improving resilience, enabling responsible low-impact tourism and supporting ongoing alien clearing, rehabilitation and productive agricultural use.
Provide a detailed motivation if no alternatives exist.
N/A
List the positive and negative impacts that the technology alternatives will have on the environment.
The technology alternatives considered relate to the manner in which the proposed consent-use components will be serviced and operated, including water supply, sanitation, energy, waste management, access roads, stormwater control and construction materials. The preferred technology alternative is an off-grid, resource-efficient and low-impact services model, supported by borehole supply, rainwater harvesting, dryland cultivation, solar energy, gas for high-demand thermal loads, package sewage treatment plants, subsurface effluent disposal, source-separated recycling and rural grass/gravel access infrastructure. Preferred technology alternative — off-grid, resource-efficient and low-impact services model This alternative includes borehole water supply, rainwater harvesting, dryland cultivation, gravity-fed distribution where practical, solar photovoltaic systems with inverter and battery storage, gas for hot water and cooking, package sewage treatment plants, shallow subsurface evapotranspiration and infiltration beds, source-separated recycling, owner-managed waste removal, grass/gravel access roads and low-impact stormwater controls. Positive impacts • Reduces the overall infrastructure footprint by using compact, decentralised and site-appropriate services. • Supports the rural and agricultural character of the property by avoiding urban-style infrastructure. • Uses the existing borehole as the primary water source, supplemented by rainwater harvesting from roofs where practical.

- Rainwater harvesting reduces demand on groundwater and provides resilience during dry periods.
- Dryland cultivation and regenerative agricultural practices avoids irrigation demand and significantly reduces pressure on water resources.
- Gravity-fed water distribution from elevated storage reduces pumping requirements and lowers energy demand.
- Solar photovoltaic systems reduce reliance on fossil-fuel-based electricity and avoid grid-extension impacts.
- Battery storage improves energy resilience and supports off-grid operation.
- Gas use for geysers, ovens and hobs reduces peak electrical demand and allows the solar system to remain appropriately scaled.
- Package sewage treatment plants allow wastewater to be treated on site in a controlled and compact manner.
- Subsurface evapotranspiration and infiltration beds avoid surface discharge and reduce direct contact, odour and pollution risks where correctly designed and maintained.
- Source separation and recycling reduce the volume of waste requiring disposal at the municipal transfer facility.
- Owner-managed waste removal allows market-day and accommodation waste to be controlled through operational procedures.
- Grass and gravel roads maintain rural character, reduce soil sealing and allow greater infiltration than paved surfaces.
- Low berms, cross-drainage and low-velocity discharge points reduce erosion risk and support controlled stormwater movement.
- Use of natural materials, gum poles, timber and recycled alien timber supports visual integration and links construction with alien-clearing objectives.
- The preferred technology model supports long-term environmental management, resilience and operational self-sufficiency.

Negative impacts

- Borehole abstraction will increase groundwater use and must be monitored to ensure that use remains sustainable.
- Rainwater harvesting systems require maintenance of gutters, first-flush diverters, tanks and filtration systems to remain effective.
- Stored water may present quality risks if tanks and filters are not properly maintained.
- Solar systems and batteries require capital investment, periodic maintenance and eventual battery replacement or disposal.
- Gas use still relies on a non-renewable energy source and requires safe storage and handling.
- Wood burners, if used, may create localised smoke emissions and should only use appropriate, dry, lawful fuel sources.
- Package sewage treatment plants require regular maintenance, monitoring and sludge removal to avoid system failure.
- Poorly maintained treatment plants or overloaded systems could result in odour, effluent quality deterioration or pollution risk.
- Subsurface disposal beds may fail if incorrectly designed, poorly maintained, overloaded or located in unsuitable soils.
- Sewer pipelines, manholes and service trenches will still create localised construction disturbance.
- Owner-managed waste removal requires strict operational discipline to avoid litter, odour, animal attraction and windblown waste.
- Grass and gravel roads may generate dust during dry periods and require maintenance after heavy rainfall.
- Low-impact roads and stormwater controls require ongoing inspection to prevent erosion, rutting or concentrated runoff.
- The off-grid model places greater responsibility on the landowner to maintain systems and ensure regulatory compliance.

Alternative sewage treatment technologies

The sewage treatment alternatives include the BioRock package plant, the Eco Tanks Big Red package plant, or another equivalent package plant that meets the required capacity, effluent quality, maintenance and regulatory requirements.

BioRock package plant

Positive impacts

- Operates under gravity and does not require an electrical supply, which is well suited to an off-grid rural property.
- Reduces operational energy demand and avoids reliance on powered aeration.
- Uses anaerobic pretreatment followed by aerobic biological treatment through a biological carrier medium.
- Can be sized to accommodate the required wastewater load, subject to final detailed design.
- Lower energy requirement supports the preferred low-impact technology approach.
- Reduced electrical dependency may improve resilience during periods of low solar generation or power-system maintenance.

Negative impacts

- Supplier information indicates that the system does not claim direct compliance with the Section 21(f) General Limit, but targets compliance in conjunction with evapotranspiration or filtration bed disposal.
- Final suitability depends on detailed design, hydraulic load, soil conditions, disposal-bed sizing and authority requirements.
- Effluent quality and disposal performance will depend on correct installation and ongoing maintenance.
- Sludge accumulation must still be monitored and removed by an appropriate service provider.

- If not properly maintained, the system could create odour, effluent quality or pollution risks.

Eco Tanks Big Red package plant

Positive impacts

- Uses anaerobic pretreatment followed by aerobic biological treatment.
- Supplier information indicates that the system can treat domestic wastewater to comply with the Section 21(f) General Limit, subject to verification and correct operation.
- Modular units allow capacity to be increased if required.
- The modest power requirement can be supplied by the proposed solar system.
- Local supplier support may assist with maintenance and parts availability.
- May provide a flexible solution for the farmers' market and farm shop where wastewater loads may fluctuate.

Negative impacts

- Requires a power supply, which increases demand on the solar system and creates dependency on inverter, battery and system performance.
- Mechanical or powered components may increase maintenance requirements compared with a gravity-operated system.
- Incorrect operation, insufficient power supply or poor maintenance could reduce treatment performance.
- Modular expansion could increase footprint and cost if wastewater loads exceed initial assumptions.
- Final suitability must still be confirmed through detailed design, supplier specifications, soil conditions and authority requirements.

Summary of comparative impacts

The conventional municipal-services or grid-reliant alternative would introduce greater infrastructure dependence and could increase disturbance through service extensions, hard surfacing, soil sealing and visual intrusion. It is therefore less suitable for the rural agricultural context.

The preferred off-grid, resource-efficient technology alternative has the most positive environmental outcome because it reduces reliance on municipal services, limits infrastructure spread, reduces energy demand, avoids irrigation, supports water efficiency, manages wastewater on site, reduces soil sealing and maintains the rural character of the property. Its main negative impacts relate to the need for groundwater monitoring, proper wastewater maintenance, battery replacement, gas safety, waste-management discipline and ongoing upkeep of grass/gravel roads and stormwater controls.

The sewage treatment technology alternatives each have advantages and constraints. BioRock has the benefit of no electrical demand, while Eco Tanks Big Red has modularity and reported compliance with general effluent limits, subject to verification. The final wastewater technology should therefore be selected during detailed design, provided that it meets all required capacity, effluent quality, maintenance and regulatory standards.

The no-go technology alternative avoids additional service-related disturbance but also prevents the implementation of resource-efficient and environmentally managed systems that support the proposed consent-use development. On balance, the preferred off-grid technology alternative is considered the most appropriate because it best avoids and mitigates negative impacts while maximising positive outcomes related to resource efficiency, resilience, pollution prevention, rural compatibility and long-term environmental management.

1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
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Provide a description of the preferred operational alternative.

Description of the preferred operational alternative

The preferred operational alternative is the controlled, low-impact and environmentally managed operation of the proposed agricultural, agri-tourism and market-related consent uses on Portion 8 of Farm 223.

Under this alternative, the farm will continue to function primarily as an agricultural property, with complementary consent-use activities operated in a manner that remains compatible with the rural setting. The farmers' market and farm shop will be managed within the approved market precinct near the R340 entrance. The eco-cabins and campsite will operate as limited-scale, nature-based accommodation with controlled occupancy, demarcated access, defined parking and guest rules. The renewed cultivation areas will be dryland cultivated within historically cultivated areas, and the airstrip will operate as a low-intensity grass airstrip within the planned firebreak.

The preferred operational model is based on the following principles:

1. **Controlled scale of operation**
The number of eco-cabins, campsite stands, market area, farm shop footprint, cultivation footprint and airstrip extent will remain within the approved limits.
2. **Defined activity areas**
Visitors, vendors, guests and vehicles will be restricted to approved and demarcated areas to prevent disturbance of rehabilitation areas, agricultural areas and ecological corridors.
3. **Resource-efficient operation**

Water use will be monitored, rainwater harvesting will be maintained, cultivation will remain dryland, and off-grid solar and gas systems will be operated efficiently.

4. **Responsible wastewater management**
Package sewage treatment plants and disposal beds will be professionally maintained, monitored and serviced to prevent pollution or system failure.
5. **Integrated waste management**
Waste will be separated at source, recycling will be encouraged, market-day waste will be removed promptly, and residual waste will be taken to an appropriate municipal facility.
6. **Low-impact access and traffic management**
Existing access and tracks will be used, market-day traffic will be managed, internal speed limits will apply, and grass/gravel surfaces will be maintained to avoid erosion and excessive dust.
7. **Fire and safety management**
Firebreaks will be maintained, open fires will be controlled, gas and wood-burning appliances will be safely managed, and guests and vendors will be informed of fire-safety requirements.
8. **Alien clearing and rehabilitation**
Ongoing alien invasive vegetation clearing, follow-up control and indigenous rehabilitation will form part of the operational management of the property.
9. **Environmental compliance and monitoring**
The EMPr, specialist recommendations and authorisation conditions will guide operation. Records will be kept for key environmental management actions, including wastewater maintenance, waste removal, borehole use, alien clearing and rehabilitation.

The preferred operational alternative is considered the most appropriate because it allows the farm to realise the agricultural, tourism and local economic benefits of the proposal while avoiding or reducing operational impacts through active management. It provides a practical framework for managing traffic, waste, water, wastewater, fire risk, visitor behaviour, rehabilitation and ongoing compliance. On balance, this alternative best mitigates unavoidable operational impacts and maximises positive outcomes relating to rural economic development, agricultural productivity, ecological rehabilitation and long-term sustainable land management.

The preferred operational alternative is the controlled, low-impact and environmentally managed operational model. This alternative allows the proposed agricultural, agri-tourism and market activities to operate, but within clear management limits and environmental controls. It is preferred because it supports the productive and economic use of the farm while ensuring that visitor activity, traffic, waste, water use, wastewater, fire risk, rehabilitation and agricultural activities are actively managed through the EMPr, landowner controls and relevant municipal or environmental authorisation conditions.

Preferred operational alternative — controlled, low-impact and environmentally managed operation

The preferred operational alternative is to operate the farm as a working agricultural property with complementary low-impact agri-tourism and local market activities. The operational model will be based on clear controls, limited visitor numbers, defined activity areas, responsible waste and wastewater management, off-grid resource efficiency, ongoing alien clearing and rehabilitation, and compliance with the EMPr.

This alternative includes the following operational controls and management measures:

Farmers' market and farm shop operations

The farmers' market will operate as a controlled, low-impact rural market within the approved market precinct near the existing entrance from the R340. The market will be limited to the approved footprint and will use grassed or gravel parking areas rather than paved urban-style parking. Market operations must be managed to avoid overflow parking, uncontrolled roadside stopping, littering, excessive noise and disturbance to farming operations.

The farm shop will operate daily or as required within the approved footprint and below the applicable size threshold. It will make use of the existing market access and parking arrangements and will not require a separate access point or additional development footprint.

Operational controls should include:

- defined trading days and hours for the market;
- vendor allocation within the approved market area;
- controlled parking and internal circulation;
- clear signage at the entrance and within the market precinct;
- waste and recycling stations for visitors and vendors;
- post-market clean-up after each trading day;
- restrictions on amplified noise or entertainment where this could affect the rural character;
- no expansion beyond the authorised market footprint without further approval; and
- ongoing maintenance of grassed and gravel parking areas to prevent erosion, dust and compaction.

Eco-cabin and campsite operations

The five eco-cabins and 10-stand campsite will be operated as low-impact, nature-based accommodation that remains subordinate to the working agricultural use of the farm. Occupancy will be limited to the approved number of units and stands. The campsite will be managed so that tents, caravans and trailers remain within demarcated stands and do not expand into surrounding rehabilitation areas.

Operational controls should include:

- clear booking and occupancy limits;

- no permanent occupation of campsite stands;
- no power or water connections at individual campsite stands;
- use of the central ablution facilities only;
- demarcated guest parking and access routes;
- guest information on waste, fire safety, water conservation and restricted areas;
- prohibition of uncontrolled off-road driving;
- controlled lighting to avoid unnecessary night-time disturbance;
- quiet hours to maintain the rural character; and
- restrictions on pets, fires and movement into rehabilitation areas where required.

Access, traffic and internal movement

The preferred operational model will use the existing R340 access and existing internal farm tracks as far as possible. Traffic associated with the accommodation uses is expected to remain low, while the farmers' market will generate periodic traffic peaks on market days.

Operational controls should include:

- maintaining clear sight lines at the R340 entrance;
- regular clearing of vegetation overgrowth in the road reserve where required by the road authority;
- controlled entry and exit on market days;
- internal signage directing visitors to parking and market areas;
- no unauthorised public access into farm production areas or rehabilitation areas;
- use of existing tracks only;
- speed limits on internal roads;
- dust management on dry market days where required; and
- monitoring of parking and access arrangements during the initial operating period.

Water-use management

The preferred operational model relies on the existing borehole, rainwater harvesting and dryland cultivation. Operational water use must remain efficient and within the expected demand assumptions.

Operational controls should include:

- monitoring borehole abstraction volumes;
- maintaining rainwater tanks, gutters, first-flush diverters and filtration systems;
- using water-efficient fittings in ablutions, cabins and the farm shop;
- no irrigation of the renewed cultivation areas, as these will be dryland cultivated;
- prompt repair of leaks;
- guest and vendor awareness on water conservation; and
- periodic review of actual water demand against the design assumptions.

Wastewater and sanitation management

Wastewater from the campsite, eco-cabins, farmers' market and farm shop will be treated through package sewage treatment plants and disposed of through shallow subsurface evapotranspiration and infiltration beds. This system requires active operational management to avoid pollution risk.

Operational controls should include:

- maintenance of treatment plants by a professional service provider at least annually, or more frequently if supplier specifications require;
- monitoring sludge accumulation and arranging removal by an appropriate vacuum tanker before it exceeds acceptable levels;
- keeping maintenance records for inspection;
- ensuring that the systems are not overloaded during market days or peak accommodation periods;
- preventing disposal of grease, chemicals, solids or unsuitable waste into the sewer system;
- maintaining subsurface disposal beds and evapotranspiration vegetation;
- monitoring for odour, surfacing effluent or system failure; and
- implementing immediate corrective action if any malfunction occurs.

Waste management and recycling

The preferred operational alternative includes source separation, recycling and owner-managed removal of residual waste to an appropriate municipal waste transfer facility. This is particularly important for market operations and accommodation use.

Operational controls should include:

- clearly marked recycling and general-waste stations at the market, campsite and accommodation areas;
- vendor requirements for waste minimisation and stall clean-up;
- daily removal of waste from public areas after market days;
- secure temporary storage to prevent windblown litter, odour and animal access;

- no on-site dumping or burning of waste;
- guest information on waste separation;
- regular removal of residual waste to the municipal transfer facility; and
- record-keeping of waste removal where appropriate.

Energy and lighting management

The preferred operational alternative is based on off-grid solar energy, battery storage and gas for high-demand thermal loads. Operational energy use should remain modest and efficient.

Operational controls should include:

- use of energy-efficient appliances and lighting;
- responsible use and safe storage of gas cylinders;
- maintenance of solar and battery systems;
- controlled use of wood burners, if used, with appropriate fire-safety measures;
- low-intensity, downward-directed lighting only where required for safety;
- no unnecessary floodlighting; and
- guest and staff awareness on energy conservation.

Agricultural operations

The proposed cultivation areas will be operated as dryland agricultural lands within historically cultivated or agriculturally used portions of the farm. The preferred operational model should support soil conservation, regenerative practices and continued agricultural productivity.

Operational controls should include:

- dryland cultivation only, with no irrigation requirement;
- soil improvement and regenerative farming measures where practical;
- retention of contour berms and stormwater management features;
- erosion monitoring after heavy rainfall;
- avoidance of cultivation outside the approved areas;
- responsible use and storage of any agricultural inputs;
- continued grazing management on the balance of the farm;
- prevention of alien invasive regrowth in cultivated and rehabilitated areas; and
- avoidance of disturbance to retained ecological corridors and rehabilitation areas.

Airstrip operations

The proposed grass airstrip will be operated as a low-intensity private farm airstrip within the planned firebreak. The airstrip will remain grass surfaced and must not develop into a formal commercial aviation facility unless separately authorised.

Operational controls should include:

- low-frequency private use only;
- maintenance of the grass surface to prevent erosion, rutting and bare soil exposure;
- no hard surfacing unless separately assessed and authorised;
- no fuel storage or aircraft maintenance activities on site unless separately approved and managed;
- use of the airstrip only under safe weather and visibility conditions;
- maintenance of the firebreak function;
- control of alien regrowth along the corridor; and
- compliance with any applicable civil aviation or municipal requirements.

Fire management, alien clearing and rehabilitation

The preferred operational model includes ongoing alien invasive vegetation clearing, rehabilitation of selected areas to indigenous vegetation and maintenance of ecological connectivity. These activities are central to maximising positive environmental outcomes. The approved ACP needs to continue to be implemented with monitoring reporting to DFFE as required.

Operational controls should include:

- implementation of the approved alien clearing programme;
- follow-up clearing to prevent alien regrowth;
- use of cleared alien timber where appropriate and lawful;
- rehabilitation of disturbed areas with suitable indigenous vegetation;
- maintenance of firebreaks;
- fire-safety controls for guests, vendors and staff;
- prohibition of uncontrolled open fires;
- emergency response procedures for fire events;
- monitoring of rehabilitated areas; and
- protection of ecological corridor areas from unnecessary access or disturbance.

Environmental monitoring and compliance

The preferred operational alternative requires ongoing implementation of the EMPr and any conditions of environmental authorisation, municipal approval and water-related requirements.

Operational controls should include:

- appointment of a responsible person to oversee environmental compliance (ECO);
- maintaining records of wastewater maintenance, waste removal, borehole abstraction, alien clearing and rehabilitation;
- regular inspection of roads, stormwater controls, parking areas, disposal beds and rehabilitation areas;
- prompt correction of erosion, litter, alien regrowth or infrastructure failure;
- staff and vendor induction on environmental rules;
- guest information on site rules; and
- periodic review of operational performance against the EMPr.

Provide a description of any other operational alternatives investigated.

The operational alternatives considered relate to the way in which the proposed consent-use components will be managed once implemented. These include the scale and frequency of market operations, visitor management, accommodation occupancy, access control, waste management, water and energy use, wastewater maintenance, agricultural practices, airstrip use, fire management, alien clearing and rehabilitation. The operational approach is important because many of the potential impacts of the proposed development can be avoided or reduced through responsible day-to-day management.

The operational alternatives considered included:

1. an unmanaged or minimally managed operational model;
2. a higher-intensity commercial operational model;
3. the preferred controlled, low-impact and environmentally managed operational model; and
4. the no-go operational alternative.

Operational alternatives that were investigated are as follows:

Unmanaged or minimally managed operational model

Under this alternative, the consent-use activities would operate with limited formal controls over visitors, traffic, waste, water use, wastewater maintenance, rehabilitation areas, alien clearing and fire risk. The farmers' market, campsite, eco-cabins, farm shop, cultivation areas and airstrip would be managed largely on an ad hoc basis.

This alternative is not preferred because it would increase the risk of environmental impacts during the operational phase. Without clear operational controls, visitor movement could extend into rehabilitation areas, waste could be poorly managed, market-day traffic could become inefficient, water and energy use could increase unnecessarily, wastewater systems could be poorly maintained, and fire risk could increase. Unmanaged operation would also reduce the effectiveness of alien clearing and rehabilitation commitments and could undermine the rural character of the property.

Although this alternative may reduce short-term administrative effort, it would not provide adequate environmental safeguards and would not comply with the intent of the EMPr. It is therefore not considered a reasonable or responsible operational option.

Higher-intensity commercial operational model

A higher-intensity operational alternative would involve operating the farmers' market more frequently or at a larger scale, increasing visitor numbers, increasing the number or occupancy of accommodation units, expanding events or entertainment activities, allowing more intensive public access, or using more formalised infrastructure and services to support larger visitor volumes.

This alternative could increase income, employment and local economic activity. It could also provide more frequent market opportunities for vendors and local producers. However, it would also increase environmental and operational impacts. Higher visitor numbers would increase traffic, parking demand, dust, noise, waste generation, water demand, wastewater loads, fire risk, lighting impacts and disturbance to fauna and rehabilitation areas. More frequent or larger market operations could also increase pressure on the R340 access, internal tracks, grass parking areas and owner-managed waste systems.

This alternative was not preferred because it would reduce the low-impact nature of the proposal and could change the character of the development from an agricultural and agri-tourism support use to a more intensive commercial destination. It would also require more infrastructure, stronger traffic controls, larger service capacity and potentially further environmental assessment if thresholds or authorised footprints were exceeded.

No-go operational alternative

The no-go operational alternative would mean that the proposed consent-use activities would not operate. The approved primary-rights agricultural development may continue, but the eco-cabins, campsite, farmers' market, farm shop, renewed cultivation areas and airstrip would not be implemented or operated as part of this application.

This alternative would avoid operational impacts such as visitor activity, market-day traffic, wastewater generation, waste production, lighting, noise and increased human movement. However, it would also prevent the positive operational benefits of the proposal from being realised. These include local market opportunities, farm-based employment, rural tourism, productive use of historically cultivated land, income diversification, support for alien clearing, improved land management and rehabilitation.

The no-go operational alternative is therefore not preferred because it does not meet the project purpose and need and would reduce the opportunity to implement a structured, environmentally managed farm operation.

Provide a motivation for the preferred operational alternative.

The preferred operational alternative is considered the most appropriate because it allows the farm to realise the agricultural, tourism and local economic benefits of the proposal while avoiding or reducing operational impacts through active management. It provides a practical framework for managing traffic, waste, water, wastewater, fire risk, visitor behaviour, rehabilitation and ongoing compliance. On balance, this alternative best mitigates unavoidable operational impacts and maximises positive outcomes relating to rural economic development, agricultural productivity, ecological rehabilitation and long-term sustainable land management.

Provide a detailed motivation if no alternatives exist.

N/A

List the positive and negative impacts that the operational alternatives will have on the environment.

The operational alternatives relate to how the consent-use activities will be managed once implemented, including the eco-cabins, campsite, farmers' market, farm shop, renewed cultivation areas, grass airstrip, access, waste, wastewater, water use, energy use, fire management, alien clearing and rehabilitation.

Preferred operational alternative — controlled, low-impact and environmentally managed operation

This alternative allows the farm to operate as a working agricultural property with complementary, limited-scale agri-tourism and market activities, subject to clear operational controls, defined footprints, visitor management, wastewater maintenance, waste management, water-use monitoring, fire controls, alien clearing, rehabilitation and compliance with the EMPr.

Positive impacts

- Maintains the primary agricultural function of the property while allowing compatible consent uses to support farm diversification.
- Limits activity to the approved footprints and defined operational areas, reducing disturbance beyond the authorised development nodes.
- Controls visitor movement and reduces the risk of trampling, littering, off-road driving and disturbance to rehabilitation areas.
- Allows the farmers' market and farm shop to support local producers, rural suppliers and small enterprises while remaining within a managed market precinct.
- Market-day traffic can be managed through defined access, parking, signage and circulation controls.
- The location of the market near the existing entrance reduces internal traffic movement through the farm.
- Limited eco-cabin and campsite occupancy reduces operational pressure on water, wastewater, waste and energy systems.
- Guest rules can reduce fire risk, noise, lighting impacts, waste impacts and disturbance to fauna.
- Source separation, recycling and controlled waste removal reduce waste volumes and pollution risk.
- Regular maintenance of package sewage treatment plants and disposal beds reduces the risk of effluent failure, odour and contamination.
- Monitoring of borehole use and maintenance of rainwater harvesting systems supports sustainable water use.
- Dryland cultivation avoids irrigation demand and reduces pressure on groundwater resources.
- Off-grid solar and gas systems reduce reliance on municipal services and support a resource-efficient rural operating model.
- Use of existing grass and gravel tracks maintains rural character and limits soil sealing.
- Routine road and stormwater maintenance reduces erosion, rutting and sediment movement.
- Ongoing alien invasive clearing and indigenous rehabilitation improve habitat condition and ecological connectivity over time.
- Maintenance of firebreaks and fire-safety controls reduces fire risk and improves land-management resilience.
- Record-keeping and compliance monitoring support implementation of the EMPr and environmental authorisation conditions.
- This alternative maximises the positive agricultural, socio-economic, tourism and rehabilitation benefits while keeping operational impacts manageable.

Negative impacts

- Operational activities will still generate traffic, particularly on market days.
- Visitors, guests, vendors and staff will increase human presence, movement and activity on the farm.
- Market days will still generate waste, noise, dust and parking pressure that require active management.
- Accommodation uses will still generate wastewater, solid waste and water demand.
- Package sewage treatment plants and subsurface disposal beds remain a potential pollution risk if maintenance is not properly implemented.
- Borehole use will increase and must be monitored to ensure that abstraction remains sustainable.
- Grass and gravel access routes may generate dust in dry weather and require maintenance after rainfall.
- The campsite and eco-cabins may introduce lighting and noise into parts of the farm currently subject to lower-intensity use.
- The airstrip will require ongoing mowing, maintenance, erosion control and operational safety management.

- Fire risk remains present due to visitor activity, cooking, gas use, wood burners and dry vegetation, although it can be mitigated through controls.
- The effectiveness of this alternative depends on consistent landowner management, staff training, guest compliance, vendor compliance and implementation of the EMPr.

Summary of comparative impacts

The unmanaged operational alternative would create the highest risk of avoidable environmental impacts because it would rely on ad hoc management and would not provide sufficient control over visitors, waste, wastewater, fire risk, traffic, water use, rehabilitation and alien clearing.

The higher-intensity commercial operational alternative would increase socio-economic benefits, but would also increase traffic, waste, wastewater, water demand, noise, lighting, fire risk and pressure on the rural character of the site. It may also require additional infrastructure and further assessment if the assessed operating assumptions are exceeded.

The no-go alternative would avoid the direct operational impacts of the consent uses, but would also prevent the agricultural diversification, rural tourism, market, employment and rehabilitation-support benefits from being realised.

The preferred controlled, low-impact and environmentally managed operational alternative is therefore considered the most appropriate option. It enables the farm to function as a diversified agricultural property while managing unavoidable operational impacts through defined footprints, visitor controls, market management, water-use monitoring, wastewater maintenance, waste separation, fire management, alien clearing, rehabilitation and implementation of the EMPr.

1.6. The option of not implementing the activity (the 'No-Go' Option).

Provide an explanation as to why the 'No-Go' Option is not preferred.

No-go alternatives all described above under each section.

1.7. Provide an explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.

All potential alternatives have been included.

1.8. Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.

Having considered the property, site, activity, design/layout, technology and operational alternatives, the preferred alternative is the implementation of the proposed consolidated agricultural, agri-tourism and market-related consent-use development on **Portion 8 of Farm 223, Uplands, Plettenberg Bay**, as shown in the Site Development Plan.

The preferred location of the activity is the application property itself, namely **Portion 8 of Farm 223**, located along the **R340 north of Plettenberg Bay**. No alternative property is preferred because the proposal is intrinsically linked to this specific agricultural property, its ownership, existing Agriculture Zone I land-use rights, approved primary-rights development, historic agricultural use, existing access, existing farm tracks, disturbed and transformed areas, and the landowner's long-term objective to restore and diversify the farm while retaining its agricultural function.

Within the property, the preferred site alternative is the consolidated on-site layout that directs the proposed consent-use activities to areas that are historically cultivated, agriculturally used, disturbed, plantation-affected or alien-infested as far as possible. The preferred layout retains the more ecologically connected and higher restoration-potential areas, particularly in the northern part of the property, for alien clearing, indigenous rehabilitation and ecological connectivity. The proposed development footprint remains below the applicable 20 ha vegetation-clearance threshold and is arranged to avoid unnecessary disturbance, road creation and service expansion.

The preferred activity alternative is the implementation of the following consent-use components:

- five eco-cabins;
- a 10-stand campsite with ablution facilities and parking;
- a farmers' market and farm shop near the existing R340 entrance;
- renewed dryland cultivation of historically cultivated agricultural areas;
- continued grazing and agricultural use on the balance of the productive areas;
- a grass airstrip within the planned firebreak;
- use and limited upgrading of existing internal farm tracks where required; and
- associated off-grid water, sanitation, energy, waste-management and stormwater infrastructure.

The preferred design and layout alternative is the consolidated low-impact layout shown in the Site Development Plan. This layout is preferred because it clusters development into logical nodes, makes use of existing access and internal tracks, positions the farmers' market and farm shop near the existing entrance to limit internal traffic, places accommodation as modest low-impact tourism nodes, retains productive agricultural areas, and protects areas identified for rehabilitation and ecological connectivity.

The preferred technology alternative is the off-grid, resource-efficient services model. This includes the use of the existing borehole, rainwater harvesting, dryland cultivation without irrigation, gravity-fed water distribution where practical, solar photovoltaic systems with battery storage, gas for high-demand thermal uses, package sewage treatment plants, subsurface evapotranspiration and infiltration beds, source-separated recycling, owner-managed waste removal, and grass or gravel roads with low-impact stormwater controls.

The preferred operational alternative is the controlled, low-impact and environmentally managed operation of the farm. Under this model, the property will continue to function primarily as a working agricultural farm, with complementary agri-tourism and

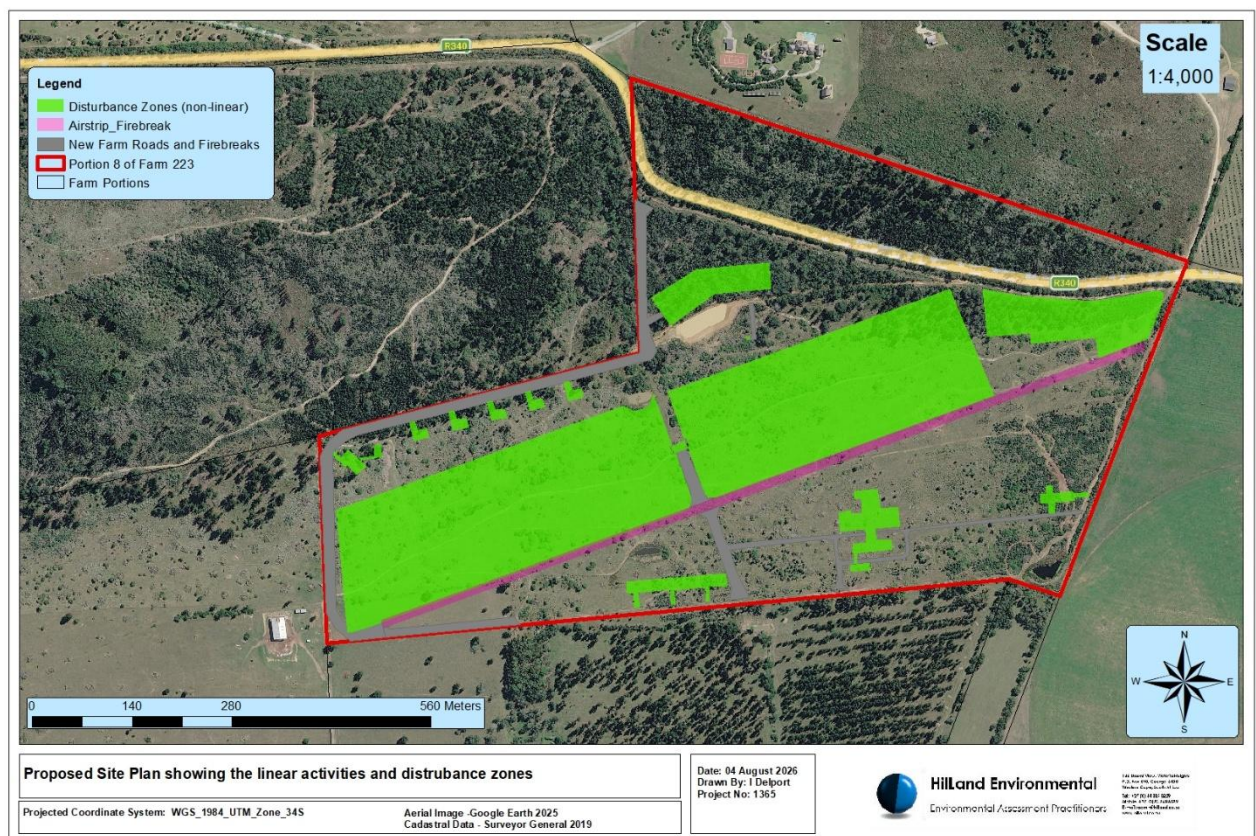
market-related activities operated within approved footprints and subject to the EMPr, specialist recommendations and conditions of authorisation. Operational controls will include defined activity areas, market-day traffic and waste management, visitor controls, water-use monitoring, wastewater-system maintenance, fire management, alien clearing, rehabilitation and ongoing environmental compliance monitoring.

The preferred alternatives are therefore considered to provide the most appropriate balance between agricultural productivity, rural economic diversification, low-impact tourism, local producer support, ecological rehabilitation and environmental protection. The preferred alternative makes use of an existing agricultural property and existing infrastructure opportunities, avoids more sensitive or higher-restoration-potential areas as far as possible, minimises new disturbance, maintains the rural agricultural character of the area, and allows unavoidable impacts to be managed through mitigation measures contained in the EMPr.

On this basis, the preferred alternative is the authorisation of the proposed consent-use development on **Portion 8 of Farm 223, Uplands, Plettenberg Bay**, in accordance with the preferred Site Development Plan, subject to implementation of the EMPr, specialist mitigation measures, municipal approvals and all relevant environmental authorisation conditions.

2. “No-Go” areas

Explain what “no-go” area(s) have been identified during identification of the alternatives and provide the co-ordinates of the “no-go” area(s).



No formal “no-go” area was identified during the alternatives assessment because the specialist assessments did not identify any confirmed fatal-flaw environmental feature within the application property that requires complete exclusion from all activity.

The property has a long history of agricultural cultivation, grazing, plantation use, alien invasive infestation and farm infrastructure, and the terrestrial biodiversity specialist confirmed that there are no mapped remnants of South Outeniqua Sandstone Fynbos remaining on site. The freshwater specialist further confirmed that the mapped ESA 1 aquatic feature is not a watercourse but corresponds with an existing farm road, and that no functional natural aquatic feature requiring a watercourse buffer was confirmed within the proposed development footprint.

Notwithstanding this, the alternatives process identified areas that must be treated as avoidance, restricted-disturbance and rehabilitation areas. These include the northern restoration and ecological connectivity portions of the property, areas surrounding the proposed campsite and eco-cabins that are to be rehabilitated to indigenous vegetation, retained screening vegetation, existing farm dams and their immediate margins, existing contour berms and stormwater flow paths, and all areas outside the approved development and cultivation footprints shown on the Site Development Plan.

These areas are not “no-go” areas in the strict sense, as alien clearing, rehabilitation, firebreak maintenance, ecological restoration and environmental monitoring may be undertaken in them. However, they must be treated as no-go areas for

construction disturbance, stockpiling, dumping, laydown areas, vehicle movement, parking, fuel storage, waste storage and any unauthorised vegetation clearance. Development must remain within the approved footprints, and all retained and rehabilitation areas must be demarcated and protected during construction and operation in accordance with the EMPr.

The above "Disturbance Zone Plan" provides an indication of the areas required for work associated with the application and areas outside these zones should not be disturbed for the purpose of the application.

The exact coordinates of the restricted-disturbance and rehabilitation areas will be reflected on the final Site Development Plan, biodiversity overlay map and EMPr.

No separate surveyed no-go polygon coordinates are available at this stage because no formal fatal-flaw exclusion area has been identified.

The general site coordinate is 33°56'38.09" S; 23°19'20.70" E. The linear grass airstrip within the planned firebreak is referenced by the following coordinates: start point 33°56'53.61" S; 23°18'36.44" E, middle point 33°56'47.16" S; 23°18'58.75" E and end point 33°56'41.52" S; 23°19'19.07" E.

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

Describe the methodology to be used in determining and ranking the nature, significance, consequences, extent, duration of the potential environmental impacts and risks associated with the proposed activity or development and alternatives, the degree to which the impact or risk can be reversed and the degree to which the impact and risk may cause irreplaceable loss of resources.

The assessment of environmental impacts and risks associated with the proposed activity, development components and alternatives will be undertaken using a structured impact-assessment methodology. The methodology provides a consistent basis for identifying, describing, evaluating and ranking the likely environmental consequences of the proposed development, including the preferred alternative, feasible alternatives and the no-go alternative. The assessment will consider both the construction and operational phases of the proposed development.

The methodology will assess each potential impact or risk according to its nature, extent, duration, intensity, consequence, probability, significance, reversibility and potential to result in irreplaceable loss of resources. The assessment will be undertaken before and after the application of mitigation measures so that the effectiveness of mitigation can be considered and the residual significance of each impact can be determined.

Identification of impacts and risks

Potential impacts and risks will be identified through a review of the proposed activities, site development plan, specialist assessments, site observations, environmental sensitivity mapping, relevant planning information, listed activities, public-participation inputs and applicable legislative requirements.

The assessment will consider impacts associated with, but not limited to:

- vegetation clearance and transformation;
- disturbance of indigenous or recovering vegetation;
- loss or reduction of habitat;
- alien invasive vegetation spread or regrowth;
- soil disturbance, compaction and erosion;
- stormwater concentration and sediment movement;
- impacts on farm dams, drainage paths and stormwater flow;
- wastewater treatment and potential pollution risks;
- borehole abstraction and water-use sustainability;
- traffic, dust, noise and access safety;
- visual impacts and rural landscape character;
- fire risk;
- waste generation and litter;
- disturbance to fauna from lighting, noise and human activity;
- agricultural productivity and land-use compatibility;
- socio-economic benefits, including local market opportunities, employment and agricultural diversification; and
- cumulative impacts associated with vegetation clearance, land transformation and increased activity on the property.

Mitigation hierarchy

The assessment will apply the mitigation hierarchy in the following order:

1. **Avoidance** – avoid sensitive areas, unnecessary disturbance and impacts that may cause unacceptable loss.
2. **Minimisation** – reduce the footprint, scale, intensity or duration of unavoidable impacts.
3. **Rehabilitation** – restore disturbed areas, stabilise soils, re-establish indigenous vegetation and control alien regrowth.
4. **Management and monitoring** – implement operational controls, EMPr measures, maintenance requirements and compliance monitoring.
5. **Offset or compensation** – considered only where required and where residual impacts remain significant after avoidance, minimisation and rehabilitation.

For the proposed development, mitigation will include limiting vegetation clearance to approved footprints, using existing roads and tracks where possible, keeping roads narrow, implementing erosion and stormwater controls, maintaining wastewater systems, managing traffic and waste, monitoring borehole use, retaining ecological corridor areas, and continuing alien clearing and indigenous rehabilitation.

Assessment of alternatives

The same methodology will be applied consistently to the preferred alternative and all feasible alternatives, including activity, layout, technology and operational alternatives, as well as the no-go alternative. This will allow the alternatives to be compared on the basis of their relative environmental, social, agricultural and economic consequences.

The comparative assessment will identify:

- which alternative avoids the greatest number of negative impacts;
- which alternative minimises unavoidable impacts most effectively;
- which alternative results in the lowest residual significance after mitigation;
- which alternative maximises positive impacts;
- whether any alternative results in unacceptable or irreversible impacts; and
- whether the preferred alternative is environmentally acceptable.

Ranking and interpretation of impacts

Each impact will be presented in an impact-assessment table that includes:

- activity or project phase;
- impact description;
- nature of impact;
- extent;
- duration;
- intensity;
- probability;
- significance before mitigation;
- mitigation measures;
- significance after mitigation;
- reversibility;
- irreplaceable loss of resources;
- confidence level; and
- overall acceptability.

Impacts rated as **low significance** after mitigation will generally be considered acceptable, provided that standard mitigation and EMPr measures are implemented. Impacts rated as **medium significance** after mitigation will require specific management, monitoring and compliance measures. Impacts rated as **high or very high significance** after mitigation will require design refinement, avoidance or strong justification before they can be considered acceptable.

Overall decision-making

The final ranking of impacts and alternatives will be used to determine whether the preferred alternative should be recommended for authorisation. The preferred alternative will be considered acceptable only if:

- no fatal flaws are identified;
- impacts of high significance can be avoided or reduced to acceptable levels;
- irreversible impacts and irreplaceable loss of resources are avoided as far as possible;
- the residual impacts can be managed through the EMPr and authorisation conditions;
- positive impacts are maximised; and
- the development is aligned with the environmental sensitivities, agricultural use, rural character and planning context of the property.

Using this methodology, the environmental assessment will provide a transparent and reasoned basis for determining the nature, significance and acceptability of the potential impacts and risks associated with the proposed development and alternatives.

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

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

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

Alternative: Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development

PLANNING, DESIGN AND DEVELOPMENT PHASE

Loss of disturbed fynbos vegetation (extracted Hoare.2026)

Criteria	Rating / response
Potential impact and risk	Construction of infrastructure; however, none falls within fynbos areas. The camping area is within secondary vegetation, resulting in a negligible regional impact.
Resource irreplaceability	The vegetation type is not listed and is not threatened. Score = 1.
Threshold	The potential impact affects a negligible proportion of the vegetation type. Score = 1.
Resource condition	The habitat on site within the proposed development footprint is in moderate to poor condition and has already been affected by historical disturbance. Score = 2.
Reversibility of impact	Loss of habitat on site is partly reversible. Vegetation can be restored to its current state through active rehabilitation in combination with natural succession. Score = 3.
Extent of impact	The impact will occur within the site boundary. Score = 1.
Duration of impact	Damage to the habitat on site is assessed as long term, if it occurs. Score = 4.
Intensity of impact	At a local scale, the impact is of low intensity, since it would result in a slight impact on ecological processes. Score = 2.
Probability of occurrence	Based on the proposed development plan and the known location of the habitats found on site, the impact will be definite. Score = 5.
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 proposed activity. No measures are therefore required to improve confidence in the assessed impact.
Significance of impact	Biodiversity value score: $(1 + 1 + 2 + 3)/4 = 1.75$. Impact magnitude: $(1 + 4 + 2)/3 = 2.33$. The impact is calculated as $(1.75 \times 2.33 = 4.1)/5 = 0.8 = \text{VERY LOW}$ significance.
Possible mitigation measures	Clear and control aliens and encourage revegetation of previously invaded areas through natural successional processes. This can lead to the development of additional areas of fynbos of greater extent than what is expected to be lost.

Invasion by alien invasive plants (extracted Hoare, 2026)

Criteria	Rating / response
Potential impact and risk	Any disturbance enhances conditions favourable for invasion by alien species. Once established, these are hard to remove and require constant follow-up due to high seed production and resilience to control. Previously invaded areas are usually biologically damaged and difficult to reverse.
Resource irreplaceability	The natural fynbos areas are sensitive ecosystems that should be protected. They are irreplaceable in the sense that the original habitat is unlikely to recover in the case of high levels of damage. Score = 5.
Threshold	The potential impact affects a negligible proportion of the vegetation type but can spread easily and become more problematic over wider areas. Score = 2.
Resource condition	The habitat on site within the proposed development footprint is in poor condition and has already been affected by historical disturbance. Score = 1.
Reversibility of impact	Reversal of alien invasion is partly reversible. Vegetation can be restored to its current state through active rehabilitation in combination with natural succession, but this requires high input. Score = 3.
Extent of impact	The impact will occur within the site boundary, but it is likely to spill over into surrounding areas. Score = 2.
Duration of impact	Damage to the habitat on site is assessed as long term, if it occurs. Score = 4.
Intensity of impact	At a local scale, the impact could be of moderate to high intensity, since it would result in processes temporarily ceasing or continuing in a highly modified way. Score = 4.
Probability of occurrence	Based on the known patterns of invasion, the impact is likely. Score = 4.
Confidence	There is a high understanding of the species that invade and the impact on natural habitats. No measures are therefore required to improve confidence in the assessed impact.
Significance of impact	Biodiversity value score: $(5 + 1 + 3 + 3)/4 = 3.00$. Impact magnitude: $(2 + 4 + 4)/3 = 3.33$. The impact is calculated as $(3.00 \times 3.33 = 10.00)/5 = 2.00 = \text{MEDIUM}$ significance.
Possible mitigation measures	Continue to implement the approved alien management plan, which highlights control priorities and areas and provides a programme for long-term control.

PLANNING, DESIGN AND DEVELOPMENT PHASE
Soil disturbance, compaction and erosion during construction and establishment

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development
Potential impact and risk	Soil disturbance, compaction and erosion associated with cultivation preparation, access upgrades, service trenching, parking areas, eco-cabin and campsite preparation, market precinct establishment and airstrip levelling.
Nature of impact	Negative, direct and indirect.
Extent and duration of impact	Local extent within the construction and establishment areas. Duration will be temporary to medium term during construction, but may become long term if erosion is not controlled.
Consequence of impact or risk	Moderate consequence before mitigation, as exposed soils and disturbed slopes may be susceptible to erosion, especially around tracks, service trenches, parking areas, contour berms and the airstrip / firebreak corridor.
Probability of occurrence	Highly probable during construction and establishment if soils are disturbed.
Degree to which the impact may cause irreplaceable loss of resources	Low, provided erosion is prevented and soils are stabilised.
Degree to which the impact can be reversed	Partly reversible. Compacted and disturbed soils can be loosened, stabilised and rehabilitated, but severe erosion may be difficult to fully reverse.
Indirect impacts	Sediment movement to farm dams or downslope areas, concentration of stormwater runoff, dust generation, alien plant establishment on disturbed soils and reduced soil productivity if topsoil is lost.
Cumulative impact prior to mitigation	Medium cumulative impact when considered with existing farm tracks, construction associated with primary rights and proposed consent-use activities.
Significance rating of impact prior to mitigation	Medium negative.
Degree to which the impact can be avoided	Partly avoidable. Soil disturbance cannot be fully avoided, but unnecessary disturbance outside approved footprints can be avoided.
Degree to which the impact can be managed	High. Soil disturbance can be managed through construction controls, stormwater management and rehabilitation.
Degree to which the impact can be mitigated	High, if soil stabilisation, stormwater controls and rehabilitation are implemented timeously.
Proposed mitigation	Restrict construction activities to approved footprints; retain and protect existing contour berms where possible; strip and stockpile topsoil separately where required; stabilise exposed soils promptly; use grassed or gravel surfaces rather than paving where appropriate; rehabilitate service trenches; prevent concentrated runoff; install low berms and controlled cross-drainage; inspect after rainfall; repair rills, rutting and erosion immediately.
Residual impacts	Localised soil disturbance, compaction and maintenance requirements on access routes, parking areas and the airstrip / firebreak corridor.

Cumulative impact post mitigation	Low to medium negative.
Significance rating of impact after mitigation	Low negative.

Disturbance to farm dams, contour berms and stormwater flow paths

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development
Potential impact and risk	Disturbance to existing farm dams, contour berms and stormwater flow paths during construction, access upgrades, cultivation preparation and service installation.
Nature of impact	Negative and indirect.
Extent and duration of impact	Local extent within the property. Duration may be temporary during construction, but could become longer term if stormwater flow paths are altered or erosion develops.
Consequence of impact or risk	Low to moderate consequence before mitigation, as the freshwater specialist has not confirmed functional natural aquatic features on site, but the farm dams and contour berms form part of the existing stormwater-management system.
Probability of occurrence	Possible to probable if works are undertaken close to farm dams, berms or runoff paths.
Degree to which the impact may cause irreplaceable loss of resources	Low, as the dams are artificial farm dams and the mapped aquatic features have been disputed; however, poor stormwater management may create avoidable erosion and sediment impacts.
Degree to which the impact can be reversed	Fully to partly reversible if disturbance is identified early and rehabilitated.
Indirect impacts	Sedimentation of farm dams, increased erosion, altered runoff direction, reduced effectiveness of contour berms and increased maintenance requirements.
Cumulative impact prior to mitigation	Medium negative if considered together with construction.
Significance rating of impact prior to mitigation	Medium negative.
Degree to which the impact can be avoided	High. Direct disturbance to farm dams, dam margins and contour berms can largely be avoided through layout control and demarcation.
Degree to which the impact can be managed	High. Runoff can be managed through berms, cross-drainage, sediment controls and routine inspections.

Degree to which the impact can be mitigated	High. Impacts can be reduced to low significance with appropriate stormwater and erosion-control measures.
Proposed mitigation	Avoid farm dams and their immediate margins; retain existing contour berms as far as possible; maintain natural and existing managed runoff routes; prevent sediment-laden runoff from entering dams; stabilise disturbed areas; install temporary sediment controls where needed; inspect berms, dams and discharge points after rainfall; repair erosion immediately.
Residual impacts	Minor localised disturbance risk and ongoing maintenance of berms and drainage routes.
Cumulative impact post mitigation	Low negative.
Significance rating of impact after mitigation	Low negative.

Construction-phase dust, noise, vehicle movement and general disturbance

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development
Potential impact and risk	Temporary disturbance from construction vehicles, machinery, material delivery, vegetation clearing, excavation, levelling, trenching, stockpiling, dust and noise during establishment of the consent-use components.
Nature of impact	Negative and direct.
Extent and duration of impact	Local extent, mostly within the property and immediate access area. Duration will be temporary to short term during construction and establishment.
Consequence of impact or risk	Low to moderate consequence before mitigation, as the construction activities are localised and temporary but may cause nuisance, dust, noise and disturbance if unmanaged.
Probability of occurrence	Highly probable during construction and ground preparation.
Degree to which the impact may cause irreplaceable loss of resources	Low. This impact is primarily nuisance- and disturbance-related and does not generally cause irreplaceable resource loss if managed.
Degree to which the impact can be reversed	Fully reversible after construction, provided disturbed areas are rehabilitated and no erosion or pollution occurs.
Indirect impacts	Dust nuisance, disturbance to livestock or fauna, temporary visual disturbance, road-surface wear, construction waste and potential public complaints.
Cumulative impact prior to mitigation	Low to medium cumulative impact when considered with construction of approved primary-rights infrastructure and consent-use components.
Significance rating of impact prior to mitigation	Low negative.

Degree to which the impact can be avoided	Partly avoidable. Construction disturbance cannot be fully avoided but can be minimised through planning and timing.
Degree to which the impact can be managed	High, through implementation of construction-phase EMPr controls.
Degree to which the impact can be mitigated	High. Impacts can be reduced through dust control, working-hour restrictions, waste management and site supervision.
Proposed mitigation	Restrict construction to approved working areas; implement standard construction working hours; control dust during dry and windy conditions; maintain vehicles and machinery; prohibit unnecessary idling; manage stockpiles; prevent construction waste from dispersing; keep internal access routes clearly demarcated; rehabilitate disturbed areas promptly; comply with the EMPr.
Residual impacts	Temporary nuisance impacts during construction, reducing after completion.
Cumulative impact post mitigation	Low negative.
Significance rating of impact after mitigation	Low negative.

Visual change during construction and establishment

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development
Potential impact and risk	Temporary visual disturbance from vegetation clearing, construction activity, exposed soils, construction materials, machinery, temporary storage areas and establishment of structures.
Nature of impact	Negative and direct.
Extent and duration of impact	Local to surrounding-area extent. Duration will be temporary to short term during construction, with some longer-term visual change once structures are established.
Consequence of impact or risk	Low to moderate consequence before mitigation, because construction disturbance will be temporary and the development is modest in scale, but some areas may be visible from the road or surrounding rural landscape.
Probability of occurrence	Probable during construction.
Degree to which the impact may cause irreplaceable loss of resources	Low. The impact affects visual character rather than irreplaceable environmental resources.
Degree to which the impact can be reversed	Partly to fully reversible for construction disturbance; longer-term visual change from approved structures will remain but will not be out of character.
Indirect impacts	Perception of disturbance, temporary.

Cumulative impact prior to mitigation	Medium negative when considered with existing primary-rights development and consent-use construction.
Significance rating of impact prior to mitigation	Low negative.
Degree to which the impact can be avoided	Partly avoidable through siting, clustering and retention of screening vegetation.
Degree to which the impact can be managed	High through construction controls, visual screening, housekeeping and rehabilitation.
Degree to which the impact can be mitigated	Medium to high through natural materials, low-impact finishes, retained vegetation and rehabilitation.
Proposed mitigation	Cluster structures within approved nodes; retain existing screening vegetation; avoid unnecessary clearing; use natural materials and colours; avoid reflective finishes; keep construction areas tidy; rehabilitate exposed areas with indigenous vegetation.
Residual impacts	Some long-term visual change from approved buildings, market structures, accommodation nodes, but integrated into the rural agricultural landscape.
Cumulative impact post mitigation	Low to medium negative.
Significance rating of impact after mitigation	Low negative.

Grass airstrip / firebreak establishment disturbance

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development
Potential impact and risk	Establishment of a grass airstrip within the planned firebreak, including vegetation management, levelling, mowing, surface preparation and erosion risk along the linear corridor.
Nature of impact	Neutral to Positive, with positive land-management benefit through dual use as a firebreak and accessibility for emergency services.
Extent and duration of impact	Local extent along the airstrip / firebreak corridor. Duration will be long term for the life of the airstrip and firebreak.
Consequence of impact or risk	Minimal because the airstrip will make use of the planned firebreak and will remain grass surfaced.
Probability of occurrence	Highly probable if the preferred alternative is implemented.
Degree to which the impact may cause irreplaceable loss of resources	Low. The area is not identified as irreplaceable habitat, is transformed grazing area and will be a firebreak.

Degree to which the impact can be reversed	Not necessary to reverse
Indirect impacts	Erosion, soil exposure and possible disturbance from occasional aircraft use.
Cumulative impact prior to mitigation	Low – no change to the existing other than minor levelling requirement.
Significance rating of impact prior to mitigation	Low negative.
Degree to which the impact can be avoided	Unavoidable. The firebreak will still require vegetation management.
Degree to which the impact can be managed	High, grass cover maintenance, low-intensity use and limited use of the airstrip.
Degree to which the impact can be mitigated	Medium to high. Impacts can be reduced by keeping the strip grassed, avoiding hard surfacing and maintaining stormwater controls.
Proposed mitigation	Locate the airstrip strictly within the planned firebreak corridor; keep the surface grassed; avoid hard surfacing; limit grading and levelling to the minimum required for safety; install and maintain low berms on the upslope side; manage crossfall and stormwater; monitor for erosion after rainfall; restrict use to low-intensity private use.
Residual impacts	Long-term maintained grass corridor with ongoing mowing, firebreak management and erosion-control requirements.
Cumulative impact post mitigation	Low negative.
Significance rating of impact after mitigation	Low negative.

OPERATIONAL PHASE – Preferred alternative

Operational waste generation from the farmers' market, farm shop, campsite and eco-cabins

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development
Potential impact and risk	Generation of solid waste from market vendors, visitors, farm-shop users, campsite users and eco-cabin guests, with associated risks of litter, windblown waste, odour, animal attraction and pollution if waste is not properly managed.
Nature of impact	Negative, direct and cumulative.
Extent and duration of impact	Local extent, mainly within the market precinct, farm shop, campsite, eco-cabin area and waste-storage areas. The impact will be long term for the operational life of the market.

Consequence of impact or risk	Moderate on market days when visitor numbers and waste volumes increase.
Probability of occurrence	Highly probable, as waste will be generated during normal operation of the consent-use activities.
Degree to which the impact may cause irreplaceable loss of resources	Low, provided waste is separated, stored and removed appropriately.
Degree to which the impact can be reversed	Fully reversible if waste is collected, recycled, stored securely and removed to an appropriate municipal waste facility.
Indirect impacts	Windblown litter, visual nuisance, odour, attraction of animals, reputational impacts if waste management is ineffective.
Cumulative impact prior to mitigation	Medium cumulative impact when considered together with market-day activity, accommodation use and farm operations.
Significance rating of impact prior to mitigation	Medium negative.
Degree to which the impact can be avoided	Avoidable through waste management (visitors, vendors and guests).
Degree to which the impact can be managed	High. Waste can be effectively managed through source separation, recycling, vendor rules, secure storage and regular removal.
Degree to which the impact can be mitigated	High. With proper controls, the residual impact can be reduced to medium significance.
Proposed mitigation	Provide clearly marked waste and recycling stations at the market, farm shop, campsite and accommodation areas; require vendors to minimise packaging and clean their stalls; separate recyclables at source; store waste securely to prevent windblown litter, odour and animal access; remove waste after market days; prohibit burning or dumping; remove residual waste to an appropriate municipal transfer facility; include waste rules in guest and vendor information.
Residual impacts	Ongoing waste generation requiring regular management, collection and disposal.
Cumulative impact post mitigation	Low negative.
Significance rating of impact after mitigation	Low negative.

Wastewater treatment and pollution risk from package sewage treatment plants and disposal beds

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development

Potential impact and risk	Pollution risk from failure, poor maintenance, overloading or incorrect operation of package sewage treatment plants, sewer reticulation and shallow subsurface evapotranspiration / infiltration beds serving the campsite, eco-cabins, farmers' market and farm shop.
Nature of impact	Negative, direct and indirect.
Extent and duration of impact	Local extent, primarily around the sewage treatment plants, sewer lines and disposal beds. The impact will require long term management - operational life of the development.
Consequence of impact or risk	Moderate to high before mitigation because poor wastewater management could affect soil, groundwater, odour conditions and public health.
Probability of occurrence	Possible without proper maintenance; reduced where professional servicing and monitoring are implemented

Degree to which the impact may cause irreplaceable loss of resources	Low with proper maintenance, but medium if prolonged system failure causes contamination.
Degree to which the impact can be reversed	Partly reversible if detected early and corrected.
Indirect impacts	Odour, soil contamination, groundwater contamination, non-compliance with water-related requirements and public-health concerns.
Cumulative impact prior to mitigation	Medium negative when considered with accommodation, campsite, farm shop and market wastewater loads.
Significance rating of impact prior to mitigation	Medium negative.
Degree to which the impact can be avoided	Avoidable through correct design, sizing, siting and responsible use and maintenance of the plant.
Degree to which the impact can be managed	High, provided maintenance, monitoring and record-keeping requirements are implemented.
Degree to which the impact can be mitigated	High, through appropriate design, professional servicing, sludge removal and operational controls.
Proposed mitigation	Install approved and appropriately sized package sewage treatment plants; confirm the final technology during detailed design; maintain sewage treatment plants at least annually or as required by supplier specifications; monitor sludge accumulation; remove sludge using an appropriate honeysucker vacuum tanker for disposal at a licensed facility; prevent overload; prohibit chemicals, grease, solids and unsuitable waste from entering the system; inspect disposal beds for odour or surfacing effluent; keep maintenance records; comply with Bitou Municipality, BOCMA / DWS and National Water Act requirements.
Residual impacts	Ongoing wastewater-management responsibility and residual pollution risk if maintenance lapses.
Cumulative impact post mitigation	Low to medium negative.

Significance rating of impact after mitigation	Low negative.
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Groundwater abstraction and water-use demand

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development
Potential impact and risk	Increased groundwater abstraction from the existing borehole for the campsite, eco-cabins, farmers' market, farm shop and associated primary-rights uses.
Nature of impact	Negative, direct and cumulative.
Extent and duration of impact	Local extent, relating to the existing borehole and on-site water supply system. The impact will be long term during the operational life of the development.
Consequence of impact or risk	Moderate before mitigation. The expected average maximum daily demand is modest in relation to the reported borehole yield, but abstraction must remain within sustainable limits.
Probability of occurrence	Probable, as operational water use will occur if the development proceeds.
Degree to which the impact may cause irreplaceable loss of resources	Low if abstraction remains within sustainable yield and dryland cultivation is maintained without irrigation.
Degree to which the impact can be reversed	Partly reversible through reduced abstraction, water-use controls and demand management if monitoring indicates stress.
Indirect impacts	Reduced groundwater availability, pressure on stored water reserves during dry periods, increased pumping requirements, and possible water-quality concerns if infrastructure is not maintained.
Cumulative impact prior to mitigation	Medium negative when considered with primary-rights development and all consent-use components.
Significance rating of impact prior to mitigation	Medium negative.
Degree to which the impact can be avoided	Partly avoidable through rainwater harvesting, demand reduction and dryland cultivation, but some water use is unavoidable.
Degree to which the impact can be managed	High through monitoring, water-efficient fittings, leak repairs and operational controls.
Degree to which the impact can be mitigated	Medium to high through water conservation, rainwater harvesting and abstraction monitoring.

Proposed mitigation	Monitor borehole abstraction volumes; maintain water use within the design assumptions; implement rainwater harvesting from roofs where practical; maintain gutters, first-flush diverters, tanks and filtration systems; use water-efficient fittings in ablutions, eco-cabins and the farm shop; repair leaks promptly; retain dryland cultivation with no irrigation requirement; review actual water demand periodically against predicted demand.
Residual impacts	Ongoing groundwater abstraction for operational uses, with reliance on continued water-use monitoring and efficient water management.
Cumulative impact post mitigation	Low negative.
Significance rating of impact after mitigation	Low negative.

Water-use efficiency and reduced water demand through dryland cultivation and rainwater harvesting

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development
Potential impact and risk	Positive impact associated with reducing water demand through dryland cultivation, rainwater harvesting, gravity-fed distribution where practical and water-efficient operation.
Nature of impact	Positive and direct.
Extent and duration of impact	Local extent, with long-term operational benefits for the property's water-use efficiency.
Consequence of impact or risk	Positive consequence because irrigation demand is avoided and roof runoff is used to supplement borehole supply.
Probability of occurrence	Highly probable if the preferred technology and operational controls are implemented.
Degree to which the impact may cause irreplaceable loss of resources	None. The impact reduces pressure on water resources.
Degree to which the impact can be reversed	Not applicable, as this is a positive impact. The benefits would reduce if rainwater harvesting and water-use controls are not maintained.
Indirect impacts	Improved resilience during dry periods, reduced pumping demand, reduced pressure on groundwater and increased awareness of water conservation by guests, vendors and staff.
Cumulative impact prior to mitigation	Positive cumulative effect when combined with off-grid services and dryland agricultural practices.
Significance rating of impact prior to mitigation	High positive.
Degree to which the impact can be avoided	Not applicable. The positive impact should be enhanced rather than avoided.

Degree to which the impact can be managed	High through maintenance of rainwater systems and enforcement of water-use controls.
Degree to which the impact can be mitigated	Not applicable, but the benefit can be enhanced through efficient fittings, leak management and monitoring.
Proposed mitigation	Maintain dryland cultivation with no irrigation; implement and maintain rainwater harvesting systems; use water-efficient fittings; repair leaks promptly; monitor water use; provide water-conservation information to guests, vendors and staff.
Residual impacts	Continued positive contribution to water efficiency, subject to ongoing maintenance.
Cumulative impact post mitigation	High positive.
Significance rating of impact after mitigation	High positive.

Traffic, access safety, dust and parking impacts

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development
Potential impact and risk	Increased vehicle movement, turning movements, parking demand, dust and access-safety risks associated mainly with the weekly farmers' market and, to a lesser extent, accommodation users and farm-shop visitors.
Nature of impact	Negative, direct and cumulative.
Extent and duration of impact	Surrounding-area extent, affecting the R340 access and internal market precinct. The impact will be long term, with periodic peaks on market days.
Consequence of impact or risk	Moderate before mitigation due to periodic concentration of vehicles and visitors on market days.
Probability of occurrence	Highly probable on market days.
Degree to which the impact may cause irreplaceable loss of resources	Low. The impact relates mainly to traffic safety, dust and operational management rather than irreplaceable resource loss.
Degree to which the impact can be reversed	Fully to partly reversible through traffic management, dust control, parking controls and access maintenance.
Indirect impacts	Dust nuisance, vegetation damage from overflow parking, disturbance to farm operations, unsafe stopping or turning, and increased maintenance of grass or gravel parking areas.
Cumulative impact prior to mitigation	Medium cumulative impact when considered with existing R340 traffic and proposed market activity.

Significance rating of impact prior to mitigation	Medium negative.
Degree to which the impact can be avoided	Partly avoidable. Market-related traffic cannot be avoided if the market operates, but unsafe or unmanaged traffic conditions can be avoided.
Degree to which the impact can be managed	High with clear access, parking, signage and market-day controls.
Degree to which the impact can be mitigated	Medium to high. Mitigation will reduce but not remove periodic traffic and dust impacts.
Proposed mitigation	Use the existing R340 access; maintain sight distances by clearing road-reserve vegetation where required; demarcate parking and internal circulation; provide directional signage; manage entry and exit during peak market periods; prevent roadside parking; maintain grass and gravel parking areas; apply dust management where required; monitor initial market operations and adjust controls if needed.
Residual impacts	Periodic traffic, dust and parking pressure on market days.
Cumulative impact post mitigation	Low negative.
Significance rating of impact after mitigation	Low negative.

Operational noise, lighting, visitor movement and disturbance to fauna

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development
Potential impact and risk	Disturbance to fauna and rural quietness from visitors, campsite users, eco-cabin guests, market activity, vehicles, lighting, noise and general human movement.
Nature of impact	Negative, direct and indirect.
Extent and duration of impact	Local extent, mainly within and around the market precinct, campsite, eco-cabin area and access routes. The impact will be long term during operation.
Consequence of impact or risk	Low to moderate before mitigation because the proposed uses are limited in scale, but visitor movement and lighting may disturb fauna and rehabilitation areas if unmanaged.
Probability of occurrence	Probable during operation.
Degree to which the impact may cause irreplaceable loss of resources	Low, provided visitor movement is controlled and rehabilitation areas are protected.
Degree to which the impact can be reversed	Fully to partly reversible through operational controls, lighting management and restriction of access to sensitive or rehabilitation areas.

Indirect impacts	Disturbance to fauna, trampling of regenerating vegetation, noise nuisance.
Cumulative impact prior to mitigation	Low negative when considered with accommodation, market activity, access routes and farming operations.
Significance rating of impact prior to mitigation	Medium negative.
Degree to which the impact can be avoided	Partly avoidable through layout, demarcation and restrictions on visitor movement.
Degree to which the impact can be managed	High through guest rules, signage, access control, lighting controls and staff oversight.
Degree to which the impact can be mitigated	High, provided operational controls are enforced.
Proposed mitigation	Limit visitors and guests to approved activity areas; demarcate restricted rehabilitation and ecological areas; enforce quiet hours at the campsite and eco-cabins; use low-intensity, downward-directed lighting only where needed for safety; avoid unnecessary floodlighting; provide guest and vendor environmental rules; restrict pets where necessary; monitor visitor behaviour and correct non-compliance.
Residual impacts	Low-level long-term disturbance associated with continued human activity and limited lighting.
Cumulative impact post mitigation	Low negative.
Significance rating of impact after mitigation	Low negative.

Alien invasive vegetation control and indigenous rehabilitation

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development
Potential impact and risk	Positive impact associated with ongoing alien invasive vegetation clearing, follow-up control and rehabilitation of selected areas to indigenous vegetation, particularly in the northern restoration and tourism focus areas.
Nature of impact	Positive, direct and cumulative.
Extent and duration of impact	Local extent within the property, with potential ecological connectivity benefits to surrounding natural areas. The impact will be long term.
Consequence of impact or risk	High positive consequence because alien clearing and rehabilitation will improve habitat condition, reduce fuel loads and support ecological restoration.
Probability of occurrence	Highly probable if the alien clearing programme and EMPs are implemented.
Degree to which the impact may cause	None. The impact improves resource condition and reduces degradation.

irreplaceable loss of resources	
Degree to which the impact can be reversed	Not applicable as a positive impact. Benefits may be lost if follow-up clearing is not maintained.
Indirect impacts	Improved ecological connectivity, reduced alien seed sources, improved visual quality, reduced fire fuel loads, improved habitat structure and enhanced long-term land stewardship.
Cumulative impact prior to mitigation	Positive cumulative impact when combined with footprint control, retention of restoration areas and low-impact tourism management.
Significance rating of impact prior to mitigation	High positive.
Degree to which the impact can be avoided	Not applicable. The impact should be enhanced.
Degree to which the impact can be managed	High through implementation of the alien clearing programme, follow-up control and rehabilitation monitoring.
Degree to which the impact can be mitigated	Not applicable, but the positive impact can be enhanced through sustained rehabilitation.
Proposed mitigation	Continue to implement the approved alien clearing programme; undertake follow-up clearing to prevent regrowth; prioritise northern restoration and ecological connectivity areas; rehabilitate disturbed areas with suitable indigenous species; use cleared alien timber where appropriate and lawful; monitor rehabilitation success; prevent visitor access into sensitive rehabilitation areas; keep records of clearing and rehabilitation actions.
Residual impacts	Long-term positive ecological and land-management benefits, subject to ongoing follow-up clearing.
Cumulative impact post mitigation	High positive.
Significance rating of impact after mitigation	High positive.

Agricultural diversification, local economic opportunities and rural livelihoods

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development
Potential impact and risk	Positive socio-economic impact associated with farm diversification, local producer support, farmers' market activity, farm-shop trade, tourism accommodation, employment and rural livelihood opportunities.
Nature of impact	Positive, direct and cumulative.
Extent and duration of impact	Surrounding-area extent, with benefits to the property, local producers, vendors, workers and the broader Uplands / Wittedrift rural economy. The impact will be long term.

Consequence of impact or risk	High positive consequence because the proposal supports productive agriculture, local value chains, rural tourism and diversified farm income.
Probability of occurrence	Highly probable if the preferred alternative is implemented and operated within the approved scale.
Degree to which the impact may cause irreplaceable loss of resources	None. The impact supports productive use of agricultural land and local economic participation.
Degree to which the impact can be reversed	Not applicable as a positive impact. Benefits would reduce if the market, accommodation or agricultural activities cease.
Indirect impacts	Increased local spending, support for small producers, improved farm viability, employment in hospitality and maintenance, improved financial basis for alien clearing and rehabilitation, and increased awareness of local agricultural products.
Cumulative impact prior to mitigation	High positive cumulative impact when considered with agricultural production, market activity, tourism and rehabilitation commitments.
Significance rating of impact prior to mitigation	High positive.
Degree to which the impact can be avoided	Not applicable. The impact should be enhanced.
Degree to which the impact can be managed	High through market rules, local vendor prioritisation, farm-to-plate focus and controlled operating scale.
Degree to which the impact can be mitigated	Not applicable, but the benefit can be enhanced through local procurement, local labour and support for small producers.
Proposed mitigation	Prioritise local producers and vendors; support farm-origin and locally produced goods; use local labour where practical; maintain the farm-to-plate focus; keep consent uses compatible with the agricultural character of the property; reinvest operational capacity into alien clearing, maintenance and rehabilitation; avoid intensification beyond the assessed scale without further approval.
Residual impacts	Long-term positive economic and livelihood benefits.
Cumulative impact post mitigation	High positive.
Significance rating of impact after mitigation	High positive.

Long-term land management, EMPr compliance and environmental monitoring

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development

Potential impact and risk	Positive impact associated with formalised environmental management, EMPr implementation, monitoring, record-keeping, rehabilitation, wastewater maintenance, waste control, fire management and operational compliance.
Nature of impact	Positive, direct and cumulative.
Extent and duration of impact	Local extent across the property, with long-term benefits during operation.
Consequence of impact or risk	High positive consequence because formalised management improves accountability, reduces environmental risks and supports long-term land stewardship.
Probability of occurrence	Highly probable if authorisation conditions, the EMPr and landowner controls are implemented.
Degree to which the impact may cause irreplaceable loss of resources	None. The impact reduces the risk of resource loss and supports restoration.
Degree to which the impact can be reversed	Not applicable as a positive impact. Benefits would reduce if compliance and monitoring are not maintained.
Indirect impacts	Improved maintenance, reduced pollution risk, better alien control, improved erosion response, reduced visitor impacts, improved fire preparedness and clearer accountability.
Cumulative impact prior to mitigation	Positive cumulative impact when considered together with the preferred layout, technology and operational controls.
Significance rating of impact prior to mitigation	High positive.
Degree to which the impact can be avoided	Not applicable. The impact should be enhanced.
Degree to which the impact can be managed	High through appointment of responsible persons, inspections, maintenance schedules and record-keeping.
Degree to which the impact can be mitigated	Not applicable, but the benefit can be enhanced through consistent implementation.
Proposed mitigation	Implement the EMPr and all authorisation conditions; appoint a responsible person for environmental compliance; keep records of wastewater maintenance, waste removal, borehole abstraction, alien clearing and rehabilitation; inspect roads, stormwater controls, parking areas, disposal beds and rehabilitation areas regularly; correct erosion, litter, alien regrowth or infrastructure failure promptly; provide staff, guest and vendor induction on environmental rules.
Residual impacts	Long-term positive environmental-management benefit, dependent on ongoing implementation.
Cumulative impact post mitigation	High positive.
Significance rating of impact after mitigation	High positive.

Operational use and maintenance of the grass airstrip / firebreak corridor

Criteria	Rating / response
Alternative	Preferred alternative – consolidated agricultural, agri-tourism and market-related consent-use development
Potential impact and risk	Ongoing operation and maintenance of the grass airstrip within the planned firebreak, including mowing, surface maintenance, low-frequency aircraft use, soil exposure and erosion risk.
Nature of impact	Negative and direct, with a positive fire-management benefit due to dual use as a firebreak.
Extent and duration of impact	Local extent along the airstrip / firebreak corridor. The impact will be long term during operation.
Consequence of impact or risk	Moderate before mitigation because the maintained grass corridor will remain a linear feature requiring ongoing maintenance and erosion control.
Probability of occurrence	Highly probable if the airstrip is implemented.
Degree to which the impact may cause irreplaceable loss of resources	Low to medium, depending on erosion control and vegetation maintenance.
Degree to which the impact can be reversed	Partly reversible. If the airstrip is decommissioned, the area can be rehabilitated, but compacted or shaped areas may require active restoration.
Indirect impacts	Erosion, soil exposure, alien regrowth, visual change, disturbance from occasional aircraft use and ongoing maintenance requirements.
Cumulative impact prior to mitigation	Medium to high negative when considered with the overall land transformation footprint.
Significance rating of impact prior to mitigation	High negative.
Degree to which the impact can be avoided	Partly avoidable if the airstrip component is excluded; however, the firebreak function may still require vegetation management.
Degree to which the impact can be managed	High through grass-cover maintenance, low-intensity use, erosion monitoring and restriction of the airstrip to the approved corridor.
Degree to which the impact can be mitigated	Medium to high. Impacts can be reduced by keeping the surface grassed, avoiding hard surfacing and maintaining stormwater controls.
Proposed mitigation	Keep the airstrip strictly within the planned firebreak corridor; maintain a grass surface; avoid hard surfacing; restrict use to low-intensity private use; prohibit fuel storage and aircraft maintenance unless separately authorised; maintain the upslope berm and crossfall drainage; monitor erosion after rainfall; repair rutting or bare patches promptly; prevent alien regrowth; retain the firebreak function.

Residual impacts	Long-term maintained grass corridor with ongoing mowing, firebreak management and erosion-control requirements.
Cumulative impact post mitigation	Medium negative, with a medium positive fire-management benefit.
Significance rating of impact after mitigation	Medium negative

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

1.	Provide a summary of the findings and impact management measures identified by all Specialist and an indication of how these findings and recommendations have influenced the proposed development.
• Agriculture: ○ The proposal will enhance the use of agricultural resources and the minor loss for camping and tourism will not negatively impact the agricultural resource utilization. ○ The property is located within the rural area and in line with the surrounding land uses ○ The proposed site plan is in keeping with the land uses of the area – agriculture in the agricultural area and consent use for market and tourism in the secondary marginal areas. ○ The existing access point to the property will serve to accommodate all required access to the farm. • Planning: the consent use application demonstrates the compatibility of the application in terms of all planning frameworks and guidelines. ○ The proposed development is consistent with all applicable spatial planning policies: the local Bitou Municipal SDF; District SDF and Provincial SDF. ○ The biophysical informants on the site were taken into consideration in the layout design of the development proposal. ○ The proposal will enhance the local rural character of the area. ○ The proposal is consistent with the SPLUMA Planning principles. ○ There is a great need for this proposal; it is highly desirable and suitable for the area. • Terrestrial biodiversity theme – ○ The proposed infrastructure is within one regional vegetation type, South Outeniqua Sandstone fynbos, which is not listed in any threat category. ○ The proposed infrastructure is not within any CBA area but most of the old cultivated lands are within an ESA2 area. ○ The vegetation within the proposed infrastructure footprint is a mixture of dense aliens, disturbed (possibly secondary) fynbos and old cultivated lands with secondary grassland. Only the disturbed fynbos has any value in terms of conservation of biodiversity patterns. ○ In terms of the legal description of natural vegetation, all of these are legally in a natural state, although the old lands and dense alien areas are ecologically modified. ○ An impact assessment considered one potential impact that is relevant to the Terrestrial Biodiversity Theme, namely: Possible loss or damage to disturbed fynbos: assessed as having VERY LOW significance. ○ Terrestrial Biodiversity Statement: ▪ Based on the site verification and impact assessment it is confirmed that the site has LOW sensitivity from a Terrestrial Biodiversity perspective. ▪ Based on the low risks to surrounding ecosystem function of the proposed project, it is regarded to be an acceptable proposal for the site and can be approved. ▪ This statement is subject to any conditions contained in the final approved EMP, including implementation of the approved invasive species management plan. • Plant Species Theme- ○ No flagged, sensitive or listed plant species were found within the proposed development footprint and none are likely to occur within these areas under current ecological conditions. There are natural fynbos areas that have a high likelihood of containing flagged plant species but these areas fall outside the proposed footprint areas and will not be affected by the proposed project. The footprint area therefore has LOW sensitivity with respect to the Plant Species Theme (even though areas of HIGH sensitivity occur within the property) and a Plant Species Compliance Statement was therefore required. The following is therefore stated: ○ The habitat of the proposed footprint area has low sensitivity with respect to the Plant Species Theme. ○ The proposed development will not have any impacts on any terrestrial plant SCC. • Animal Species Theme ○ Of the animal species flagged for the site, none are likely to be resident. None were found during the site inspection. The site therefore has LOW sensitivity with respect to the Animal Species Theme. An Animal Species Compliance Statement was therefore required. The following is therefore stated: ○ The habitat of the proposed footprint area has LOW sensitivity with respect to the Terrestrial Animal Species Theme. ○ The proposed development will not have any impacts on any terrestrial animal SCC.	

- **Aquatic Biodiversity Theme**
 - No sensitive aquatic features on site
- **Visual**
 - the activities are all compatible with the rural character of the area and will enhance the agricultural rural "look and feel" of the area.
 - The proposed development is expected to have a low visual impact due to its modest scale, clustered layout and location within existing vegetated areas. The eco-cabins and campsite are positioned as compact nodes on vegetated slopes, allowing natural screening to reduce visibility from surrounding areas. Although the agricultural buildings, farm shop and farmers' market may be visible from the main road, these elements are considered compatible with the rural agricultural character and are not expected to be out of scale with the receiving environment. Visual mitigation will be achieved through retaining and rehabilitating indigenous vegetation, limiting the development footprint, avoiding unnecessary new access routes and paved surfaces, using natural materials and low-impact finishes, and maintaining a farm-appropriate architectural style. These measures will help ensure that the development remains visually unobtrusive and integrated with the rural landscape.
- **Socio-economic**
 - The proposed development will result in an overall positive socio-economic impact by strengthening the productive use and long-term viability of Portion 8 of Farm 223.
 - The proposal supports agricultural diversification through renewed dryland cultivation, continued grazing, the farm shop and farmers' market, while also introducing compatible low-impact agri-tourism accommodation in the form of eco-cabins and a campsite.
 - The farmers' market and farm shop will provide a local outlet for farm-origin produce, value-added goods and products from surrounding producers, thereby supporting small businesses, shortening local supply chains and creating opportunities for local participation in the rural economy.
 - The development is also expected to generate direct and indirect employment opportunities during construction and operation, including farm work, hospitality, cleaning, maintenance, market management, vendor support and environmental management activities such as alien clearing and rehabilitation.
 - The proposal aligns with the Bitou SDF, the Western Cape Rural Areas Guidelines and broader rural-development objectives by supporting agriculture, low-impact tourism, local economic participation and rural livelihood diversification, while retaining the agricultural character of the property.
 - Negative socio-economic impacts are expected to be limited and manageable, mainly relating to periodic traffic, dust, noise and waste associated with market days and visitor activity.
 - With implementation of the EMPr, traffic controls, waste management, operational rules and compliance monitoring, the residual socio-economic impact is considered to be positive and of medium to high significance.

All recommendations made by the specialist form part of the EMPr.

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

Terrestrial biodiversity specialist impact management measures (Hoare, 2026)

Assessed impact	Impact significance	Recommended impact management measures
Loss of disturbed fynbos vegetation	Very Low	Clear and control alien invasive plants and encourage revegetation of previously invaded areas through natural successional processes. This may allow additional fynbos areas to develop and could offset the limited disturbed vegetation loss expected.
Invasion by alien invasive plant species	Medium	Continue implementing the approved Alien Control and Vegetation Management Plan, including priority control areas, follow-up clearing and long-term alien invasive plant management.

Additional general recommendation linked to biodiversity management:

- Obtain permits for any protected plant species that may be affected by the proposed development in terms of the **Cape Nature and Environmental Conservation Ordinance 19 of 1974**.

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

All will be implemented

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

The proposed development is expected to have an overall positive impact on the surrounding communities, particularly the Uplands, Wittedrift, Redford, Kurland and broader Plettenberg Bay rural area, by strengthening the local rural economy and creating new opportunities linked to agriculture, tourism and local trade. The farmers' market and farm shop will provide a regular outlet for local farmers, small producers, artisans and food vendors to sell farm-origin produce, value-added goods and locally made products directly to consumers. This will help shorten local supply chains, improve access to fresh and local produce, and support small-scale enterprise development within the surrounding communities. The proposed eco-cabins and campsite will also attract visitors to the area, creating indirect benefits for local service providers, tourism operators, maintenance contractors and suppliers. Employment opportunities are expected during both construction and operation, including farming, hospitality, cleaning, maintenance, market management, vendor support, alien clearing and rehabilitation activities.

The development may also contribute positively to rural social interaction by creating a community-oriented market space along the R340, where local residents, visitors and producers can interact in a controlled farm-based setting. The proposal

supports agricultural diversification and rural livelihood resilience, which is particularly relevant in farming areas where income can be affected by seasonal conditions, drought, input costs and market fluctuations. By combining continued agriculture with low-impact agri-tourism and local-producer trade, the project can help improve the long-term viability of the farm while contributing to the broader rural economy.

Potential negative impacts on surrounding communities are expected to be limited and manageable. These may include periodic increases in traffic, dust, noise and parking demand on market days, as well as increased waste and visitor activity. These impacts will be most noticeable near the R340 access and market precinct, particularly during peak market periods. However, the use of the existing access, maintenance of sight distances, demarcated parking, internal traffic controls, waste management, dust control, visitor rules and implementation of the EMPr will reduce these impacts. The development is not expected to place additional pressure on municipal bulk services because water, sanitation, waste handling and energy will be managed on site through borehole supply, rainwater harvesting, package sewage treatment plants, owner-managed waste removal and off-grid energy systems.

Overall, the proposed development is considered compatible with the surrounding rural community context. It will retain the agricultural character of the property, support local economic participation, provide additional tourism and market opportunities, and contribute to environmental management through alien clearing and rehabilitation. With implementation of the recommended mitigation and operational controls, the residual impact on surrounding communities is expected to be positive and of medium to high significance, while localised nuisance impacts are expected to remain manageable.

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

Climate change may influence the proposed development primarily through changes in rainfall patterns, more frequent or intense droughts, higher temperatures, increased fire risk, more intense rainfall events, and associated impacts on water availability, agricultural productivity, stormwater management, visitor comfort and infrastructure maintenance. These risks are relevant to the proposed dryland cultivation, grazing, eco-cabins, campsite, farmers' market, farm shop, internal roads, wastewater systems, borehole use, rainwater harvesting and the grass airstrip/firebreak corridor.

The potential impacts of climate change have been considered in the project design through the adoption of a low-impact, resource-efficient and resilient development model. The proposed cultivation areas will remain dryland and will not rely on irrigation, thereby reducing pressure on groundwater resources during dry periods. Water demand for the consent-use components is limited and will be supplied through the existing borehole, supported by rainwater harvesting from buildings where practical. Borehole abstraction must be monitored, water-efficient fittings must be used, leaks must be repaired promptly, and operating capacity must be reviewed if monitoring indicates water stress or declining borehole yield.

The risk of increased rainfall intensity has been addressed through the use of existing farm tracks where possible, grassed and gravel surfaces rather than extensive hard surfacing, retention of existing contour berms, low berms on the upslope side of roads and the airstrip, controlled cross-drainage, low-velocity discharge points and protection of existing farm dams and stormwater flow paths. These measures will reduce erosion, sediment movement and concentrated runoff during storm events. Disturbed areas must be stabilised and rehabilitated, and roads, berms, parking areas, drainage points and the airstrip/firebreak corridor must be inspected after heavy rainfall and repaired where erosion, rutting or sediment movement occurs.

Increased temperatures and drought conditions may also increase fire risk, particularly where dry grass, alien vegetation, visitor activity, gas use, cooking, wood burners and camping activities overlap. This has been addressed by locating the airstrip within a planned firebreak, maintaining firebreaks, continuing alien invasive vegetation clearing and follow-up control to reduce fuel loads, controlling open fires, managing gas installations safely, providing fire-safety rules to visitors and vendors, and restricting fire-related activities during high-risk weather conditions.

The development also incorporates climate-responsive service and design measures. The property will operate largely off-grid, using solar photovoltaic systems, battery storage and gas for higher-demand thermal uses, thereby reducing reliance on municipal energy infrastructure and limiting operational greenhouse gas emissions. The compact and clustered layout reduces unnecessary disturbance and infrastructure expansion, while the use of natural materials, retention of screening vegetation and rehabilitation with locally indigenous species will improve shade, landscape resilience and ecological connectivity. Alien clearing and indigenous rehabilitation will further support climate adaptation by improving habitat condition, reducing fire fuel loads and enhancing ecological function.

Overall, while climate change may increase pressure on water resources, fire management, stormwater systems, agricultural production and maintenance requirements, the proposed development has incorporated appropriate adaptation and mitigation measures. With continued implementation of the EMPr, water monitoring, rainwater harvesting, erosion controls, fire management, alien clearing, rehabilitation and operational monitoring, climate-related risks are considered manageable and are not expected to represent a fatal flaw to the proposed development.

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

No conflicts between specialist recommendations. – good agricultural land is being retained for agriculture and areas with restoration potential in terms of biodiversity are being proposed for such restoration. The development areas are proposed in the appropriate locations.

Based on the information available, no substantive conflicting recommendations between the specialists have been identified. The specialist inputs are broadly aligned in that they support the use of the more transformed, historically cultivated, grazed, plantation-affected and alien-infested portions of the property for the proposed agricultural, market and low-impact tourism components, while recommending that areas with restoration potential be protected, rehabilitated and managed through alien clearing and follow-up control.

The terrestrial biodiversity specialist confirmed that the site has been substantially altered by historic cultivation, grazing, plantation use and alien infestation, and that no mapped remnants of South Outeniqua Sandstone Fynbos remain on the site. The specialist also identified the more suitable restoration and ecological connectivity opportunities as being located mainly in the northern portion of the property. This recommendation is consistent with the proposed layout, which directs the main agricultural production and market-related uses to the more transformed and agriculturally appropriate areas, while retaining the northern areas for restoration, alien clearing, low-impact tourism and ecological connectivity.

The freshwater specialist's findings also do not conflict with the terrestrial biodiversity findings. The freshwater assessment disputed the mapped ESA 1 aquatic feature, confirming that the mapped feature corresponds with an existing farm road and not a functional watercourse, and that the non-perennial drainage feature shown in broader mapping was not confirmed as a functional aquatic feature on site. The freshwater specialist nevertheless recognised the importance of existing farm dams, contour berms and stormwater flow paths as part of the farm's stormwater-management system. This has been addressed by avoiding unnecessary disturbance to dams and dam margins, retaining contour berms where possible, and incorporating stormwater and erosion-control measures into the design and EMPr.

Where there are differences between the desktop sensitivity mapping and the specialist site findings, these are not considered unresolved specialist conflicts. Rather, they have been addressed through site verification and specialist interpretation. For example, the WCBSP mapping identifies ESA areas on the property, including an ESA 1 watercourse; however, the site-specific specialist assessments refine this interpretation by confirming that the mapped aquatic feature is not a watercourse and that the areas with the greatest ecological restoration potential are located elsewhere on the property. The BAR therefore relies on the site-specific specialist findings while still applying a precautionary approach by protecting rehabilitation areas, managing stormwater, avoiding unnecessary clearance and implementing alien-clearing and restoration measures.

Any potential interface between agricultural productivity, biodiversity restoration, freshwater/stormwater management, traffic/access design and visual/rural landscape considerations has been resolved through the preferred layout and mitigation hierarchy. Development has been clustered, existing access and internal tracks are used as far as possible, the farmers' market and farm shop are located near the existing R340 entrance, renewed cultivation is limited to historically agricultural areas, and the eco-cabins and campsite are positioned as low-impact tourism nodes within areas where alien clearing and indigenous rehabilitation will occur. The EMPr will further ensure that specialist recommendations are implemented through footprint control, no-go and rehabilitation-area demarcation, stormwater controls, wastewater-system maintenance, alien invasive clearing, fire management and operational monitoring.

Accordingly, there are no unresolved conflicting specialist recommendations. The specialist findings have been integrated into the preferred alternative, the Site Development Plan and the proposed mitigation measures, and any differences between mapped sensitivities and field-verified specialist findings have been addressed by adopting the site-specific specialist conclusions together with a precautionary environmental-management approach.

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

Good biodiversity management – restoration proposed in the secondary transformed areas, while keeping agricultural practices in the high potential agricultural areas.

NEMBA – Alien management - Ongoing alien vegetation clearing to protect the biodiversity and agricultural resources as approved in the ACP.

Planning and policy management - Planning consistency with the policies and frameworks ensures no negative precedent set in the rural area.

The following mitigation measures are proposed for the various impacts and phases of the development implementation:

Planning, design and construction phase mitigation measures

1. Footprint control and layout management

- All development must remain within the approved footprints shown on the final Site Development Plan.
- No construction, clearing, stockpiling, parking, laydown areas, waste storage or vehicle movement may occur outside the approved working areas.
- The farmers' market, farm shop, campsite, eco-cabins, cultivation areas, internal access routes, services and airstrip/firebreak corridor must be clearly demarcated before work starts.
- The final layout must retain the clustered development approach and avoid unnecessary fragmentation of the farm.
- The northern restoration, rehabilitation and ecological connectivity areas must be retained as low-disturbance areas.
- Any change to the approved layout or expansion of the assessed footprint must be screened against the environmental authorisation, EMPr and applicable listed activities before implementation.

2. Vegetation clearance and habitat protection

- Vegetation clearance must be limited to the minimum area required for the approved development components.
- Clearing must be phased where practical to avoid unnecessary exposure of large areas at one time.
- Indigenous vegetation retained for screening, rehabilitation or ecological connectivity must be protected.
- No unnecessary clearing may occur outside the approved cultivation, market, accommodation, access, services or airstrip/firebreak footprints.
- Vegetation clearing boundaries must be pegged or otherwise visibly demarcated before clearing starts.
- Cleared vegetation must be managed responsibly and may not be pushed into retained vegetation, dams, stormwater paths or rehabilitation areas.

- Alien invasive vegetation clearing must be undertaken in accordance with the approved alien-clearing programme (ACP) and followed by appropriate follow-up control.
- Disturbed areas not required for permanent infrastructure or cultivation must be rehabilitated with suitable locally indigenous vegetation.

3. No-go, restricted and rehabilitation areas

- All areas outside the approved construction footprint must be treated as no-go areas for construction disturbance.
- Rehabilitation areas, retained vegetation, ecological corridors, farm dam margins and stormwater management features must be demarcated before construction.
- No construction camps, stockpiles, spoil, waste, fuel, chemicals, parking or laydown areas may be placed in no-go or rehabilitation areas.
- Access into restoration areas must be limited to approved alien clearing, rehabilitation, fire management, environmental monitoring and maintenance activities.
- Contractors and staff must be informed of the location and purpose of no-go areas before work begins.

4. Soil protection, compaction and erosion control

- Topsoil must be stripped separately where practical and stockpiled for later use in rehabilitation.
- Topsoil stockpiles must be kept low, stable and free of alien invasive vegetation.
- Construction traffic must remain on demarcated access routes to prevent unnecessary soil compaction.
- Exposed soils must be stabilised as soon as possible after disturbance.
- Erosion-control measures must be installed where slopes, disturbed soils, roads, trenches or the airstrip/firebreak corridor may concentrate runoff.
- Low berms (contours), controlled cross-drainage and low-velocity discharge points must be used where required.
- Existing contour berms must be retained and protected as far as possible.
- Rills, rutting, gullying or sediment movement must be repaired immediately.
- Disturbed areas must be inspected after heavy rainfall and rehabilitated where erosion is observed.

5. Stormwater management and farm dams

- Existing stormwater flow paths, farm contour berms and farm dams must be protected during construction.
- No sediment-laden runoff may be allowed to enter farm dams.
- Farm dams and their immediate margins must be avoided by construction activities unless specifically required and authorised.
- Temporary sediment controls (silt fencing) must be installed where construction works could generate sediment runoff.
- Runoff must be dispersed at low velocity and must not be concentrated onto unstable soils.
- Roads and tracks must be constructed or upgraded with appropriate crossfall, low berms and controlled drainage points.
- Stormwater controls must be inspected during and after construction and repaired where needed.

6. Construction access, roads and traffic

- Existing access from the R340 must be used; no additional public access points may be created unless authorised.
- Existing internal farm tracks must be used wherever possible.
- No widening of existing roads by 4 m or more may occur unless specifically authorised.
- Passing bays, road upgrades and entrance improvements must be kept to the minimum required for safe access.
- Sight distances at the R340 entrance must be maintained through lawful vegetation clearing in the road reserve where required.
- Construction traffic must be managed to avoid unsafe turning, road obstruction, dust and damage to road edges.
- Construction vehicles must comply with site speed limits and remain on demarcated routes.
- Any damage to internal roads or access tracks must be repaired promptly.

7. Airstrip / firebreak establishment

- The airstrip must remain within the planned firebreak corridor and must remain grass surfaced.
- Grading and levelling must be limited to the minimum required for safe low-intensity private use.
- No hard surfacing of the airstrip may occur unless separately assessed and authorised.
- The airstrip corridor must be protected from erosion through crossfall management, low berms and appropriate drainage.
- The grass cover must be retained or re-established as soon as possible after shaping.
- No fuel storage, aircraft maintenance area or associated aviation infrastructure may be established unless separately assessed and authorised.
- The airstrip must retain its firebreak function.

8. Excavations, trenching and service installation

- Service routes for water, sewer and other infrastructure must follow existing disturbance corridors where practical.
- Trenches must be kept as narrow and short as practicable and must be backfilled promptly.
- Topsoil and subsoil from trenches must be separated where practical and replaced in the correct order.
- Trenches must not remain open for longer than necessary.
- Open trenches must be made safe for people and animals.
- Disturbed service corridors must be stabilised and rehabilitated after installation.
- Sewer and water pipelines must be pressure-tested or inspected as required before commissioning.
- Service infrastructure must be installed in accordance with municipal, supplier and engineering specifications.

9. Waste management during construction

- Construction waste must be collected, stored and removed regularly to an authorised facility. Recycle where possible.

- No construction waste may be buried, dumped or burnt on site.
- Waste storage areas must be clearly designated and managed to prevent windblown litter.
- Hazardous waste, including oil-contaminated materials, paint containers, chemical containers and fuel residues, must be stored separately and disposed of lawfully.
- Contractors must keep the construction area tidy and must undertake regular litter inspections.

10. Pollution prevention, fuel and hazardous substances

- Fuel, oils, chemicals and hazardous substances must be stored in a secure, bunded or contained area.
- Refuelling and maintenance of vehicles or machinery must occur only in designated areas, away from dams, drainage paths and rehabilitation areas.
- Spill kits must be available on-site during construction.
- Any spill must be contained, cleaned immediately and contaminated material removed to an authorised disposal facility.
- Cement, concrete wash water, paint, oil, chemicals and wastewater must not be discharged onto soil, into dams, stormwater paths or rehabilitation areas.
- Equipment must be maintained to prevent oil and fuel leaks.
- Contractors must be briefed on spill prevention and response procedures.

11. Dust, noise and nuisance control

- Dust must be controlled during dry and windy conditions, particularly on access tracks, parking areas and exposed soil surfaces. Use of woodchips to suppress dust where practical.
- Construction vehicles must comply with site speed limits to reduce dust.
- Stockpiles must be stabilised or dampened where necessary.
- Construction activities must be limited to reasonable working hours unless otherwise approved.
- Machinery and vehicles must be properly maintained to reduce noise and emissions.
- Unnecessary idling of vehicles and machinery must be avoided.
- Construction activities must be managed to minimise disturbance to neighbouring properties, livestock and wildlife.

12. Visual mitigation during construction

- Construction areas must be kept neat and orderly.
- Materials, equipment and stockpiles must be stored in designated areas.
- Existing screening vegetation must be retained where possible.
- Natural materials, muted colours and non-reflective finishes must be used for visible buildings and structures.
- Temporary construction lighting must be avoided unless required for safety.
- Disturbed edges must be rehabilitated or softened with vegetation after construction.
- Structures must remain modest in scale and compatible with the rural agricultural setting.

13. Fire prevention during construction

- No uncontrolled open fires may be made during construction.
- Smoking must be restricted to designated safe areas where appropriate.
- Firefighting equipment must be available where hot works, welding, grinding or vegetation clearing is undertaken.
- Hot works must not be undertaken during high fire-risk conditions unless adequate precautions are in place.
- Cleared vegetation and combustible material must not be stockpiled in a way that increases fire risk.
- Alien clearing and firebreak establishment must be coordinated to reduce fuel loads.
- Emergency contact numbers and fire-response procedures must be available to contractors and site staff.

14. Protection of fauna and livestock

- Construction staff must not disturb, harm, capture or feed wildlife.
- Any animals encountered during clearing must be allowed to move away safely.
- Open trenches and excavations must be inspected and made safe to prevent trapping of animals.
- Vehicle speeds must be controlled to reduce collision risk with livestock and fauna.
- Work areas must be kept free of food waste that could attract animals.
- Pets belonging to contractors must not be allowed on site unless specifically authorised and controlled.
- Fencing or temporary barriers must be used where needed to protect livestock, visitors or construction areas.

15. Alien invasive vegetation management

- Alien invasive vegetation removed during site preparation must be handled in a manner that prevents regrowth and spread.
- Follow-up alien clearing must be undertaken after initial clearing.
- Disturbed areas must be monitored for alien seedlings and regrowth.
- Alien material must not be dumped in rehabilitation areas, drainage paths or farm dams.
- Cleared alien timber may be reused on site.
- Rehabilitation planting must prioritise locally suitable indigenous species.
- The approved ACP must be integrated with firebreak maintenance and rehabilitation planning.

16. Heritage and chance finds

- If any archaeological, palaeontological, cultural, historical or burial material is uncovered during construction, work in the immediate area must stop.
- The area must be protected from further disturbance.
- The EAP and relevant heritage authority must be notified.
- Work may only resume once the finds have been assessed and the appropriate authority has provided guidance.

- Contractors must be informed of the chance-finds procedure before construction begins.

17. Contractor environmental induction and compliance

- All contractors and staff must receive environmental induction before starting work.
- The induction must include approved footprints, no-go areas, waste management, fire safety, spill response, erosion control, fauna protection and reporting requirements.
- A copy of the EMPr and relevant authorisation conditions must be available on site.
- A responsible person must be appointed to monitor compliance during construction.
- Non-compliance must be corrected promptly and recorded.
- Environmental incidents must be reported to the EAP and relevant authority where required.
- Construction activities must comply with the EMPr, environmental authorisation, municipal approvals and specialist recommendations.

18. Rehabilitation after construction

- All temporary construction areas must be cleared of waste, rubble and redundant material.
- Disturbed areas not required for permanent infrastructure, access, cultivation or operational use must be rehabilitated.
- Compacted soils must be loosened where appropriate.
- Exposed soils must be stabilised using vegetation, mulch, erosion-control materials or other suitable measures.
- Rehabilitation must use suitable locally indigenous species where ecological restoration or screening is required.
- Rehabilitation success must be monitored and failed areas must be replanted or stabilised.
- Alien regrowth must be controlled during the post-construction rehabilitation period.

Additional Operational mitigation measures to include

1. Waste generation from market, farm shop, campsite and eco-cabins

Proposed mitigation:

- Provide clearly marked general waste, recycling and organic waste bins at the farmers' market, farm shop, campsite and eco-cabin areas.
- Require all vendors to remove waste from their stalls at the end of each market day and comply with market waste rules.
- Undertake a full litter sweep of the market area, parking area, access routes, campsite and accommodation areas after each market day or peak-use period.
- Store waste in a secure, covered area to prevent windblown litter, odour and access by animals.
- Separate recyclable material at source and remove recyclables to an appropriate recycling facility where available.
- Provide guest and vendor information explaining the waste-separation and no-litter requirements.
- Keep records of waste removal where required by the EMPr.

2. Wastewater treatment and pollution risk

Proposed mitigation:

- Install appropriately sized and approved package sewage treatment plants for the anticipated design loads – as approved by the local authority.
- Final sewage treatment technology must be confirmed during detailed design and must meet the required effluent quality, capacity, maintenance and regulatory requirements.
- Maintain sewage treatment plants by a competent service provider.
- Monitor sludge accumulation and ensure sludge does not exceed the supplier's recommended capacity, or 30% of the anaerobic chamber volume where applicable.
- Remove sludge using a licensed or appropriately authorised honey sucker and dispose of it at a lawful facility.
- Keep maintenance, inspection and sludge-removal records.
- Prohibit disposal of chemicals, oils, grease, sanitary products, wet wipes, solids or unsuitable materials into the sewer system.
- Install grease traps where food preparation areas may discharge wastewater.
- Inspect sewer lines, manholes and disposal beds regularly for odour, blockages, surfacing effluent or signs of failure.
- Maintain disposal-bed vegetation and prevent vehicle movement, compaction or construction activity over disposal beds.
- Implement immediate corrective action if odour, leakage, effluent surfacing or system malfunction is detected.
- Comply with Bitou Municipality and relevant water-authority requirements.

3. Groundwater abstraction and operational water demand

Proposed mitigation:

- Monitor borehole abstraction volumes and compare actual use with the predicted demand assumptions.
- Maintain rainwater harvesting systems, including gutters, first-flush diverters, filters, tanks and pumps.
- Use water-efficient taps, shower heads, toilets and appliances in all accommodation, ablution and farm-shop facilities.
- Undertake routine leak inspections and repair leaks immediately.
- Provide water-use awareness information to guests, staff and vendors.
- Maintain dryland cultivation only; no irrigation of the renewed cultivation areas should occur unless separately assessed and authorised where required.
- Review water demand during peak periods such as market days and holiday seasons.
- If monitoring indicates declining yield or water stress, reduce non-essential use and review operating capacity.

- Maintain water-quality treatment systems to ensure potable water standards where water is supplied for domestic use.

4. Traffic, access safety, dust and parking

Proposed mitigation:

- Use the existing access from the R340 and avoid creating additional access points.
- Maintain the required sight distance at the R340 entrance through regular vegetation clearance where permitted by the road authority.
- Provide clear signage at the entrance and within the market precinct to direct visitors to parking and circulation routes.
- Demarcate parking areas and prevent overflow parking onto the R340 road reserve or sensitive / rehabilitation areas.
- Provide staff or marshal assistance during peak market arrival and departure periods if required.
- Maintain grass and gravel parking areas to prevent rutting, erosion and dust.
- Apply dust suppression during dry, windy or high-traffic periods where necessary.
- Monitor traffic flow during the initial operating period and adjust market-day controls if congestion or safety concerns arise.
- Maintain low internal speed limits and prohibit off-road driving.
- Keep emergency access routes open at all times.

5. Visitor disturbance, noise, lighting and fauna impacts

Proposed mitigation:

- Limit guests, visitors and vendors to approved activity areas and demarcated access routes.
- Demarcate rehabilitation, ecological corridor and restricted-access areas.
- Prohibit off-road driving and unauthorised access into farm production, grazing or rehabilitation areas.
- Enforce quiet hours at the campsite and eco-cabin areas.
- Use low-intensity, downward-directed and motion-sensitive lighting where practical.
- Avoid unnecessary floodlighting and lighting of rehabilitation areas.
- Provide guest information on environmental rules, waste, fire safety, water conservation and restricted areas.
- Restrict pets where necessary to avoid disturbance to livestock and fauna.
- Monitor visitor behaviour and address non-compliance promptly.
- Keep market, campsite and accommodation activities within the approved operating scale and footprint.

6. Operational visual impact and rural landscape character

Proposed mitigation:

- Maintain the clustered layout of development nodes and avoid expansion beyond the approved footprints.
- Use natural materials, muted colours and non-reflective finishes for buildings, stalls, decks and visible infrastructure.
- Retain existing screening vegetation where possible.
- Rehabilitate disturbed edges with suitable indigenous vegetation.
- Avoid urban-style hard surfacing and excessive signage.
- Keep market stalls, storage areas, parking areas and accommodation nodes tidy and well maintained.
- Screen service areas, waste-storage areas, tanks and utilities where practical.
- Use low-level lighting only where required for safety.
- Maintain the farm-appropriate scale and appearance of all operational infrastructure.

7. Fire risk

Proposed mitigation:

- Maintain approved firebreaks, including the airstrip / firebreak corridor.
- Continue alien invasive vegetation clearing and follow-up control to reduce fuel loads.
- Prohibit uncontrolled open fires.
- Allow fires only in designated and managed areas, if provided.
- Provide fire extinguishers or appropriate firefighting equipment at the farm shop, market area, campsite, ablutions and eco-cabins.
- Ensure gas cylinders and gas appliances are installed, stored and maintained safely.
- Provide fire-safety rules to guests, vendors and staff.
- Restrict or prohibit fires during high fire-risk weather conditions.
- Maintain emergency contact numbers and fire-response procedures on site.
- Ensure staff are aware of basic fire-response measures.
- Inspect firebreaks, cooking areas, wood burners and gas installations regularly.

8. Alien clearing and rehabilitation

Proposed mitigation / enhancement:

- Implement the approved alien invasive vegetation clearing programme.
- Undertake follow-up clearing to prevent regrowth.
- Prioritise rehabilitation of northern restoration areas, ecological corridors and areas around the campsite and eco-cabins.
- Use suitable locally indigenous species for rehabilitation and screening.
- Prevent disturbance, vehicle movement, camping expansion or market activity in rehabilitation areas.

- Control alien regrowth along roads, parking areas, the airstrip / firebreak corridor and disturbed edges.
- Use cleared alien timber on site only where lawful and appropriate.
- Monitor rehabilitation success and replace failed plantings where necessary.
- Keep records of alien clearing, follow-up control and rehabilitation activities.

9. Socio-economic and rural livelihood benefits

Enhancement measures:

- Prioritise local producers, farmers, small businesses and artisans for market participation where practical.
- Encourage sale of farm-origin and locally produced goods in the farm shop and market.
- Use local labour and service providers where practical.
- Maintain the market as a farm-to-plate and local-producer outlet rather than a general commercial market.
- Keep the scale of activities consistent with the rural agricultural setting.
- Reinvest operational capacity into maintenance, alien clearing, rehabilitation and farm management.
- Avoid intensification beyond the assessed scale without further approval.

10. Long-term land management and EMPr compliance

Proposed mitigation / enhancement:

- Implement the EMPr and all environmental authorisation conditions throughout operation.
- Appoint a responsible person to oversee environmental compliance.
- Maintain records of wastewater maintenance, waste removal, borehole abstraction, alien clearing, rehabilitation and firebreak maintenance.
- Conduct regular inspections of roads, parking areas, stormwater controls, disposal beds, waste areas and rehabilitation areas.
- Correct erosion, litter, alien regrowth, infrastructure failure or non-compliance promptly.
- Provide staff, vendor and guest induction on environmental management requirements.
- Review operational performance periodically and update management procedures where required.
- Ensure any expansion, intensification or change in activity is assessed against authorisation requirements before implementation.

11. Airstrip / firebreak operation

Proposed mitigation:

- Maintain the airstrip strictly within the approved grass firebreak corridor.
- Keep the airstrip grass surfaced and avoid hard surfacing.
- Restrict use to low-intensity private use unless further approvals are obtained.
- Prohibit fuel storage, aircraft maintenance or commercial aviation activities unless separately assessed and authorised.
- Maintain the upslope berm and cross-drainage to prevent erosion.
- Inspect the airstrip after heavy rainfall and repair rutting, bare patches or erosion promptly.
- Mow and maintain the strip in a way that preserves grass cover and firebreak function.

Operational mitigation measures:

- The operational phase impacts must be managed through implementation of the EMPr, the approved Site Development Plan, specialist recommendations and all authorisation conditions.
- Waste must be separated at source, with clearly marked general waste and recycling bins provided at the farmers' market, farm shop, campsite and eco-cabin areas.
- Vendors must clean their stalls after each market day, litter sweeps must be undertaken after-market days and peak-use periods, and residual waste must be removed regularly to an authorised municipal waste transfer facility.
- No waste may be buried, dumped or burnt on site.
- Wastewater infrastructure must be appropriately sized, approved and maintained by a competent service provider.
- Sewage treatment plants, sewer lines and subsurface disposal beds must be inspected regularly for odour, blockages, sludge accumulation, leakage or surfacing effluent, and sludge must be removed by an authorised honey sucker (vacuum tanker) to a lawful disposal facility when required.
- Chemicals, grease, oils, sanitary products, wet wipes, solids and other unsuitable materials must not be disposed of into the sewer system.
- Borehole abstraction must be monitored and actual water use must be compared with predicted demand.
- Rainwater harvesting systems, filters, tanks and pumps must be maintained, water-efficient fittings must be installed, leaks must be repaired immediately and renewed cultivation must remain dryland unless further approval is obtained where required.
- Traffic and access impacts must be managed through use of the existing R340 access, maintenance of sight distances, demarcated parking, internal signage, low internal speed limits, dust control where necessary and market-day traffic management during peak periods. Any specific requirements of the District Roads Department must be included.
- Visitors, guests and vendors must be restricted to approved activity areas and demarcated access routes, with rehabilitation areas, ecological corridors and farm production areas protected from unauthorised access.
- Quiet hours must be enforced at the campsite and eco-cabins, lighting must be low-intensity and downward directed, and off-road driving must be prohibited.

	• Fire risk must be managed through maintained firebreaks, continued alien clearing, controlled use of gas and cooking areas, prohibition of uncontrolled open fires, provision of fire-safety rules and firefighting equipment, and restriction of fires during high-risk weather. • Visual impacts must be reduced by retaining the clustered layout, using natural materials and muted colours, avoiding reflective finishes and excessive signage, screening service and waste areas where practical and maintaining a neat farm-appropriate appearance. • Alien invasive clearing and follow-up control must continue according to the approved ACP, especially in rehabilitation areas, along access routes and within the airstrip/firebreak corridor, and disturbed areas must be rehabilitated with suitable locally indigenous species. • The grass airstrip must remain within the approved firebreak corridor, remain grass-surfaced, be used only for low-intensity private use unless further approvals are obtained, and must not include fuel storage, hard surfacing or aircraft maintenance unless separately assessed and authorised. • Records must be kept for wastewater maintenance, waste removal, borehole abstraction, alien clearing, rehabilitation, firebreak maintenance and operational inspections.
8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option. • Avoid impacts – the SDP specifically avoids sensitive areas – agricultural activities retained in the agricultural areas, while the consent uses are concentrated to avoid fragmenting the productive agricultural lands. Sensitive vegetation has been avoided, activities are proposed in marginal transformed areas and a good ecological corridor buffer has been proposed to allow for linking adjacent sensitive areas. • Minimise impacts – where direct impacts cannot be avoided, recommended mitigation measures from this assessment and various specialists have been included in the assessment and captured in the EMPr. • Rectify – rehabilitation and restoration will be done in accordance with the EMPr – this will cover the restoration of the natural ecological corridor as well as restoration of the agricultural potential and soil health through regenerative farming practices. • Reduce – mitigation measures will be implemented as per the EMPr • Offset - none required

SECTION J: GENERAL

1. Environmental Impact Statement

1.1.	Provide a summary of the key findings of the EIA. The proposed development enhances the positive impacts on the agricultural sensitivity of the site together with promotion of restoration to redress historic biodiversity impacts (infestation of alien vegetation on previously disturbed land). The mitigation hierarchy has been followed through avoidance of impacts and promotion of positive or enhancing impacts. There are no conflicts or flaws in the application that require any form of modification or change. Key finding of the biodiversity specialist (Hoare, 2026) The assessment found that the proposed development footprint on Portion 8 of Farm 223 is located within South Outeniqua Sandstone Fynbos, a vegetation type that is not listed as threatened. The footprint area is largely transformed or ecologically modified, comprising old cultivated lands, secondary grassland, disturbed vegetation and areas affected by dense alien invasive plants in the process of being cleared. No plant or animal species of conservation concern were recorded within the proposed development footprint, and the footprint is assessed as having low sensitivity for the Terrestrial Biodiversity, Plant Species and Animal Species themes. Natural fynbos areas of higher ecological value occur adjacent to the property on neighbouring properties and through the creation of a restoration area, an ecological corridor can be created ensuring the continuation of ecosystem function, pattern and process. The main assessed impacts are the potential loss or disturbance of already disturbed vegetation, which was rated as having very low significance, and the potential spread or reinvasion of alien invasive plants, which was rated as medium significance if not managed. Overall, the proposed development is considered acceptable from a terrestrial biodiversity perspective, provided that sensitive areas are avoided and the recommended mitigation measures are implemented. Key recommendations are to continue implementing the approved Alien Control and Vegetation Management Plan, maintain ongoing follow-up control of alien invasive plants, avoid disturbance of natural fynbos areas outside the development footprint, and restore the ecological connectivity between neighbouring properties where possible. Key findings of the Agricultural assessment (Malan, 2026) Confirmation that the soil, terrain and climate is high sensitivity for agriculture and that there is a high potential for agricultural production. The associated or "ancillary" consent uses will not detract from the agricultural potential of the site and will contribute to the agricultural local economy. Following regenerative farming practices as proposed, the proper management the soil, climate, terrain combination has the potential for annual crop production such as planted pastures as well as permanent crop production. Key findings of the Aquatic assessment (Van Driel, 2026) There are no sensitive aquatic features on the property and the proposal will have no impact on any adjacent aquatic features. Key findings of the planning consent use application (Planning Space, 2026)
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"ENVIRONMENTAL MANAGEMENT AND LAND REHABILITATION

There is a clear need for proactive land stewardship on the property. Without ongoing management, previously cleared areas are highly susceptible to reinfestation by invasive alien species, particularly black wattle. Such invasion undermines biodiversity, depletes water resources, increases fire intensity, and places a long-term burden on both landowners and public authorities. The proposed regenerative farming and rehabilitation programme ensures continuous alien clearing, restoration of indigenous vegetation and improved ecological functioning.

Supports active agriculture:

The development will bring currently unused land back into production through dryland pastures, livestock farming and regenerative rehabilitation, in line with the purpose of the Agriculture Zone I.

Strengthens the rural economy:

The additional dwellings (tourist cabins), campsite, farm shop and market introduce low impact rural tourism that diversifies the income base of the farm. This is consistent with both the Bitou SDF and the Western Cape Rural Areas Guidelines, which identify agri-tourism as an essential rural economic driver.

Responds to an identified tourism need in the Wittedrift-Uplands area:

There is limited small-scale accommodation in this part of the municipal area. The cabins and campsite fill a gap in the market for nature-based, farm-stay tourism experiences, identified as a growing sector.

Creates local economic opportunities:

The farmers' market and farm shop will support small producers, shorten supply chains, and provide a valuable local outlet for fresh produce and artisanal goods.

Conservation Outcome:

All proposed developments are small in scale, clustered, and situated within previously disturbed areas. Although the Basic Assessment identified no sensitive or vulnerable natural features, substantial portions of the farm are being rehabilitated to indigenous vegetation. This restoration process has been underway for some time and has already had a clear, positive effect on the landscape.

Compatible with spatial policy at all levels:

The proposal fits within the strategic direction of the PSDF, Bitou SDF, and Rural Areas Guidelines, which encourage productive agriculture paired with appropriate, low-impact rural tourism.

Efficient and self-sufficient services model:

No municipal services are required. Water, electricity, and sanitation will be managed on-site, reducing burden on municipal infrastructure.

No land use conflicts anticipated.

The development is appropriate for a rural setting, consistent with neighbouring land uses, and does not introduce urban-style development."

1.2.	Provide a map that that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2)
	See appendix B2
1.3.	Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.

POTENTIAL IMPACT ON THE SURROUNDING AREA

The Wittedrift-Uplands area forms part of the rural hinterland of Plettenberg Bay, characterised by a mix of smallholdings, farms, rural residential properties, low-intensity tourism and agricultural activities. The landscape consists of hills, valleys, wetlands, fynbos, and cultivated land, which contribute to the area's scenic value. Settlement patterns are low-density, with a strong rural character.

Tourism activity in the broader area is present but low-key, comprising small guest cottages, riding stables, and farm-based accommodation. The more prominent establishments include Bela Manga Country Escape, directly to the south of the property, offering a variety of tourist accommodation options (B&B, self-catering suites and self-catering lodges) as well as a function venue. Belle Balance to the east of the property is situated in the popular Plettenberg Bay Nature Reserve and offers tourism accommodation and function venues. The Bobbejaanskloof Retreat, situated within the Bobbejaanskloof Private Nature Reserve, slightly further away, offers accommodation and space for health retreats.

In general, the proposal is not out of character and scale and is expected to have more positive impacts than negative impacts. Detailed impact assessment and mitigation will be undertaken through the Environmental Authorisation (EA) process, supported by specialist studies.

Expected Positive Impacts

- **Local economic benefits:** Employment creation and support for small-scale producers through the farmers' market and tourism activities, and primary agricultural activity.
- **Environmental improvement:** Alien-clearing, ecological rehabilitation and enhanced fire management.
- **Rural service enhancement:** Provision of a local market and associated amenities, improving access to produce and social activity.

Potential negative impacts (to be fully assessed in the EA)

- **Biodiversity disturbance:** Vegetation clearing and habitat disturbance could occur, but this will only take place in previously disturbed areas with low sensitivity

- **Visual and landscape change:** Introduction of built structures in a rural landscape may have a visual impact. The placement of the accommodation units and campsite will be largely obscured from view by existing vegetation and design and will thus have a minimal impact. Agricultural buildings and the market may be visible from the main road, but will not be out of character or scale.
- **Traffic and access:** Increased traffic volumes on the R340 during market days. Traffic assessments and operational planning will address this.
- **Noise and activity-related nuisance:** Increased activity levels associated with market and tourism uses. Operational management plans will control this.

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

2.1.	Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMPr
	Impact management outcomes for the EMPr 1. Development footprint and spatial control The development must remain within the approved footprints and activity areas shown on the final Site Development Plan and biodiversity overlay map. No unauthorised clearing, construction, stockpiling, laydown, parking, waste storage or vehicle movement may occur outside the approved development, cultivation, access, services and airstrip/firebreak footprints. All no-go, retained vegetation, rehabilitation and restricted-disturbance areas must be clearly demarcated and protected before commencement and throughout construction and operation. 2. Protection of restoration and ecological connectivity areas The northern restoration and ecological connectivity areas, retained vegetation areas, rehabilitation zones and areas surrounding the proposed eco-cabins and campsite that are identified for indigenous rehabilitation must be protected from unnecessary disturbance. These areas must function primarily as alien-clearing, rehabilitation, ecological connectivity, screening and low-impact tourism management areas. Construction and operational activities must not compromise the long-term restoration potential of these areas. 3. Vegetation clearance and habitat transformation Vegetation clearance must be restricted to the minimum area required for the authorised development components and must not exceed the assessed cumulative vegetation-clearance footprint. Clearing must be phased where practical, confined to demarcated areas, and undertaken in a manner that prevents unnecessary loss of retained vegetation, recovering indigenous vegetation, screening vegetation and rehabilitation areas. Disturbed areas not required for permanent infrastructure or cultivation must be rehabilitated. 4. Alien invasive vegetation management and rehabilitation Alien invasive vegetation must be cleared and controlled in accordance with the approved alien invasive management programme and the EMPr. Follow-up clearing must be undertaken to prevent regrowth, especially in disturbed areas, rehabilitation areas, road edges, the campsite and eco-cabin areas, the market precinct and the airstrip/firebreak corridor. Rehabilitation must use suitable locally indigenous species where ecological restoration or visual screening is required. The outcome must be progressive reduction in alien invasive cover and improvement in habitat condition and ecological connectivity. 5. Soil conservation and erosion prevention Soils must be protected from unnecessary disturbance, compaction and erosion during construction and operation. Exposed soils, service trenches, road edges, parking areas, cultivation edges and the grass airstrip/firebreak corridor must be stabilised as soon as possible. Existing contour berms must be retained and maintained where practical. Erosion features such as rills, rutting, gulying or sediment movement must be repaired promptly. The outcome must be no uncontrolled erosion, no avoidable topsoil loss and no sediment movement into farm dams or neighbouring properties. 6. Stormwater management and farm dams Stormwater must be managed to avoid concentrated runoff, erosion, sedimentation and disturbance to farm dams, contour berms and existing managed flow paths. Roads, parking areas and the airstrip/firebreak corridor must incorporate grassed or gravel surfaces, low berms, controlled cross-drainage and low-velocity discharge points where required. Farm dams and their immediate margins must be protected from construction disturbance and sediment-laden runoff. The outcome must be maintained stormwater functionality, stable drainage routes and no avoidable sedimentation of farm dams. 7. Freshwater and aquatic-resource protection Although the freshwater specialist did not confirm functional natural aquatic features within the development footprint and disputed the mapped ESA 1 aquatic feature, a precautionary approach must be applied to all farm dams, stormwater paths and drainage-management features. No pollutants, wastewater, sediment, waste, fuel, cement wash water or contaminated runoff may enter farm dams or managed stormwater routes. The outcome must be no deterioration in surface-water quality or stormwater-management functionality on the property. 8. Water-use efficiency and groundwater management Operational water demand must be managed within the design assumptions and sustainable supply capacity of the existing borehole. Borehole abstraction must be monitored, leaks must be repaired promptly, water-efficient fittings must be used and rainwater harvesting systems must be maintained. Renewed cultivation must remain dryland unless further approval is obtained where required. The outcome must be efficient water use, reduced pressure on groundwater resources and no uncontrolled increase in abstraction demand. 9. Wastewater treatment and pollution prevention All wastewater from the campsite, eco-cabins, farmers' market and farm shop must be treated by appropriately designed, approved and maintained package sewage treatment plants and disposal systems. Sewer lines, treatment plants, manholes, sludge levels and subsurface disposal beds must be inspected and maintained regularly by competent persons. Sludge must be removed lawfully by an appropriate vacuum tanker and disposed of at an authorised facility. The outcome must be no untreated effluent discharge, no surfacing effluent, no odour nuisance, no groundwater or soil contamination and ongoing compliance with municipal and water-authority requirements. 10. Solid waste management

Waste generated by construction, market activities, the farm shop, campsite, eco-cabins and farm operations must be minimised, separated at source, securely stored and removed to authorised recycling or municipal waste facilities. No waste may be buried, dumped or burnt on site. Litter sweeps must be undertaken after market days and peak-use periods. The outcome must be no windblown litter, no illegal dumping, no waste-related pollution and a clean, well-managed operating environment.

11. Traffic, access and parking management

Traffic, access and parking must be managed to maintain safe access from the R340 and prevent unmanaged parking, dust, congestion and disturbance to surrounding road users and farm operations. Existing access must be used, sight distances must be maintained, internal circulation and parking must be demarcated, roadside parking must be prevented and market-day traffic must be monitored during peak periods. The outcome must be safe and orderly access, no persistent congestion, no unsafe roadside parking and reduced dust nuisance.

12. Internal roads and access tracks

Existing internal farm tracks must be used where practical, and any new or upgraded roads must remain within the authorised footprint and width limitations. Roads must be grassed or gravel surfaced where appropriate and designed to maintain low-velocity drainage without erosion. Off-road driving must be prohibited. The outcome must be a controlled internal access network that avoids unnecessary vegetation clearance, soil compaction and erosion.

13. Grass airstrip and firebreak management

The grass airstrip must remain within the approved firebreak corridor and must remain grass surfaced. Hard surfacing, fuel storage, aircraft maintenance infrastructure or commercial aviation intensification must not occur unless separately assessed and authorised. The airstrip/firebreak corridor must be maintained to prevent erosion, rutting, bare soil exposure, alien regrowth and loss of firebreak functionality. The outcome must be a stable, grassed, low-intensity private landing strip that continues to function as a firebreak and does not create avoidable environmental impacts.

14. Fire-risk management

Fire risk must be reduced through maintained firebreaks, continued alien clearing, safe gas and cooking arrangements, control of open fires, fire-safety rules for guests and vendors, firefighting equipment, emergency procedures and restrictions during high-risk weather. Fuel loads must be reduced through alien clearing and grass management. The outcome must be reduced wildfire risk, safe visitor and vendor behaviour, protected infrastructure and improved fire preparedness.

15. Visual and rural landscape character

The rural agricultural character of the property must be retained by maintaining clustered development nodes, modest building scale, natural materials, muted colours, non-reflective finishes, retained screening vegetation, rehabilitation planting and low-intensity lighting. Service areas, waste areas, tanks and utilities must be screened where practical. The outcome must be a visually integrated development that remains compatible with the rural agricultural landscape and avoids urban-style visual intrusion.

16. Noise, lighting and visitor disturbance

Operational noise, lighting and visitor movement must be controlled to protect rural quietness, fauna movement, rehabilitation areas and the nature-based tourism experience. Visitors, guests and vendors must remain within approved activity areas and demarcated routes. Quiet hours must be enforced at the campsite and eco-cabins. Lighting must be low-intensity, downward directed and limited to safety requirements. The outcome must be reduced disturbance to fauna, livestock, neighbours and rehabilitation areas.

17. Fauna protection

Construction workers, visitors, guests and vendors must not harm, disturb, feed, capture or collect wildlife. Open trenches and excavations must be made safe and inspected where relevant. Vehicle speeds must be controlled, and off-road driving must be prohibited. The outcome must be no intentional harm to fauna and reduced risk of fauna injury or displacement.

18. Agricultural productivity and land-use compatibility

The property must continue to function primarily as a working agricultural farm, with agri-tourism and market-related consent uses remaining complementary and subordinate to the agricultural character of the property. Renewed cultivation must be limited to the approved historically cultivated or agriculturally used areas and must remain dryland unless further approvals are obtained. The outcome must be retention and enhancement of agricultural productivity, rural land-use compatibility and farm viability.

19. Socio-economic and local economic benefits

The farmers' market, farm shop, accommodation and farm activities must be managed to support local producers, local labour, small businesses, rural livelihoods and agri-tourism opportunities while avoiding unacceptable nuisance impacts. The outcome must be a positive contribution to the local rural economy, increased market access for local producers and manageable localised traffic, waste and visitor-related impacts.

20. Climate-change resilience

The development must be operated in a climate-resilient manner through dryland cultivation, efficient water use, rainwater harvesting, off-grid solar energy, reduced hard surfacing, stormwater controls, alien clearing, firebreak maintenance and rehabilitation with indigenous vegetation. The outcome must be reduced vulnerability to drought, intense rainfall, erosion, fire risk and service interruptions.

21. Heritage and chance finds

If any archaeological, palaeontological, cultural, historical or burial material is uncovered during construction or earthworks, work in the immediate area must stop and the relevant heritage authority must be notified. The outcome must be protection of any heritage resources that may be encountered unexpectedly.

22. Environmental compliance, monitoring and reporting

The EMP, environmental authorisation, specialist recommendations and municipal conditions must be implemented throughout construction and operation. A responsible person must be appointed to oversee compliance. Records must be kept for waste removal, wastewater maintenance, borehole abstraction, alien clearing, rehabilitation, firebreak maintenance, stormwater inspections and environmental incidents. The outcome must be demonstrable compliance, effective environmental management and early correction of non-compliance.

23. Decommissioning and rehabilitation

Should any component of the development be decommissioned, redundant infrastructure must be removed responsibly, waste must be disposed of at authorised facilities, compacted areas must be loosened where appropriate,

	exposed soils must be stabilised, and disturbed areas must be rehabilitated to appropriate agricultural use or indigenous vegetation. The outcome must be safe closure, no residual pollution, stable soils and successful rehabilitation of redundant footprints.
2.2.	Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.
	The following aspects were conditional to the findings of the assessment and specialist inputs and should be included as conditions of the Environmental Authorisation, where authorised: ○ The environmental acceptability of the proposed development is conditional on strict implementation of the final approved Site Development Plan, the EMP, the specialist recommendations and the mitigation measures identified in the BAR. The authorised development must be limited to the assessed footprint and activity components, including the five eco-cabins, campsite, farmers' market, farm shop, renewed dryland cultivation areas, associated services, internal access and the grass airstrip/firebreak corridor. No expansion, intensification, additional vegetation clearance, new access roads, additional accommodation units, increase in campsite capacity, increase in market footprint or change in activity may occur without prior screening and any further approvals required in terms of NEMA, the municipal land-use approval and other applicable legislation. ○ The cumulative vegetation clearance must remain within the assessed footprint and below the applicable Basic Assessment threshold. All development footprints, no-go areas, retained vegetation, rehabilitation areas and ecological connectivity/restoration areas must be clearly demarcated before construction or clearing starts. Vegetation clearance must be restricted to the approved footprints only, and the northern restoration and ecological connectivity areas must be protected from unnecessary disturbance. Disturbed areas not required for permanent infrastructure, cultivation or operational use must be rehabilitated using suitable locally indigenous species. ○ The specialist findings are conditional on continued alien invasive vegetation control and rehabilitation. The approved alien-clearing programme must be implemented, with follow-up clearing undertaken to prevent regrowth, especially in disturbed areas, rehabilitation areas, access edges, the campsite and eco-cabin areas and the airstrip/firebreak corridor. Rehabilitation and restoration areas must be monitored, and failed rehabilitation must be corrected. ○ The terrestrial biodiversity findings are conditional on development being directed to historically disturbed, cultivated, grazed, plantation-affected or alien-infested areas and on avoidance of unnecessary disturbance to areas with ecological restoration potential. The northern restoration and ecological corridor areas must remain protected and must not be converted to cultivation, parking, structures or intensive visitor use. ○ The freshwater findings are conditional on avoiding disturbance to the existing farm dams, contour berms and managed stormwater flow paths. Although the freshwater specialist disputed the presence of functional natural aquatic features within the mapped ESA 1 area, a precautionary approach must be applied. No sediment-laden runoff, wastewater, fuel, oil, cement wash water, waste or contaminated runoff may enter farm dams or stormwater flow paths. Existing contour berms must be retained and maintained as far as practical, and all roads, parking areas and the airstrip/firebreak corridor must include appropriate stormwater and erosion-control measures. ○ The traffic and access acceptability is conditional on using the existing R340 access, maintaining adequate sight distances, preventing unsafe roadside parking and managing market-day traffic and parking within the approved site. Road upgrades and internal access must remain within the authorised footprint. No widening of existing internal roads by more than 4 m may occur unless authorised. Sight-distance vegetation management in the R340 road reserve must be undertaken lawfully and in consultation with the relevant road authority where required. ○ The airstrip component is conditional on the airstrip remaining a grass-surfaced, low-intensity private landing strip located within the planned firebreak corridor. No hard surfacing, commercial aviation use, fuel storage, aircraft maintenance facility, hangar or additional aviation infrastructure may be established unless separately assessed and authorised. The airstrip/firebreak corridor must be maintained to prevent erosion, rutting, bare soil exposure and alien regrowth, while retaining its firebreak function. ○ Water-use acceptability is conditional on the development remaining within the stated water-demand assumptions, continued use of dryland cultivation with no irrigation, implementation of rainwater harvesting where practical and monitoring of borehole abstraction. Water-efficient fittings must be installed, leaks must be repaired promptly and operating intensity must be reviewed if borehole monitoring indicates stress or declining yield. Potable water supplied to guests, vendors or staff must be appropriately treated and maintained to potable standards. ○ The wastewater-management findings are conditional on installation of appropriately sized, approved and maintained package sewage treatment plants and disposal beds. Final sewage treatment technology must meet the required capacity, effluent-quality, maintenance and regulatory requirements. Sewage treatment plants, sewer reticulation, manholes and disposal beds must be inspected and maintained by competent persons. Sludge must be removed by an authorised vacuum tanker and disposed of at a lawful facility. No surfacing effluent, odour nuisance or untreated discharge may be permitted. ○ The assessment is also conditional on effective solid-waste management. Waste must be separated at source, stored securely, removed regularly to an authorised municipal waste facility and recycled where practical. Waste may not be buried, dumped or burnt on site. Litter sweeps must be undertaken after market days and peak-use periods. ○ The visual and rural-character findings are conditional on maintaining the clustered, low-impact and farm-appropriate layout and design. Buildings, stalls, decks and visible infrastructure must use natural materials, muted colours and non-reflective finishes. Excessive signage, urban-style hard surfacing and unnecessary lighting must be avoided. Existing screening vegetation must be retained where possible and disturbed edges must be rehabilitated. ○ The fire-risk assessment is conditional on maintenance of firebreaks, continued alien clearing to reduce fuel loads, safe gas installation and operation, provision of fire-safety rules to guests and vendors, availability of firefighting equipment and restrictions on open fires during high-risk weather. The airstrip/firebreak corridor must remain functional as part of the fire-management system. ○ The socio-economic and planning findings are conditional on the consent uses remaining complementary and subordinate to the primary agricultural use of the property. The farmers' market and farm shop must retain their agricultural and local-producer focus and must not be expanded or intensified into a general commercial or urban-style retail use without further approval. The farm shop must remain within the applicable municipal size and land-use parameters. ○ The authorisation should also be conditional on compliance with all applicable municipal land-use approvals, approval of the final SDP, service requirements, road-authority requirements, Heritage Western Cape requirements, BOCMA/DWS

	requirements where applicable, NEMBA alien invasive species duties and any conditions issued by commenting authorities. A chance-finds procedure must be implemented for any archaeological, palaeontological, cultural, historical or burial material uncovered during earthworks. Finally, the applicant must appoint or identify a responsible person to oversee environmental compliance during construction and operation. Records must be kept for vegetation clearance, rehabilitation, alien clearing, stormwater inspections, erosion repairs, wastewater maintenance, sludge removal, waste disposal, borehole abstraction, firebreak maintenance and environmental incidents. These records must be made available to the competent authority on request.
2.3.	Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.
	Based on the findings of the Basic Assessment, the site-specific specialist assessments and the information currently available, it is my reasoned opinion that the proposed activity should be authorised, subject to the implementation of the mitigation measures, specialist recommendations, EMPr requirements and conditions listed below. The proposed development is located on an existing agricultural property that has been historically cultivated, grazed, plantation-affected and invaded by alien vegetation. The site-specific terrestrial biodiversity assessment confirms that the property is largely transformed or disturbed, that no mapped remnants of South Outeniqua Sandstone Fynbos remain on site, and that the more meaningful ecological opportunities relate to alien clearing, rehabilitation and restoration of ecological connectivity, particularly in the northern portion of the property. The freshwater assessment does not confirm functional natural aquatic features within the development footprint and disputes the mapped ESA 1 aquatic feature; however, the existing farm dams, contour berms and managed stormwater routes remain important farm stormwater-management features and must be protected. The proposal has been designed to locate the main agricultural production, farmers' market, farm shop and related access infrastructure within more transformed and agriculturally appropriate areas, while retaining restoration and low-impact tourism areas in the northern portion of the farm. The development also supports the continued agricultural use and viability of the property through renewed dryland cultivation, continued grazing, local-producer trade, agri-tourism accommodation and rural economic diversification. It is consistent with the Bitou SDF, the Western Cape Rural Areas Guidelines and broader rural-development objectives, which support appropriate agriculture-linked tourism, farm diversification, local economic participation and retention of rural character. The main negative impacts relate to vegetation clearance, soil disturbance, erosion risk, wastewater management, traffic and dust on market days, visual change, fire risk and operational waste. These impacts are considered manageable and can be reduced to acceptable residual levels through footprint control, stormwater and erosion management, waste and wastewater controls, alien-clearing and rehabilitation measures, fire-risk management, visitor controls and implementation of the EMPr. The cumulative vegetation clearance remains below the applicable 20 ha Basic Assessment threshold, and no fatal flaws have been identified. The no-go alternative would avoid some disturbance, but would also result in the loss of positive socio-economic, agricultural diversification, local market, rural tourism, alien-clearing and rehabilitation benefits. Accordingly, provided that the development remains within the assessed footprint and is implemented in accordance with the final approved SDP, EMPr and specialist recommendations, the residual negative impacts are considered acceptable, while the positive agricultural, socio-economic, land-management and rehabilitation outcomes are expected to be medium to high in significance. On this basis, environmental authorisation is recommended. Recommended conditions of authorisation Should the competent authority grant Environmental Authorisation, the following conditions should be included: Approved layout and activity limits - The authorised development must be limited to the components assessed in the BAR, namely five eco-cabins, a campsite with ten camping stands, a farmers' market, a farm shop, renewed dryland cultivation areas, associated services, internal access and the grass airstrip/firebreak corridor. - The development must be implemented strictly in accordance with the final approved Site Development Plan and biodiversity overlay map. - No expansion, intensification, additional accommodation units, additional campsite capacity, increase in market footprint, additional vegetation clearance, new access roads or change in activity may occur without prior screening and any further approvals required in terms of NEMA, municipal land-use approval and other applicable legislation. Development footprint and vegetation clearance - Vegetation clearance must be restricted to the approved and demarcated footprints only. - The cumulative vegetation clearance must remain within the assessed footprint and below the applicable Basic Assessment threshold. - No construction, clearing, stockpiling, laydown areas, parking, waste storage or vehicle movement may occur outside the approved footprints. - All no-go, retained vegetation, rehabilitation and ecological connectivity areas must be demarcated before commencement. Protection of restoration and ecological connectivity areas - The northern restoration and ecological connectivity areas must be retained and protected from unnecessary disturbance. - These areas may only be used for approved low-impact tourism, alien clearing, rehabilitation, ecological management, fire management and environmental monitoring. - No conversion of these areas to cultivation, parking, structures or intensive visitor use may occur unless separately assessed and authorised. Alien invasive vegetation management and rehabilitation - The approved alien invasive vegetation control programme must be implemented.

- Follow-up clearing must be undertaken to prevent regrowth, especially in disturbed areas, rehabilitation areas, road edges, the campsite and eco-cabin areas, the market precinct and the airstrip/firebreak corridor.
 - Disturbed areas not required for permanent infrastructure, cultivation or operational use must be rehabilitated using suitable locally indigenous species.
 - Rehabilitation success must be monitored and failed rehabilitation must be corrected.
5. **Soil, erosion and stormwater management**
- Existing contour berms must be retained and maintained where practical.
 - Roads, parking areas, service trenches and the airstrip/firebreak corridor must include appropriate erosion and stormwater controls.
 - Runoff must be dispersed at low velocity and must not be concentrated onto unstable soils.
 - Rills, rutting, gullying or sediment movement must be repaired promptly.
 - No sediment-laden runoff may be allowed to enter farm dams or neighbouring properties.
6. **Freshwater and farm dam protection**
- Farm dams, dam margins, contour berms and managed stormwater flow paths must be protected during construction and operation.
 - No wastewater, fuel, oil, cement wash water, chemicals, waste or contaminated runoff may enter farm dams or stormwater flow paths.
 - A precautionary approach must be applied to all farm dams and stormwater-management features, notwithstanding the freshwater specialist's finding that mapped natural aquatic features were not confirmed.
7. **Water supply and abstraction**
- Operational water use must remain within the assessed demand assumptions.
 - Borehole abstraction must be monitored and records must be kept.
 - Rainwater harvesting must be implemented where practical and maintained.
 - Water-efficient fittings must be installed and leaks must be repaired promptly.
 - Renewed cultivation must remain dryland unless further approval is obtained where required.
 - Potable water supplied to guests, vendors or staff must be appropriately treated and maintained to potable standards.
8. **Wastewater management**
- Only appropriately sized, approved and maintained package sewage treatment plants may be installed.
 - Final sewage-treatment technology must meet the required capacity, effluent-quality, maintenance and regulatory requirements.
 - Sewer reticulation, treatment plants, manholes and disposal beds must be inspected and maintained by competent persons.
 - Sludge must be removed by an authorised or appropriately contracted vacuum tanker and disposed of at a lawful facility.
 - No untreated discharge, surfacing effluent, odour nuisance or groundwater/soil contamination may occur.
 - The development must comply with Bitou Municipality, BOCMA/DWS and National Water Act requirements where applicable.
9. **Solid waste management**
- Waste must be separated at source, securely stored and removed regularly to an authorised municipal waste or recycling facility.
 - No waste may be buried, dumped or burnt on site.
 - Litter sweeps must be undertaken after market days and peak-use periods.
 - Vendors, guests and staff must be informed of waste-separation and no-litter requirements.
10. **Traffic, access and parking**
- The existing R340 access must be used.
 - Sight distances at the R340 entrance must be maintained, subject to lawful vegetation management and any road-authority requirements.
 - Internal parking and circulation areas must be demarcated.
 - Roadside parking on the R340 road reserve must be prevented.
 - Market-day traffic and parking must be monitored during initial operations and additional controls must be implemented if required.
 - No widening of existing roads by 4 m or more may occur unless authorised.
- Grass airstrip / firebreak corridor**
- The airstrip must remain a grass-surfaced, low-intensity private landing strip located within the planned firebreak corridor.
 - No hard surfacing, commercial aviation use, fuel storage, aircraft maintenance area, hangar or additional aviation infrastructure may be established unless separately assessed and authorised.
 - The airstrip/firebreak corridor must be maintained to prevent erosion, rutting, bare soil exposure and alien regrowth.
 - The firebreak function of the corridor must be retained.
- Visual and rural character**
- The development must remain clustered, modest in scale and compatible with the rural agricultural landscape.
 - Natural materials, muted colours and non-reflective finishes must be used for visible structures where practical.
 - Existing screening vegetation must be retained where possible.
 - Disturbed edges must be rehabilitated with suitable indigenous vegetation.
 - Excessive signage, urban-style hard surfacing and unnecessary lighting must be avoided.
- Agricultural compatibility**
- The property must remain primarily agricultural in character and use.
 - The farmers' market and farm shop must retain their farm-origin, local-producer and agriculture-linked focus.
 - Consent uses must remain complementary and subordinate to the agricultural use of the property.

- The farm shop must remain within applicable municipal size and land-use parameters.

Compliance with other approvals

- The applicant must comply with all applicable municipal land-use approvals, the final SDP, service requirements, road-authority requirements, Heritage Western Cape requirements, BOCMA/DWS requirements where applicable, and NEMBA alien invasive species duties.
- A chance-finds procedure must be implemented for any archaeological, palaeontological, cultural, historical or burial material uncovered during earthworks.

Environmental compliance and record-keeping

- The EMPr and all specialist recommendations must be implemented throughout construction and operation.
- A responsible person must be appointed to oversee environmental compliance.
- Records must be kept for vegetation clearance, alien clearing, rehabilitation, stormwater inspections, erosion repairs, wastewater maintenance, sludge removal, waste disposal, borehole abstraction, firebreak maintenance, market-day management and environmental incidents.
- Records must be made available to the competent authority on request.

Decommissioning

- If any authorised component is decommissioned, redundant infrastructure must be removed responsibly, waste must be disposed of lawfully, compacted areas must be rehabilitated where appropriate, and disturbed areas must be stabilised and returned to suitable agricultural use or rehabilitated with indigenous vegetation.

2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.
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Conclusion and recommendations have been made based on the following assumptions:

- That the information provided and gathered (including specialist findings) that was used to compile this report is correct;
- That the recommended mitigation methods that have been specified in this report and the EMPr will be complied with;
- &
- That stakeholders and interested and affected parties will submit a relevant comment during the public participation process that can positively influence the outcome of the NEMA process.

It is assumed that all the impacts have been identified and that the proposed preferred alternative will be accepted and approved.

Uncertainties and gaps in knowledge:

Given the fairly simplistic and low impact nature of the development and taking into consideration that the property is located outside the urban edge, there are no uncertainties or gaps in knowledge identified. This is provided that the EMPr is strictly adhered to, and compliance is monitoring by a suitable qualified ECO.

Overall summary:

The findings of the assessment and the proposed mitigation measures are based on the information available at the time of compiling the Basic Assessment Report, including the project description, Site Development Plan, planning motivation, specialist inputs, desktop mapping, aerial imagery, site observations and engineering/service assumptions. The assessment assumes that the proposed development will be implemented substantially in accordance with the assessed layout, development components and footprint areas, including the five eco-cabins, ten camping stands, farmers' market, farm shop, renewed dryland cultivation areas, associated services, internal access and grass airstrip/firebreak corridor. It is also assumed that the cumulative vegetation clearance will remain within the assessed footprint and below the applicable Basic Assessment threshold, and that no expansion, intensification or additional listed activity will occur without further screening and approval where required.

The assessment assumes that the land-use history interpreted from aerial imagery and available records is correct, particularly in relation to historic cultivation, grazing, plantation use, alien infestation and the transformed or disturbed condition of the property. While site-specific specialist verification has refined the desktop sensitivity mapping, some uncertainty remains regarding the exact composition and recovery potential of vegetation in disturbed, alien-cleared or historically cultivated areas, especially where indigenous vegetation may be regenerating. This uncertainty has been addressed by applying a precautionary approach, restricting clearing to approved footprints, protecting rehabilitation and ecological connectivity areas, requiring alien follow-up control, and rehabilitating disturbed areas with suitable locally indigenous vegetation.

The terrestrial biodiversity findings rely on the specialist's site assessment that the property is largely transformed or disturbed, that no mapped remnants of South Outeniqua Sandstone Fynbos remain on site, and that the most meaningful restoration opportunities occur mainly in the northern portion of the property. Although the specialist findings reduce the uncertainty associated with broader desktop sensitivity mapping, ecological conditions may change over time as alien clearing progresses and vegetation recovers. The mitigation therefore requires ongoing monitoring of rehabilitation areas, control of alien regrowth and protection of retained vegetation and restoration corridors.

The freshwater assessment assumes, based on the freshwater specialist's findings, that the mapped ESA 1 aquatic feature is incorrectly mapped and that functional natural aquatic features are not present within the development

footprint. However, there remains some uncertainty associated with seasonal stormwater behaviour, overflow routes from farm dams, and the performance of existing contour berms during intense rainfall events. This has been addressed by treating farm dams, contour berms and stormwater flow paths as important management features, applying a precautionary approach, avoiding disturbance to dams and dam margins, and requiring erosion and stormwater controls on roads, parking areas, service corridors and the airstrip/firebreak corridor.

The water-supply assessment is based on the reported borehole yield, estimated average maximum daily water demand, proposed rainwater harvesting and the assumption that renewed cultivation will remain dryland and will not require irrigation. Actual water demand may vary depending on occupancy rates, market attendance, seasonal tourism use, rainfall, drought conditions and operational practices. The mitigation therefore requires borehole abstraction monitoring, water-efficient fittings, leak detection and repair, rainwater harvesting maintenance, review of actual water demand against assumptions, and operational adjustment if monitoring indicates water stress or declining yield.

The wastewater assessment is based on preliminary engineering assumptions regarding package sewage treatment plant capacity, sewer reticulation, treated effluent quality and subsurface disposal by evapotranspiration and infiltration beds. The final sewage treatment technology has not yet been confirmed and may include BioRock, Eco Tanks Big Red or another package plant meeting the required specifications. There is uncertainty regarding final supplier design, effluent performance, maintenance frequency, sludge accumulation rates and long-term disposal-bed performance under variable use and rainfall conditions. This has been addressed by requiring final detailed design to meet capacity, effluent-quality, maintenance and regulatory requirements, regular inspection and servicing by competent persons, lawful sludge removal, prevention of system overload and immediate corrective action if odour, leakage or surfacing effluent is detected.

The traffic assessment is based on estimated trip generation, market-day visitor assumptions, the use of the existing R340 access and the existing sight-distance information. Actual traffic volumes may vary depending on the success of the farmers' market, seasonal tourism patterns and event-day conditions. There is also some uncertainty regarding road-reserve vegetation management and future road-authority requirements. These uncertainties are addressed through conditions requiring use of the existing access, maintenance of sight distances, demarcated parking, prohibition of unsafe roadside parking, market-day traffic monitoring during initial operation and adjustment of traffic controls if congestion or safety concerns arise.

The stormwater and erosion assessment assumes that existing farm tracks, grassed areas, contour berms and low-velocity drainage measures will remain functional if maintained. Climate variability, intense rainfall events, drought-induced vegetation loss, construction disturbance and airstrip levelling may alter runoff behaviour and erosion risk. This uncertainty is addressed by requiring low berms, cross-drainage, grassed and gravel surfaces, prompt stabilisation of exposed soils, inspections after heavy rainfall and immediate repair of erosion, rutting or sediment movement.

The airstrip assessment assumes that the landing strip will remain grass-surfaced, low-intensity and private, and that it will be located within the planned firebreak corridor. The detailed operational frequency, aircraft type and exact maintenance requirements may vary. These uncertainties are addressed by limiting the airstrip to low-intensity private use, prohibiting hard surfacing, fuel storage, aircraft maintenance or commercial aviation use unless separately assessed and authorised, and requiring erosion control and firebreak maintenance.

The visual assessment is based on the currently available layout, indicative architectural style, existing topography, screening vegetation and proposed use of natural materials. Final architectural detailing, colour finishes, signage, lighting and landscaping may change during detailed design. This uncertainty is addressed by requiring natural materials, muted colours, non-reflective finishes, retained screening vegetation, rehabilitation planting, low-intensity lighting, modest building scale and avoidance of urban-style hard surfacing or excessive signage.

The socio-economic assessment assumes that the farmers' market, farm shop, accommodation and agricultural activities will operate within the scale and character assessed, and that the market will maintain a local-producer and farm-to-plate focus. Actual socio-economic benefits will depend on market uptake, vendor participation, visitor numbers, local labour use, procurement practices and operational management. This uncertainty is addressed by recommending that the consent uses remain complementary to agriculture, that local producers and labour be prioritised where practical, and that the market and farm shop not be intensified into a general commercial or urban-style retail use without further approval.

Climate-change risks introduce uncertainty regarding future rainfall reliability, drought frequency, fire risk, groundwater availability and storm intensity. These risks cannot be predicted with certainty at site level. The mitigation measures therefore include dryland cultivation, water-use monitoring, rainwater harvesting, reduced hard surfacing, stormwater controls, firebreak maintenance, alien clearing, fuel-load reduction, off-grid energy systems and rehabilitation with locally indigenous vegetation to improve resilience.

The assessment also assumes that all relevant approvals, authority comments and service confirmations will be obtained and complied with, including municipal land-use approval, final SDP approval, Heritage Western Cape requirements, road-authority requirements, Bitou Municipality requirements, BOCMA/DWS requirements where applicable and NEMBA alien invasive species duties. Where final authority comments or detailed technical approvals are still outstanding, these represent gaps to be resolved before or during implementation through conditions of authorisation and EMP requirements.

Overall, while some assumptions and uncertainties remain, they are not considered to undermine the findings of the assessment. The identified gaps are typical of a Basic Assessment stage and can be addressed through final design

confirmation, authority approvals, implementation of the EMPr, monitoring, adaptive management and conditions limiting the development to the assessed footprint and operating scale.	
2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.
Commencement of the listed activities must occur within 5 years from the date of authorisation and construction of service infrastructure is to be concluded within 10 years of issuing. • Period for which the EA is required - 10 years • Date of which the construction activity will be concluded - 10 years • When post-construction monitoring requirements should be finalised - 10 years Operational phase: • Tourism facility is ongoing and will not have a concluding date • Farming activities will be ongoing and will not have a concluding date	

3. Water

3.1	Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.
Water conservation, potable water avoidance and water reuse measures The Western Cape is recognised as a water-scarce province and the proposed development has therefore been designed to limit potable water demand, avoid unnecessary reliance on municipal potable water supplies, and promote efficient use, reuse and recycling of water wherever practical. The development will not connect to municipal potable water infrastructure and will instead rely on an existing on-site borehole, supplemented by roof rainwater harvesting from buildings where practical. This approach avoids placing additional demand on municipal bulk water infrastructure and supports a more self-sufficient rural services model. During the development and construction phase, potable water use will be avoided as far as reasonably possible. Construction water requirements will be kept to the minimum necessary and water will be used primarily for essential construction activities such as dust suppression, limited concrete work, cleaning of equipment where required, and establishment of rehabilitation areas. Contractors must avoid unnecessary washing, prevent leaks from temporary storage tanks and hoses, and use non-potable water sources where suitable and lawful. Dust suppression must be targeted and not excessive, and disturbed areas must be stabilised promptly to reduce repeated watering requirements. No potable water may be used for unnecessary cleaning of vehicles, hard surfaces or equipment. Construction workers must also be briefed on water-saving requirements as part of the environmental induction. During the operational phase, water demand will be reduced through the use of water-efficient design and operational controls. The renewed cultivation areas will remain dryland and will not require irrigation. This is one of the most important water-saving measures, as agricultural irrigation would otherwise be the largest potential water demand. The eco-cabins, campsite ablution block, farm shop and farmers' market will be fitted with water-efficient taps, showerheads, toilets and appliances. Low-flow fittings, dual-flush toilets and water-efficient wash-up facilities must be used where practical. Leaks must be repaired immediately, and routine inspections of taps, toilets, pipes, tanks and pumps must be undertaken to prevent avoidable water loss. Guests, vendors and staff must be informed of the need to conserve water through signage, guest information and vendor rules. Rainwater harvesting will be implemented from roofs where practical as a secondary water source. Harvested roof runoff will be collected through gutters and downpipes, pre-treated using gutter guards and first-flush diverters, and stored in rainwater tanks associated with the relevant buildings. Rainwater will be prioritised for non-potable or lower-quality water uses such as toilet flushing, wash-down where required, garden establishment and other appropriate operational uses. Where rainwater is used for washbasins, kitchen supply or other domestic uses, it must pass through appropriate filtration and treatment systems. The rainwater storage tanks may be topped up from the borehole-fed reservoir when required, but this should be managed to maximise use of harvested rainwater before borehole water is used. Borehole abstraction will be managed carefully to avoid excessive groundwater use. The existing borehole has been identified as the primary water source, but abstraction must remain within the assessed demand assumptions and sustainable yield. The average maximum daily demand for the proposed consent-use components and approved primary-rights development has been estimated at approximately 5.78 kilolitres per day, which is substantially lower than the reported borehole yield. Nevertheless, abstraction volumes must be monitored, records must be kept, and actual water use must be reviewed during peak periods such as holiday seasons and market days. If monitoring indicates declining yield, seasonal stress or abnormal increases in demand, non-essential water use must be reduced and operational capacity must be reviewed. Water reuse and recycling will be implemented mainly through the wastewater-management system. Wastewater from the campsite, eco-cabins, farm shop and farmers' market will be treated in appropriately sized package sewage treatment plants. The treated effluent will be disposed of to shallow subsurface evapotranspiration and infiltration beds, where it will support evapotranspiration vegetation and soil moisture recharge in a controlled manner. This system avoids direct discharge to surface water, reduces pollution risk and allows treated water to be beneficially returned to the soil profile rather than being wasted. Treated effluent must not be used for unrestricted irrigation or public-access areas unless it complies with the applicable water-quality and authorisation requirements. Disposal beds must be maintained, protected from vehicle compaction and inspected for odour, surfacing effluent or blockages.	

Additional water-saving measures include maintaining the gravity-fed water distribution system from the elevated storage tank where practical, using gas geysers to reduce energy demand associated with hot water, avoiding unnecessary hard surfacing that would reduce infiltration, and retaining grassed and vegetated surfaces to improve stormwater absorption. Stormwater will be managed through existing contour berms, low berms, grassed drainage areas and controlled low-velocity discharge points, thereby promoting infiltration and reducing erosion rather than rapidly conveying runoff off-site.

Overall, the proposed development avoids reliance on municipal potable water, limits groundwater abstraction through dryland cultivation and rainwater harvesting, reduces demand through efficient fittings and operational controls, and reuses treated wastewater through controlled subsurface evapotranspiration and infiltration beds. With monitoring, maintenance and adaptive management, the water demand of the development is considered manageable and appropriate for a rural property in a water-scarce region.

4. Waste

4.1 Explain what measures have been taken to reduce, reuse or recycle waste.

The following measures have been incorporated to **reduce, reuse and recycle waste** during both the development and operational phases of the proposed activity.

During the construction phase, waste generation will be reduced by keeping construction activities within the approved footprint, avoiding unnecessary clearing and earthworks, ordering materials according to need, and reusing suitable materials on site where practical. Cleared alien timber may be reused on the property for appropriate farm structures, fencing, market stalls, landscaping, edging, firewood or other lawful farm-related purposes, provided that such reuse does not facilitate the spread of alien invasive species. Topsoil and suitable excavated material will be reused for rehabilitation, landscaping, backfilling and erosion-control works where appropriate. Construction waste such as packaging, scrap metal, timber offcuts, plastics, cardboard and rubble must be separated where practical, stored in designated areas, and removed regularly to an appropriate recycling or authorised disposal facility. Hazardous waste, including oil-contaminated materials, paint containers, chemical containers and fuel residues, must be stored separately and disposed of lawfully. No waste may be buried, dumped or burnt on site.

During the operational phase, the development has been designed to minimise waste generation through a low-impact rural tourism and farm-based market model. The farmers' market and farm shop will encourage the sale of local produce, fresh food, value-added farm products and goods with reduced packaging where practical. Vendors should be required to minimise single-use packaging, remove waste from their stalls after market days, and comply with market waste rules. Clearly marked waste-separation stations must be provided at the farmers' market, farm shop, campsite and eco-cabin areas for general waste, recyclables and, where practical, organic waste. Recyclable materials such as glass, tins, cardboard, paper and plastics must be separated at source and removed to an appropriate recycling facility where available.

Organic waste from the farm shop, farmers' market and accommodation components should be reduced by encouraging responsible stock control, food-waste minimisation and separation of suitable compostable material. Where appropriate and lawful, clean organic waste may be composted or reused on the farm as part of soil-improvement or regenerative farming practices, provided that it does not create odour, attract animals, cause nuisance or introduce contaminants. Food waste that cannot be composted or safely reused must be stored securely and removed with the residual waste stream.

The landowner will be responsible for collecting and removing residual waste to the municipal waste transfer facility, as already identified in the project description. Waste must be stored in secure, covered containers or a designated waste-storage area to prevent windblown litter, odour and access by animals. Litter sweeps must be undertaken after market days and peak visitor periods, including the market area, parking areas, access routes, campsite, eco-cabin areas and surrounding disturbed areas. Guest and vendor information must include waste-separation, recycling and no-litter requirements.

Wastewater will be managed separately through package sewage treatment plants, with treated effluent disposed of via shallow subsurface evapotranspiration and infiltration beds. Although this does not constitute general solid waste recycling, it allows treated wastewater to be beneficially returned to the soil profile in a controlled manner rather than discharged to surface water or wasted. Sludge from the sewage treatment plants must be monitored and removed by a privately contracted vacuum tanker for disposal at a licensed disposal site.

Overall, the waste-management approach follows the waste hierarchy by reducing waste at source, reusing suitable materials on site, recycling recoverable materials, composting suitable organic waste where practical, and disposing of only residual waste at an authorised municipal facility. This will reduce the volume of waste requiring disposal and minimise the risk of pollution, litter, odour and nuisance impacts.

5. Energy Efficiency

5.1 Explain what design measures have been taken to ensure that the development proposal will be energy efficient.

The development proposal incorporates several design measures to ensure energy efficiency and reduce reliance on external energy infrastructure. The property will operate entirely off-grid, with electricity supplied primarily through solar photovoltaic system supported by inverter and battery-storage capacity for the eco-cabins, campsite ablutions and farm shop. This avoids the need for connection to municipal or Eskom grid infrastructure and reduces the operational carbon footprint of the development.

The energy design separates high-demand thermal uses from electrical supply, which improves overall efficiency. Hot-water geysers, ovens and hobs will be gas powered, while heating will be provided by gas or wood burners where required. This reduces the electrical load placed on the solar system and ensures that the solar photovoltaic capacity can be reserved mainly for lighting, refrigeration, small appliances and essential domestic uses. All domestic appliances, except kettles, will be solar powered, and the system has been sized with dedicated inverter capacity, battery storage and solar panel capacity for each main operational component.

The campsite has also been designed to reduce unnecessary energy demand. Individual camping stands will not be provided with power connections, encouraging a low-impact and self-sufficient camping experience. Energy demand will therefore be concentrated at the central ablution block, where services can be managed more efficiently. The eco-cabins will be compact in scale and designed as low-impact accommodation units, which reduces the energy required for lighting, heating and cooling. The farm shop and market facilities will remain modest in scale and compatible with the rural setting, further limiting operational energy requirements.

Additional energy-efficiency measures include the use of natural materials and low-impact finishes, clustered development nodes to reduce service reticulation distances, low-intensity lighting, and avoidance of unnecessary lighting in rehabilitation and low disturbance areas. Gravity-fed water distribution from the elevated storage tank will also reduce pumping requirements where practical, while gas geysers will operate efficiently at the available residual pressure. The use of solar-powered systems, battery storage, gas for high-energy thermal uses, compact building footprints and limited electrification of campsite stands collectively ensures that the development remains energy efficient, resilient and appropriate for an off-grid rural environment.

SECTION K: DECLARATIONS

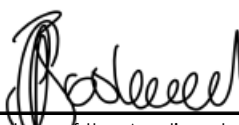
DECLARATION OF THE APPLICANT

Note: Duplicate this section where there is more than one Applicant.

I...**Craig Peter Boshard**, ID number ...**7804285019087**.....in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
 - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
 - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
 - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
 - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
 - Legitimate costs in respect of specialist(s) reviews; and
 - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

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


Signature of the Applicant:

6 August 2026
Date:

GPC Property Investments (Pty) Ltd
Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I **Cathy Avierinos**..., EAP Registration number ...**2019/1053**.. as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this BAR and any other documents/reports submitted in support of this BAR;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all 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 prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;



6 August 2026

Signature of the EAP:

Date:

Hilland Environmental (Pty) Ltd

Name of company (if applicable):

DECLARATION OF THE REVIEW EAP

I, EAP Registration number as the appointed Review EAP hereby declare/affirm that:

- I have reviewed all the work produced by the EAP;
- I have reviewed the correctness of the information provided as part of this Report;
- I meet all of the general requirements of EAPs as set out in Regulation 13 of the NEMA EIA Regulations;
- I have disclosed to the applicant, the EAP, the specialist (if any), the review specialist (if any), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.

Signature of the EAP:

Date:

Name of company (if applicable):

DECLARATION OF THE SPECIALIST (SEE SPECIALIST REPORTS)

Note: Duplicate this section where there is more than one specialist.

I, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

Signature of the EAP:

Date:

Name of company (if applicable):

DECLARATION OF THE REVIEW SPECIALIST

I, as the appointed Review Specialist hereby declare/affirm that:

- I have reviewed all the work produced by the Specialist(s);
- I have reviewed the correctness of the specialist information provided as part of this Report;
- I meet all of the general requirements of specialists as set out in Regulation 13 of the NEMA EIA Regulations;
- I have disclosed to the applicant, the EAP, the review EAP (if applicable), the Specialist(s), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.

Signature of the EAP:

Date:

Name of company (if applicable):