



UPDATED DRAFT AMENDMENT ENVIRONMENTAL IMPACT REPORT – PART 2 AMENDMENT

for

SKULPIESBAAI ESTATE

On

ORIGINALLY PORTION 51/FARM 485,
HESSEQUA MUNICIPAL DISTRICT
ERVEN 4601, 4602, 4718, 4719, 4599 & 4600

In terms of the

National Environmental Management Act (Act No.
107 of 1998, as amended) & 2014 Environmental
Impact Regulations

Prepared for Applicant: Wonderdeals (Pty) Ltd.

Date: 11 August 2025 (updated 15 October 2025)

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UPDATED DRAFT ENVIRONMENTAL IMPACT REPORT

in terms of the

National Environmental Management Act, 1998 (Act No. 107 of 1998 as amended) & Environmental Impact Regulations 2014 (as amended)

SKULPIESBAAI ESTATE

Previously Portion 51/Farm 485 for Erven 4601, 4602, 4718, 4719, 4599 & 4600

Submitted for:

Stakeholder Review & Comment

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REPORT DETAILS

Title:	Updated Draft Environmental Impact Report – Skulpiesbaai Estate
Purpose of this report:	This report provides information on the visual assessment potentially associated with the partial amendment of Condition 8 of the Environmental Authorisation issued to Skulpiesbaai on 21 January 2013 (Ref: number: M/3/6/5). This updated Draft Environmental Impact Report is available for a second 30-day commenting period extending from 16 October – 14 November 2025 following on the first round of public participation that ran from 12 August 2025 – 13 September 2025.
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Authors:	Louise-Mari van Zyl – Appointed EAP
Cape EAPrac Ref:	HES012c/04
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REGULATORY FRAMEWORK

An environmental authorisation may be amended by following the process prescribed in Regulations 31 of the NEMA Regulations, if the amendment will result in a change to the scope of a valid environmental authorisation where such change will result in an increased level or change in the nature of impact, where such level or change in nature of impact was not (a) not assessed and included in the initial (2012) application for environmental authorisation, or (b) if an impact was not taken into consideration in the initial environmental authorisation; and the change does not, on its own, constitute a listed or specified activity.

The Regulations stipulating a Part 2 Amendment process, specifically focus on the following:

- assessment of all impacts related to the proposed change i.e. increase in height from 5m – 7.5m on select erven within Skulpiesbaai Estate;
- advantages and disadvantages associated with the proposed change i.e. changes in viewshed / views from properties overlooking the select erven, flexibility for owners of the six select erven into design;
- measures to ensure avoidance, management and mitigation of impacts associated with such proposed change i.e. exclude two of the six erven and recommend adjustment for point of measurement; and
- any changes to the EMPr i.e. the Operational Environmental Management Plan (OEMP) having come into effect upon occupation of the first house, does not require an amendment.

Unlike the initial application for environmental authorisation that necessitated the consideration and assessment of a wide variety of potential impacts, which included a detailed visual impact assessment of the development in its entirety, as part of the then change in land use, this Part 2 amendment application focusses on the possible change in **landscape/character/visual impacts** associated with an increase in height from 5m to 7.5m on six (6) select erven within the estate. All other impacts are assumed to be similar and therefore need not be re-assessed as part of this amendment investigation.

This Part 2 Amendment Assessment report includes a Visual Impact Assessment (VIA) of which the scope is to assess the difference between the status quo (approved 5m height restriction for all erven) and the proposal to increase the height to 7.5m on six (6) select erven within the Estate, in order to determine the level of, as well as significance of potential impacts associated with the proposed partial amendment of Condition 8 of the Environmental Authorisation (EA).

THE SIX SELECT ERVEN ON SKULPIESBAAI ESTATE

The Appeal Environmental Authorisation (EA) for Skulpiesbaai Estate, authorised 152 single residential erven in total. All of the approved erven has a height restriction of 5m from natural ground level to the apex of the roof (Condition 8 of the Environmental Authorisation).

A number of the approved erven have been developed, whilst most erven have been sold.

Leading up to this application, the Applicant was approached by potential buyers interested in purchasing erven in Skulpiesbaai that will allow double-volume homes. Accordingly, the developer, in conjunction with the Skulpiesbaai Home Owners Association (HOA) and controlling architect (Messrs Boogertman Partners), identified six (6) erven not yet sold or and still vacant, within the Estate that could in their considered opinions, accommodate the requests to construct double-volume homes.

Four (4) of the six (6) identified erven are situated at the rear of the Estate (northern node), and two (2) at the front (southern node).

Such a change necessitated approval by the HOA, as well as an amendment to the Estate Architectural Guidelines, as well as an amendment of the Environmental Authorisation, more specifically **Condition 8**, to be partially amended to enable a height restriction deviation from 5m from natural ground level to 7.5m for erven **4718, 4719, 4599, 4560, 4601 & 4602**.

OUTCOME OF THE SPECIALIST VISUAL IMPACT ASSESSMENT

The visual specialist considered/assessed the potential change in landscape / character, as well as views should the identified six (6) erven be permitted the height deviation from 5m to 7.5m, taking into account the applicable Specialist Guideline Series, previous Visual Impact Assessments for the greater development, additional measurements at the selected sites, alongside visual modelling/measurements from potentially affected neighbouring properties overlooking the select erven, as well as the updated Architectural Guidelines for the Estate.

The specialist determined that **only four (4)** of the identified six (6) erven, namely **erven 4718 and 4719** in the southern node and **erven 4599 and 4600** in the northern node) may be considered for the height deviation from 5m to 7.5m and then only subject to **additional mitigation measures** relating to a **lower level from where the (increased) height must be measured** i.e. lowest level/point on the site or point of access to the site / street level to ensure that the structure sinks into the natural ground level to compensate for the height deviation as much as possible. The status quo allows for the structure to be constructed along natural ground level (NGL) slope. Additional and original mitigation measures for roof colour/split and lighting specifications to minimise the additional visual impact.

The visual specialist recommends that for erven **4601 & 4602** in the northern node, the status quo **5m height restriction remains in place** to ensure that visual receptors, mostly properties in the neighbouring Bokmakierie development, are not detrimentally affected and visual impacts will therefore not change.

CONTENTS OF AN ENVIRONMENTAL IMPACT REPORT

Regulations 31 – 33 of the 2014 EIA Regulations specifies the process and the required contents of an amendment assessment report. This report complies with the minimum information requirements detailed in this Regulation.

STAKEHOLDER ENGAGEMENT PROCESS

The Draft Amendment Assessment Report was made available to stakeholders in accordance with the approved Public Participation Plan.

The availability of the draft report was advertised in the *SuidKaap Forum* (Friday, 8 August 2025), site notices were placed at the entrance to the Estate and nodes, immediate neighbouring property owners/residential estate governing bodies/resident associations were notified in written, relevant Organs of State, as well as mandated State Departments, received written notification of the draft document for review and comment.

The commenting period on the draft assessment report extended from 12 August 2025 – 13 September 2025. All submissions received during this period have been considered and are reflected in the Comments & Response Report. A Stakeholder Register was opened to capture the details of interested & affected parties (I&APs) who responded to the notification and/or submitted comment during the specified time.

Considering the submissions received, it became evident that the visual impact assessment (VIA) had to be updated to include more detailed modelling/measurements from erven in close proximity to the selected four (4) erven since owners/residents of close erven indicated concern about their loss of view/privacy.

To meet the stipulated 90-day regulatory timeframe for submission of the Final Environmental Impact Report (FEIR), the FEIR had to have been submitted to the Competent Authority no later than 29 September 2025. Updating of the visual assessment required additional site visits by the visual specialist, with a surveyor. Time restrictions did not allow for such to happen without missing the deadline.

Subsequently the Department was informed of a 50-day extension in terms of Regulation 32(b) to allow the visual specialist accompanied by a surveyor, to revisit the property and surrounding properties of key stakeholders to gather the new information i.e. new modelling/measurements in order to present it to stakeholders. The 50-day extension must include a 30-day public participation period.

Adhering to this extension timeframe, the deadline for submission of the Final EIR is therefore 19 November 2025, with the second commenting period extending from 16 October – 14 November 2025.

CONCLUSION

The visual specialist concludes that the six (6) selected erven are located in areas previously assessed and given visual impact ratings of HIGH. Despite this rating, development i.e. erven in this location, was authorised with the 5m height restriction measured from natural ground level along the slope of the erven, to the apex of the roof of each unit.

Having considered the impact (of increased height) on viewshed, visibility and visual intrusion from adjacent neighbouring properties in Bokmakierie and Bosbokduin, the impact rating remains the same.

The updated visual impact assessment confirms that the **viewshed** will not be affected by the proposed height increase on the six (6) erven, however the **visual intrusion** on views from some properties in Bokmakierie overlooking the northern node, must still be **mitigated**, whilst the visual intrusion on views/privacy on neighbouring properties in Bosbokduin Estate will be **minimal** considering the elevation difference and distance between the units select Skulpiesbaai erven and those in Bosbokduin.

- Only **erven 4599 and 4600** in the northern node may be increased from 5m to 7.5m, on condition that the **level from where height must be measured**, is lowered from the status quo natural ground level slope, to the **access point level i.e. street level** with adherence to all other mitigation measures applicable from the original Visual Impact Assessment;
- Erven **4718 and 4719** in the southern node may be increased from 5m to 7.5m, on condition that the level from where height must be measured, is the access point level i.e. street level, with adherence to all other mitigation measures applicable from the original Visual Impact Assessment;
- For all four (4) erven namely erven 4599, 4600, 4718 and 4719 the **roof forms must be fragmented** and **no more than 25% of any roof area may be on a continuous plane** and the **roof colour** for these houses must be **dark grey** to which end the Estate Architectural Guidelines must be updated to include these additional mitigation measures.

The Holder of the Authorisation has committed to these four (4) erven being the only ones to be considered for this deviation. Considering the outcome of the visual impact assessment considering the deviation, they undertake to not consider or apply for any other erven to height restriction deviation.

ORDER OF REPORT

Report Summary

Draft Environmental Impact Report – Main Report

- Appendix A : Location, Topographical Plans
- Appendix B : Visual Impact Assessment Report 2025 updated
- Appendix C : Visual Impact Assessment Report 2012
- Appendix D : Environmental Authorisation
- Appendix E : Comments & Response Report

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SUMMARY

I. INTRODUCTION

Cape EAPrac has been appointed by **Wonderdeals (Pty) Ltd**, hereafter referred to as the Holder of the Environmental Authorisation (EA), as the independent Environmental Assessment Practitioner (EAP), to facilitate an Amendment Assessment process required in terms of the National Environmental Management Act (NEMA, Act 107 of 1998) for the proposed **partial amendment of Condition 8** of the **Environmental Authorisation (EA)** for the Skulpiesbaai Estate, Stilbaai (Hessequa Municipal District).

Skulpiesbaai Estate obtained authorisation on 21 January 2013 following an appeal process in which the Minister confirmed the approval for a total of 152 Single Residential erven. Bulk services are installed for the Estate, which concluded the construction phase, whilst several houses have been built and occupied which classify as the operational phase of the development.

The EA contains several Conditions of Approval of which **Condition 8** stipulated a **five (5) metre height restriction** for all erven.

At the time of the original environmental assessment, the site was vacant (no development) and vegetation cover included invasive alien vegetation, both factors influences a site's perception of landscape. The origin of the 5m height restriction reflected in Condition 8 of the EA, stems from the then character of the landscape and surrounding developments, the natural setting of erven within the remaining natural open space areas, the natural slope of the property seawards, as well as what was then the surrounding developments namely Bosbokduin (to the South) and Bokmakierie (to the North).

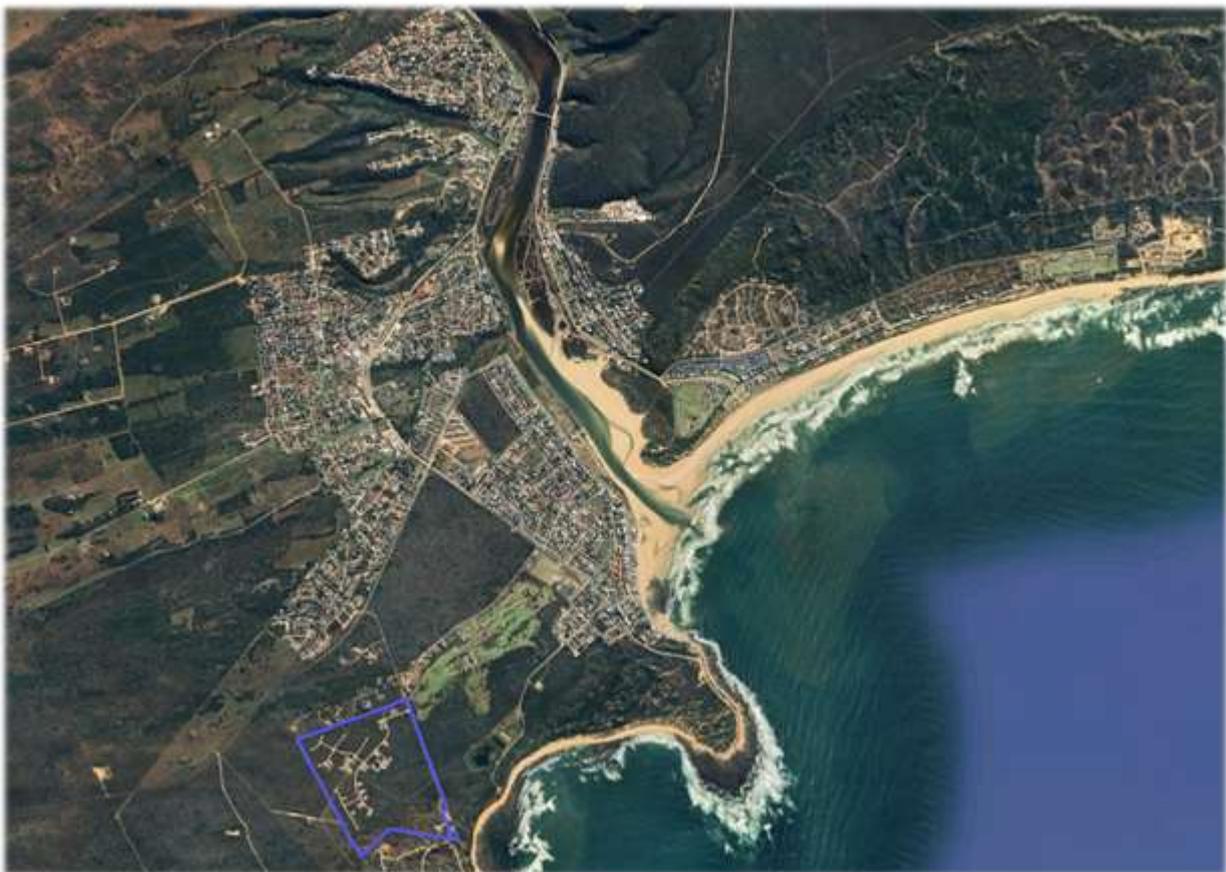


Figure 1: Skulpiesbaai Estate located in West-Stilbaai along the urban fringe between Bokmakierie Estate (North) and Bosbokduin Estate (South). The Stilbaai Golf Course/Estate, Municipal Sewage Work and Morris Point lie to the East with vacant agricultural land to the West.

As a result of enquiries from prospective buyers/investors, the Holder in consultation with the Estate Architect and HOA identified six (6) vacant erven within the Estate where a possible deviation of the height restriction from 5m to 7.5m seemed viable. The Holder submits that single residential erven are typically allowed as single or double-storey structures and they motivate that making allowance for an additional 2.5m height increase for these six erven, will optimise their views considering their location in the landscape, as well as make them more attractive to buyers who has a preference for double-volume homes.

The six (6) erven identified are indicated in Figure 2 below and are registered as erven **4601, 4602, 4718, 4719, 4599 & 4600** on the Surveyor General (SG) map for the development.

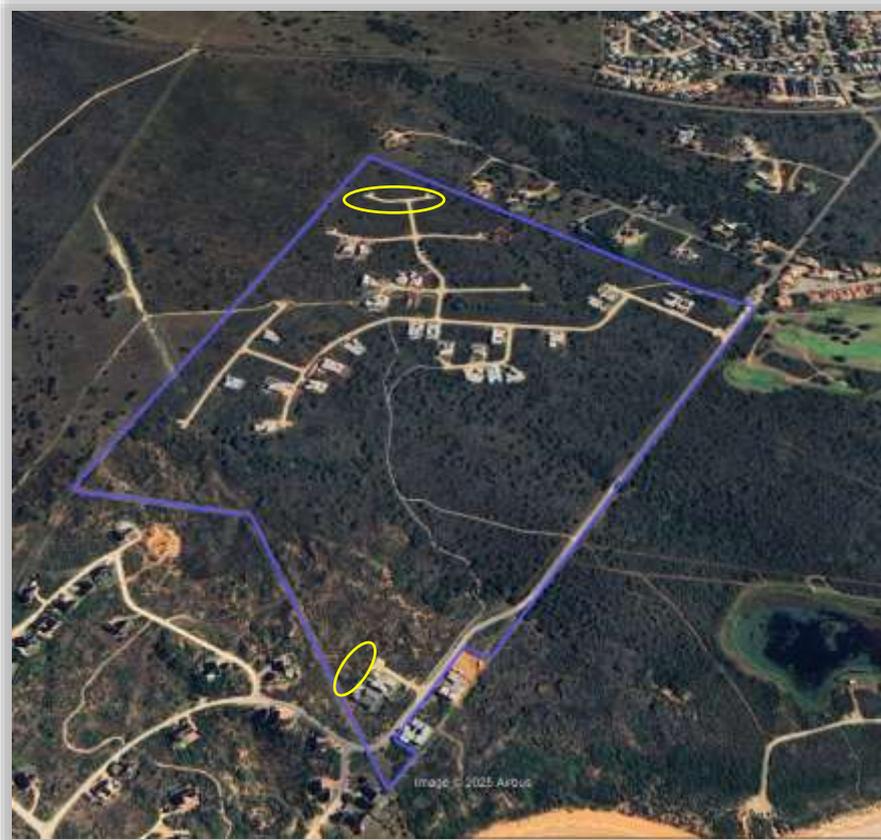


Figure 2: Indicative location of the six erven on Skulpiesbaai Estate.



Figure 3: Approved site plan for Skulpiesbaai Estate indicating the location of the identified six (6) erven.

It is noted that the proposed height increase for these six (6) erven was considered by the Skulpiesbaai Home Owners Association (HOA) previously and subsequently approved 28 January 2021 whereafter the Estate Architectural Guidelines was amended accordingly.

Despite this allowance being made for the height increase on the six erven in the Architectural Guidelines, building plans cannot be considered by Hessequa Municipality until such time as the EA is not also amended.

II. RECOMMENDATION OF THIS UPDATED DRAFT ENVIRONMENTAL REPORT

The six erven, where a height increase is being sought, are in areas previously assessed (2012) and given visual impact ratings of HIGH negative, without mitigation.

Considering the mitigation measures at the time which included colour schemes, roof fragmentation, orientation, landscaping, coverage limits, as well as the 5m height restriction, the erven within these areas of HIGH impact were authorised.

The visual specialists at the time of the 2012 assessment (CndV) determined that the introduction of all of these mitigation measures combined, would reduce the (visual) impact significance from HIGH negative to **MEDIUM-HIGH negative** for properties overlooking these development nodes.

The independent visual specialist confirms that visual intrusion on south facing sea views from existing houses in Bokmakierie, overlooking the northern four (4) erven, will be interrupted once the four vacant erven are developed (with the stipulated five (5) metre height restriction).

- Put differently, even if the height restriction relaxation to 7.5m is not permitted i.e. status quo, the houses located behind these four northern node erven, will still experience HIGH-MEDIUM negative visual intrusion irrespective.

The specialist reiterates that it is not only the height restriction (of 5m) that forms part of the visual mitigation spectrum, since colour, roof fragmentation, landscaping and orientation of these houses all help to reduce the visual intrusion overall and whilst height is one of the mitigating factors, none of the other mitigating factors will be affected.

It is for this reason, that two of the four northern node erven can be considered for the height restriction relaxation.

The visual specialist deems the viewshed from **Bokmakierie properties** overlooking these two (2) erven towards Morris Point and Shelly Beach to be more sensitive, when compared to view across **Bosbokduin** and further towards the West.

- For this reason, it is the recommendation of the visual specialist that the height restriction for **Erven 4601 & 4602 not be relaxed** to 7.5m and that the **status quo height restriction of 5m remain** in place for these two (2) erven.
- That the other four (4) erven, namely **4718, 4719, 4599 & 4560** can be considered to a relaxation of their height restrictions from 5m to 7.5m **without increasing the level or significance or visual intrusion or impact to receptors**.

Table 1: Comparative assessment ratings of the Status Quo (5m) vs the Deviation (7.5m) from neighbouring properties confirming that there will be little-to-no measurable increase in impact ratings/significance.

5m height		7,5m height	
Significance before mitigation	Significance after mitigation	Significance before mitigation	Significance after mitigation
Construction Phase - Visual scarring during construction			
High(-)	Medium (-)	High(-)	Medium (-)
Operations Phase - Visual intrusion and obscuring of ocean views from Northern neighbours			
High (-)	High - Medium (-)	High (-)	High - Medium (-)
Operations Phase - Visual intrusion and obscuring of views from Bosbokduin neighbours			
High (-)	High - Medium (-)	High (-)	High - Medium (-)

Comments received in response to this Amendment application process, will be considered and where necessary responded to by the visual specialist and environmental practitioner prior to the final Assessment Report submission to the DEADP.

III. ENVIRONMENTAL LEGISLATIVE REQUIREMENTS

The current assessment is being undertaken in terms of the **National Environmental Management Act** (NEMA, Act 107 of 1998)¹ and Environmental Regulations. The Regulations makes provision for the assessment of impacts that are potentially detrimental to the environment/receptors insofar as changes to the Environmental Authorisation (Regulation 31 - 33).

This amendment assessment process includes public participation to allow stakeholders the opportunity to review the application and provide comment to inform decision-making. Furthermore, the assessment is being informed by an independent specialist (visual) assessment to ensure compliance with the applicable Departmental Guideline series.

IV. AMENDMENT ALTERNATIVES

- This amendment application process relates *only* to **Condition 8 of the EA** and specifically *only* to the option of increasing the height from 5m to 7.5m on six (6) erven of the total approved 152 erven which is the Holder's **PREFERRED ALTERNATIVE 1**. This alternative has been **eliminated** due to the fact that allowing all six erven to have said height increase will result in an increase in the visual impact experienced by receptors in the neighbouring Bokmakierie Estate.
- The **RECOMMENDED ALTERNATIVE** as per the independent visual specialist is to limit the amendment to **Erven 4718, 4719, 4599 & 4560** only. Thus erven Erf 4601 & 4602 to **not be considered** for this height increase. This is submitted as **ALTERNATIVE 2**.
- The Environmental Authorisation (EA) for Skulpiesbaai Estate is a valid approval and the **STATUS QUO ALTERNATIVE 3** (i.e. what is already approved) remains enforce for all erven to have a height of 5m measured from natural ground level i.e. along the slope of each erf.

V. IMPACT SUMMARY AND STATEMENT

The key visual impact associated with the different alternatives is summarised as follows and considering that there is no substantive increase in impact significance between the visual intrusion ratings of Alternative 2 and 3, the Alternative 2 can be considered for approval through means of an Amendment of the EA Condition 8. Alternative 1 is not supported and has been eliminated.

ALTERNATIVE 1 (six erven increase to 7.5m height restriction)	HIGH NEGATIVE
ALTERNATIVE 2 (four erven increase to 7.5m height restriction)	MEDIUM HIGH NEGATIVE
ALTERNATIVE 3 (status quo, no height increase)	MEDIUM HIGH NEGATIVE

VII. CONCLUSIONS & RECOMMENDATIONS

Cape EAPrac is of the opinion that the information contained in the Amended Draft Environmental Impact Report and the updated visual impact assessment (VIA) with associated documentation, is sufficient to allow stakeholders (including the competent authority) to apply their minds to the change being applied for.

¹ The Minister of Water and Environmental Affairs promulgated new regulations in terms of Chapter 5 of the National Environmental Management Act (NEMA, Act 107 of 1998), viz, the Environmental Impact Assessment (EIA) Regulations 2014 (as amended). These regulations came into effect on 08 December 2014 and replace the EIA regulations promulgated in 2006 and 2010.

On condition that Erven Erf 4601 & 4602 retain the original 5m height restriction, there is no measurable or material difference in impact significance between the Status Quo Alternative 3 (when all the houses are built at 5m height measured from natural ground level) and Alternative 2 (when only Erven 4718, 4719, 4599 & 4560 may increase heights to 7.5m albeit measured from the point of access to these erven i.e. street level). It therefore follows that **Alternative 2** can be considered for approval by the Competent Authority.

UPDATED DRAFT ENVIRONMENTAL IMPACT REPORT

1 INTRODUCTION

Cape EAPrac has been appointed by Wonderdeals (Pty) Ltd, hereafter referred to as the Holder of the Environmental Authorisation (EA), as the independent Environmental Assessment Practitioner (EAP), to facilitate the amendment application reporting process required in terms of the National Environmental Management Act (NEMA, Act 107 of 1998) partially adjusting **Condition 8** of the EA.

Condition 8 reads as follows:

8. The height of all units must be restricted to 5m measured from natural ground level to the apex of the roof and all units must be designed with suitable materials and colour schemes.

The preferred alternative submitted by the Holder is for the above condition to be amended to enable Erven 4601, 4602, 4718, 4719, 4599 & 4560 to deviate from this height restriction to allow a 2.5m increase to a maximum of 7.5m.

The Environmental Regulations distinguish between a so-called Part 1 (non-substantive) Amendment process and a Part 2 (substantive) Amendment process. A Part 1 Amendment is for administrative changes mostly and does not typically include studies or public participation, whereas a Part 2 Amendment application process may include specialist studies and requires public participation.

The purpose of the **Amendment Environmental Impact Report** (DEIR) is to consider and assess the impacts of change for the alternatives presented in this assessment.

Information relating to the outcome of the assessment has been presented to potential I&APs, organs of state, state departments and the competent authority through means of the Draft EIR. In compliance with Chapter 6 of the 2014 EIA regulations (as amended), the Draft EIR was made available for a period of 30-days, extending from **12 August – 13 September 2025**.

Comments received on the Draft EIR have been considered and in order to further address the comments/concerns raised by registered I&APs, the visual specialist conducted further fieldwork in order to develop additional modelling/measurements to verify the findings/recommendations. Specifically the VIA has been updated to include more detailed visual modelling from neighbouring properties/erven in both Bosbokduin and Bokmakierie in as far as registered I&APs identified their specific concerns. This was done with input from a Surveyor who assisted with height measurements and spot levels.

This updated Draft Environmental Assessment Report contains the updated VIA and include the Comments & Response Report and is available for a further 30-day commenting period extending from 16 October – 14 November 2025.

Additional comments received in response to the updated report, will be included along with submissions made during the process to date and will be presented with the updated Comments & Response Report and Final Amendment Assessment Report, to the Competent Authority, Department of Environmental Affairs & Development Planning (George office) for consideration and decision-making.

All registered I&APs will be notified of the final submission and given access to the final documentation for information purposes. Once the Department has taken a decision on the application, all registered I&APs will be notified of the outcome of the decision and their right to appeal the decision.

1.1 RECOMMENDATION OF THE ENVIRONMENTAL IMPACT REPORT

Having considered the outcome of the updated Visual Impact Assessment (VIA) undertaken as part of the amendment investigation, it is submitted that only four (4) of the six (6) select erven can be considered. These erven already fall within an area-of-influence, that will (once developed) result in

Medium-High visual intrusion on the views of immediate neighbouring properties irrespective of having a 5m or a 7.5m height restriction. This rating of Medium-High stems from the original VIA investigation done as part of the original (2012) environmental impact assessment process and the updated VIA confirms that the increase in height will not increase this original rating.

Under **Alternative 1** where all six (6) erven would have the height increase, there will be an increased visual impact which will elevate the impact rating to **High negative**.

For this reason, the recommendation of this assessment is that the roof heights for units on **Erven 4601 and 4602** be **retained at 5m** from natural ground level (status quo), whilst the proposal of increasing roof heights to 7.5m on erven 4718, 4719, 4599 & 4560 must be measured from the level of point of access i.e. street level instead of natural ground level, roofs must be **fragmented** and no more than 25% of any roof area may be on a continuous plane, with **dark roof colours** i.e. dark grey.

With these recommendations/mitigation measures in place, the visual impact associated with an allowance to a 7.5m roof height (specifically for erven 4718, 4719, 4599 & 4560 only) will not increase beyond the originally assessed Medium-High negative rating, which is deemed acceptable since it achieves the same impact rating outcome as the Status Quo Alternative 1 and can therefore be considered for authorisation. According to the visual specialist these recommended mitigation measures will ensure that the significance of the potential visual impact is maintained to the same as the significance when the building heights were restricted to 5m.

1.1 RECOMMENDED MITIGATION MEASURES

The specific additional mitigation measures are summarised below and must be implemented in addition to all of the original documented mitigation measures from the CnDV Visual Impact Assessment from the original EIA:

- the 7,5m roof height on Erf 4599 must be measured from the lowest point on that site, namely the access road/street level in south eastern corner;
- the 7,5m roof height on Erf 4600 must be measured from the access road/street level;
- the 7,5m roof height on Erven 4718 and 4719 must be measured from the access road/street level;
- the roofs for these units must not be monolithic but articulated;
- the roof colour must be dark grey, unlike some of the existing roofs on units on site

To this end it is important that the 2022 Architectural guidelines be revised according to the outcome of this application.

1.2 ASSUMPTIONS & LIMITATIONS

This section provides a brief overview of *specific assumptions and limitations* having an impact on this amendment application process:

- It is assumed that the information on which this report is based (specialist studies and project information, as well as existing information) is **correct, factual and truthful**.
- The proposed development is **in line** with the statutory planning guidelines for Single Residential zoning, most notably the local Spatial Development Plan, and thus it is assumed that issues such as the cumulative impact of development in terms of character of the area and its resources, have been taken into account during the strategic planning for the area.
- It is assumed that all the relevant **mitigation and management measures** specified in this report will be implemented in order to ensure that impacts do not increase beyond the recorded level of impact.
- It is assumed that Stakeholders and Interested and Affected Parties notified of the availability of the EIR will provide **comments within the designated 30-day** review and commenting

periods, so that these were able to be included in the Final Environmental Impact Report to be timeously submitted to the competent authority for consideration and decision making.

- It is assumed that the Holder's commitment to limit the height increase of erven to the outcome of this application is noted as an assumption.

1.2.1 Assumptions and Limitations of Visual Specialist

- The visual impact report is based on a site visit at which time weather conditions were overcast resulting in some unclear photography, particularly from a distance.
- Follow-up site inspection was undertaken on a clear sunny day which improves the level of confidence of the assessment.
- Due to the timing of the process, access to the potentially affected private parties was not possible for the initial VIA;
- The follow-up site inspection provided access to most of the affected neighbouring properties which improves the level of confidence of the assessment.
- The follow-up site inspection included input and assistance from a Surveyor to provide additional measurements and added accuracy to the updated VIA.

2. PROPOSED AMENDMENT

The 2024/2025 Hessequa Spatial Development Framework (SDF) references the so-called 'urban-edge' for Stilbaai. The urban edge runs along the western boundary of Skulpiesbaai, as such the development is deemed to fall within an 'urban area' as per the Environmental Regulations.

The SDP includes parameters for different types of development within Stilbaai, notably for Low-Density Development. Skulpiesbaai falls within this category, with a low density of houses, set within an open space area.

The SDF notes that double-storey dwellings are permitted within so-called low-density developments, but at the same time it acknowledge that restrictions with respect to height and scale, can be implemented.



Figure 4: Location of Skulpiesbaai Estates (GREEN) within the urban edge of Stilbaai with the yellow arrows indicating the location of the six erven (Source: 2024/2025 SDP as adopted by Council).

Below extract from the 2024/2025 SDP referencing height limitations for low-density developments similar to Skulpiesbaai.

3.3.5.16.4 Development Height

Height Limitation: A maximum of two storeys will be permitted across developments, maintaining a low profile that integrates with the natural surroundings.

The Holder of the EA is applying for a partial amendment of Condition 8 of their Environmental Authorisation (EA) to allow deviation from the stipulated 5m height restriction for Erven 4601, 4602, 4718, 4719, 4599 and 4560.

The recommendation from the visual specialist is that only erven 4718, 4719, 4599 and 4560 be considered since a height increase on these four (4) erven will not result in an increase in the original Medium-High visual impact rating.

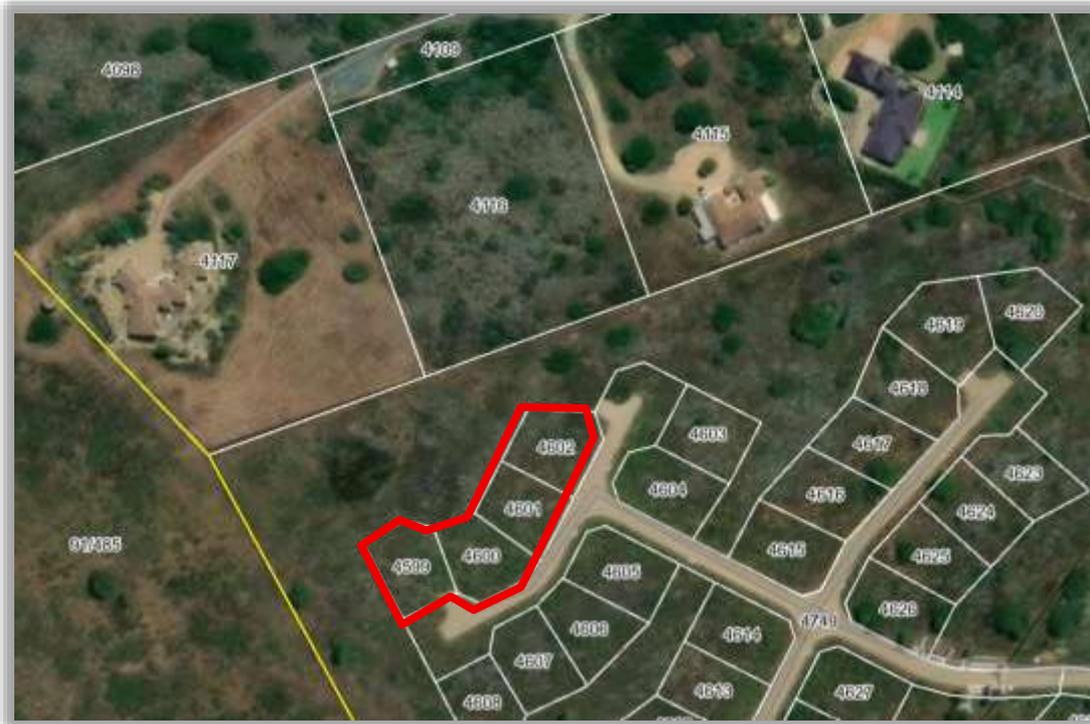


Figure 5: Location of Erven 4599, 4600, 4601 & 4602 within Skulpiesbaai.



Figure 6: Location of erven 4718 & 4719 within Skulpiesbaai.

2.1 PROJECT NEED AND DESIRABILITY

In keeping with the requirements of an integrated Environmental Impact process, the DEA&DP *Guidelines on Need and Desirability (2010 & 2011)*² were referenced to provide the following estimation of the activity in relation to the broader societal needs. The concept of need and desirability can be explained in terms of its two components, where *need* refers to *time*, and *desirability* refers to *place*. Questions pertaining to these components are answered in the Sections below.

2.1.1 Need (time)

In accordance with the guidelines on need and desirability, a project should be able to answer a series of questions to demonstrate 'need'. These are highlighted in the table below:

Table 2: Project Need Analysis

Need	Discussion	
Is the land use considered within the timeframe intended by the existing approved Spatial Development Framework (SDF)? (i.e., is the proposed development in line with the projects and programmes identified as priorities within the credible IDP?	Yes	Skulpiesbaai Estate is located within the urban edge, as well as urban area of Stilbaai-West. The SDP does make allowance for low-density developments, such as typical eco-estates similar to Skulpiesbaai, Bosbokduin, Bokmakierie, to have double-storey structures measured from natural ground level unless otherwise stipulated.
Should the development occur here at this point in time?	Yes	Only for erven 4718, 4719, 4599 & 4560 where a 2.5m increase in roof height will not result in an increase (of impact) beyond the originally assessed significance and rating of Medium-High on condition that the measured height is taken from the point of access to the erven i.e. street level.
Does the community / area need the activity, and the associated land use concerned?	Partially	Potential buyers of these erven have indicated that they prefer a double-storey (max height 7.5m) house. Numerous houses on surrounding estates have either double-volume or double-storey houses already. Provision is made to limit the erven to only four (4) on the Estate. Cognisance must be given to how such height increase is perceived by immediate neighbouring property owners.
Are the necessary services with adequate capacity currently available?	Yes	Skulpiesbaai Estate is an approved residential development with already installed services and allocations. The requested increase in height for a select number of erven on the Estate does not impact on services demand and therefore has no impact on services availability.
Is this development provided for in the infrastructure planning of the municipality?	Yes	Skulpiesbaai Estate is an approved residential development with already installed services and allocations. The requested increase in height for a select number of erven on the Estate does not impact on municipal services/infrastructure planning.
Is this project part of a national programme to address an issue of national concern or importance?	No	Skulpiesbaai Estate is a private residential development with a Private Home Owners Association and private development entity.

2.1.2 Desirability (place)

In accordance with the guidelines on need and desirability, a project should be able to answer a series of questions to demonstrate desirability. These are highlighted in the table below:

Table 3: Project Desirability Analysis

Desirability	Discussion	
Is the development the best practicable environmental option for this land / site?	Yes	The recommended alternative of only four erven, namely erven 4718, 4719, 4599 & 4560 will not increase the level of visual impact beyond what it is already deemed to be under the Status Quo Alternative 1 (as approved) into the existing Environmental Authorisation and VIA compiled by CNdV in 2012. Increasing the height from 5m to 7.5m on these four erven can therefore be considered since the impact rating is equal.
Would the approval of this application compromise the integrity of the existing approved and credible municipal IDP and SDF?	No	Increasing the height of erven zoned Single Residential, within a low-density development, within the urban edge of Stilbaai, does not compromise the IDP or SDP. It may not however be considered unless the EA is amended accordingly and the mitigation measures implemented.
Would the approval of this application compromise the integrity of the existing approved environmental management priorities for the area?	Unlikely	The recommendation by the visual specialist eliminates two of the six erven identified by the Holder as being locations where an increased height allowance has the potential to also increase the visual impact rating to High negative, whereas the remaining four erven with a height increase will not increase the visual impact rating beyond the level it was originally assessed to have at 5m height restrictions.
Do location factors favour this land use at this place?	Yes	Erven 4718 and 4719 are located in a low lying area of the site from where a double-storey (maximum 7.5m) will not compromise the views of existing erven adjacent to, or in close proximity to these erven given the height elevation and distance between these erven. Erven 4599 and 4560 are also at a lower ground level when compared to adjacent erven to the North and an increase in their roof height will not compromise views of higher lying adjacent properties to the North given the elevation difference and viewshed.
How will the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas?	None	An increase of 2.5m on a single residential house, within an urban environment, without increasing footprint or coverage, will have no impact on sensitive or cultural landscapes.
How will the development impact on people's health and wellbeing?	Partially	Properties that overlook the erven will experience visual intrusion of (mostly) their views of the ocean/Shelly Beach/Morris Point. However, the mitigation measures recommended by the visual specialist, combined with the fact that the erven in question are situated on average 5-7m lower when compared to properties overlooking them, are sufficient to allow the Department to consider the deviation from 5m to 7.5m for erven 4718, 4719, 4599 and 4560 respectively. Given the elevation difference between the closest properties overlooking the four erven, coupled with the distance between such properties, it is unlikely that wellbeing/privacy will be notably impacted.
Will the proposed activity or the land use associated with the activity applied for, result in unacceptable opportunity costs?	Unlikely	The visual impact assessment clearly considered the 'bench mark' of the potential for visual intrusion on surrounding/neighbouring properties when making a recommendation. It was found that the deviation for only erven 4718, 4719, 4599 and 4560 will not increase the level of visual impact beyond the original impact rating of Medium-High negative and as such can be

Desirability	Discussion
	considered on condition that the level from where measurements are taken, is changed from natural ground level to the access point for each erf which is the equivalent of the street level.

The Applicant submits that their motivation for this application stems from enquiries they received from prospective buyers at the time who enquired about double-volume structures that allows more design flexibility. The Holder identified the six vacant properties in consultation with the Estate Architect as being ones that are less likely to increase visual impact. Once this proposal was approved by the Home Owners Association (HOA) in 2021, the Estate Architectural Guidelines were updated accordingly (2022).

3. VISUAL IMPACT ASSESSMENT

The VIA considers the following key criteria in terms of this amendment in accordance with the same criteria previously used by CnDV for the 2012 VIA to ensure consistency, namely **visibility** of the proposed development, **viewsheds** of the affected areas, **zone of visual influence**, **visual absorption capacity** of the area, compatibility with the **surrounding landscape and developments**, **intensity** of the visual impact, as well as **duration** of the visual impact which culminates in the overall significance of the visual impact.

The specialist submits that prior to any additional mitigation the Holder's Preferred Alternative for six (6) erven, measured from natural ground level, will obscure more views from neighbours directly overlooking these erven, specifically the northern node. The potential cumulative impacts associated with **Preferred Alternative** will be additive in nature and High in significance. Simply stated the proposed height increase of all six properties will have a significant cumulative impact resulting from higher buildings obscuring more than 50% of views.



Figure 7: Figure from VIA indicating how erven 4601 & 4602 will obscure more than 50% of the primary views from the directly adjacent, north westerly neighbouring properties.

With **Alternative 2** (recommended alternative) allowing for only four (4) of the original six (6) erven, two in the northern node and two in the southern node, plus the further mitigation of altering the measuring level from natural ground level to the level of access i.e. street level, the view from these most affected northern properties will not be affected to the same extent. Similarly their distant ocean views to the West will remain unaffected.

Therefore the large view cone between Morris Point and Bosbokduin's western boundary that would be affected under the **Preferred Alternative**, would be reduced to status quo levels under **Recommended Alternative** (only four units, two in the northern node and two in the southern node only).



Figure 8: Visual zone of the closest southern property in Bosbokduin Estate overlooking erven 4718 & 4719 with less visual impact due to orientation and difference in elevation.

With the existing elevation difference between the closest Bosbokduin properties and Erven 4718 & 4719 in the southern node, there is enough contour level difference to accommodate the height increase. With the increased roof height from 5m to 7.5m on these two properties, their new roof height would be at 37.5m above MSL which would mean that views over these dwellings will not impact substantially on the properties, similar to them retaining their 5m roof heights and therefore little visual impact is expected in this instance.

The impacts have been considered both in terms of construction, as well as operational impacts and are summarised in the following tables:

	5m high buildings	7,5m high buildings
PHASE: CONSTRUCTION		
Nature of impact:	Cleared of natural vegetation and visual scarring as a result of subsoil being exposed and increase of traffic and people and activity that will affect the Sense of place - negative	
Extent: of Impact	Local	
Duration of impact	Temporary	
Intensity	Medium, where the affected environment is altered, but cultural and social functions and processes continue, albeit in a modified way	
Probability of occurrence:	Definite	
Significance rating of impact prior to mitigation	High	
Degree to which the impact may cause irreplaceable loss of resources	Moderate to High	
Degree to which the impact can be reversed:	Moderate	
Degree to which the impact can be mitigated:	Moderate	
Proposed mitigation:	As per CNdV VIA Mitigation measures 5.9 Construction Period	
Significance rating of impact after mitigation	Medium	
Cumulative impact prior to mitigation	Medium	
Cumulative impact post mitigation	Medium	
Consequence Significance	Insignificant	

	5m high buildings	7,5m high buildings
PHASE: OPERATION - North Western Erven (4599, 4600, 4601, 4602)		
Nature of impact:	Visual Intrusion on/obstruction of Ocean views – negative	
Extent: of Impact	Local: limited to the immediate surroundings	
Duration of impact	Permanent - where time will not mitigate the impact	
Intensity	High, where the affected environment is altered, cultural and social functions and processes are significantly affected	
Probability of occurrence:	Definite	
Cumulative impact prior to mitigation	Moderate to High	Moderate - High
Significance rating of impact prior to mitigation	High negative – the impact will have significant effects and require mitigation measures to achieve an accepted level of impact	Higher negative – the impact will have significant effects and will require significant mitigation measures to achieve an accepted level of impact
Degree to which the impact may cause irreplaceable loss of resources - views	Moderate to High	High
Degree to which the impact can be reversed:	Partly reversible – the impact is reversible but more intense mitigation measures are required	Partly reversible - the impact is reversible but more intense mitigation measures are required
Degree to which the impact can be mitigated:	Moderate	Moderate
Proposed mitigation:	As per CNDV VIA 2009 mitigation measures	Retain 5m roof height on Erven 4601 and 4602 On Erven 4599 and 4600, the roof height level must be taken from the level of the access road onto the site.
Significance rating of impact after mitigation	High - Medium	High - Medium
Cumulative impact post mitigation	Medium negative – the impact will have moderate negative effects	
Consequence Significance	The project has been approved on this significance so probably no significance	

	5m high buildings	7,5m high buildings
PHASE: OPERATION - South eastern Erven 4718 and 4719		
Nature of impact:	Visual Intrusion on/obstruction of Ocean views – negative	
Extent: of Impact	Local: limited to the immediate surroundings	
Duration of impact	Permanent - where time will not mitigate the impact	
Intensity	High, where the affected environment is altered, but cultural and social functions and processes are affected but continue in a modified way	
Probability of occurrence:	Definite	
Cumulative impact prior to mitigation	Low	
Significance rating of impact prior to mitigation	High negative – the impact will have significant effects and require mitigation measures to achieve an accepted level of impact	Higher negative – the impact will have significant effects and will require significant mitigation measures to achieve an accepted level of impact
Degree to which the impact may cause irreplaceable loss of resources	Moderate - Low	Moderate to Low
Degree to which the impact can be reversed:	Partly reversible – the impact is reversible but more intense mitigation measures are required	Partly reversible - the impact is reversible but more intense mitigation measures are required
Degree to which the impact can be mitigated:	Moderate	Moderate
Proposed mitigation:	As per CNDV VIA 2009 mitigation measures	The 7,5m roof height must be measured from the level of the access road onto the site, The roof colour must be dark charcoal The roofs cape must be articulated
Significance rating of impact after mitigation	High - Medium	High - Medium
Cumulative impact post mitigation	Low negative – the impact will have moderate negative effects	
Consequence Significance	The project has been approved on this significance so probably no significance	

It is noted from the VIA that the cumulative impact of the proposed height deviation will obscure more views from neighbours albeit still within the scope of the original impact rating range. The potential cumulative visual impact would still be additive in nature and remains High-Medium in significance meaning it will still result in a significance cumulative impact resulting from obscuring more of sea views prior to mitigation.

The additional measures taken by the visual specialist considered specific points from neighbouring properties that are most likely to be impacted by the proposed height deviation. The following images give an indication of the points and measures taken as part of the updated VIA to be able to verify the original findings of the assessment relating to potential visual impact and intrusion.



Figure 9: Indication of measurement positions for additional measurements from Bokmakierie properties overlooking the northern node.



Figure 10: Indication of measurements for properties from Bosbokduin overlooking select erven in the southern node.

3.1 CONSIDERATION OF ALTERNATIVES

The Holder's preferred alternative is to have the deviation in height restrictions apply to all six (6) identified erven, namely Erven 4601, 4602, 4718, 4719, 4599 and 4560 with no additional mitigation.

Alternative 1 (Holder's preferred alternative):

ANTICIPATED OVERALL IMPACT **INCREASES** FROM MEDIUM-HIGH NEGATIVE, TO **HIGH NEGATIVE**.

The visual specialist does not support the Holder's preferred alternative due to reasons associated with an increased visual impact linked to erven 4601 and 4602 especially. This increase is not deemed acceptable and therefore this alternative is not considered feasible/reasonable.

Alternative 2 (Recommended alternative):

In this instance only four (4) of the six (6) erven can be considered and additional mitigation applies to change the (status quo) measure level of natural ground level to the access point level i.e. street level.

ANTICIPATED OVERALL IMPACT FOR THE FOUR SPECIFIC ERVEN, REMAINS SIMILAR TO THE AUTHORISED STATUS QUO IMPACT RATING OF **MEDIUM-HIGH NEGATIVE**.

In the event that none of the six erven are permitted this height deviation, the Status Quo (or No-Change) alternative remains the baseline against which the amend/change must be assessed.

Alternative 3 (Status Quo):

ORIGINAL IMPACT RATING OF **MEDIUM-HIGH NEGATIVE** FOR ALL SIX PROPERTIES REMAIN UNCHANGED AT 5M MEASURED FROM NATURAL GROUND LEVEL.

3.1.1 Comparison of alternatives

According to the visual impact assessment the **scenic resources** of the area can be described as low density residential, natural and rural and are therefore **Highly** rated.

The **Viewshed** remains unchanged in spite of the proposed higher roofs while the **Visibility** of the proposed higher roof on Erf 4599 has a slight chance of being seen from direction Jongensfontein. **Views** from the neighbouring house in the north west will be impacted while views from the closest house on Bosbokduin Estate will be less affected.

The **Visual Absorption Capacity** of the site is high with the exception of the developments to the south and north which are not shielded and will be affected by the proposed height increase on the adjacent erven.

The **Visual Intrusion** will remain **MODERATE** as it partially fits into the surroundings to the south but will be clearly noticeable to the north. The expected **Visual Impacts** are tabled below including significance before and after mitigation:

Table 4: Alternative comparison as per the VIA.

5m height		7,5m height	
Significance before mitigation	Significance after mitigation	Significance before mitigation	Significance after mitigation
<i>Construction Phase - Visual scarring during construction</i>			
High(-)	Medium (-)	High(-)	Medium (-)
<i>Operations Phase - Visual intrusion and obscuring of ocean views from Northern neighbours</i>			
High (-)	High - Medium (-)	High (-)	High - Medium (-)
<i>Operations Phase - Visual intrusion and obscuring of views from Bosbokduin neighbours</i>			
High (-)	High - Medium (-)	High (-)	High - Medium (-)

The table below reflects the key environmental advantages and disadvantages of the three alternative (i.e., keep to the existing 5m height restrictions on all erven, only permit four erven to have increased roof heights or allow all six erven to have increased roof heights). Please also refer to the summary of comments from registered I&APs that add to the list of potential impacts.

Table 5: Potential issues associated with the different alternatives.

Alternative	Preference	Reasons (incl. potential issues)
Alternative 1: Increase roof height of six erven from 5m to 7.5m without any additional mitigation.	Preferred alternative by the Holder	<ul style="list-style-type: none"> - This height increase has already been approved internally by the Skulpiesbaai HOA (2021); - The Estate's Architectural Guidelines has been adopted accordingly to allow for this deviation; - Property values are optimised to allow double-volume structures.

Alternative	Preference	Reasons (incl. potential issues)
		<ul style="list-style-type: none"> - Increased visual intrusion noted especially for properties location North of Erven 4601 and 4602. - Impact rating expected to increase from Medium-High negative to High negative.
Alternative 2: Permit only erven 4718, 4719, 4599 & 4560 to have increased roof heights from 5m to 7.5m with additional mitigation measure to alter the measurement level from natural ground level to level of access i.e. street level.	Recommended to the DEIR/VIA	<ul style="list-style-type: none"> - This height increase has already been approved internally by the Skulpiesbaai HOA (2021) – subsequent adjustment to exclude Erven 4601/4602 required and Architectural Guideline to be amended; - Property values are optimised to allow double-volume structures. - Impact rating expected to remain similar to the Status Quo as approved namely Medium-High negative.
Alternative 3: No change in the height restriction, remains at 5m as per the Environmental Authorisation Condition 8	Status Quo	<ul style="list-style-type: none"> - Visual intrusion rating is similar to that of Alternative 2 at 5m height.

The following schematic images are provided for explanatory purposes only in order to display the difference in measuring from 'natural ground level' meaning a structure can be staggered from the lowest point of a property to the highest/lowest point of the property with the lowest and highest part of the structure being the same i.e. 5m for Status Quo. Compared to a scenario of designing a structure that may only be measured from the access point i.e. street level of the same property i.e. 7.5m structure will therefore be 'sunk' below the natural ground level if a property has a gradient/slope.

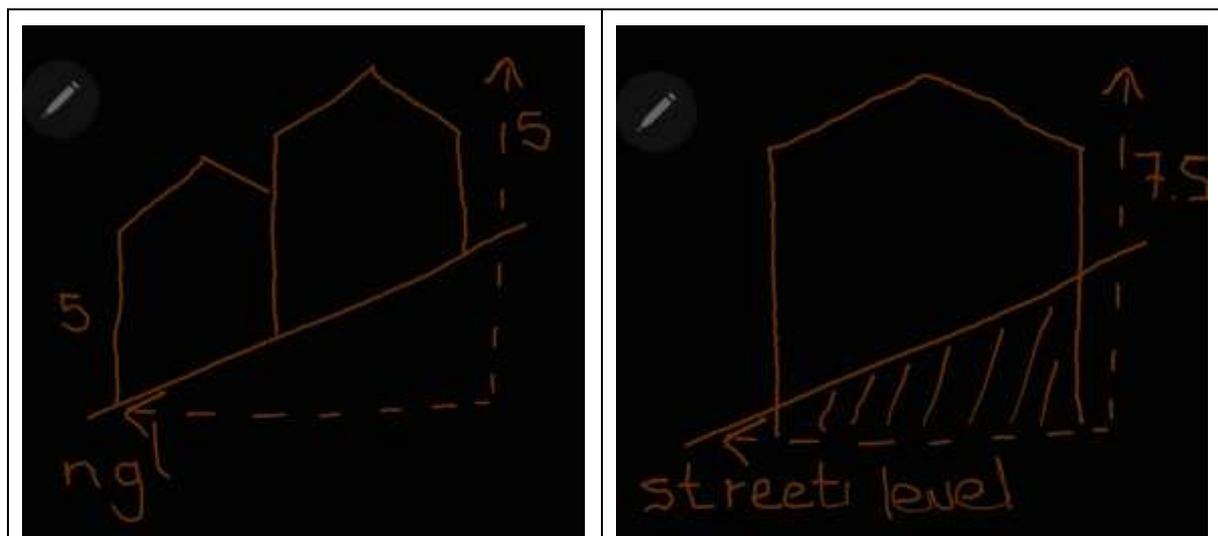


Figure 11: Schematic images indicative of the additional mitigation measure changing the level of measurement from 'natural ground level' that allows the structure to follow the gradient/slope of an erf vs the measurement from access point/street level.

In addition to these original issues identified by the project team as part of the Draft Assessment, the following issues were identified by registered I&APs through the commenting period to date. In order to ensure a fair process to ensure accurate responses, it was decided that additional measures had to be taken to provide more accurate details as part of the VIA to respond appropriately. A further site visit was made and included photographs taken from affected *neighbouring* receptors representing mostly registered I&APs, to the north west and Bosbokduin. Poles were erected on the building envelope corners of the six erven, showing 7,5m (proposed) as well as the (approved) 5m heights. The building envelopes, with varying heights, were then added to the photos taken from the 13 receptors to verify the potential visual impact that would be experienced from these receptors for both alternatives namely the Status Quo as well as the Recommended Alternative.

- Visual intrusion and/or loss of sea views due to the fact that all properties are orientated around primary sea views;
- Loss of privacy as a result of (elevated) houses that could have views of neighbouring properties with reference to NEMA Principles as well as the Environmental Regulations associated with social, visual as well as sense-of-place aspects;
- Concern around land use matters associated with deviation of height that can have an impact on surrounding property rights and existing land uses;
- Concern around setting a precedent by allowing height deviation of six/four erven within the estate;
- Allowing a height deviation conflicts with the existing character of the estate/area;
- Need and desirability of the increase in height for the select erven in terms of the community / area taking into account that all the other erven within the Estate will be restricted to 5m;
- Clarity required on why the proposed change i.e. height deviation is a better environmental option than what was originally approved at 5m;
- Must clarify how the mitigation hierarchy has been taken into account;
- Advantages and disadvantages associated with the proposed change must be taken into account;
- Gap in the VIA of not considering external properties outside the Estate must be assessed;
- Clarity must be provided in terms of the mitigation measures applied to minimise impacts;
- Concern about potential light and noise pollution associated with the increased height;
- Potential infringement on property values;
- Cumulative impact associated with potential future applications for the same height deviations;
- Need to optimise sea views and property value of erven 4718 and 4719 that would otherwise be looking into other approved houses within the southern node;
- HOA approval of the height deviations in 2021, as well as the Architectural guidelines were adjusted to allow 7.5m height deviations on the selected erven in 2022 which created expectations for prospective buyers/owners of said properties;
- Concern about 'rights purchased and guaranteed' for those that bought one or some of the six (6) erven associated with negative investment impact;
- Concern that only select erven within Skulpiesbaai are awarded the 'privilege' of having a height deviation whilst the remaining property owners who are yet to build is not being awarded equal right on the same matter;
- Issue with houses within the Skulpiesbaai Estate that are already built as double-story houses therefore having ignored due process;
- Concern that the height deviation for select erven is to the detriment of property values in neighbouring Estates linked to loss of views/privacy;
- Contesting the conclusion of the Visual Impact Assessment that excludes erven 4601 and 4602 from being affected by a restriction to a 5m-high building;
- Clarity is sought on whether or not the approved Environmental Management Plan (EMP) and Architectural Guidelines for the Estate must be amended.
- CapeNature confirms that they have no objection to the application considering that there is no additional/new impact on biodiversity;
- Heritage Western Cape confirms that no further/additional studies are required and that their original comment is unchanged.

Please refer to the detailed Comments & Response Report attached to this report as an Appendix for the detailed comments from which the above summary has been compiled.

4. LEGISLATIVE AND POLICY FRAMEWORK

The legislation that is relevant to this study is briefly outlined below. These environmental requirements are not intended to be definitive or exhaustive but serve to highlight key environmental legislation and responsibilities only.

4.1 NATIONAL LEGISLATION

This section deals with nationally promulgated or nationally applicable legislation associated with the proposed residential development within an urban area.

4.1.1 The Constitution of the Republic of South Africa

The Constitution of the Republic of South Africa (Act 108 of 1996) states that, everyone has a right to a non-threatening environment and that reasonable measures are applied to protect the environment. This includes preventing pollution and promoting conservation and environmentally sustainable development, while promoting justifiable social and economic development.

The Constitution and Bill of Rights provides that:

Everyone has the right:

- to an environment that is not harmful to their health or well-being; and
- to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures:
 - prevent pollution and ecological degradation;
 - promote conservation; and
 - secure, ecologically sustainable development and the use of natural resources while promoting justifiable economic and social development.

The National Environmental Management Act, NEMA (discussed below) is the enabling legislation to ensure this primary right is achieved.

4.1.2 National Environmental Management Act (NEMA)

The current amendment assessment is being undertaken in terms of the **National Environmental Management Act** (NEMA, Act 107 of 1998)³. This Act makes provision for the identification and assessment of activities that are potentially detrimental to the environment, and which require authorisation from the competent authority (in this case, the Provincial Department of Environmental Affairs & Development Planning) based on the findings of an Amendment Assessment.

The proposed amendment of a Condition of Approval does not imply further approval in terms of any so-called 'listed activities'. The Regulations do however stipulate that a change in scope/nature of impacts must be considered and assessed accordingly to ensure compliance. To this end **Regulations 31 – 33** must be complied with its procedure associated with a **Part 2 Amendment**.

4.2 REGIONAL AND MUNICIPAL LEGISLATION

This section deals with regionally and municipally promulgated or regionally or municipally applicable legislation associated with the proposed amendment.

³ The Minister of Water and Environmental Affairs promulgated new regulations in terms of Chapter 5 of the National Environmental Management Act (NEMA, Act 107 of 1998), viz, the Environmental Impact Assessment (EIA) Regulations 2014 (as amended). These regulations came into effect on 08 December 2014 and replace the EIA regulations promulgated in 2006 and 2010.

1. Hessequa Spatial Development Framework (SDF, 2024/2025)

The main purpose of the SDF is to guide the form and location of especially future physical development within a municipal area in order to address spatial planning in a sustainable manner.

The Skulpiesbaai Estate is located within the urban edge of Stilbaai as defined and adopted by the Hessequa Municipality in their 2024/2025 SDF. The SDF supports low-density development along the 'urban fringes' and Skulpiesbaai Estate conforms to this description with large open space areas.

The SDF makes allowance for two-storey structures in so-called 'low density developments', however the SDF also acknowledge that height restrictions may be applicable where appropriate.

2. Hessequa Zoning Scheme Regulations (2023)

Amongst others, the zoning scheme details criteria for specific land use / zoning typologies within a Municipal area. For the 'single residential' zoning, this scheme recommends structures not exceed two storey's height.

It defines 'storey' as *".....that portion of a building between the surface of any floor and the surface of the next floor above; or, if there is no floor above the ceiling, then up to the ceiling; provided that, unless the contrary appears clearly from the provisions of this By-law.....any storey which is greater than 4 metres, measured from the finished floor level to the finished floor level of the storey above, or to the ceiling in the case of a top storey, but equal to or less than 6,5 metres in height is, for the purpose of the height measurement, regarded as two storeys, and every additional 4 metres in height or portion thereof, is regarded as an additional storey"*.

5. SITE DESCRIPTION AND ATTRIBUTES

The following sections provide a description of the natural environment/landscape and built environment context of the Skulpiesbaai Estate and surrounds.

5.1 LOCATION & BUILT ENVIRONMENT

The Estate is located along the western edge of Stilbaai-West and along with Bokmakierie and Bosbokduin developments, form the western most edge of the built-up township south of the Jongensfontein Road.

The Estate can be described as an 'eco-estate' type development with a low number/density of units distributed throughout private open space areas.

A number of houses have been built and are occupied on the Estate already.

Directly to the East of the Estate lies the Municipal Golf Course, as well as the Stilbaai Sewage Works and Skulpiesbaai Nature Reserve.

Access to the Estate is by means of a security gate with controlled access requirements.

5.2 VISUAL CONTEXT

The far Northern node of the Estate, borders on large erven within what was known as Bokmakierie Estate at the time of the original EIA process. These erven face primary South to optimise sea views. These erven along the northern boundary of Skulpiesbaai are located at a high point in the landscape, from where the topography slopes down and in a Southern direction.

Using Google Earth as a spatial tool, the elevation can be seen to drop from approximately 77m above mean sea level (MSL) outside the Skulpiesbaai Estate i.e. highest neighbouring property, to 70m above MSL at street level directly below where erven 4601, 4602, 4599 and 4560 are approved.

Apart from Erven 4601 and 4602, this difference in elevation, combined with the general orientation of views from the neighbouring Bokmakierie properties and the visual zone of influence from these

properties, is sufficient to consider a roof height increase from 5m to 7.5m for Erven 4599 and 4560 only.



Figure 12: Screenshot of elevation difference between closest neighbouring property to the North overlooking erven 4601, 4602, 4599 and 4560.

For erven 4718 and 4719 located more to the South of the Estate, the topography slopes in a Northerly direction, away from Bosbokduin Estate with the closest properties within Bosbokduin at roughly 36m above MSL down to approximately 30m above MSL to where the two erven within Skulpiesbaai Estate are approved.

This difference in elevation, combined with the general orientation of views from the neighbouring Bosbokduin properties and the visual zone of influence from these properties, as well as the distance between the closest Bosbokduin properties and the select erven, are sufficient to consider a roof height increase from 5m to 7.5m for Erven 4718 and 4719.

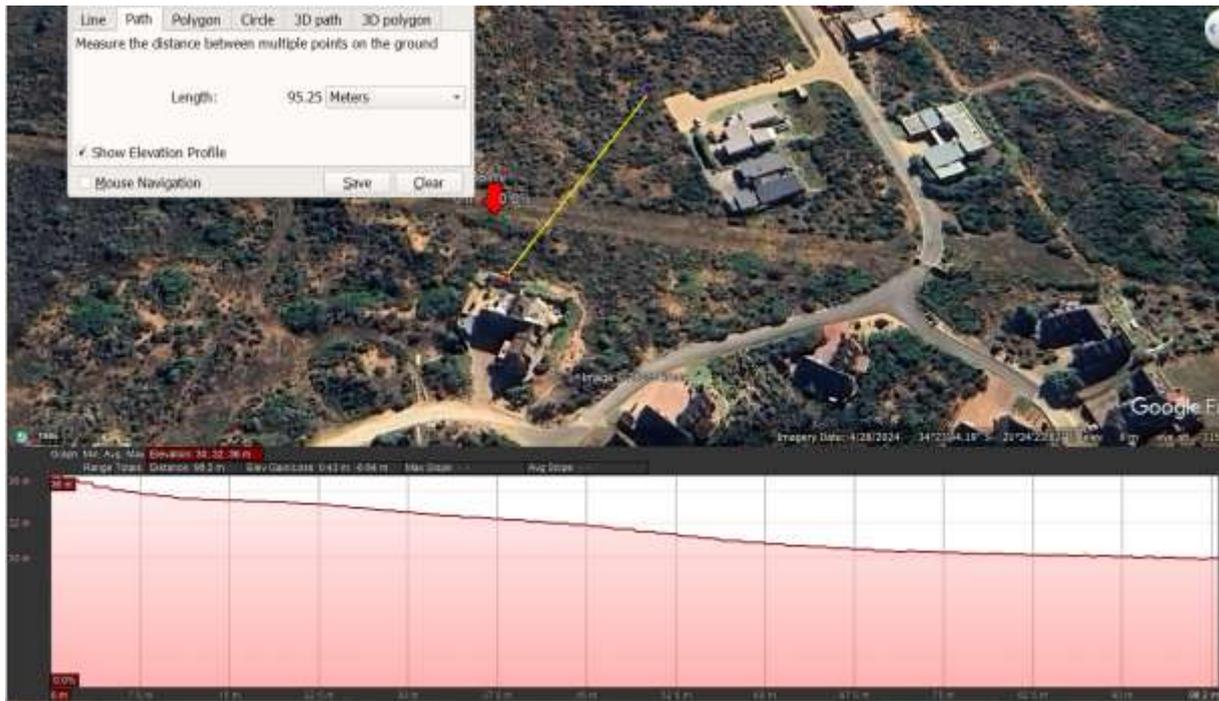


Figure 13: Screenshot of elevation difference between closest neighbouring property to the South overlooking erven 4718 and 4719.

6. PUBLIC PARTICIPATION PROCESS

Section 41 in Chapter 6 of regulation 982 details the public participation process that has to take place as part of an environmental process. The table below provides a quick reference to show how this environmental process has or intends to comply with these legislated requirements relating to public participation.

Table 6: Key dates for Public Participation Actions

Public Participation Action	Date / Date Range
Site Notices Placed.	11 August 2025
Newspaper Advert – Availability of Draft EIR	8 August 2025
Notifications to potential I&APs – Availability of Draft EIR.	12 August 2025
Comment Period – Draft EIR.	12 August – 13 September 2025
Notifications to registered I&APs – Updated Draft EIR.	15 October 2025
Comment period – Updated Draft EIR	16 October – 14 November 2025
Submit Final EIR with Comments & Responses to DEADP for consideration and decision-making	19 November 2025
Regulated Requirement	Description
(1) If the proponent is not the owner or person in control of the land on which the activity is to be undertaken, the proponent must, before applying for an environmental authorisation in respect of such activity, obtain the written consent of the landowner or person in control of the land to undertake such activity on that land.	Holder of the EA is owner of the Estate and individual land owners as home owners will be notified through the HOA.

The person conducting a public participation process must take into account any relevant guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties of an application or proposed application which is subjected to public participation by -	
(a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of - (i) the site where the activity to which the application or proposed application relates is or is to be undertaken; and (ii) any alternative site;	Site Notices placed at the northern main entrance to Skulpiesbaai Estate, as well as closest to the southern node of the development.
(b) giving written notice, in any of the manners provided for in section 47D of the Act, to -	
(i) the occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	Land owners within the Estate received notification of the availability of the DEIR via the HOA communication structure. The application will also be presented at their August Annual General Meeting (AGM) in September 2025. Registered I&APs notified of the updated Draft EIR in writing by the EAP.
(ii) owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	Immediate owners directly adjacent to the North (Bokmakierie Estate Residents Association), as well as the Bosbokduin HOA and Farm property owner to the West notified. Stilbaai Municipality as the property owner directly to the East also notified in writing of the DEIR from details obtained from the Hessequa Municipality. Registered I&APs notified of the updated Draft EIR in writing by the EAP.
(iii) the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;	Ward Councillor notified
(iv) the municipality which has jurisdiction in the area;	Hessequa Municipality notified.
(v) any organ of state having jurisdiction in respect of any aspect of the activity; and	CapeNature notified. Heritage Western Cape notified. Garden Route District Municipality notified.
(vi) any other party as required by the competent authority;	None indicated.
(c) placing an advertisement in - (i) one local newspaper; or (ii) any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;	An advert calling for registration of I&APs and notifying of the availability of the DEIR was placed in the <i>SuidKaap Forum</i> on Friday, 8 August 2025. There is no official Gazette for this region.
(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken: Provided that this paragraph need not be complied with if an advertisement has been placed in an official Gazette referred to in paragraph (c)(ii);and	Adverts were not placed in provincial or national newspapers, as the potential impacts will not extend beyond the borders of the municipal area.

<p>(e) using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to -</p> <p>(i) illiteracy;</p> <p>(ii) disability; or</p> <p>(iii) any other disadvantage.</p>	<p>In the event of any stakeholder not being able to communicate in writing or via phone, Cape EAPrac will engage with such individuals in such a manner as agreed on with the competent authority.</p>
<p>(3) A notice, notice board or advertisement referred to in sub regulation (2) must -</p> <p>(a) give details of the application or proposed application which is subjected to public participation; and</p> <p>(b) state -</p> <p>(i) whether procedures are being applied to the application;</p> <p>(ii) the nature and location of the activity to which the application relates;</p> <p>(iii) where further information on the application or proposed application can be obtained; and</p> <p>(iv) the manner in which and the person to whom representations in respect of the application or proposed application may be made.</p>	<p>Compliance.</p>
<p>(4) A notice board referred to in sub regulation (2) must -</p> <p>(a) be of a size at least 60cm by 42cm; and</p> <p>(b) display the required information in lettering and in a format as may be determined by the competent authority.</p>	<p>Compliance.</p>
<p>(5) Where public participation is conducted in terms of this regulation for an application or proposed application, sub regulation (2)(a), (b), (c) and (d) need not be complied with again during the additional public participation process contemplated in regulations 19(1)(b) or 23(1)(b) or the public participation process contemplated in regulation 21(2)(d), on condition that -</p> <p>(a) such process has been preceded by a public participation process which included compliance with sub regulation (2)(a), (b), (c) and (d); and</p> <p>(b) written notice is given to registered interested and affected parties regarding where the -</p> <p>(i) revised basic assessment report or, EMPr or closure plan, as contemplated in regulation 19(1)(b);</p> <p>(ii) revised environmental impact report or EMPr as contemplated in regulation 23(1)(b); or</p> <p>(iii) environmental impact report and EMPr as contemplated in regulation 21(2)(d);</p> <p>may be obtained, the manner in which and the person to whom representations on these reports or plans may be made and the date on which such representations are due.</p>	<p>Public participation process compliance and in accordance with the approved Public Participation Plan.</p>

<p>(6) When complying with this regulation, the person conducting the public participation process must ensure that -</p> <p>(a) information containing all relevant facts in respect of the application or proposed application is made available to potential interested and affected parties; and</p> <p>(b) participation by potential or registered interested and affected parties is facilitated in such a manner that all potential or registered interested and affected parties are provided with a reasonable opportunity to comment on the application or proposed application.</p> <p>(7) Where an environmental authorisation is required in terms of these Regulations and an authorisation, permit or licence is required in terms of a specific environmental management Act, the public participation process contemplated in this Chapter may be combined with any public participation processes prescribed in terms of a specific environmental management Act, on condition that all relevant authorities agree to such combination of processes.</p>	<p>All reports that are submitted to the competent authority will be subject to a public participation process. These include:</p> <ul style="list-style-type: none"> - Draft EIR - All specialist reports that form part of this environmental process. - Updated Draft EIR - All updated specialist reports that form part of this environmental process.
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6.1 REGISTRATION OF KEY STAKEHOLDERS

All participating stakeholders that register as Interested & Affected Parties (I&APs) have their details added to the Stakeholder Register for this application process. Registered I&APs have been kept informed throughout the remainder of the amendment assessment process and have been notified of both the extension, as well as the availability of the updated DEIR and VIA.

Once the second commenting period closes, the EIR will be finalised to include and reflect all the comments received during the two commenting periods.

Table 7: Key Authorities automatically registered as part of the Environmental Process

Stakeholders Registered		
Hessequa Municipality	Hendrik Visser	Planning & Environmental Affairs
CapeNature	Rhett Smart	Environmental
Garden Route District Municipality	Administration	Environmental
Heritage Western Cape	Stephanie-Ann Barnardt	Cultural landscape

The Department in their acceptance of the Public Participation Plan did not highlight any additional stakeholders to be registered for this amendment application process.

6.2 AVAILABILITY OF THE ENVIRONMENTAL ASSESSMENT REPORT

The Draft EIR was available for a 30-day commenting period extending from 12 August – 13 September 2025⁴.

Electronic copies of the report were available via the following platforms:

- Cape EAPrac Website: www.cape-eaprac.co.za under 'Active Projects'.
- Direct download link via both WeTransfer and Dropbox (request to be made in writing)

⁴ Note that the newspaper advert referenced 11 August – 11 September. This commenting period has been adjusted by one-day and all notifications adjusted accordingly to ensure a full 30-day commenting period.

All notifications (including the site notice and advert) make provisions for potential I&APs to contact *Cape EAPrac*, should they not have access to the digital platforms provided. In such instances, *Cape EAPrac* would arrange other suitable mechanisms for them to be able to access the relevant information.

Copies of the newspaper advert, photos of the site notices and copies of the written notifications are included/attached to this report. Note that the Protection of Private Information Act (POPIA) will be adhered to at all times, therefore original submissions containing private contact information is not included with this report although they are captured in the Comments & Response Report. The final submission made to the Competent Authority will include original submissions to ensure transparency.



LEW
Suid-Kaap FORUM
Vrydag, 8 Augustus 2025

Soek jy 'n platform om JOU besigheid te adverteer?

Suid-Kaap Forum is die aangesigste platform vir die klein- en middelbedryfsektor in die Suid-Kaap. Dit bied jou 'n platform om jou besigheid te adverteer en te groei.

Forum

Kontak: my vraging en ons gratis besigheid adverteerings. myvacancy@skforum.co.za

Dubbele trots vir Riversdal Blues

RIVERSDAL – Riversdal Blues se jong rugbytalent, Caydee Sauls en Cortleigh Boesak, het onlangs die groot eer te beurt geval om vir die o. 21 S.W.D. Arends gekies te word. Die twee spelers sal binnekort vir hul provinsie op die veld uitdraf en hul dorp met trots verteenwoordig. Die Blues-familie en dorp is baie trots – Ben Snyman



Caydee Sauls met die bal.

Cortleigh Boesak (voor) is onlangs gekies vir die o. 21 S.W.D. Arends. Foto's: Riversdal Blues

Blink toekoms vir Heidelberg se jong rugbystere

Die twee jong talentvolle spelers van Heidelberg-rugbyklub, Juana Turck (links), en Leyton Desmet (regs) is gekies om deel te wees van die S.W.D. Arends se o. 21-span. Beide spelers het baie opponente kiel trap met hul uitnemende spel wat hulle wettig aan die klub en sy klubiese onderleiers seëls.

HESSEQUA
PLAASLIKE MUNISIPALITEIT

Speker – Riversdal

Besook ons webtuiste vir die volgende advertensie en om vir hierdie geleentheid aansoek te doen. Die vakature kan ook op die kennisgewingsbord by die betrokke Munisipale kantore besigtig word. Kontak me J. van der Merwe op 028 713 7965 vir meer besonderhede.

Webtuiste: www.hessequa.gov.za
Stellingsdatum: 15 Augustus 2025

HESSEQUA
LOCAL MUNICIPALITY

TENDER NOTICE

Notice is hereby given that the following tenders are advertised on Hessequa Municipality's website at www.hessequa.gov.za and on the municipal notice boards at our offices in Riversdal, Heidelberg, Albertinia and Stilbaai:

- HES-TECH 17/2025: CONSTRUCTION HEALTH & SAFETY SERVICES FOR A PERIOD OF THREE (3) YEARS;
- HES-COM 02/2025: UPGRADE OF THE THUSONG CENTRE BRAAI AREA IN RIVERSDAL.

Prospective suppliers may also contact Leanne Windvogel at tel. (028) 713 8987 or e-mail leanne@hessequa.gov.za to obtain the electronic version of the detailed advert.

A.S.A DE KLERK
MUNICIPAL MANAGER

HESSEQUA
PLAASLIKE MUNISIPALITEIT

TENDERKENNISGEWING

Kennis gegee hiermee dat die volgende tenders op Hessequa Munisipaliteit se webwerf by www.hessequa.gov.za en op die munisipale kennisgewingsbord by ons kantore in Riversdal, Heidelberg, Albertinia en Stilbaai geadvertiseer word.

- HES-TECH 17/2025: KONSTRUKSIE GEBOUWES- EN VERBODINGSDEENSTE VIR 'N TYDPERK VAN DREI (3) JAAR;
- HES-COM 02/2025: OPGRADERING VAN DIE THUSONG SENTRUM BRAAI AREA IN RIVERSDAL.

Waardevolle wenkkopers kan ook vir Leanne Windvogel by tel. (028) 713 8987 of e-pos: leanne@hessequa.gov.za kontak om 'n elektroniese versie van die gedetailleerde advertensie te bekom.

A.S.A DE KLERK
MUNISIPALE BESTUURDER

WE'RE HIRING

GROUP EDITORS is looking for a **CREATIVE** driven and highly skilled **GRAPHIC DESIGNER** to join its team in **GEORGE**. Must have at least two years experience. A flair for page layout will be advantageous.

REQUIREMENTS:

- Post-matric qualification in graphic design and/or relevant experience;
- Must be able to edit images, prepare basic design/layout briefs and correctly execute the process of preparing print-ready designs for Group Editors;
- Must be creative and able to work in a fast-paced environment.

DO YOU THINK YOU HAVE WHAT IT TAKES?

If you believe you are a great graphic designer with an eye for creativity, **RE-DESIGN THIS LOGO** (give different colour options) and then send your design, CV, and a cover letter telling us why you will be the best person for this job to vacancy@groupeditors.co.za before **8 August 2025**.

If you have not heard from us by 22 August consider your application as unsuccessful.

ON THE GO eatery

VACANCY

GROUP EDITORS

Cape Environmental Assessment Practitioners

PUBLIC PARTICIPATION PROCESS
PART 2 AMENDMENT APPLICATION

FOR CONSIDERING A HEIGHT INCREASE (5m – 7.5m) FOR A MAXIMUM OF SIX (6) SELECTED HOUSES AT SKULPIESBAAI ESTATE, STILBAAI (HESSEQUA MUNICIPAL DISTRICT)

We hereby give notice of a Public Participation Process in terms of the National Environmental Management Act (NEMA, Act No. 107 of 1998) as amended.

An Amendment Assessment process is underway for allowing a Condition of Approval of the existing Environmental Authorisation (EA) for the Skulpiesbaai Estate, for deviating from the prescribed height of 5m to 7.5m, on a maximum of six (6) erven. An application has been made to the Provincial Department Environmental Affairs & Development Planning (DEADP/ George) for a Part 2 Amendment Application process.

DEADP Ref: 16/30/0/0515/0013/25 **Environmental Consultant:** Cape EAPrac
Proponent: Wonde de la (Pty) Ltd **Environmental Officer:** None applied for

Appointed EAP: Louise-Marl van Zyl of Cape EAPrac (SAPASA Reg. 2019/144)

Scope: Skulpiesbaai Estate holds an Environmental Authorisation (EA) in terms of the National Environmental Management Act (NEMA) with specific Conditions of Approval. Condition 8 restricts all houses in the Estate to a maximum height of 5m. The Holder of the Authorisation is notified six (6) erven that are all vacant, for which they wish to have this height restriction relaxed to 7.5m. This application does not affect the remainder of the approved Skulpiesbaai Estate erven.

Location: Four (4) erven identified in the North-Western corner of Skulpiesbaai bordering the Bokmolen Estate, two (2) erven identified in the South-Eastern node bordering Bokmolen Estate, Stilbaai West.

Information Available: Draft Impact Assessment Report will be available for a period of 30-days extending from Monday 11 August 2025 to 10 September 2025. The document is available in digital format on our website (www.cape-eaprac.co.za) (active projects) and can also be distributed via email/ flash drive on request.

Application In-lieu: Amendment of Condition 8 of the EA, to allow deviation on height restriction on erven 4 601, 4602, 4710, 4719, 4899 & 4900 within Skulpiesbaai Estate.

In order to be registered as an Interested and Affected Party (IAP) for this application process, individuals are requested to respond to this notice by submitting their complete contact details and/or comments to Cape EAPrac in writing to address below) on or before **20 September 2025** (correspondence throughout the remainder of the environmental process will be distributed to registered IAPs on a daily basis).

Registration & Comments on Draft IAR:
Cape EAPrac Attention: Ms Louise-Marl van Zyl, Email: louise@cape-eaprac.co.za, PO Box 2070, George, 6530. 044 874 0302

Note: In terms of the POPIA legislation when registered as an IAP a person consents to the lawful processing of personal information for the intended purposes, as described by the Protection of Personal Information Act, 2013 (Act no. 4 of 2013). By registering/submitting comment a person agrees that his/her contact details will, where required by a public body, be reflected in regulated reports that must be compiled and submitted to the general public; registered stakeholders; organs of state as well as the competent authority for consideration and decision-making.

Figure 14: Tear sheet from the Suid-Kaap Forum local newspaper advert.

The updated DEIR is made available for a further 30-day commenting period extending from 16 October – 14 November 2025 whereafter the Final EIR must be submitted to the Competent Authority within the regulated timeframe by no later than 19 November 2025.

6.3 REMAINDER OF THE AMENDMENT ENVIRONMENTAL ASSESSMENT PROCESS

The following process is to be followed for the remainder of the environmental process:

- Comments received will be considered and responded to via the Comments & Response Report;
- The EIR will be updated with all submissions received;
- The Final EIR will be submitted to the Competent Authority for consideration and decision-making;
- Registered I&APs will be notified of the submission and given access to the final document for information purposes.

7. CONCLUSION AND RECOMMENDATIONS

Cape EAPrac is of the opinion that the information contained in this Updated Draft Environmental Impact Report and the documentation attached, are sufficient to allow the registered I&APs (including the competent authority) to apply their minds to the potential negative and/or positive impacts associated with the amendment in respect of the height restriction deviation applied for. The additional measurements and modelling done to include external (neighbouring property) vantage points overlooking the select erven has confirmed that the impact rating awarded to the original 5m height approval is (High-Medium negative visual impact) will be similar to that of the impact rating (High-Medium negative visual impact) to the 7.5m height deviation for the four (4) erven of the recommended alternative (note not the preferred alternative).

Impacts associated with the amendment is associated mostly with visual intrusion and also privacy and therefore the Visual Impact Assessment (VIA) was necessary to inform this amendment application process.

The outcome of the independent visual assessment is that the Holder's preferred alternative (**Alternative 1**) for six (6) erven to have increased roof heights from 5m to 7.5m is **not supported**.

The recommended alternative (**Alternative 2**) is submitted to be an acceptable option with only four (4) of the original six (6) to be considered for this height restriction deviation (two erven in the Northern node and two erven in the Southern node) on condition that the level for measurement for these erven is **adjusted from natural ground level to the point of access to these erven** i.e. street level to effectively lower the structure into the ground below natural ground level to balance the increase in height as much as possible.

Specifically **erven 4601 and 4602** in the northern node, south of the Bokmakierie Estate development, must **retain the 5m height restriction status quo**, whilst erven 4599 and 4560 (northern node) and erven 4718 and 4719 (southern node) can be considered for such the height restriction deviation subject to **mitigation measures** recommended by the visual specialist.

Considering that Alternative 2 will result in the same impact outcome as the Status Quo No-Change Alternative 3, being **Medium-High negative**, it is the finding of this amendment assessment that **Alternative 2** can be considered for authorisation.

Any additional comments registered I&APs may have in response to this updated DEIR report, must be submitted to the undersigned within the 30-day commenting period. I&APs are requested to please consult the Comments & Response Report attached as an Appendix to this EIR for detailed responses to their submissions/issues and concerns raised to date.

Address submissions to:

Louise-Mari van Zyl

louise@cape-eaprac.co.za

PO Box 2070, George, 6530

8. GENERAL ABBREVIATIONS

AIA	Archaeological Impact Assessment
BGIS LUDS	Biodiversity Geographic Information System Land Use Decision Support
BESS	Battery Energy Storage System
CBA	Critical Biodiversity Area
CDSM	Chief Directorate Surveys and Mapping
CEMP _r	Construction Environmental Management Programme
DFFE	Department of Forestry, Fisheries and the Environment
DEA&NC	Department of Environmental Affairs and Nature Conservation
DME	Department of Minerals and Energy
DSR	Draft Scoping Report
EAP	Environmental Impact Practitioner
EHS	Environmental, Health & Safety
EIA	Environmental Impact Assessment
EIR	Environmental Impact Report
EMPr	Environmental Management Programme
ESA	Ecological Support Area
GPS	Global Positioning System
GWh	Giga Watt hour
HIA	Heritage Impact Assessment
I&APs	Interested and Affected Parties
IDP	Integrated Development Plan
IFC	International Finance Corporation
IPP	Independent Power Producer
kV	Kilo Volt
LUDS	Land Use Decision Support
LUPO	Land Use Planning Ordinance

MW	Mega Watt
NEMA	National Environmental Management Act
NEMBA	National Environmental Management: Biodiversity Act
NERSA	National Energy Regulator of South Africa
NHRA	National Heritage Resources Act
NPAES	National Protected Area Expansion Strategy
NSBA	National Spatial Biodiversity Assessment
NWA	National Water Act
PM	Post Meridiem; "Afternoon"
PSDF	Provincial Spatial Development Framework
REIPPPP	Renewable Energy Independent Power Producer Procurement Programme
S.A.	South Africa
SACAA / CAA	South African Civil Aviation Authority
SAHRA	South African National Heritage Resources Agency
SANBI	South Africa National Biodiversity Institute
SANS	South Africa National Standards
SDF	Spatial Development Framework
TOPS	Threatened and Protected Species

9. REFERENCES

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- DEAT** (2005). *Guideline 4: Public Participation*, in terms of the EIA Regulations 2005, Integrated Environmental Management Guideline Series, Department of Environmental Affairs and Tourism, Pretoria.
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- Münster, F.** (2005). *Guidelines for Determining the Scope of Specialist Involvement in EIA Processes*: