

APPENDIX F5: Emails, Registry Post and Letters

Comments received during pre-application

Consultation with DEFFE prior to Pre-Application Public Participation

FW: Onsite meeting

**Melanie Koen** <Mkoen@dfpe.gov.za>
To:  Natalie Sharp

 Terngnet.kmz
3 KB

 Latest_TERGNET_TREE PLOTTING_10-09-2024.pdf
4 MB

 Position of protected trees_Terngnet.jpg
181 KB

😊 Reply Reply All Forward

Sat 10/5/2024 11:49 AM

From: natalie@dsafrica.co.za
Sent: Friday, 13 September 2024 14:04
To: Melanie Koen
Cc: Tgwala@dfpe.gov.za; NFAWesternCape@dfpe.gov.za; pietdc@stagafrican.com
Subject: Onsite meeting

Good day Ms Koen,
Just a kind reminder of our site visit for Terngnet site scheduled for Monday, 16 Sept at 9:30am.
I have sent a KMZ so you will have the location of the site.
As well as the proposed layout of the site and the positions of protected tree species as identified by Confluence Environmental Consultancy.

Kind regards



Natalie Sharp
Reg. EAP (EAPASA)
Pri. Sci. Nat. (Reg No 123443)
Member of IAISA (7237)
natalie@dsafrica.co.za

From: Melanie Koen
Sent: Monday, 16 September 2024 23:30
To: natalie@dsafrica.co.za
Subject: FW: Onsite meeting

Dear Mrs Sharp- Thank you for the site visit today. The property consist of mostly protected Milkwood trees and shrubs- with pioneer species such as Taaibos and Crossberry with few scattered rooikrantz. Forestry would formally comment once documents are provided by consultant for public participation- but will request: units to be reduced especially where too close to singlestanding trees as well as clusters of protected trees occur, that larger trees be incorporated within the development layout; also the cluster of large protected trees situated north-east as well as south-east of eastern side of Robertson rd of proposed development be retained/ incorporated as no-go area. But Forestry will formally comment once proposed development documents are circulated and would also request a follow-up site visit. Kind regards

Consultation sent out via email and responses:

PRE-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25 - Terngnet

**Natalie Sharp**

To: nmoffice@mosselbay.gov.za; dnaidoo@mosselbay.gov.za; btruter@mosselbay.gov.za; jroux@mosselbay.gov.za; adellemijn@mosselbay.gov.za; nina@gardenroute.gov.za; jchoeman@gardenroute.gov.za; avlok@capenture.co.za; msimons@capenture.co.za; vanessa.stoffels@westerncape.gov.za; runkelc@nra.co.za; jandre.bakker@westerncape.gov.za; environment@caa.co.za; Chiara.Singh@westerncape.gov.za; Clyde.Lamberts@westerncape.gov.za; brandon.layman@westerncape.gov.za; cor.vanderwalt@westerncape.gov.za; cabrahams@bgcma.co.za; mkoen@dfpe.gov.za; wilmari.immelman@westerncape.gov.za; nathan.jacobs@westerncape.gov.za; scfpa.riversdale@gmail.com; kebasenosi@yahoo.com; Phumzile.sithole@transnet.net; Mike.khoza@transnet.net; infrastructuremanager@transnet.net; dineo.mazibuko@transnet.net; pietdc@stagafrican.com; Louisadams1965@gmail.com; Andreabeierle27@gmail.com; info@berdinadesigns.co.za; Carelaspeling1966@gmail.com; Paulgreyling05@gmail.com; Carelaspeling1966@gmail.com; Uys.meiring@gmail.com; Debeer.kobie@gmail.com; Joy.mcferrin1955@gmail.com; louise.pretorius@hotmail.com; louise@osquare.co.za; vdberghs@ufs.ac.za; willie@bok.za.net

 Cover letter for pre-applicationDBAR_I&AP.pdf
199 KB

 Background Information Document_Terngnet.pdf
3 MB

😊 Reply Reply All Forward

Fri 2/6/2026 12:24 PM

Good day

Please take note that there is an intent to submit an environmental authorisation application with the Department of Environmental Affairs, Development and Planning in the Western Cape for a proposed residential development on Portion 38 of Farm No. 136, Terngnet, Western Cape.

You are invited to partake in the pre-application public participation process. Attach to this email, you will find the relevant documents for your information.

Kind regards



Natalie Sharp
Reg. EAP (EAPASA)

RE: PRE-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25...

 Colene Runkel (WCP) <Runkelc@nra.co.za>
To:  Natalie Sharp

 You replied to this message on 2/6/2026 12:48 PM.

2/6/2026

Dear Natalie

Please submit all environmental documents in the SANRAL Western and Northern Cape to Ms Nicole Abrahams at abrahamsn@sanral.co.za

Kind Regards

Colene Runkel
Statutory Controller
Western Cape Province (WCP)
1 Havenga Street, Oakdale, Bellville, 7530, South Africa
T: +27 21 957 4613
Runkelc@nra.co.za www.sanral.co.za

PRE-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25 - T...

 Natalie Sharp
To:  'opsupofficer.scfpa@gmail.com';  'adminfpa@telkomsa.net';  'cabrahams@bocma.co.za'

 Cover letter for pre-applicationDBAR_I&AP.pdf
199 KB

 Background Information Document_Tergniet.pdf
3 MB

Good day

Please take note that there is an intent to submit an environmental authorisation application with the Department of Environmental Affairs, Development and Planning in the Western Cape for a proposed residential development on Portion 38 of Farm No. 136, Tergniet, Western Cape.

You are invited to partake in the pre-application public participation process. Attach to this email, you will find the relevant documents for your information.

Kind regards

 **DSA**
Digital Soils Africa

Natalie Sharp
Reg. EAP (EAPASA)
Pri. Sci. Nat (Reg No 123443)
Member of IAASA (7237)
 natalie@dsafrica.co.za
 +27 82 414 0472
 www.dsafrica.co.za

PRE-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25 - T...

NS

Natalie Sharp

To 'Phumzile.sithole@transnet.net'

2/6/2026

PDF

Cover letter for pre-applicationDBAR_I&AP.pdf

199 KB

PDF

Background Information Document_Tergniet.pdf

3 MB

Good day

Please take note that there is an intent to submit an environmental authorisation application with the Department of Environmental Affairs, Development and Planning in the Western Cape for a proposed residential development on Portion 38 of Farm No. 136, Tergniet, Western Cape.

You are invited to partake in the pre-application public participation process. Attach to this email, you will find the relevant documents for your information.

Kind regards



Natalie Sharp

Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAIAAs (7237)

PRE-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25 - T...

NS

Natalie Sharp

To mike.khoza@transnet.net

2/6/2026

PDF

Cover letter for pre-applicationDBAR_I&AP.pdf

199 KB

PDF

Background Information Document_Tergniet.pdf

3 MB

Good day

Please take note that there is an intent to submit an environmental authorisation application with the Department of Environmental Affairs, Development and Planning in the Western Cape for a proposed residential development on Portion 38 of Farm No. 136, Tergniet, Western Cape.

You are invited to partake in the pre-application public participation process. Attach to this email, you will find the relevant documents for your information.

Kind regards



Natalie Sharp

Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAIAAs (7237)

Re: PRE-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25...

 Andrea Beierle <andreabeierle27@gmail.com>
To:  Natalie Sharp

2/7/2026

Dear Natalie

Thank you for the information.
I would like to register as an affected and interested party. I will submit detailed objections / comments on or before 9 March 17:00.

Regards

Andrea Beierle

Pre-Application Public Participation: Tergniet: 16/3/3/6/7/1/D6/35/0133/25

 Natalie Sharp
To:  Steve Kleinhans
Cc:  Francois Naude;  Danie Swanepoel

2/9/2026

 Cover letter for pre-applicationDBAR_DEADP.pdf
199 KB

Good day Mr Kleinhans

Please take note that there is an intent to submit an environmental authorisation application with your Department for a proposed residential development on Portion 38 of Farm No. 136 Tergniet.

You are invited to partake in the pre-application public participation process and all the relevant documents have been loaded onto the online system. The link is [Tergniet](#)

If you need anything please do not hesitate to contact me.

Kind regards

 Natalie Sharp
Reg. EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)

Application for the submission of a property environmental study for com...

 Application Manager <applications@westerncaperoadsinfrastr>
To:  Natalie Sharp

2/6/2026

 Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Dear Digital Soils Africa

The message below refers to your application for the submission of a property environmental study for comment (Application No - 2026-02-0021) submitted to the Western Cape Government on 2026/02/05:

Properties related to the application :

- Portion 38 of Farm FARM 136, MOSSEL BAY
- Portion 38 of Farm FARM 136, MOSSEL BAY

The matter is receiving attention, and further communication will be addressed to you as soon as circumstances permit.

Best Regards,
Western Cape Government

EIA COMMENTS FARM 136 PORTION 38 TERGNIET

DM

David Maloka <David@edendm.co.za>

To

Natalie Sharp

Cc

Nathan Jacobs;

Johan Compion

2/9/2026

Follow up. Completed on Monday, March 30, 2026.
You replied to this message on 3/24/2026 2:09 PM.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

EIA COMMENTS TERNIET.pdf
76 KB

Good morning, kindly find the attached for comments.

Regards

David Maloka

Environmental Health Practitioner

David@edendm.co.za

Tel: +27 (0)44 693 0006 |

EIA Comments Tergniet – letter from the Garden Route Municipality



54 York Street,
George
Western Cape
6529

PO Box 12,
George,
Western Cape
6530

Tel: 044 803 1300
Fax: 086 555 6303
E-mail: info@gardenroute.gov.za
www.gardenroute.gov.za

OFFICE OF THE MUNICIPAL MANAGER

Enquiries: D Maloka
Reference: 18/3/4/4
Date: 09 February 2026

Dr Darren Bouwer
45 church street
Port Elizabeth

natalie@dsafrika.co.za

Dear Sir or Madam

ACTIVITIES ON FARM 136: PORTION 38 TERGNIET, WESTERN CAPE:

With reference to the abovementioned application, the following is for your attention:

The transformation of undeveloped land to residential/ commercial may include the following construction activities: Site preparation (vegetation clearing, scraping road surfaces), excavations, tarring, building, construction of bulk services (sewage and water, piping installations).

The abovementioned activities may create a negative impact on human health such as stress, respiratory infections (asthma, coughing, wheezing, and lung irritations) and vector borne illnesses from increased waste.

Recommendations:

Management of all above mentioned activities to prevent and/or limit the negative health effects to humans through:

- Proper storage and disposal of waste generated (general waste and construction waste) on site.
- Managing dust emanating from site by means of the most practical option available.
- Ensure proper toilet facilities for employees on site.

The Environmental Health Practitioner responsible for the area in which the construction will take place will be responsible for monitoring effect to human health.

For further information, please contact D Maloka at telephone number 044 693 0006.

Yours faithfully

DAVID MALOKA
ENVIRONMENTAL HEALTH PRACTITIONER



PP: MONDE STRATU
MUNICIPAL MANAGER

Y:\DAVID MALOKA\Work 2026\EIA'S\EIA FARM 136 PORTION 38 TERNIET WESTERN CAPE.docx

DATE: 09/02/2026

RE: EIA COMMENTS FARM 136 PORTION 38 TERGNIET



Natalie Sharp
To: 'David Maloka'
Cc: Nathan Jacobs; Johan Compion

Reply Reply All Forward

Mon 2/9/2026 9:41 AM

Goo day Mr. Maloka,

Thank you for your comments.

Your recommendations as listed below, will be included in the Basic Assessment Document and Environmental Management Plan.

Recommendations:

Management of all above mentioned activities to prevent and/or limit the negative health effects to humans through:

- Proper storage and disposal of waste generated (general waste and construction waste) on site.
- Managing dust emanating from site by means of the most practical option available.
- Ensure proper toilet facilities for employees on site.

Please take note that this is a **pre-application public participation process**. When we submit the application, another round of public participation will occur, and you will be consulted again.

Kind regards

RE: EIA COMMENTS FARM 136 PORTION 38 TERGNIET



Nathan Jacobs <Nathan.Jacobs@westerncape.gov.za>

To: Natalie Sharp
Cc: Johan Compion; Bawinile Ndlovu; Heliza Le Roux; David Maloka

Follow up. Completed on Monday, March 30, 2026.
You replied to this message on 2/9/2026 10:32 AM.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.



WCGHW Comments proposed residential development on Portion 38 of Farm No. 136, Tergniet.pdf
338 KB

Reply Reply All Forward

Mon 2/9/2026 10:19 AM

Dear Ms. Sharp,

Hope all is well.

Thank you for inviting the Western Cape Government: Health and Wellness (Garden Route and Central Karoo Districts) to comment on the Background Information Document (BID) and associated pre-application public participation documentation for the proposed residential development on Portion 38 of Farm 136, Tergniet.

The documentation has been reviewed from a public health and Environmental Health perspective. We wish to advise that the Department has **no objection in principle** to the proposed development, **subject to compliance with the recommendations and requirements provided by the Garden Route District Municipality Environmental Health Practitioner.**

We trust that these recommendations will be duly incorporated into the Draft Basic Assessment Report and Environmental Management Programme as the application progresses.

Please do not hesitate to contact us should any further information or clarification be required.

Kind regards,

Nathan Jacobs, MTech (Master of Technology: Environmental Health - NMU)
Therapeutic & Medical Support Services Programme Coordinator (Grade 1)
Environmental Health Services
Garden Route & Central Karoo District
Professional Support Services
Department of Health and Wellness
Western Cape Government
HPCSA Number: HI 0082112

3rd Floor, York Park Building, St Johns Street, George, 6530

Tel: 044 813 2926

Cell: 081 030 4557

Email: Nathan.Jacobs@westerncape.gov.za

Website: www.westerncape.gov.za

WCGHW Comments – Comments from the Department of Health



Reference: 19/3/1/R

To: Digital Soils Africa (Pty) Ltd

Attention: Ms Natalie Sharp – Environmental Assessment Practitioner

RE: COMMENT ON THE PRE-APPLICATION PUBLIC PARTICIPATION / BACKGROUND INFORMATION DOCUMENT – PROPOSED RESIDENTIAL DEVELOPMENT ON PORTION 38 OF FARM 136, TERGNIET, MOSSEL BAY MUNICIPALITY

The Western Cape Government: Health & Wellness (Garden Route and Central Karoo Districts), in its role as the Public Health authority, acknowledges receipt of the Background Information Document (BID) and associated pre-application public participation documentation for the proposed residential development on Portion 38 of Farm 136, Tergniet.

This office has reviewed the available information from a public health and Environmental Health perspective and **has no objection in principle** to the proposed development, **subject to compliance with the Environmental Health comments and recommendations issued by the Garden Route District Municipality**, as well as all applicable national, provincial and municipal legislation.

This office fully supports and aligns itself with the Environmental Health comments and recommendations provided by the Garden Route District Municipality and trusts that these requirements will be formally incorporated into the Draft Basic Assessment Report (DBAR) and Environmental Management Programme (EMPr) prior to submission to the competent authority.

Compliance with municipal Environmental Health requirements will be critical to ensuring that public health impacts are adequately prevented, mitigated, and managed throughout the construction and operational phases of the proposed development.

Yours faithfully,

H. LE ROUX

DIRECTOR RHS: GARDEN ROUTE & CENTRAL KAROO DISTRICS

DATE: 09 February 2026



**Western Cape
Government**

Health and Wellness

Mrs. Heliza Mentoer

Director RHS: Garden Route and Central Karoo Districts

Heliza.Mentoer@westerncape.gov.za | Tel: 044 803 2700

Reference: Deleg/Auth-EIA Comments

Mr. N. Jacobs
Environmental Health Programme Coordinator
Professional Support Services
Garden Route and Central Karoo Districts

Dear Mr. Jacobs

DELEGATION: ENVIRONMENTAL IMPACT ASSESSMENTS (EIA) APPLICATIONS FOR COMMENTS

As the Programme Coordinator for Environmental Health, you are hereby delegated to review, consider, and provide comments on all Pre-Application/Draft Basic Assessment Reports (BAR), Scoping Reports, Environmental Management Programmes (EMPr), and any other EIA applications on behalf of the Garden Route and Central Karoo Districts during the public participation process in relation to proposed developments/projects, where the Department of Health and Wellness is registered as an Interested and Affected Party (I&AP) within the Districts' jurisdiction

Your willingness in this regard is highly appreciated.

Yours faithfully

Mrs. Heliza Mentoer
Director: Rural Health Services
Garden Route & Central Karoo District
Western Cape Department of Health and Wellness

Date: 9/4/2025

Accepted

Mr. Nathan Jacobs
Environmental Health Programme Coordinator
Garden Route & Central Karoo District
Western Cape Department of Health and Wellness

Date: 09/06/2025

DEPT. OF HEALTH
DEP. VAN GESONDHEID

09 JUN 2025

Garden Route District Office
Private Bag X6592/Privaatsak
George 6530

RE: EIA COMMENTS FARM 136 PORTION 38 TERGNIET

 Natalie Sharp
To  Nathan Jacobs
Cc  Johan Compion;  Bawinile Ndlovu;  Heliza Le Roux;  David Maloka

2/9/2026

Good day Mr Jacobs,
Thank you for your response, it is noted.
As indicated to Mr. Maloka, we will incorporate the recommendation into the Basic Assessment and EMP.
Please note this is a pre-application public participation process, when the application is submitted, you will be consulted again.
Kind regards

 **DSA**
Digital South Africa

Natalie Sharp
Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAIA (7237)
✉ natalie@dsafrica.co.za
☎ +27 82 414 0472
🌐 www.dsafrica.co.za

RE: EIA COMMENTS FARM 136 PORTION 38 TERGNIET

 Natalie Sharp
To  'David Maloka'
Cc  Nathan Jacobs;  Johan Compion

Tue 3/24

 Letter to GRDMunicipality_Environmental Health.pdf
258 KB

Good day Mr. Maloka,
Thank you for your comments.
Please find our response.

Kind regards

 **DSA**
Digital South Africa

Natalie Sharp
Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAIA (7237)

Letter to GRDMunicipality_Environmental Health

Garden Route District Municipality
P O Box 12
George
6530

Attention: David Maloka

24 March 2026

Our Ref: 16/3/3/6/7/1/D6/35/0133/25

Your Ref: 18/3/4/4

RESPONSE TO COMMENTS RECEIVED ON THE DRAFT DOCUMENTS DURING THE PRE-APPLICATION PUBLIC PARTICIPATION PROCESS OF AN ENVIRONMENTAL ASSESSMENT FOR A PROPOSED RESIDENTIAL DEVELOPMENT OF 5.96HA ON PORTION 38 OF FARM NO. 136, TERGNIET, WESTERN CAPE. APPLICANT: MR. P. DE CLERK

Thank you for your comments and for outlining the potential human health considerations associated with the proposed development. Your inputs are noted and appreciated.

The potential impacts identified, including dust generation, waste management, and general construction-related disturbances, have been assessed as part of the Basic Assessment process and are addressed in detail within the Environmental Management Programme (EMP). In response to your recommendations:

Waste management:

Provision has been made in the EMP for the proper handling, storage, and disposal of both general and construction waste. Waste will be removed from site by approved service providers and disposed of at licensed facilities.

Dust control:

Dust suppression measures are included in the EMP and will be implemented during construction. These include the wetting of exposed surfaces, limiting cleared areas, and managing construction activities during windy conditions.

Sanitation facilities:

Adequate ablution facilities will be provided on site for construction workers and will be serviced regularly in accordance with health and safety requirements.

The EMP further includes monitoring and compliance measures to ensure that all mitigation measures are effectively implemented throughout the construction phase. We note that the Environmental Health Practitioner will monitor the construction activities, and we confirm that all relevant health and safety requirements will be adhered to.

We trust that the above adequately addresses your comments.

Yours sincerely



Natalie Sharp

Pri.Sci.Nat (Reg nr. 123443)

Reg. EAP (EAPASA)

Member of IAIA (7237)

Tergniet ontwikkeling



uys.meiring@gmail.com

To • Natalie Sharp

Cc • liz.meiring89@gmail.com

You forwarded this message on 2/12/2026 8:59 AM.

[Translate message to: English](#) | [Never translate from: Afrikaans](#) | [Translation preferences](#)



2/11/2026

More Natalie, ek is ,n buurman aan die noordekant. Jaquilines place no 6. Die huis is die laaste aan die ooste kant. Die eiendom is enkelverdieping. Ek het die eiendom gekoop met 'n seeuitsig, wat ek tans het. My besware is die ontneming van hierdie waardevolle toevoeging tot my eieendomswaarde my beleging kan benadeel. Ek neem ernstige beswaar rakende die ontwikkeling voor my huis.

Groete Uys Meiring
UYS MEIRING FAMILIE TRUST

RE: Tergniet ontwikkeling



Natalie Sharp

To • 'uys.meiring@gmail.com'

Cc • liz.meiring89@gmail.com

[Translate message to: English](#) | [Never translate from: Afrikaans](#) | [Translation preferences](#)



2/12/2026

Goeie More Uys,

Baie dankie vir die terugvoer. Ek neem kennis.

Ek sal jou beswaar aan die argitek stuur en vir hom vra om te bevestig of julle uitsig belemmer gaan word of nie.

Ek weet hulle het reeds vergadering gehad met van die eienaars tydens die publieke deelname vir die hersonerings aansoek, en hierdie was een van die besware wat opgekom het.

Ek weet ook hulle het hulle ontwerp verander, sodat die impak nie ervaar sal word nie.

Ek sal opvolg en terug kom na jou toe.

Groete



Natalie Sharp

Reg. EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAIAA (7237)



To uys.meiring@gmail.com; liz.meiring89@gmail.com



2/13/2026



900 KB



27 KB



38 KB

Goeie more Uys,
Ek vertrou dit gaan goed.

Ek het terugvoering van die argitek gekry, sien asb onder hulle antwoord. Asook, hulle illustrasies om te bewys dat jou uitsig nie beïnvloed sal word nie.

Laat weet asb of daar enigeiets anders is waarmee ek kan help.

Groete



Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)



To Natalie Sharp; liz.meiring89@gmail.com



2/26/2026

 Follow up. Completed on Friday, March 6, 2026.
You replied to this message on 3/6/2026 11:06 AM.

[Translate message to: English](#)
[Never translate from: Afrikaans](#)
[Translation preferences](#)

Middag Natalie, dankie vir die terugvoer. Die feit dat ek afwaards na die see kyk word nie in ag geneem nie, ons is naby en hoog. Indien hierdie uitsig wat vroeër aangemeld is belemer word, hou ek die ontwikkelaars verantwoordelik vir my verliese. Trouers ek het net 'n uitsig deur die gaping wat Impala straat het op die bult. Ek hou by hierdie een en ek het die kanale gevolg vir my beswaar.

Vriendelike groete

Uys Meiring



To uys.meiring@gmail.com; liz.meiring89@gmail.com

Cc: 'pietdc@stagafrican.com'



3/6/2026

[Translate message to: English](#)
[Never translate from: Afrikaans](#)
[Translation preferences](#)

Goeie more Uys,

Dankie vir jou terugvoer.

Indien jy sou verkies om met die aansoeker te vergader, laat weet gerus, dan kan ons 'n geskikte tyd vir 'n ontmoeting reël.

Groete



Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)

-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25 - Terg...



Carel Aspeling <carelaspeling1966@gmail.com>
To: Natalie Sharp



2/11/2026

Follow up. Completed on Tuesday, March 31, 2026.
You replied to this message on 2/12/2026 9:02 AM.

[Translate message to: English](#) | [Never translate from: Afrikaans](#) | [Translation preferences](#)

Goeie middag.

Kan U asb vir my weer dokumente stuur wat aangeheg was by email van 6 Februarie 2026.

Carel Aspeling

RE: -APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25 - T...



Natalie Sharp
To: 'Carel Aspeling'



2/12/2026



Cover letter for pre-applicationDBAR_DEADP.pdf
199 KB



Background Information Document_Tergniet.pdf
3 MB

[Translate message to: English](#) | [Never translate from: Afrikaans](#) | [Translation preferences](#)

Goeiemore Carel,

Soos versoek, hier is die dokumente.

Laat weet asb as jy enige ander vrae het.

Groete



Natalie Sharp
Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAIAasa (7237)

RE: PRE-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25...

 Chiara Singh <Chiara.Singh@westerncape.gov.za>
To:  Natalie Sharp

 You replied to this message on 2/13/2026 11:08 AM.

Dear Natalie

Thank you for your email. Please note that HWC's comment of 'No Further Studies' is still applicable.

Kind regards
Chiara Singh
Heritage Officer

Heritage Resource Management Services
Contact Number: 0218293325
Protea Assurance Building Greenmarket Square, Cape Town
Website: www.hwc.org.za / www.westerncape.gov.za




RE: PRE-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25...

 Natalie Sharp
To:  Chiara Singh

Good day Chiara,
Thank you for confirmation.

Kind regards



Natalie Sharp
Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAIAsa (7237)

Participation Process : Proposed Residential Development on portion 38 remainder of farm 136 Tergniet. Reference: G-BA-EIA-L9

 Christa Vreugdenburg <christa.vreugdenburg6@gmail.com>
To:  admin@mosselbay.gov.za;  mayor@mosselbay.gov.za
Cc:  adellemijn@mosselbay.gov.za;  Natalie Sharp

 Follow up. Completed on Wednesday, February 25, 2026.
You replied to this message on 2/25/2026 4:34 PM.
This message was sent with High importance.

 Reply  Reply All  Forward  ...

Wed 2/25/2026 11:00 AM

To whom it may concern,

The topic above refers.

Since the first notice dated 20 June 2025 regarding : Tergniet Estate (Rezoning of portion 38 remainder of farm 136 Tergniet), we as Dolphin Crescent Paraat what's up group raised our concerns regarding the proposed development. We have indicated that we regard ourselves as an I&EP and wanted to be part of the PPP. We have submitted a detailed document complete with Signatures, Objections and Suggestions.

To our great disappointment we received absolutely no communication from the Municipality or the Developers since our submission, despite of several promises by the Municipality. We also learned that there was a second public meeting to which were not invited to, despite of our requests to be involved.

We herewith wish to express our dissatisfaction with the poor handling of the matter by both the Municipality and the Developer. It appears if the Municipality regard new developments requests merely as "Tick Box" exercises.

We henceforth request better future communication and request that the following are attended to:

- 1) The latest notice for the PPP and EIA dated 6 February 2026 must be displayed conspicuously in accordance with the required standards so that everybody driving/walking past can see it. Currently it is hidden behind a bush heading towards the railway line. This should receive your urgent attention. The notice is only displayed in English. To the best of our knowledge it should be posted in at least three languages. In this area Afrikaans is the dominant language.
- 2) We want clear confirmation whether the land has been rezoned from Agricultural to Residential land.
- 3) We hereby wish to notify the Relevant Parties that we intend to register as an I&AP, as the Dolphin Paraat Group. (We will register with DSA before 9 March 2026 as required by the latest notice.)
- 4) You are herewith informed that we will update our previous documentation in accordance with the new documents available from DSA. (Electronic copies of our documents can be requested via the E-Mail above or Cell 083 284 4399)
- 5) We did mention domestic water supply as a concern in our original document, but in the light of the current water restrictions, this will become a major point of contention. We are of the opinion that Mosselbay lack the capacity to built an additional 133 dwellings.

We trust that future relations and communication will improve and will give our full cooperation in the process.
Yours Sincerely

Chris Vreugdenburg (on behalf of Dolphin Crescent Paraat Group I&EPs)

RE: Participation Process : Proposed Residential Development on portion 38 remainder of farm 136 Tergniet. Reference: G-BA-EIA-L9



Natalie Sharp
To: 'Christa Vreugdenburg'; admin@mosselbay.gov.za; mayor@mosselbay.gov.za
Cc: adellemijn@mosselbay.gov.za
Bcc: 'pietdc@stagafrican.com'

😊 Reply

↩ Reply All

➡ Forward

Wed 2/25/2026 4:35 PM

Cover letter for pre-application DBAR_I&AP.pdf
199 KB

Background Information Document_Tergniet.pdf
3 MB

Good day Ms Vreugdenburg,

Thank you for your correspondence and for your participation in the public participation process. We acknowledge receipt of your comments and concerns.

We would like to clarify that the land use application being considered in terms of SPLUMA is a separate statutory process from the Environmental Authorisation process undertaken in terms of NEMA. The SPLUMA application is being managed by Theo Steyn of NuPlan Africa Town and Urban Planners, and any queries relating specifically to rezoning, municipal processes, or public meetings held under that framework should be directed to his office.

The Environmental Impact Assessment process is regulated by the competent authority, namely the Department of Environmental Affairs and Development Planning (DEADP). This process focuses specifically on the assessment of potential biophysical and relevant socio-economic impacts as prescribed by NEMA and the EIA Regulations. While certain issues may overlap, zoning and municipal planning considerations are determined within the SPLUMA framework.

Regarding engineering services, a bulk water and sewer capacity assessment was undertaken by GLS Consulting Engineers (February 2025). The assessment concluded that sufficient bulk water supply and reservoir storage capacity exists to accommodate the estimated additional domestic demand of approximately 65.7 kL/day. The Municipality will verify compliance with service capacity requirements as part of its approval processes.

In response to the specific matters raised:

- 1) The site notice will be repositioned to ensure improved visibility. Thank you for bringing this to our attention.
The notice and documentation forming part of the Environmental Authorisation process has been prepared in English, which is the standard language of submission to the competent authority. The public participation process must ensure that interested and affected parties are provided with reasonable opportunity to understand and comment on the proposed development.
As your correspondence has been submitted in English, we understand that the documentation is accessible to you in its current format. Should there be any specific sections that require clarification, we would gladly assist in explaining those aspects further.
- 2) The property has not been rezoned from Agricultural to Residential land at this stage.
- 3) Your intention to register as an Interested and Affected Party (I&AP) on behalf of the Dolphin Crescent Paraat Group is noted. We will register your details accordingly.
- 4) Updated documentation may be submitted and will be included in the Comments and Responses Report forming part of the EIA submission.
- 5) Your concerns regarding domestic water supply, particularly in light of current restrictions, are acknowledged and will be captured in the formal reporting to the competent authority.

Please note that this is currently the pre-application public participation phase. Following submission of the Environmental Authorisation application, a further round of public participation will be undertaken in accordance with the EIA Regulations, during which additional opportunity for comment will be provided.

We remain committed to transparent engagement and confirm that all comments received will be included in the formal submission to the competent authority for consideration.

Kind regards



Proposed residential development on portion 38 of farm no 136, Tergniet

 Janine Greeff <janineg@l2b.co.za>
To:  Natalie Sharp



Mon 3/2/2026 10:01 AM

 You replied to this message on 3/3/2026 7:21 AM.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

 SKMBT_C284e26030210020.pdf
512 KB

Good morning Natalie,

I hope you are well. I came across a basic assessment notice for **"Proposed residential development on portion 38 of farm no 136, Tergniet"**

I do not have any objections but would like to please be registered as an interested party. Please register me with the email address projects@l2b.co.za.

I follow building and construction related projects from conceptual / feasibility up until completion.

Thank you so much.

Kind Regards
Janine Greeff | Regional Content Researcher Projects

RE: Proposed residential development on portion 38 of farm no 136, Tergn...

 Natalie Sharp
To:  'Janine Greeff'



3/3/2026

Good morning Janine.
Thank you for registering. I will add you to the list.

Kind regards

 Natalie Sharp
Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAIAA (7237)

Participation Process : Proposed Residential Development on portion 38 re...

 admin@mosselbay.gov.za
To:  christa.vreugdenburg6@gmail.com
Cc:  adellemijn@mosselbay.gov.za;  Natalie Sharp



3/2/2026

 This message was sent with High importance.

Correspondence Reference: 34999336
File Reference: 15/4/40/4

ACKNOWLEDGEMENT / ONTVANGSERKENNING

We acknowledge receipt of your letter regarding the abovementioned matter and wish to confirm that the matter is receiving attention.

Ons erken ontvangs van u skrywe in bogemelde verband en bevestig dat die saak aandag geniet.

Yours faithfully / Die uwe

MOSSEL BAY MUNICIPALITY
MOSSelBAAI MUNISIPALITEIT

From: Christa Vreugdenburg <christa.vreugdenburg6@gmail.com>
Sent: Thursday, March 5, 2026 3:50 PM
To: 'Venter, Carel' <cventer@mosselbay.gov.za>; Suzi McCaw <admin@dsafrica.co.za>; Suzi McCaw <admin@dsafrica.co.za>; mayor@mosselbay.gov.za
Cc: rleroux@mosselbay.gov.za; adellemijn@mosselbay.gov.za
Subject: RE: Participation Process : Proposed Residential Development on portion 38 remainder of farm 136 Tergniet. Reference: G-BA-EIA-L9

Good Afternoon,

In response to the only reply we received regarding the matter raised above we wish to inform you that we are laying a formal dispute with the Mosselbay Municipality and DSA on the matter above.

- 1) No attempt has been made to comply with Municipal By-Laws with regards to placing of notice boards at conspicuous points.
- 2) We need clarification regarding the process. In our opinion the EIA should take place and be completed before rezoning can be considered.
- 3) We noted with that the Tergniet EIA under "ENVIRONMENT" on the DSA Web site has been removed? How do you expect an I&AP to comment if the documents are unavailable?
- 4) We also noted that an excavator was operating on the land on Saturday , 28 February 2026.

We hereby submit that the process is flawed, and that all activities be stopped, until full compliance are met.

RE: Participation Process : Proposed Residential Development on portion 38 remainder of farm 136 Tergniet. Reference: G-BA-EIA-L9



Natalie Sharp

To: christa.vreugdenburg6@gmail.com
Cc: cventer@mosselbay.gov.za; Mayor of Mossel Bay; rleroux@mosselbay.gov.za; adellemijn@mosselbay.gov.za; pietdc@stagafrican.com

Reply Reply All Forward

Fri 3/6/2026 10:44 AM

RE: Participation Process : Proposed Residential Development on portion 38 remainder of farm 136 Tergniet. Reference: G-BA-EIA-L9
Outlook item

20260205_192132.jpg
551 KB

20260205_192146.jpg

Good day Ms Vreugdenburg,

The email correspondence below, as well as our previous response dated 25 February 2026 (attached for ease of reference), refers.

Thank you for your continued participation in the public participation process. We respond to the matters raised in your email of 5 March 2026 as follows:

1) Placement of the notice board

The Environmental Impact Assessment (EIA) process is regulated by the National Environmental Management Act (NEMA) and the EIA Regulations, and therefore the requirements applicable to the placement of notice boards are those prescribed under Regulation 41 of the EIA Regulations.

Regulation 41(2)(a)(i) requires that notice be given to potential Interested and Affected Parties by fixing a notice board at a place that is conspicuous and accessible to the public at the boundary, fence, or corridor of the site where the activity is proposed.

In addition, Regulation 41(4)(a) and (b) requires that the notice board must:

- be at least 60 cm x 42 cm in size, and
- display the required information in the format determined by the competent authority.

The notice board placed on site measures 594 mm x 841 mm (A1 size), which exceeds the minimum size requirement stipulated in the Regulations.

The notice board has been installed along the boundary fence of the property, where it is accessible and visible to members of the public. The notice board is not positioned behind vegetation or obscured by bushes, and is clearly visible from the surrounding area. Photographs of the notice board placement are attached for reference. We have also received enquiries from individuals who noticed the board, which confirms that the notice has been visible to passing members of the public.

In terms of language, as your correspondence has been submitted in English, we understand that the documentation is accessible to you in its current format. Should there be any specific sections that require clarification, we would gladly assist in explaining those aspects further.

2) Sequence of the EIA and rezoning processes

The rezoning application is being undertaken in terms of SPLUMA and is managed separately through the Mossel Bay Municipality and the appointed town planner.

The Environmental Authorisation (EA) process is undertaken in terms of NEMA and falls under the jurisdiction of the Department of Environmental Affairs and Development Planning (DEA&DP).

While these processes may run concurrently, no development may commence unless all required approvals have been granted. In practice, development can only proceed once both the Environmental Authorisation and the land use approval have been obtained.

3) Availability of documents on the DSA website

The documentation relating to the proposed development remains available on the Digital Soils Africa website.

As indicated in the cover letter and Background Information Document sent on 25 February 2026, the documents can be accessed on the DSA website, www.dsafrica.co.za. Please follow the link to Environmental, Documents and choose the **P.de Clerk** link. Mr. De Clerk is the applicant and thus his name is used for the link. The documents have never been removed from the website and have been available to you.

This page contains the Draft Basic Assessment Report and the associated specialist studies for review and comment.

4) Excavator observed on site

The excavator observed on site on 28 February 2026 was being used to undertake geotechnical investigations, which form part of the specialist studies required to assess the suitability of the site for development.

These investigations are necessary to evaluate soil conditions, rock structure, and groundwater conditions, which inform engineering design and ensure the long-term structural stability of future infrastructure.

The investigation activities were limited in scope, avoided protected plant species, and resulted in disturbance well below the 300 m² threshold. These activities do not constitute construction works and do not indicate the commencement of development.

We trust the above clarifies the matters raised.

The applicant has indicated that he would be willing to meet with you to discuss the proposed development and your concerns further. Should you wish to do so, please advise on your availability.

Thank you again for your participation in the process.

Kind regards

—

Natalie Sharp

Public Participation Process : Proposed Residential Development on portion 38 remainder of farm 136 Tergniet. Reference: G-BA-EIA-L9



Christa Vreugdenburg <christa.vreugdenburg6@gmail.com>

To: ● Natalie Sharp; ○ admin@mosselbay.gov.za; ○ Suzi McCaw

Cc: ○ adellemijn@mosselbay.gov.za; ○ rleroux@mosselbay.gov.za; ○ mayor@mosselbay.gov.za

Follow up. Completed on Friday, March 6, 2026.
You replied to this message on 3/6/2026 11:02 AM.
This message was sent with High importance.

Signatures of oppsing residents.pdf
538 KB

😊 Reply Reply All Forward 📧 ⋮

Fri 3/6/2026 10:37 AM

To whom it may concern,

In terms of the notice issued on 06 February 2026, by DSA, the Dolphin Crescent Paraat Group herewith wish to register as an I&APs .
(Attached is the list of members of the Group who are objecting against the proposed development)

We are of the opinion that the PPP is flawed and not carried in accordance with requirements.

We have a problem in the manner in which the notice was placed. It is not clearly visible and it appears in only one language. (67% of the residents in this area are Afrikaans speaking.)

We also noted that the TERGNIET link on your Web Site has been removed. (See screenshot below). With only 3 days before commentary is closed this is totally unacceptable and we believe not legal.
We cannot comment if we don't have the required documents to our disposal.

We request that the current process is cancelled and a new process is launched.

We are urgently awaiting your response.

Thank You

Chris Vreugdenburg (On behalf of the Dolphin Crescent Paraat Group)
083 284 4399

Signatures of opposing residents

"TERGNIET DEVELOPMENT" - MEMBERS OF IAP (Dolphin Paraat Group)

[illegible]

RE: Public Participation Process : Proposed Residential Development on portion 38 remainder of farm 136 Tergniet. Reference: G-BA-EIA-L9



Natalie Sharp

To: Christa Vreugdenburg; admin@mosselbay.gov.za
Cc: adellemijn@mosselbay.gov.za; rleroux@mosselbay.gov.za; mayor@mosselbay.gov.za; Ankie De Lange



Fri 3/6/2026 11:03 AM

Good day Ms Vreugdenburg,

Thank you for your email and for submitting the list of members of the Dolphin Crescent Paraat Group who wish to register as Interested and Affected Parties.

The Dolphin Crescent Paraat Group will be recorded as registered I&APs for the project. We note that some of the handwriting on the list provided is difficult to read, which may be due to the quality of the scan. Where contact details are unclear, we will attempt to confirm these with the individuals using the cellphone numbers provided in order to ensure that they are properly included in the stakeholder database.

With regard to the matters raised in your email:

Availability of documents

As indicated in the cover letter and Background Information Document previously sent to you, the project documentation is available on the DSA website under the "P. de Clerk" project link and not under a "Tergniet" link. The documentation remains accessible via the following page:

<https://dsafrica.co.za/services/environmental-services/documents-p-de-clerk/>

The Draft Basic Assessment Report and specialist studies are available for download and comment at this link, and is in the screenshot you provided.

Public Participation Process

It should also be noted that the current phase forms part of the pre-application public participation process. The environmental application has not yet been submitted to the competent authority. Following submission of the application, the Draft Basic Assessment Report will again be circulated for public review, and all registered I&APs will be given the opportunity to provide further comments in accordance with the timeframes prescribed by the EIA Regulations.

Language of the notice

The notice board and documentation have been prepared in English, which is the standard language used for submission to the competent authority and for most environmental assessment documentation. As your correspondence has been submitted in English, we understand that the information provided is accessible to you.

Should any members of the community require clarification of specific aspects of the documentation, we would be happy to assist in explaining these where necessary.

All comments received will be captured and addressed in the Comments and Response Report, which forms part of the Environmental Impact Assessment submission to the competent authority.

Thank you again for your participation in the process.

Kind regards



Natalie Sharp
Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IA/Asa (7237)

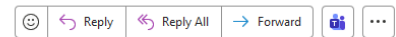
RE: Participation Process : Proposed Residential Development on portion 38 remainder of farm 136 Tergniet. Reference: G-BA-EIA-L9



Christa Vreugdenburg <christa.vreugdenburg6@gmail.com>

To: Natalie Sharp
Cc: adellemijn@mosselbay.gov.za; rleroux@mosselbay.gov.za

Follow up. Start by Monday, March 30, 2026. Due by Monday, March 30, 2026.
You replied to this message on 3/9/2026 12:46 PM.
This message was sent with High importance.



Mon 3/9/2026 11:39 AM

Good Day,

Thank you for your response. Herewith our response

- 1) Driving South (towards the ocean) the Notice Board invisible unless one is aware of it and one look slightly backwards. Driving North it is not in normal line of sight. We drove past there at least three times after placement of the Notice Board and didn't see it. It was only when we went for a walk and our neighbour alerted us that we saw it. It is wrong to assume that because you received some comments that everybody has seen it. (The photographs attached are misleading. I will send you a video)
- 2) According to your explanation the Land can be re-zoned before the EIA is completed. Are we correct? (We realise that it is two separate processes, but it doesn't make sense.)
- 3) We accept that it is partially our mistake not to have noticed that the link to the documents have changed. But DSA deviated from the official notice displayed on 06 February 2026, and your communication could have been better. (A separate E-Mail perhaps?) So, technically the notice board is invalid as it contain the wrong information.

Thank you,

Chris Vreugdenburg

RE: Participation Process : Proposed Residential Development on portion 38 remainder of farm 136 Tergniet. Reference: G-BA-EIA-L9

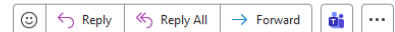


Natalie Sharp

To: Christa Vreugdenburg

Cc: adellemijn@mosselbay.gov.za; rleroux@mosselbay.gov.za

This message is part of a tracked conversation. Click here to find all related messages or to open the original flagged message.



Mon 3/9/2026 12:47 PM

Good day Ms Vreugdenburg,

Thank you for your response and for your continued participation in the process.

We take note of your comments regarding the notice board. As this stage forms part of the pre-application public participation process, we will take your comments into consideration when the application is formally submitted and the 30-day statutory public participation period is undertaken. At that stage, we will ensure to place the notice board along the road verge to further improve visibility, and the notice will be prepared in both English and Afrikaans. The information reflected on the notice board will also correspond with the written notices circulated to Interested and Affected Parties to ensure clarity regarding where the documentation can be accessed. Thank you for pointing this out to us.

With regard to the rezoning application, as you are aware, the Environmental Impact Assessment (EIA) process and the land use application are separate regulatory processes administered by different authorities. While these processes may run concurrently, as far as we are aware, in practice, the Municipality will generally require an approved Environmental Authorisation (EA) *before finalising* the land use application. So according to our understanding the EA must first run its course before the rezoning is finalised.

Should you require further clarification on the rezoning process, we recommend directing those queries to the Mossel Bay Municipality or the appointed town planner responsible for the land use application.

Thank you again for your participation. We appreciate the time taken to review the documentation and provide input.

Kind regards



Natalie Sharp

Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAASA (7237)

RE: Participation Process : Proposed Residential Development on portion 38 remainder of farm 136 Tergniet. Reference: G-BA-EIA-L9



Christa Vreugdenburg <christa.vreugdenburg6@gmail.com>

To: Natalie Sharp

Follow up. Completed on Tuesday, March 24, 2026.

You replied to this message on 3/24/2026 11:20 AM.

This message was sent with High importance.

This message is part of a tracked conversation. Click here to find all related messages or to open the original flagged message.



Mon 3/9/2026 2:57 PM



Good day Natalie,

Thank you for your reply.

Attached please find some comments from the Dolphin Crescent Paraat IAPs for your records.

Regards

Chris Vreugdenburg (on behalf the Dolphin Crescent Paraat IAPs)

Rezoning of portion 38 remainder of farm Tergniet – comments from Paraat Group

“TERGNIET DEVELOPMENT” – COMMENTS BY THE IAP (Dolphin Paraat Group)

ITEM	Sub Heading	Concerns	Action Required	Recommendation/Request	Progress
1. Environmental Impact Assessment	1.1. Compliance	We are concerned that rezoning of the land will take place before the EIA	None	We recommend that rezoning is only approved after the EIA We are aware that the processes may run concurrently.	
			Evaluate EIA	We request a peer review of the EIA conducted by the Municipality by a Consultant of the residents' (IAPs) choice. (At the Municipal expense)	
		We take exception in the manner the PPP has been conducted thus far.	Ensure adequate Liaison between IAPs, Municipality and Developer	Extend PPP period if necessary	
	1.2.Flora	Was the cumulative impact of deforesting of all developments between Great Brak River and Monte Christo taken into account? (During the past 10 years) An EIA can not be done be done in isolation	A total/combined impact assessment is required.	a) A summary/ inventory of all Complexes/Developments that were established, or those that are being established in the past 10 years between Great Brak River and Monte Christo. (New applications should also be included.) The document must contain the following information: i)The number of units per complex. ii)Total amount of hectares that were deforested for all these Developments together.	
		In the Application Document a number of protected plant species have been identified which will be protected. Who is going to monitor	Ensure compliance	The municipality and developer must provide a proper monitoring process and keep record of any deviances.	

ITEM	Sub Heading	Concerns	Action Required	Recommendation/Request	Progress
		that?			
	1.3. Fauna	The Specialist Terrestrial Biodiversity and plant species theme site sensitivity verification report indicates the Terrestrial Biodiversity theme as having a Very High sensitivity. e.g . Wild life, like Mongoose, Cape Grysbok, Porcupines, Mammals, Tortoises that were roaming our area freely in 2015 have virtually disappeared. Bird species like Dik Koppies, Vlei Loerie, Jakkals Voëls and many other birds have virtually disappeared. The proposed Tergniet development will reduce their habitat even further	The Municipality and/or the Developer clarify this to this IAP.	If our understanding of this issue is correct the development cannot continue.	
	1.4. Dust pollution	Dust liberation/pollution especially during development phase. NB : During development of Zandhoogte dust suppression and control, was totally ignored which endangered the health of the residents and caused major inconvenience especially over the festive season 2023. Complaints to the Municipality and Developer were totally ignored.	Ensure adequate preventative/ control measures as well as monitoring programs are clearly specified in the EIA document.	a) The developer must submit a comprehensive action plan to minimise the liberation of dust. b) Deforesting must be done in phases to minimise the potential dust liberating surfaces. c) The Developer and/ or the Municipality must offer us an effective DISPUTE/COMPLAINT RESOLUTION mechanism or forum, which we can use during the construction phase of the development to resolve complaints and disputes from us as an IAP. Consider to appoint an	

ITEM	Sub Heading	Concerns	Action Required	Recommendation/Request	Progress
				arbiter to resolve all complaints/ disputes during the construction phase.	
	1.5. Noise pollution	Noise during the development phase can be a potential problem. The ALARA principle must be strictly applied. Work must be conducted as stipulated in Municipal By-Laws on Saturdays, Sundays and Public holidays	Ensure it is included in the standard procedures.	a)The Developer and/ or the Municipality must offer us an effective DISPUTE/COMPLAINT RESOLUTION mechanism or forum, which we can use during the construction phase of the development to resolve complaints and disputes from us as an IAP. Consider to appoint an arbiter to resolve all complaints/ disputes during the construction phase.	
		Noise after completion. Most residents in the area purchased properties in the area for peace and tranquillity. The addition of 133 units will definitely have a negative impact on existing home owners and holidaymakers. (We accept December is an exemption)	The Home Owners Association must ensure compliance.	a) Ensure this adequately addressed in the Home Owners Association regulation.	
2. Roads and traffic	2.1.Peak hour/Holiday season traffic	In the Application document traffic flow is described as very slight traffic. We as an IAP disagree. Traffic in during peak hours, as well as during peak holiday season is definitely not very slight, and congestion is experienced on some days.	Re-evaluate the traffic flow pattern.	a) Explain to the IAP what how traffic flow as determined. b) Were physical studies and counting conducted?	

ITEM	Sub Heading	Concerns	Action Required	Recommendation/Request	Progress
	2.2. Limited access and entrance points to Tergniet, Kleinbrak, Fraaiuitsig and Reebok to the R102	We are of the opinion that this a serious safety risk. Some members of this IAP had close encounters at these intersections. A number of accidents have already occurred at these intersections.	Re-evaluate the traffic pattern	Provide IAP with a comprehensive traffic impact study. Consider road circles. (Four way stops and robots as an alternative but not as feasible.)	
	2.3. Access points to the complex	We are concerned that the gravel road adjacent to Dolphin crescent entrance will be used as temporary access to the development area, whilst the main access points from Impala road are being established. This will cause major dust and noise pollution. We are totally opposed against this.	Residents must be informed if this is part of the planning.	Authorities must consult with residents before this takes place in order to implement mitigation action. e.g. Dust allaying of the road	
	2.4. Pedestrian and Cycling safety	A vast amount of residents, holiday makers and general workers are walking to the beach (with their dogs), or to their places of work on a daily basis. It is also a very popular cycling route. We are concerned that the main entrances to the new Tergniet complex from Robertson avenue especially on days when municipality refuse trucks are operating will put people at risk e.g. A cyclist travelling at 40-50kph have no chance of survival if a vehicle enters the road in front of him/her.	Mitigating factors required	a) Provide the IAP with mitigating factors and action plan. b) Design safe crossings for pedestrians and cyclists.	

ITEM	Sub Heading	Concerns	Action Required	Recommendation/Request	Progress
3. Infrastructure Sewerage, Water , Electricity, Storm water	3.1. Water supply Capacity	We are very concerned that there will not be sufficient water to service the new Tergniet and Zandhoogte complexes . During past holiday season we experienced low water pressure and received warning notices from the Municipality to minimise water usage. Two weeks later water restrictions were implemented.	Verify capacities starting at the Wolwedans dam. The complete domestic water supply strategy must be reviewed. Appendix E16 does not address the complete water supply system and the requirements of that document is not in line with other documents.	In our opinion, the critical water situation on its own, is reason enough to shelve the project. Residents want assurance in writing that the additional 343* dwellings s will not have a negative impact on our electricity, sewerage and water supply. *Zandhoogte, Tergniet and other areas's calculations can't be done in isolation.	
	3.2. Storm water	Storm water drainage is a major concern. Properties, especially Dolphin Crescent 7 is regularly flooded by storm water . Stormwater from Dolphin crescent and Impala/Blesbok road from Zandhoogte development comes down to no 7 Dolphin crescent and drains out through the sewage station into the newly development stands. Will the new catchment dams in the new development be able to accommodate all the storm water during a rain storm?	Verify adequacy. We noticed with concern that the Streets and Stormwater Department was not represented at the pre –application meeting held on 22 November 2024	The total storm water drainage system must be reviewed redesigned if required.	

ITEM	Sub Heading	Concerns	Action Required	Recommendation/Request	Progress
	3.2 Sewerage	We have noticed a 'potential' bottle neck in the Sewerage reticulation system on the discharge side of the Tergniet pump station. Appendix B1.7 (110 mm diameter discharge pipe too small)	We noticed with concern that the Sewerage Department was not represented at the pre – application meeting held on 22 November 2024	Engineering Department to investigate and additional piping to be installed if necessary .	
4. Nature and Social	4.4. Nature and social interaction	We are of the opinion that the social interaction and a harmonious balance between nature and current residents will be negatively impacted. Many residents in the area bought their properties because of the views and tranquillity that the area offers. This cannot be looked at in isolation. The cumulative effect of all the developments during the past 10 years as a must be cumulative considered. Without absolute approval from all the current neighbours of the development, permission for rezoning cannot be granted by the municipality. Our interpretation of the By Laws is that even if one of the	The cumulative effect of all the developments during the past 10 years as a must be cumulatively considered.	Ensure compliance to Municipal B-Laws with regards to rezoning. a) A summary/ inventory of all Complexes/Developments that were established, or those that are being established in the past 10 years between Great Brak River and Monte Christo. (New applications should also be included.) The document must contain the following information: i)The number of units per complex. ii)Total amount of hectares that were deforested for all these Developments together.	

ITEM	Sub Heading	Concerns	Action Required	Recommendation/Request	Progress
		neighbouring/adjacent houses object, the blanket approval cannot be granted.			

1)The Municipality— (a) must record all departures, consent uses or other permissions granted and non-conforming uses in the register; (b) may keep the register from the date of commencement of the zoning scheme in an electronic format; and (c) must make the register available to members of the public for viewing.

RE: Participation Process : Proposed Residential Development on portion 3...

 **Natalie Sharp**
To:  Christa Vreugdenburg
3/9/2026

 This message is part of a tracked conversation. [Click here to find all related messages or to open the original flagged message.](#)

Good day Ms. Vreugdenburg,
Thank you for the comments. We will not be able to reply to all today, but will formulate an appropriate response in due course.
Your participation is appreciated.

Kind regards

 **Natalie Sharp**
Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAIAsa (7237)

RE: Participation Process : Proposed Residential Development on portion 38 remainder of farm 136 Tergniet. Reference: G-BA-EIA-L9

 **Natalie Sharp**
To:  Christa Vreugdenburg
Cc:  Ankia De Lange
Tue 3/24/2026 11:21 AM

 This message is part of a tracked conversation. [Click here to find all related messages or to open the original flagged message.](#)

 Letter to Dolphin Paraat Group.pdf
342 KB

Good day Ms Vreugdenburg,

Thank you for your participation in the pre-application public participation process and for submitting your comprehensive comments and concerns.

Your comments will be captured and addressed in the Comments and Response Report to be included in the next Draft BAR (Version 2), which will be made available for review once the application has been submitted to DEADP.

Please find attached our detailed response to the concerns raised. The Environmental Management Programme (EMP) has also been updated where necessary in response to these inputs.

We note that you also submitted a list of members of the Dolphin Paraat Group, including contact details. Some of the handwritten information was unfortunately unclear, and we have been able to confirm the details for all individuals except AG Nieuwoudt.

We would appreciate your assistance in providing the correct contact number and email address for this individual, should it be available.

We trust that the above is in order. Should you require any further clarification, please do not hesitate to contact us.

Kind regards

 **Natalie Sharp**
Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAIAsa (7237)

Letter to Dolphin Paraat Group

Dolphin Paraat Group
Tergniet Resident

24 March 2026
Ref: 16/3/3/6/7/1/D6/35/0133/25

RESPONSE TO COMMENTS RECEIVED ON THE DRAFT DOCUMENTS DURING THE PRE-APPLICATION PUBLIC PARTICIPATION PROCESS OF AN ENVIRONMENTAL ASSESSMENT FOR A PROPOSED RESIDENTIAL DEVELOPMENT OF 5.96HA ON PORTION 38 OF FARM NO. 136, TERGNIET, WESTERN CAPE. APPLICANT: MR. P. DE CLERK

We acknowledge receipt of the comments submitted by the Paraat Group (I&APs) and appreciate the time and effort taken to review the Draft Basic Assessment Report (DBAR). The concerns raised have been considered in detail in conjunction with the specialist studies and applicable legislative requirements. Responses are provided below.

1. Environmental Impact Assessment Process

1.1 Concern: Rezoning prior to EIA approval

It is noted that concerns have been raised regarding the sequencing of the rezoning and Environmental Impact Assessment (EIA) processes.

In terms of South African planning and environmental legislation, it is not uncommon for land use planning processes (such as rezoning) and environmental authorisation processes to run concurrently. However, it is important to emphasise that:

- No development may commence without Environmental Authorisation (EA) in terms of the National Environmental Management Act (NEMA).
- Any planning approval does not override the requirement for EA, nor does it authorise the commencement of listed activities.

The EIA process therefore remains the legally binding decision-making process in respect of environmental impacts.

Concern: Request for independent peer review

The EIA process has been undertaken in accordance with the NEMA EIA Regulations (2017, as amended) and includes:

- Independent specialist assessments (botanical, faunal, aquatic, agricultural, heritage, civil and traffic)
- Public Participation Process (PPP)
- Review by the competent authority (DEADP)

All specialist studies were undertaken by independent, SACNASP-registered professionals, who have declared no conflict of interest.

The competent authority (Department of Environmental Affairs and Development Planning – DEADP) is responsible for reviewing the adequacy of the assessment and may request additional information or peer review where deemed necessary. It is not the Municipality, although they are regarded as Interested and Affected Parties and are requested to make comment on draft documents.

Concern: Public Participation Process (PPP)

The submission of a rezoning application is handled by a town planner and regulated by the Municipality. A public participation process is required, which to our knowledge was conducted. The submission of an environmental authorisation application is handled by the Environmental Assessment Practitioner (EAP), which is Digital Soils Africa in this case, and is regulated by the DEADP.

Please note that this is a *pre-application* public participation phase (PPP) that is not required by law, however was conducted. The pre-application PPP was conducted in accordance with Regulation 41–44 of the EIA Regulations, including:

- Notification of registered I&APs and authorities
- Provision of access to the DBAR and specialist reports
- Prescribed commenting periods

All comments received, including those from the Paraat Group, will be included in the Comments and Responses Report.

Once the application is submitted to DEADP, another round of PPP will commence for 30 days and will be conducted in accordance with Regulation 41–44 of the EIA Regulations. All comments received will be added to the Comments and Responses Report and submitted as part of the Final BAR.

The EAP remains committed to maintaining transparent communication throughout the process and trust that this will satisfy your request of extended PPP.

1.2. Concern: Cumulative impact of development in the area

The concern regarding cumulative impacts is noted and is valid in principle.

The specialist assessments and DBAR considered:

- The transformed and fragmented nature of the surrounding landscape

-
- Existing residential development surrounding the site
 - The site's position within the urban edge

The botanical and land-use analysis confirms that the site is already subject to edge effects and surrounding development pressures, with remaining vegetation largely confined to internal portions of the site.

While cumulative impacts are acknowledged, the development is proposed within an area already identified for urban infill and expansion in the Mossel Bay SDF.

With respect to the request for a detailed inventory of all developments within the broader Great Brak River to Monte Christo area over the past 10 years, it is noted that such a regional, cumulative dataset falls beyond the scope of a project-specific EIA and is typically addressed at a strategic planning level (e.g. municipal SDFs and spatial biodiversity planning).

Notwithstanding this, the specialist assessments confirm that the site occurs within a landscape that has been historically transformed and is currently influenced by surrounding residential development, resulting in reduced ecological connectivity, fragmentation, and pronounced edge effects. Historical imagery and site assessments indicate that the property and its surrounds have undergone significant land-use change over time, with the site becoming increasingly isolated as surrounding areas have been developed.

The vegetation on site is described as a disturbed but recovering mosaic of Hartenbos Dune Thicket, with evidence of past transformation and ongoing invasive species pressures, which further reflects the altered ecological condition of the site.

While the site falls within a Critical Biodiversity Area (CBA 1) and supports an Endangered vegetation type, the specialist assessments recognise that the ecological functioning of the site is influenced by its fragmented and modified landscape context.

From a planning perspective (separate from the specialist findings), the site is located within an existing urbanising environment and within the defined urban edge, where infill and expansion are anticipated in terms of the relevant municipal spatial planning frameworks.

The cumulative impact is therefore acknowledged but, based on the specialist findings and the existing land use context, is not considered to result in unacceptable additional ecological loss at a landscape scale, subject to the implementation of recommended mitigation measures.

Concern: Loss of flora and protected species

The concern regarding the “Very High” sensitivity rating for the terrestrial biodiversity theme is noted.

It is important to clarify that the “Very High” sensitivity identified by the DFFE Screening Tool represents a preliminary, risk-based trigger intended to ensure that specialist assessments are undertaken. It does not in itself preclude development, but rather indicates that a detailed specialist investigation is required.

In response to this, both terrestrial faunal and botanical specialist assessments were undertaken for the site.

The faunal specialist assessment confirms a HIGH sensitivity for the site, primarily due to the presence and potential occurrence of Species of Conservation Concern (SCC) and the presence of suitable thicket habitat. However, the assessment does not conclude that development cannot proceed. Instead, it identifies potential impacts and provides mitigation measures, including the incorporation of habitat corridors and the retention of natural open space areas to reduce impacts on fauna.

Similarly, the botanical and terrestrial biodiversity assessment confirms that the site supports Endangered Hartenbos Dune Thicket and falls within a Critical Biodiversity Area (CBA 1). At the same time, the report also recognises that the site has been historically transformed and currently represents a disturbed but recovering vegetation system, with moderate ecological importance in parts of the site. The assessment includes a full impact evaluation, as well as mitigation and layout recommendations to minimise ecological loss.

Importantly, the proposed development layout has been refined in response to the specialist findings, including a reduction in unit numbers and the incorporation of ecological corridors and natural open space areas to maintain some level of habitat connectivity and ecological function.

In terms of the EIA process, the decision on whether development may proceed is not based on the screening sensitivity alone, but on the outcomes of the specialist assessments, impact significance ratings, and the effectiveness of proposed mitigation measures.

The specialist studies therefore do not indicate that the site is unsuitable for development, but rather that development must be carefully designed and implemented to manage and minimise ecological impacts.

Thus, mitigation and design responses include:

- Reduction of units from 144 to 133.
- Adjustment of layout to avoid protected trees.
- Retention of open space areas and ecological corridors (Option C layout).
- Retention of natural open space areas.
- Controlled construction practices.
- Environmental awareness and management through the EMPr
- An Ecological Control Officer (ECO) will be appointed if the application is approved and will do the monitoring and environmental auditing that is required with such developments and normally part of the conditions of approval, if it is approved.
- Monitoring will be in compliance with the Environmental Management Plan.

Concern: Monitoring and compliance

Monitoring requirements are clearly defined in the Environmental Management Programme (EMPr), including:

- Appointment of an Environmental Control Officer (ECO)
- Monitoring of vegetation clearing and protected species
- Implementation of mitigation measures during all project phases

Compliance is therefore not left unmanaged but forms part of a structured and enforceable system.

Concern: Dust and Noise Pollution

The concern regarding dust and noise generation during the construction phase is noted and understood, particularly in light of past experiences in the area.

Dust and noise generation is recognised as a typical short-term impact associated with construction activities such as site clearing, earthworks, and vehicle movement. As such, this impact was assessed as part of the Basic Assessment process and is addressed in detail within the Environmental Management Programme (EMP).

The EMP includes specific mitigation and management measures to prevent and control dust emissions during construction. These measures include, but are not limited to:

- Regular wetting of exposed surfaces and access roads during dry and windy conditions
- Limiting the extent of cleared areas at any given time (phased clearing)
- Covering of stockpiles where required and minimising the duration of stockpiling
- Speed control of construction vehicles on site and on access roads
- Prompt stabilisation or rehabilitation of disturbed areas
- Proper management of construction activities during high wind conditions.

The EMP prescribes specific mitigation measures to manage and minimise noise impacts, including:

- Restricting construction activities to standard working hours in accordance with municipal by-law
- No construction activities on Sundays and public holidays, unless otherwise authorised
- Ensuring that all machinery and equipment are maintained in good working order to minimise noise emissions
- Avoiding unnecessary idling of vehicles and equipment
- Locating high-noise activities as far as practicable from neighbouring properties

In addition, the implementation of the EMP will be overseen by an Environmental Control Officer (ECO), who will be responsible for complaints received and resolve of such complaints, monitoring compliance

and ensuring that mitigation measures are effectively implemented throughout the construction phase. A residential representative or forum can be chosen or established prior to development and through the representative or forum together with the ECO compliants can be lodges and resolved.

Through the implementation of the prescribed mitigation measures and monitoring mechanisms contained in the EMP, dust and noise related impacts are expected to be effectively managed and reduced to acceptable levels in accordance with the requirements of the National Environmental Management Act (NEMA).

With respect to operational noise, the proposed development constitutes residential land use within an already established urban area. As such, the anticipated noise levels are consistent with typical residential activities and are not expected to exceed acceptable levels or introduce abnormal noise sources into the area.

In addition, compliance with applicable municipal by-laws relating to noise control will be required during both the construction and operational phases. Your request for Home Owners Association to monitor and take responsibility for noise once operational has been added in the EMP.

Through the implementation of the EMP and adherence to relevant legislation, noise-related impacts are expected to be effectively managed and limited to acceptable levels.

Concern: Roads and Traffic

The concerns raised regarding roads and traffic are noted and addressed as follows:

Traffic flow was determined through a detailed Traffic Impact Assessment (TIA) that was attached as Appendix G8 in the Draft Documents and was undertaken by a qualified traffic engineer. The assessment was based on both physical traffic counts conducted on site and standard South African methodologies. Traffic counts were undertaken during the weekday morning (06:00–08:00) and afternoon (16:00–18:00) peak periods on a normal working day to establish existing traffic conditions. These baseline volumes were then combined with development-generated traffic (calculated using TMH17 trip generation rates) and future growth projections (3.5% per annum) to assess a conservative future scenario (2030).

The study included a capacity analysis using SIDRA Intersection software, which confirmed that both affected intersections will continue to operate at a Level of Service A (free-flow conditions) during peak hours, with negligible impact from the proposed development. Based on this, no additional intersection upgrades (such as traffic circles) are required from a traffic engineering perspective.

With regard to access and safety, the proposed access from Impala Road has been assessed as acceptable in terms of spacing, visibility, and functionality. Provision is made for adequate stacking distance at the entrance, and the access design accommodates emergency and service vehicles.

The concern regarding the use of the gravel road adjacent to Dolphin Crescent is noted and the EMP has been updated accordingly. The TIA indicates that a separate contractor's access is not required due to the relatively small scale of the development. Should temporary access arrangements be required during construction, this will be managed in terms of the EMP, which includes measures to control dust, noise, and traffic movement. Affected residents will be informed accordingly if such temporary measures are implemented.

Pedestrian and cyclist safety is acknowledged. The development is located within an existing residential area where traffic volumes are low and speeds are controlled. Notwithstanding this, mitigation measures include safe access design, appropriate visibility at intersections, and internal road layouts that promote low vehicle speeds. Should the Municipality require additional measures such as pedestrian crossings, these can be considered as part of the detailed design phase.

Overall, the TIA confirms that the proposed development will not result in unacceptable traffic or safety impacts on the surrounding road network, including during peak periods.

Concern: Infrastructure – Sewerage, water, electricity and storm water

The concerns regarding infrastructure capacity (water, sewer, electricity and stormwater) are noted and addressed as follows:

A detailed bulk services capacity assessment was undertaken by GLS Consulting Engineers, together with supporting municipal confirmations. The development forms part of a planned future development area (U40) that was already considered in the Mossel Bay Municipal Water and Sewer Master Plans .

Water supply:

Bulk supply originates from the Sandhoogte Water Treatment Works via the Tergniet reservoir system. The assessment confirms that there is sufficient bulk supply capacity and reservoir storage to accommodate the proposed development, with the Tergniet reservoir providing approximately 97 hours of storage under full demand conditions . The only identified constraint relates to fire flow capacity, which requires a planned pipeline upgrade (200 mm diameter), as already identified in both the engineering report and confirmed by the Municipality . This upgrade forms part of the required engineering conditions for the development and will be implemented accordingly.

Sewerage:

The municipal confirmation indicates that there is sufficient capacity within the existing sewer reticulation system to accommodate the development . The detailed engineering assessment further confirms that downstream gravity sewer capacity is adequate . The development will include a private pump station and rising main, designed to required standards, which will connect into the existing system and manage flows appropriately. This addresses potential constraints within the existing network, including the Dolphin Crescent / Tergniet pump station system.

Electricity:

An electrical services report was undertaken in consultation with Mossel Bay Municipality. The development will be connected via a new medium-voltage (MV) ring network, including new mini-substations and upgraded infrastructure, ensuring adequate and reliable supply. The required capacity (approximately 1000 kVA) has been calculated and will be formally applied for and secured from the Municipality, with all upgrades forming part of the development cost and implementation.

Stormwater management:

Stormwater management has been incorporated into the site design and civil engineering planning. The development includes engineered stormwater attenuation measures (catchment ponds/detention areas) designed to manage runoff and reduce peak flows. The aquatic assessment confirms that no natural watercourses occur within the site and that stormwater can be managed on-site without impacting downstream systems, subject to the implementation of appropriate design and mitigation measures. Stormwater will be controlled to mimic pre-development runoff conditions and prevent erosion or flooding impacts.

Overall capacity assurance:

The combination of:

- confirmed municipal service availability
- detailed engineering capacity assessments required infrastructure upgrades (where identified)
- and implementation through approved engineering designs

ensures that the proposed development will not result in unacceptable impacts on existing water, sewer, electricity or stormwater systems.

All infrastructure upgrades and connections will be subject to municipal approval and will be implemented as part of the development, ensuring compliance with applicable engineering and environmental requirements.

Concern: Nature and social

The concerns regarding cumulative impacts on both the natural and social environment are noted.

Cumulative impacts were considered as part of the Basic Assessment process and informed by the specialist studies, which assessed the site within its broader landscape and development context. The assessments confirm that the site forms part of an already transformed and urbanising environment, with surrounding residential development, existing infrastructure, and reduced ecological connectivity. The site is therefore not functioning as an intact, undisturbed system, but rather as part of a fragmented landscape subject to ongoing development pressures.

From a biodiversity perspective, while the site falls within a CBA and supports Endangered vegetation, the specialist studies evaluated the significance of impacts in a cumulative context and provided mitigation measures, including the retention of ecological corridors and open space areas, to reduce further loss of ecological function.

From a social perspective, the development is consistent with the existing residential character of the area and is located within the defined urban edge, where infill and expansion are anticipated in terms of municipal spatial planning frameworks. The development does not introduce a new or incompatible land use, but rather contributes incrementally to an already established settlement pattern.

With respect to the request for a detailed inventory of all developments in the broader area, it is noted that such cumulative regional analysis is typically addressed at a strategic planning level (e.g. SDFs and municipal planning processes), rather than within the scope of a project-specific EIA. Notwithstanding this, the current assessment has considered cumulative effects at a site and local scale, and no unacceptable cumulative impacts have been identified, subject to the implementation of the recommended mitigation measures.

We trust that the above responses adequately address the concerns raised in your submission. The assessment has been undertaken in accordance with the applicable legislative requirements and informed by specialist inputs.

Should any further clarification be required on specific technical aspects, this can be provided.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'N Sharp', enclosed within a circular scribble.

Natalie Sharp

Pri.Sci.Nat (Reg nr. 123443)

Reg. EAP (EAPASA)

Member of IAIAAsa (7237)

Re: PRE-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25...



Andrea Beierle <andreabeierle27@gmail.com>

To:  Natalie Sharp



3/6/2026

 You replied to this message on 3/23/2026 1:44 PM.



Tergniet EIA Objection.odt
40 KB

Tergniet EIA Objection

2 March 2026

Digital Soils Africa
45 Church Street
Walmer
6070

**REGISTRATION AS INTERESTED AND AFFECTED PARTY AND COMMENTS ON THE PROPOSED RESIDENTIAL DEVELOPMENT OF 5,6HA ON PORTION 38 OF THE FARM NO 136 TERGNIET WESTERN CAPE
DEA&DP PRE-APPLICATION REFERENCE NO: G-BA-EIA-L9**

Kindly note that I, Andrea Beierle, contact details andreabeierle27@gmail.com herewith wishes to register as interested and affected party in terms of the above-mentioned Application. I own a property adjacent from the proposed development and will therefore be directly impacted by the proposed development.

Please include me in all future correspondence.

Also find attached my comments on the Application and Supporting documents:

Draft Basic Assessment Report (DBAR)

The Report displayed on the EAP's website showed the following anomalies:

1. Details of the Applicant: The Applicant is not clearly identified in the Application:

- The advert in Mossel Bay Advertiser dated 6 February 2026 states the proponent is Mr. Pieter de Clerk;
- The copyright reservation refers to Piet de Clerk; and
- The Landowner information differs in the DBAR relative to the signed landowner's consent (Appendix E-21). In the DBAR the landowners are given as Marthinus Theodorus Janse van Rensburg and Martha Maria Aletta Jansen van Rensburg with an address in Belfast, Mpumalanga but the landowner consent form is signed by Charles Ochre located in Durbanville, Cape Town.

2. The date of the Application and supporting reports:

The cover page of the Report states February 2026, but the footer of the document and various other references in the Report reads April 2024.

3. The EAPASA registration number of the Environmental Assessment Practitioner (EAP) undertaking the Basic Assessment process is not displayed on the Notice or newspaper advert as is required in terms of the Environmental Impact Assessment Regulations as amended.

4. The size of the development should be confirmed – 5ha vs 10ha in the municipal application.

5. The reference number in the advertisement referred to in paragraph 1 above mentions the pre-application number: G-BA-EIA-L9, whilst a different reference number is provided on the Draft Basic Assessment Report (DBAR). Similarly, the reference on the Background Information Document is also given as G-BA-EIA-L9.

This reference number is incorrectly used. Whilst the PPP guideline issued by the national department¹ notes that it is not obligatory to wait for a reference number from the Competent Authority before undertaking notification activities, it follows that where a reference number has been provided, this ought to be used in all PPP-related communication. This has not been done.

6. It is clear from the cover page of the DBAR that DEA&DP has issued a reference number. The reference number on the cover of the report is in the format that the DEA&DP use.

COMMENTS ON THE PUBLIC PARTICIPATION PROCESS (PPP)

The use of different reference numbers and title of the application raises a material and fundamental problem in the context of the PPP. The covering letter that was provided with the Background Information Document (BID) is headed as follows: **“PRE-APPLICATION: PUBLIC PARTICIPATION PROCESS...”** and the BID itself refers to an “intent” to submit an environmental application. Given the DEA&DP Reference Number provided on the cover page of the Draft Basic Assessment Report (DBAR), characterising the PPP as being “pre-application” is incorrect and misleading. This means the PPP is flawed from the outset as is shown in the following points:

7.1. It is clear that the Basic Assessment process commenced more than two years prior to the notifications inviting I&APs to register and comment on the DBAR were issued. This fact is evidenced by the date of the DBAR, being April 2024. This indicates that the PPP has been severely compromised and even more concerning, that the spirit and intent of public participation have not been met.

7.2. On page 43 of the DBAR the following statement is made: “Comments received in response to the Pre-Application Draft Basic Assessment Report will be considered and incorporated in the Draft Basic Assessment Report once the application is submitted.” This is a misrepresentation of the facts.

7.3. It is evident from page 6 of the DBAR that it was completed in April 2024 – refer to the date in the footer of the report and the dates when specialist studies were undertaken (e.g. botanical field work took place in 2024). The 2024 version of the DBAR was not subject to public comment. There is no evidence of notification of this report and there is no record of any PPP, including by relevant authorities, such as a Comments and Responses Report.

8. There is no evidence that key stakeholder departments have been consulted, such as SANBI and CapeNature. This is a material gap, given the ecological sensitivity of the site as discussed further in this objection:

¹ Department of Environmental Affairs (2017), Public Participation guideline in terms of NEMA EIA Regulations, Department of Environmental Affairs, Pretoria, South Africa.

The 2023 Western Cape Biodiversity Spatial Plan (WCBSP) has been formally adopted through publication in the Provincial Gazette. It is inconceivable that it would be considered unnecessary to obtain input from CapeNature as early as possible in the Basic Assessment process.

9. The feedback from the DEA&DP in response to the application submission is not provided. This is not acceptable. I&APs have a right to have access to the feedback from the Competent Authority – this must be part of the PPP.

10. According to the DEA&DP Guideline², a 21-day period should be provided for I&APs to register their interest after the environmental application has been submitted and accepted by the DEA&DP. DSA have not followed this process. Instead, an invitation to register as an I&AP and to comment on the DBAR has been collapsed into a single step in the PPP, despite the fact that the Basic Assessment process commenced some 2 years ago. This compromises the PPP and it affects the rights of I&APs negatively, because I&APs have been deprived of the opportunity to raise their concerns at an early stage in the Basic Assessment process.

11. From the foregoing points, it is clear that I&APs have been denied the opportunity to raise their concerns and comments on the proposed development for almost 2 years while the Basic Assessment process has been underway. This is indefensible. It is accepted practice to allow I&APs the opportunity to participate in the pre-application phase of an environmental assessment process. This is because pre-application is focused on screening, that is, identifying issues of concern and potential impacts that require consideration in the assessment. The screening tool developed by the national department (Department of Forestry, Fisheries and the Environment – DFFE) is one aspect of screening, Input from I&APs (including relevant authorities and agencies) is an important tool for identifying concerns, as well as for accessing local knowledge in relation to environmental issues.

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT AND SPECIALIST STUDIES

Biodiversity Specialist Studies

12. The incorrect reference to the most recent National Vegetation Map is used in the Terrestrial Biodiversity (Botanical) specialist study (page 15). The 2018 version is cited, where the most recent version is 2024.

13. There are several information inconsistencies and inaccuracies in the DBAR. For example, it is stated that the site falls within the Southern Cape Dune Fynbos (page 48). This is factually incorrect and does not correlate with the information in the Terrestrial Biodiversity (Botanical) Specialist Study dated December 2025 (note that the footer in this report shows a date of September 2025).

14. There is no consideration in either the Draft BAR or Terrestrial Biodiversity (Botanical) Specialist Study to the of the fine-scale vegetation mapping undertaken by Vlok and colleagues for the CAPE Programme – a programme specifically concerned with the Cape Floristic Region.

² DEA&DP (2013) Guideline on Transitional Arrangements, EIA Guideline and Information Document Series. Western Cape Department of Environmental Affairs & Development Planning (DEA&DP), March 2013.

15. According to the Terrestrial Biodiversity (Botanical) Specialist Study dated December 2025, a single field survey session was conducted on the 8th of April 2024. This is almost 2 years ago, which means there has been ample time for additional surveys. This is a significant gap - The fact that no further surveys were conducted means that only the autumn season has been covered. The effort to identify indigenous species and especially the presence of Species of Conservation Concern (SCC) is inadequate, especially as the specialist acknowledges (page 37) that the habitat on the site could support SCC.

16. It is stated in the Terrestrial Biodiversity (Botanical) Specialist Study that “trigger reasons for the 2023 layer are not yet available.” This statement is in reference to the 2023 Western Cape Biodiversity Spatial Plan (WCBSP) and it is factually incorrect - The 2023 WCBSP was published in the Provincial Gazette in December 2024, which allows at least a year for the specialist report to be updated and accuracy checked. Furthermore, had CapeNature been consulted, these “triggers” would have been quickly and readily revealed.

17. Also, from the Terrestrial Biodiversity (Botanical) Specialist Study is the following statement: “The no-go alternative, while avoiding direct habitat loss, maintains existing pressures on the site and contributes little to long-term conservation of Hartenbos Dune Thicket or land-use certainty.” This statement stands to be rejected with the disdain it deserves.

17.1. It fails to recognise the role of CBAs in meeting conservation targets, among other objectives.

17.2. Furthermore, there has been no consultation of conservation and biodiversity authorities (e.g. CapeNature, DEA&DP Directorate: Biodiversity and Coastal Management).

17.3. The fact that an intense development footprint is proposed which will cover most of the site with hard development (houses, paved areas, roads etc.) will cause irreversible loss of sensitive biodiversity. Once the habitat on the site has been removed to make way for development and replaced with a built residential areas and associated infrastructure, it is lost in perpetuity. It is considered improbable that the limited amount of “green space” will sustain ecological processes and serve as adequate habitat for fauna and flora, given the extent of the development footprint and the degree to which existing connectivity will be disrupted.

18. The Terrestrial Biodiversity (Botanical) Specialist Study notes that recovery of the Hartenbos Dune Thicket is being hindered by invasive species, which indicates the following:

18.1. The landowner and/or the person in control of the land is not complying with the alien vegetation control legislation.

18.2. It also shows poor land stewardship, especially as the specialist notes that: “....recovering patches of thicket are doing very well without any intervention so far.” In other words, active management of alien invasive vegetation would assist and enhance the recovery of the Hartenbos Dune Thicket.

18.3. It follows that alien vegetation control, which is legally required, is required to facilitate recovery of the site which is designated as a CBA and on which there is an endangered ecosystem being the Hartenbos Dune Thicket.

18.4 Failure to implement the legally required alien vegetation control poses a risk of further degradation of a CBA and endangered ecosystem. The fact that invasive alien species have are present cannot be used as a basis for downgrading the biodiversity sensitivity of the site. Quite the contrary in fact. The Terrestrial Biodiversity (Botanical) Specialist Study states the following (page 39): “Although the current condition is not pristine, the vegetation contributes meaningfully to the local ecological network and the broader conservation objectives for this ecosystem.”

18.5. The ‘no go option’ is incorrectly framed as “the site is left in the current state.” (page 37 of the Terrestrial Biodiversity (Botanical) Specialist Study. Given the presence of alien invasive species, the ‘no go option’ must be based on fulfilment of alien invasive control legal obligations, allowing restoration of the Hartenbos Dune Thicket, especially given that this is an endangered ecosystem and the site is designated as CBA.

19. The discussion on Site Ecological Importance (SEI) in the Terrestrial Biodiversity (Botanical) Specialist Study does not take cognisance of the full range of facts that ought to be considered. As a result, the significance of the site has been downplayed and its importance is underrated as a result.

19.1. The determination of the SEI as ‘medium (page 52) relies heavily on the fact that the site is “heavily invaded by invasive species” and that the population of the SCC *Hermannia lavandulifolia* on the site is not significant. The scientific criteria or rationale that was applied to determine the importance of the SCC population is not provided.

19.2 According to information from the Red List (<https://redlist.sanbi.org/species.php?species=1852-127>) this species “...is declining due to severe, ongoing habitat loss and degradation. Based on the observed rate of habitat loss...” and “*Hermannia lavandulifolia* has lost nearly 80% of its habitat to crop cultivation in the past, and this loss continues. It is also threatened by habitat loss to coastal development between Stilbaai and Plettenberg Bay. Subpopulations on the southern Cape coast are also threatened by competition from dense infestations of alien invasive plants.” It is recognised that the species is common “It is still common in spite of extensive historical habitat loss, but continues to decline. It has lost 8% of its habitat between 1990 and 2014, and based on the observed rate of loss, a population reduction of 31% over three generations (60 years) is inferred.” This species was upgraded from Least Concern (in 2009) to Vulnerable (2020).

19.3. In the Terrestrial Biodiversity (Botanical) Specialist Study the following claim is made about *Hermannia lavandulifolia*: “This SCC will soon be downgraded to Near Threatened, and there is a chance that this SCC will be removed from the Red List entirely.” No scientific or research reference is provided so the source of this information is unknown. If a claim such as a change in the Red List status of this species is to be made and used in an impact assessment, it is imperative that this is based on verifiable and scientifically thorough research.

19.4. Another factor that is used to rate the SEI as ‘medium’ is that “The property has also recently been isolated in an existing residential development, where most connections to wider open spaces have been significantly compromised.” This contradicts information provided elsewhere in the specialist study regarding the important ecological role of the site (refer to point 18.4 in this submission).

19.5 The designation of the site as CBA has not been taken into account and neither has the evidence of persistence and recovery of Hartenbos Dune Thicket. Similarly, the contribution of the site to the local ecological network (refer to point 18.4 in this submission) is also ignored.

20. The 2021 guidelines for the Albany Thicket Biome, within which the Hartenbos Dune Thicket ecosystem falls is not referenced. This guideline shows Hartenbos Dune Thicket as Least Threatened and poorly protected. The status of Hartenbos Dune thicket has changed and it is now classified as Endangered (since the revised list of Threatened Ecosystems was published in 2022). In addition, the ecological threat status of the site itself has been upgraded from to Least Threatened in the 2017 WCBSP to CBA in the 2023 WCBSP. These factors point to a material change in the site's ecological importance and conservation value status, making development such as that proposed, wholly inappropriate.

21. The Terrestrial Animal Species Specialist Assessment lists several SCC in Table 5. It is stated that a single site visit was undertaken on 13 June 2025 (described as late autumn – page 17). This is inadequate, especially as factors such as breeding patterns and migration are generally season-dependent.

22. It is stated that camera traps were placed on the site for a week to augment field information. No dates for the deployment of camera traps are given, which shows an inadequate level of scientific rigour and record keeping. Assuming this was done at the time of the field visit in June, this information is of limited value in covering seasonal patterns.

23. The site sensitivity rating of HIGH and the rating of the SEI do not correlate. It must be noted that the protocol states that areas with a high sensitivity rating for the animal species theme, are not suitable for development.

24. The Terrestrial Animal Species Specialist Assessment states (page 8) that the “Bontebok National Park contains all known populations of the subspecies in the Western Cape.” Besides the fact that no reference is given, this statement is factually incorrect. This shows an inadequate level of scientific research, even at a basic desktop level and hence insufficient scientific rigour. What is of greater concern is how the distribution of Bontebok has been misused to downplay the significance of the Hartenbos Dune Thicket and CBA present on the site.

24.1. It is stated in several instances in the DBAR (e.g. pages 4, 31 and 36) that the CBA designation for the property is due the potential of the site to act as refuge for the Bontebok. This statement appears to arise from the Terrestrial Animal Species Specialist Assessment (page 8) where reasons for the assignment of CBA to the site are discussed. No references are provided, which means the source of this information is not known. Suffice to say that the points listed in the specialist study, including those that are greyed out appear to be of no relevance to the site. Canca Limestone Fynbos and Groot Brak Dune Strandveld are mentioned, neither of which are noted for the site in the WCBSP.

24.2. Further to the above point, the claim that CBA status has been attributed to the site because of its potential to act as refuge for the Bontebok is misdirected and shows a fundamental misunderstanding of the purpose of CBAs and the criteria for their selection. CBAs would be designated for an area on the basis of a single criterion, yet this is how the DBAR presents the situation.

24.3 On page 36 of the DBAR, the following statement is made: “During the 2017 WCBSP the site was classified as “Other Natural Areas”. However, this classification was changed in the 2023 WCBSP to CBA 1 status due to the potential of the site to function as a Bontebok refuge area.” No reference is given for this statement.

24.4. The Bontebok rationale for designating the site as CBA is then taken further, by using it to discount the CBA status of the site. This is achieved by statements such as this in the DBAR (page 38): “Although the site is not suitable for Bontebok, it is still rated as CBA1 on the system....”. This approach is regarded as disingenuous and the entire rationale for discounting the validity of the CBA designation for the site stands to be rejected with the disdain it deserves.

25. Despite the claim in the DBAR that the design and infrastructure placement phase will take account of the location of Milkwood trees, Cheesewood trees, the contrary is true. The layout shows that trees will need to be removed as they are located within the footprint of a housing unit. This shows that the proposed development has not responded adequately to the environmental sensitivities present on the site. It should be the other way around – residential plots should be placed so as to avoid all protected trees.

Impact Assessment Table

26. I do not agree with the impact ratings in this table, where all the factors are not represented in the table and the report, resulting in lower impact ratings. For example:

26.1. The provision for the habitat corridor along the southern side: this provision is totally inadequate, since the area provided for will be part of the fenced area and will therefore isolate the adjacent undeveloped areas. Based on the status of the surrounding natural and undeveloped areas, this rating should have been a high impact.

26.2 The development will result in the death of various species. This impact is unavoidable and should therefore be high.

26.3 Further to the above point, loss of vegetation is discussed and it is stated that there will be permanent loss of between 51 and 55% of the remaining and transformation of at least 67 to 70% of the site. In terms of residual impacts – it is stated there will be none. This is incorrect. The residual impact is high because of the level of permanent loss of vegetation and the extensive transformation of the site. Clearly, the potential for mitigation is LOW. It therefore follows that the significance rating after mitigation cannot be LOW(-ve), as this does not follow sound scientific logic.

26.4 The impacts on the loss of “secondary” Hartenbos Dune Thicket. This endangered ecosystem is not described as “secondary” anywhere else in the Terrestrial Biodiversity (Botanical) Specialist Study until it comes to the impact discussion starting on page 30 of that report. In terms of the WCBSP, the term “secondary” is applied to CBA2 (degraded CBA). Most of the site is CBA1, with some areas of CBA2 – this has been verified on Cape Farm Mapper and the CBA layers were last updated in May 2025.

26.5 The result of the approach to the assessment of biodiversity impacts is that CBAs have not been considered. A search of the impact table shows that CBAs are not mentioned. Instead, loss of vegetation and characterising the Hartenbos Dune Thicket as “secondary” has been applied. This serves to minimise biodiversity sensitivity and hence downplay the impacts of the proposed development on biodiversity.

26.6. Accordingly, the impacts on the CBAs and the endangered ecosystem have been inadequately addressed and the significance ratings in the impact table insofar as biodiversity impacts are concerned are understated, unreliable and stand to be rejected.

27. References to the fact that the land was previously disturbed – the report concludes that as a result of the time lapse the land should be regarded as undisturbed. Although invader plant infestations occur on the property, this does not affect the fact that endangered and protected species occur on the property. It does not negate the sensitive status of the property. It was the obligation of the property owner to eradicate the invader plants in terms of the National Biodiversity Act and the failure of the landowner to fulfil their legal obligations does not change the status of the indigenous and flora.

28. Further to the above statement, there is a heavy reliance on the site showing disturbance and the presence of alien invasive species to characterise it as “not pristine” in the Background Information Document (BID). This approach results in the significance of impacts on biodiversity being understated.

29. The proposed movement corridor does not take cognisance of the terrestrial animals of which some species are or conservation concern. The proposed movement corridor is not adequate for the flight patterns of the birds, butterflies and small mammals. The habitat of these species is already significantly reduced by the other developments in the area such as Seegenot and Zandhoogte estates. The estates are in close proximity of each other and isolate the movement of especially the small mammals. This fact is totally underplayed in the application and supporting specialist reports.

30. Heritage Impact: Although there are no heritage resources in the area of the proposed development, the development borders on a number of the oldest (and remaining) houses in the Reebok area. Completion of the development as proposed will result in isolation of these resources and will destroy its heritage value.

31. The property is zoned as agricultural land and will result in sub-division of agricultural land in terms of the Subdivision of Agricultural Land Act (SALA). The application contains no reference to this requirement or whether the application was submitted to the Department of Agriculture for approval of this activity. Note that this restriction applies even if the land is situated in a municipal area. This contention is supported by a legal opinion from VDM Attorneys. The Department is also not listed under the interested and affected parties.

32. The statement on page 33 of the DBAR regarding provision of housing opportunities: The suburbs of Tergniet, Reebok, Fraaiuitzicht and Klein Brak River are characterised by its rural feel. Recent and planned developments in its immediate surrounds already threaten to destroy this character. The current and already approved, but still to be constructed developments will provide adequate need if not resulting in an oversupply for housing and due to the presence of the endangered species and potential for animal movement this area should be left undisturbed - In a radius of 5km of the proposed development there are not less than 7 new developments (existing, in progress and planned, but already approved). Another 133 housing units are not required.

33. If the mitigation hierarchy had been applied, then the development proposal in its current form would be rejected, based on the biodiversity sensitivity. The management objectives and conservation objectives for CBAs and endangered

ecosystems are not met by the development proposal. Moreover, it is considered impossible to meet these objectives based on the intense development and coverage that is proposed.

34. The visual impact and impact on sense of place have not been assessed.

35. In terms of residual impact, a rating of “none” is given for every single impact in the Impact Table. This demonstrates a fundamental misunderstanding of the meaning of “residual impact”.

35.1. Residual impacts are **the impact/s of a proposal that are expected to remain after the application of the mitigation hierarchy**. If there is irreplaceable loss of resources and /or an adverse impact cannot be fully mitigated or reversed, then it follows that there has to be a residual impact / effect. It is a failure of the Basic Assessment process that a central element of that process (i.e. determination of impact significance) has been misrepresented.

35.2 There are many guidelines and published research on how impact significance ought to be determined. It is quite clear that the following must be true. An impact that is recognised as being unmitigatable (i.e. irreversible) is the transformation of ecosystems, vegetation types, CBAs (to name a few examples). Another is transformation of sense of place. In the context of environmental impact assessment and where development is proposed on an undeveloped site, the very word transformation speaks to loss of resources. Once a scenic view is transformed by development, this is permanent. Similarly, once vegetation is removed and replaced by hard development, this change is permanent.

35.3 Given the above points, the significance rating of impacts is incomplete, inaccurate and cannot be relied upon.

Need And Desirability

36. The need and desirability component of the DBAR (Appendix K) cannot be relied upon because it is inconsistent with specialist studies and with factual information. For example, the following is stated “Because the site is not a CBA or ESA and is already disturbed, the impact on regional biodiversity patterns is low.” (Table 0.1, Item 1.1 and 1.2). This statement is factually incorrect since the site is designated as CBA as noted elsewhere in these comments. In addition, it is stated that the site does not “overlap with any threatened ecosystem as Section 52 of NEMBA.” Also 2.6 - Wrong

37. In terms of benefits of the proposed project, the following statement is made (page 2 - Employment and Economic Benefits of the Residential Alternative): “The total job opportunities expected to be created by the proposed project is estimated to be approximately 15 000 (13 000 skilled and 2000 unskilled) during the construction phase and around 1010 during the operation phase.” No research is cited to support these job creation figures. The assumptions that inform these figures are not given. It is questionable as to whether the job creation figures are accurate or even realistic.

Alternatives

38. The alternatives that have been proposed are variations on a theme. None of them are responsive to the environmental sensitivity of the site. All involve an intense level of development footprint. The reduction from 158 to 144 units to 133 units does nothing to reduce the impact.

38.1. The fact that the 3 alternatives do not differ in terms of environmental impacts is clear from the Impact Table. For each impact, almost every criterion has the same rating across all 3 alternatives.

38.2. Most notable is the fact that the post-mitigation (with mitigation) significance rating for every impact that has been considered is the same for all 3 alternatives.

38.3. Absent from the consideration of alternatives is the very obvious option of a low-intensity development proposal that is more in keeping and respectful of the site's environmental sensitivities.

39. Item 2 under point 5 on page 37 – the size of open space and green corridors incorporated in the design layout is totally inadequate to retain the integrity of the dune thicket and the corridors required to ensure movement of the sensitive species in this area. The number of units are too high and the size of the erven are way too small to maintain the biodiversity requirements.

40. item 5, page 38: the statement in respect of no impact on listed ecosystems is not true – I have indicated on more than one occasion that the site is primarily covered by endangered dune thicket and milkwood trees – it is not clear how many protected trees will ultimately be removed. I can therefore not agree with the closing statement in this paragraph that the proposal is environmentally compatible with the area's biodiversity context, when this context is ignored in specialist studies.

41. The application does not mention that water supply structures in the area are under pressure – the Garden Route is an official water scarce area (at the time of the public participation process the area is suffering from a drought and strict water restrictions are in place). Yet another development in this area will only place the water supply infrastructure under additional pressure. The proposed development also does not incorporate any water recovery measures, resulting in another water intensive development in an almost oversaturated area.

42. The application does not mention any climate change impacts – the loss of biodiversity, increased concrete structures or the carbon footprint of the development. This is totally out of sync with recent developments in environmental impact management.

43. I do not agree with the traffic impact study results – Robertson Street, which is the main access route for both sides of the development cannot handle the additional traffic on the roads and the impact of the increased vehicle emissions on the plants in the area will prove to be catastrophic.

Alignment With Municipal and Provincial Spatial Plans

44. The current provision for open space areas in the proposed development is totally inadequate – it does not leave adequate space for faunal movement or continued existence of the endangered Hartenbos Dune Thicket. I therefore do not agree that the proposed development supports the local municipality's spatial development framework in avoidance of sensitive biodiversity areas and maintenance of ecological corridors.

45. The applicants did not take cognisance of the fact the Municipality's Spatial Development Framework (SDF) is currently under review (full awareness that this document is a living document), the document has not been updated to reflect the declaration of the Hartenbos Dune Thicket as endangered and it is furthermore not aligned with South Africa's commitments in terms of the Kummig/Montreal Framework whereby 30% of the world's conservation areas should be expanded by 30% by 2030. The proposed development area poses an excellent opportunity to contribute to this commitment.

46. The Mossel Bay Municipality's SDF of 2022 ignores sensitive habitats such as the Hartenbos Dune Thicket and declares areas where this ecosystem occurs as suitable for development. I object to that and wonder why a biodiversity assessment was not done for the area between Klein Brak River, the Reebok, Tergniet, Fraaiuitsig and Great Brak River to determine the ecological importance of the area as was done for the Aalwyndal case study.

47. I also question the accuracy of the claim that the proposed development is consistent with the Mossel Bay SDF, in particular, the claim that (page 48 of the DBAR): "The area is designated for managed residential infill within the urban edge, but with strict protection of coastal ecological corridors." is considered an inaccurate interpretation. Consistency with the Mossel Bay SDF is based on singling out one criterion (i.e. that the property is designated for residential infill within the urban edge etc.) is inadequate. What has been ignored is the inconsistency with Section C of the Mossel Bay SDF, namely ENVIRONMENTAL MANAGEMENT VISION AND DIRECTIVES dated 2023.

47.1. Not all land within the urban edge is open to development. Areas set aside for conservation and as 'green spaces' are an important component of the urban fabric and also fall within the urban edge. The high sensitivity of the site from a biodiversity perspective ought to be prioritized, rather than the fact that it is situated within the urban edge, even if the land has not been adequately maintained, resulting in degradation of biodiversity condition. This is not a sound reason for motivating or justifying development.

47.2. According to Section C of the Mossel bay SDF, the applicable Environmental Management Zone (EMZ) / Spatial Planning Category (SPC) is that of "Controlled Zone." This EMZ / SPC was established so as to ensure "sustainable development on landscapes that can withstand marginal impacts." Heritage and scenic resources that are important to society for sense of place and an element of wilderness are included in this zone. Development within Other Natural Areas (ONAs) may be permitted. Protection of irreplaceable resources (conservation zones). ONAs consist of land that is of less biodiversity importance. Unlike the CBAs, the ONAs do not need to be protected in order to meet biodiversity thresholds, therefore allowing for controlled development to occur. Conservation and tourism orientated developments should be promoted within the buffer area." Refer to page 56 and 57. Section C of the Mossel Bay SDF is available at:

<https://www.mosselbay.gov.za/storage/documents/1d672d4536e39c8797abdd2f855a585e.pdf>

48. The area is indicated as a sensitive area in the provincial spatial framework. Due to the fact that the municipal development framework is not updated, it does not correspond with the provincial legislation. The municipal framework cannot override the provincial framework.

49. I do not agree with the statements under point 4.4, item 5 on page 37 in respect of reinforcement of the Tergniet settlement – this area is oversaturated; it is a handbook example of ribbon development along the shoreline, it does not reduce pressure on sensitive coastal ecosystems – on the contrary, it places the sensitive ecosystem under increased pressure to the brink of extinction of the species in the development area, it does not avoid fragmentation of the natural coastal corridor – once again, it is a prime example of this point.

50. I do not agree with the statements under point 5 item 1: it is evident from that the development will not avoid sensitive biodiversity areas and it will destroy the ecological corridor. I cannot see how the construction of artificial stormwater drainage systems will keep the natural drainage patterns intact and removal of endangered plant species will not result in destruction of the ecological corridor. The conclusion under this item that sensitive habitats will be avoided is furthermore not true – 10 ha of endangered dune thicket will be destroyed and the number of milkwood trees that will be retained is a disgrace.

I refer to Seegenot Appeal Decision dated July 2025, where it was concluded (point 4.6.2), that the development will result in fragmentation of the area and result in the loss of an endangered ecosystem type and contribute towards a cumulative loss of Hartenbos Dune Thicket which over time can lead to a negative change in the conservation status of this vegetation type.

CONCLUDING REMARKS

Finally, given the information inaccuracies and misrepresentations in the DBAR and the associated specialist reports that I have noted in these comments, it is clear that the sensitivity of the environment and the significance of impacts of the proposed development on the environment have been materially understated.

I wish to highlight the impact of the development on an area that is naturally rehabilitating itself as recorded in the reports – proceeding with the proposed development will result in a total destruction of this process and permanently reverse the progress made over the past years. Removal of alien vegetation as required in terms in the Alien and Invader Species Regulations in terms of the National Environmental Management: Biodiversity Act does not pose a risk to this natural recovery process.

In conclusion, I strongly object against the proposed development, for the following reasons:

- the impact assessment is oversimplified;
- it is watered down in large parts of the impact assessment;
- the application is superficial;
- partly factually incorrect and
- ignores various laws and environmental management practices.

I also agree with the authors in the article in the George Herald dated 12 August 2025 that sensitive areas are particularly at risk when EIAs fail to account for shifting development footprints and increased impact levels.

Finally, the DBAR and the impact assessment process that has been followed is materially flawed. It also does not meet the requirement to provide accurate, comprehensive and well-researched information. To name but two examples: (i) there is contradictory and incorrect factual information; and (ii) the level and frequency of field work is wholly inadequate. The DBAR does not meet the requirements of the legislation in many respects, including public participation, independence and objectivity of the assessment process. Due diligence would be expected where a sensitive environment is involved. The NEMA principles, including the precautionary principle and the mitigation hierarchy have been inadequately applied. The application as it is set out in the DBAR and associated documents cannot be accepted.

Yours sincerely

Andrea Beierle

Concerned Tergniet Resident

RE: PRE-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25...

NS

Natalie Sharp

To

Andrea Beierle

😊

↶

↷

➡

👤

...

3/9/2026

Good day Ms Beierle,
Thank you for your participation in the public participation.
We will work through the comments and objections and respond in due time.

Kind regards

NS

DSA

Natalie Sharp

Reg.EAP (EAPASA)

Pri.Sci.Nat (Reg No 123443)

Member of IAIAsa (7237)

RE: PRE-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25...

NS

Natalie Sharp

To

Andrea Beierle

😊

↶

↷

➡

👤

...

Mon 3/23

📎

Letter to Andrea Beierly_reponse.pdf

457 KB

Good day Ms. Beierly,
Please find our response to your comments and objections.
Kind regards

NS

DSA

Natalie Sharp

Reg.EAP (EAPASA)

Pri.Sci.Nat (Reg No 123443)

Letter to Andrea Beierle

Andrea Beierly
Tergniet Resident

23 March 2026
Ref: 16/3/3/6/7/1/D6/35/0133/25

RESPONSE TO COMMENTS RECEIVED ON THE DRAFT DOCUMENTS DURING THE PRE-APPLICATION PUBLIC PARTICIPATION PROCESS OF AN ENVIRONMENTAL ASSESSMENT FOR A PROPOSED RESIDENTIAL DEVELOPMENT OF 5.96HA ON PORTION 38 OF FARM NO. 136, TERGNIET, WESTERN CAPE. APPLICANT: MR. P. DE CLERK

Thank you for registering as an Interested and Affected Party (I&AP) and for providing detailed comments on the proposed residential development on Portion 38 of Farm 136, Tergniet. Your comments are noted and addressed below.

1. Applicant and landowner details:

The applicant's name will be corrected to reflect the full name Mr Pieter de Clerk in the next revision of the report. Any discrepancies relating to landowner information will be clarified and confirmed by the Applicant in the next revision of the report.

The property is owned by two parties within the same family: a 1/6 share is held by the Janse van Rensburg family, while the remaining 6/7 share is owned by Heanesch (Pty) Ltd, whose members are Peter Carlisle, Charmaine de Klerk, Estelle Ochse and Hersel Pepler. Mr Charles Ochse has been formally mandated to act on behalf of all property owners, and a copy of this mandate will be included in the DBAR. In turn, Mr Pieter de Clerk has been authorised by Mr Ochse to act on behalf of the owners and to undertake all actions necessary for the application process, including the preparation, submission and signing of documentation required to obtain environmental authorisation for the proposed residential development. This approach is standard practice in instances involving multiple landowners or where an application is submitted by a representative. The postal addresses of the individual members are not material to the application, as they reside in various locations across South Africa. The DBAR(v2) will be updated to clearly reflect and clarify these arrangements.

2. Date reflected in the DBAR:

The reference to April 2024 in the footer of the report relates to the DEA&DP Basic Assessment Report template date, which indicates the version of the reporting template issued by the Department and does not reflect the date the DBAR was submitted for comment. The Draft Basic Assessment Report (DBAR v1) itself was distributed in February 2026 for the pre-application public participation process.

3. EAPASA registration number:

The Environmental Assessment Practitioner's EAPASA registration number will be displayed on the site notices and advertisements during the next round of public participation.

4. Development footprint vs property size:

The property extent is approximately 10.1362 ha, as reflected in the project description. However, the actual development footprint will be approximately 5–6 ha, as parts of the property are constrained by existing infrastructure such as Robertson Avenue and associated servitudes, which are not developable.

5–6. Reference numbers used:

Two different reference numbers appear in the documentation:

- G-BA-EIA-L9 – DEA&DP fee reference
- 16/3/3/6/7/1/D6/35/0133/25 – DEA&DP file reference

Both refer to the same project. To avoid confusion, the DEA&DP file reference number will be used consistently in future documentation.

7. Status of the process (Pre-Application):

The current process is a pre-application Basic Assessment process. The environmental application has not yet been formally submitted to the competent authority. The DEA&DP reference number was issued following submission of a Notice of Intent (NOI) and discussions held during a pre-application meeting in 2025.

To clarify further, a Notice Of Intent (NOI) to submit an environmental authorization was submitted to DEA&DP on 10 April 2025. This was supported by various draft reports including a Site Sensitivity Report. The Department responded to the NOI on 15 May 2025 and an in-person pre-application meeting was arranged for 3 June 2026 where the response from the DEA&DP was discussed. During the pre-application meeting DEA&DP indicated that a pre-application public participation process must be conducted before the application is submitted, this was done and the Draft BAR was released for comment between 6 February 2026 – 9 March 2026.

7.1 Timing of studies:

Certain site sensitivity and baseline investigations were undertaken in 2024 as part of a due-diligence and feasibility phase for the client. These studies informed the decision to proceed with the environmental assessment and allowed specialist studies to be conducted in accordance with the applicable protocols.

7.2 Status of the DBAR:

The DBAR (v1) is the first draft released for comment during the pre-application phase. At this stage, no comments had yet been received and therefore none could be incorporated. Comments received during this phase will be recorded and responded to in the Comments and Response Report and incorporated into the next revision of the report.

7.3 Previous point addressed:

This matter has been addressed under points 7 and 7.1 above.

8. Consultation with authorities:

Consultation with relevant authorities forms part of the ongoing environmental process. Evidence of consultation and all comments received will be included in the updated DBAR (v2) and the accompanying Comments and Response Report, which will be made available to registered I&APs.

9. Feedback from DEA&DP:

DEA&DP has been informed of the proposed development through the Notice of Intent submission and pre-application engagement. Comments received from the Department on the Site Sensitivity Report were discussed during the pre-application meeting, as discussed previously. DEA&DP has also been provided with the DBAR (v1) for comment.

10. Registration of I&APs:

The competent authority has been informed of the proposed development during the pre-application phase. The current process provides an opportunity for stakeholders to register as I&APs and submit comments early in the process, which will be incorporated into the application documentation once the formal application is submitted.

11. Opportunity for participation:

Registered I&APs have been provided with access to the DBAR (v1) and supporting documents and have been given the opportunity to submit comments. The intention of the pre-application process is specifically to allow early stakeholder engagement and identification of issues prior to formal submission of the environmental application.

12. Reference to National Vegetation Map

Thank you for noting this oversight. Our sincere apologies for the incorrect citation of the National Vegetation Map version. The original baseline report was compiled prior to the release of the 2024 National Vegetation Map, and unfortunately the reference was not updated when the subsequent impact assessment report was prepared. This omission is acknowledged.

Section 3.1 of the methodology has now been updated to correctly reference the 2024 National Vegetation Map, and an updated vegetation map has been included in the report. The revised mapping confirms that the site still falls within the Hartenbos Dune Thicket, which remains classified as Endangered. No changes to the assessment findings arise from this update.

13. Vegetation type referenced in the DBAR

The vegetation types referenced in the DBAR will be reviewed against the specialist report to ensure consistency. Any typographical or referencing inconsistencies will be corrected in the next revision of the report. The specialist report has also been reviewed and updated where necessary, and the footer date has been corrected to reflect the revised submission (March 2026).

14. Fine-scale vegetation mapping (Vlok mapping)

Thank you for this comment. Consideration of the fine-scale vegetation mapping undertaken by Vlok and colleagues for the CAPE Programme is included in the Terrestrial Biodiversity (Botanical) Specialist Study. This is discussed in Section 4.1.2, where the relevant vegetation types from the Vlok vegetation map are described. Specifically, the assessment area corresponds primarily with “Hartenbos Strandveld”, with a small portion along the southern boundary mapped as “Hartenbos Primary Dune.”

15. Botanical field survey timing

Thank you for this comment. The report has been updated to clarify that two site visits were undertaken as part of the assessment. The initial botanical survey was conducted on 8 April 2024, and a second site visit was undertaken on 20 June 2025, during which the site was revisited together with the faunal specialist. The report has been amended to include this additional survey date.

While it is correct that the primary botanical survey occurred during the autumn season, the assessment of Species of Conservation Concern (SCC) is not based solely on seasonal detectability of flowering plants, but also on habitat suitability, vegetation structure, and known distribution records for the area. These factors were evaluated in the specialist assessment to determine the likelihood of SCC occurrence within the study area.

The field observations, combined with habitat assessment and available spatial biodiversity datasets, were considered sufficient to evaluate the presence or likelihood of SCC and to inform the impact assessment. No additional information obtained during the second site visit altered the conclusions of the assessment.

16. Western Cape Biodiversity Spatial Plan (WCBSP)

Thank you for this comment. At the time the assessment was undertaken, the Western Cape Biodiversity Spatial Plan (WCBSP) 2023 spatial layer was available, but the associated “reasons” or trigger layer explaining the basis for the mapped categories was not publicly available through the standard data portals used for specialist assessments.

CapeNature was contacted in 2025 to request clarification regarding these trigger reasons; however, the detailed reasons layer is still not publicly available. The statement in the report therefore reflects the availability of the supporting datasets at the time of the assessment and remains accurate.

Notwithstanding this, the assessment incorporated the WCBSP 2023 spatial categories in the sensitivity verification and impact assessment. The conclusions of the specialist assessment therefore remain unaffected.

17. No-go alternative

The statement referenced in the Terrestrial Biodiversity (Botanical) Specialist Study was intended to contextualise the ecological implications of the no-go alternative within the current land-use setting of the property. The intention was not to diminish the conservation importance of the vegetation type, but rather to indicate that the absence of development does not automatically translate into active conservation management or improved ecological outcomes for the vegetation on site.

17.1. CBAs and conservation targets

The role of Critical Biodiversity Areas (CBAs) in achieving biodiversity conservation targets is recognised and forms part of the spatial biodiversity datasets considered during the assessment. The statement in the report does not dispute the conservation function of CBAs; rather, it reflects that the designation of an area as a CBA does not in itself guarantee formal protection or active management, particularly where land remains under private ownership and existing land-use pressures may continue. The assessment therefore considered both the biodiversity importance of the vegetation type and the realistic land-use context of the site.

To add in this discussion, a new section was added to the botanical and terrestrial biodiversity report called “9. CONTEXT OF CRITICAL BIODIVERSITY AREAS AND SCALE MISMATCH”

17.2. Consultation with CapeNature, DEA&DP

Consultation with conservation authorities such as CapeNature and the DEA&DP Directorate: Biodiversity and Coastal Management forms part of the broader environmental assessment process and was conducted during the Draft BAR review process in this pre-application public participation process. No comment from either Departments were received.

The role of the botanical specialist study is to provide an independent ecological assessment based on field surveys, spatial biodiversity datasets, and available literature. The conclusions of the specialist study were derived using these sources of information.

17.3. Loss of sensitive biodiversity

Thank you for this comment. The specialist study recognises that the proposed development would result in the permanent transformation of most of the natural vegetation currently present on the property, and this impact is explicitly acknowledged and assessed in the report. The irreversible loss of habitat within the development footprint forms a central component of the impact assessment.

The assessment therefore considered not only the development footprint itself, but also the broader Project Area of Influence (PAOI), which includes adjacent areas where ecological processes may be affected through edge effects, fragmentation, and changes in connectivity. As discussed in the report, the site is already located within an urbanised and fragmented landscape in Tergniet, with existing barriers such as surrounding residential development, Robertson Avenue, and the railway line limiting ecological connectivity.

The report further acknowledges that the remaining natural vegetation contributes to the local network of open space within the area and that any additional fragmentation should be approached with caution, particularly given the Endangered status of Hartenbos Dune Thicket. For this reason, mitigation measures were proposed to retain habitat pockets, protect mature trees, manage invasive species, and incorporate a biodiversity corridor within the preferred development option in order to maintain some degree of ecological connectivity and habitat function within the site.

The conclusion that residual impacts are of Minor significance following mitigation is based on the site-specific ecological condition, the Medium Site Ecological Importance (SEI) determined for the property, the already fragmented landscape context, and the limited contribution of the site to the regional

extent of the vegetation type, rather than an assumption that habitat loss would be negligible. These considerations are discussed in detail in Sections 9 and 10 of the specialist report.

It is correct that the property will likely no longer contain adequate habitat for most fauna. Provision is made for the inclusion of a corridor with fences equipped with gaps which wild fauna would use, maintaining the connectivity of the landscape. Site Ecological Importance for the faunal theme reveals that the site itself does not serve irreplaceable habitat function for species of conservation concern as given in the legislative mandate under which specialist studies are conducted.

18–18.5. Alien vegetation

The Terrestrial Biodiversity (Botanical) Specialist Study documents the presence of invasive alien plant species as an ecological observation. The assessment did not evaluate or make findings regarding legal compliance of the landowner with alien vegetation control legislation, as compliance monitoring falls outside the scope of the specialist ecological assessment.

Furthermore, mitigation measures and environmental management actions, including alien vegetation management where applicable, are included in the Environmental Management Programme.

18.2. Land stewardship

The report notes that certain patches of vegetation are showing natural recovery where invasive species pressure is limited, which highlights the ecological resilience of the vegetation type. This observation was included to illustrate the vegetation dynamics on site and does not imply a judgement regarding land stewardship. The study also recommends ongoing invasive species management as part of the mitigation measures and long-term site management.

18.3. Required to facilitate recovery of the site which is designated as a CBA.

The report recognises the Endangered status of the Hartenbos Dune Thicket vegetation type and acknowledges the biodiversity importance of the site within the local ecological network. Invasive alien plant management is identified as an important management action for maintaining and improving ecological condition, and this is reflected in the mitigation measures and management recommendations provided in the report.

18.4 The legally required alien vegetation control poses a risk of further degradation of a CBA

The presence of invasive alien species was not used to downgrade the biodiversity sensitivity of the site. The sensitivity ratings determined through the applicable environmental assessment protocols remain Very High for the Terrestrial Biodiversity Theme and High for the Plant Species Theme, as stated in the report.

The Site Ecological Importance (SEI) rating of Medium reflects the current ecological condition and landscape context of the site, which is a standard component of ecological assessment methodologies and does not alter the protocol sensitivity ratings assigned to the vegetation type.

18.5. The ‘no go option’ is incorrectly framed as “the site is left in the current state.”

While improved invasive alien plant management could enhance ecological recovery of the vegetation over time, such restoration interventions typically require active and sustained management effort,

technical capacity, and financial resources. In practice, invasive species control on privately owned land is often implemented incrementally and may vary depending on available resources and management priorities.

It is also well recognised in ecological management literature that invasive alien plant control in thicket and dune systems typically requires repeated clearing and long-term follow-up interventions, and vegetation recovery is often gradual and dependent on sustained management over time. For this reason, the no-go alternative in the assessment was not framed as a fully resourced ecological restoration scenario, but rather as the continuation of the current land-use and management context, which is the standard approach in environmental impact assessment.

19. Site Ecological Importance (SEI)

The Site Ecological Importance (SEI) assessment in the Terrestrial Biodiversity (Botanical) Specialist Study was conducted using a structured evaluation framework incorporating Conservation Importance (CI), Functional Integrity (FI), and Receptor Resilience (RR), informed by the Vegetation Assets, States and Transitions (VAST) framework. These factors were assessed together to determine the ecological importance of the site within its current landscape context.

The SEI rating was therefore not determined by a single factor, but by the combined consideration of vegetation condition, landscape connectivity, species occurrence, ecosystem status, and recovery potential, as described in Section 7 and summarised in Table 8 of the report.

19.1. The determination of the SEI

The SEI determination does not rely solely on the presence of invasive species or the population size of *Hermannia lavandulifolia*. These elements form only part of the broader SEI evaluation framework.

The importance of the *Hermannia lavandulifolia* population on the site was assessed in relation to the known distribution and ecological behaviour of the species, which is widespread along the southern Cape coastal belt and typically occurs in disturbed habitats and road verges. The individuals recorded during the survey were located primarily within a road verge habitat subject to ongoing disturbance and maintenance, which limits the ecological importance of that specific population within the broader regional context.

The SEI rating therefore reflects the combined ecological characteristics of the site, including vegetation condition, habitat connectivity, ecosystem status, and recovery potential, rather than being based on a single species population.

19.2 Red List information

The information cited from the SANBI Red List regarding *Hermannia lavandulifolia* is acknowledged and consistent with the species' current Vulnerable (VU) conservation status. The species was accordingly treated as a Species of Conservation Concern (SCC) within the assessment and incorporated into the sensitivity and SEI evaluation.

While the species has experienced historical habitat loss across its range, it remains relatively widespread and locally common within parts of its distribution, particularly in disturbed coastal habitats. The presence of this species on the site was therefore recognised as contributing to the conservation

importance of the vegetation but does not in itself elevate the ecological importance of the entire property beyond the SEI category assigned.

19.3. The Red List status of *Hermannia lavandulifolia*:

The statement regarding the potential future reassessment of *Hermannia lavandulifolia* was based on informal expert discussions within the botanical community regarding the species' widespread occurrence and resilience in disturbed habitats. However, it is acknowledged that future Red List status changes can only be confirmed through the formal SANBI Red List reassessment process.

To avoid ambiguity, this statement has been removed from the revised report, and the assessment now refers only to the current official Red List status of Vulnerable (VU) as listed by SANBI.

19.4. The SEI as 'medium' status

The observation that the property is isolated within an existing residential landscape reflects the current fragmented spatial context of the site, which was considered as part of the Functional Integrity component of the SEI assessment.

This observation does not contradict the statement that the vegetation contributes to the local ecological network, as both statements recognise that remnant natural habitat within an urbanising landscape may still provide ecological value while simultaneously experiencing reduced connectivity relative to historical conditions. These considerations were explicitly incorporated into the SEI evaluation.

19.5 The designation of the site as CBA

The designation of the site within a Critical Biodiversity Area (CBA) and the Endangered status of Hartenbos Dune Thicket were explicitly recognised in the specialist study and formed part of the Conservation Importance component of the SEI evaluation. See the new section in the botanical and terrestrial biodiversity report before the impact assessment called "9. CONTEXT OF CRITICAL BIODIVERSITY AREAS AND SCALE MISMATCH"

The report also acknowledges the persistence and partial recovery of Hartenbos Dune Thicket on the site, as well as its contribution to the local ecological network. These factors are discussed in the report and informed the assignment of a Medium SEI rating, which reflects both the conservation significance of the vegetation type and the current ecological condition and fragmented landscape context of the site.

Closing comment on point 19: It should also be noted that the protocol sensitivity ratings determined for the site remain High to Very High, and the SEI assessment does not alter those protocol sensitivity outcomes but rather provides site-specific ecological context for impact assessment purposes.

20. Ecosystem status and biodiversity status

The specialist study recognises the current Endangered conservation status of the Hartenbos Dune Thicket ecosystem, which reflects the revised list of Threatened Ecosystems published in 2022. This updated status was taken into account in the ecological assessment and is reflected throughout the report.

The Albany Thicket Biome ecosystem guideline referenced in the comment represents an earlier ecosystem status classification, which has since been superseded by the updated national Threatened Ecosystems listing. For this reason, the assessment relies on the most recent national ecosystem status information available.

The designation of the site as a Critical Biodiversity Area (CBA) in the 2023 Western Cape Biodiversity Spatial Plan was also considered during the sensitivity verification and ecological assessment. These spatial biodiversity planning layers form part of the broader environmental context considered in the specialist study.

The determination of whether a development is ultimately appropriate within a CBA is a planning and decision-making matter for the competent authority, informed by specialist input, rather than a determination made solely within the botanical specialist study.

Terrestrial Animal Specialist Study

21. Animal field surveys

Limitations in this regard are acknowledged in Section 4.3 on Assumptions and Limitations of the Terrestrial Faunal Report. Seasonal and time of day considerations as well as the low likelihood of detection or just happenstance of observation (the species is present but happened to not be observed on this day) are considered in the assignment of likelihood of occurrence of fauna. This is evidenced by the fact that multiple SCC are given a medium likelihood of occurrence despite no direct observations of the species being made by the specialist.

22. Camera trap deployment

Thank you for this note. The report has been amended to include dates for camera trap deployment. Seasonality related and other limitations are acknowledged in Section 4.3 Assumptions and Limitations, see especially point 4.

23. Site sensitivity vs development suitability

The site sensitivity rating and Site Ecological Importance assessment are determined through different assessment frameworks and criteria. It is important to clarify that the protocol sensitivity rating and the Site Ecological Importance (SEI) assessment serve different purposes within the environmental assessment process.

The protocol sensitivity rating is derived from national spatial biodiversity datasets and represents a precautionary screening-level classification intended to trigger specialist assessment where potential biodiversity constraints may exist. It does not represent a site-specific ecological condition assessment.

The SEI assessment, by contrast, provides a site-specific evaluation of ecological importance, based on field observations and a structured assessment of Conservation Importance (CI), Functional Integrity (FI), and Receptor Resilience (RR), informed by the VAST framework. This assessment incorporates the actual condition of the vegetation, degree of disturbance, landscape connectivity, and ecological recovery potential observed on the site.

The SEI rating therefore does not replace or contradict the protocol sensitivity classification but rather provides additional ecological context to inform the impact assessment and mitigation hierarchy. The High protocol sensitivity rating for the animal species theme triggered the specialist assessment, which has now been undertaken. The results of the specialist studies then inform the environmental impact assessment and decision-making process.

24. Bontebok reference and CBA designation

Thank you for your note, this specification on Bontebok Extended Distribution Range has been amended to state the following “this theme addresses the ability of the site to support population/s of Vulnerable Bontebok (*Damaliscus pygargus pygargus*) as it forms part of the Extended Distribution Range of the species given in the Biodiversity Management Plan for Bontebok (Department of Environmental Affairs, Notice 887 of 2017). Suitable natural habitat for Bontebok is described as renosterveld patches, grassy micro-habitat patches in fynbos areas, and strandveld. None of these habitats are available at the site in sufficient amounts to support a population of Bontebok, even considering its connections to other areas in the landscape. Vegetation types outlined as suitable to support this species are given as Shale Renosterveld per the National Vegetation Map which does not characterize the present site. This theme is therefore not relevant to the site.” Information is taken from the Conservation Assessment of the species as compiled by the Endangered Wildlife Trust, upon which all unreferenced statements on mammal SCC are based. This amendment has no bearing on the outcome of the faunal report.

24.1. References and relevance

Information is taken from the Western Cape Biodiversity Spatial Plan 2017 Reasons layer (as mentioned in Section 2.3 Western Cape Biodiversity Spatial Plan of the faunal report). They are included as no reasons layer for the 2023 WCBSP has been released.

24.2. Potential to act as refuge for the Bontebok is misdirected

The reasons assigned by the 2017 WCBSP reasons layer as well as the definitions and management objectives for the CBA categories are included in the report.

24.3 The 2017 WCBSP the site was classified as “Other Natural Areas”, however, this classification was changed in the 2023 WCBSP to CBA 1

The designation of Critical Biodiversity Areas (CBAs) forms part of the regional systematic biodiversity planning process undertaken in the Western Cape Biodiversity Spatial Plan and is not determined within this specialist study. The botanical specialist report therefore does not attempt to redefine or invalidate the CBA classification of the site but instead recognises the CBA status and incorporates it into the sensitivity assessment in accordance with the applicable environmental sensitivity mapping protocol.

Faunal: The WCBSP reasons layer included in the faunal report is based on the 2017 WCBSP and is not assigned by the specialist. No reasons layer has been released for the 2023 WCBSP. No changes have been made on the basis of the site being able to function as refuge for Bontebok.

The Draft BAR will be amended accordingly.

Layout and Impact Assessment

25. Protected trees and layout design

The comment relates to the detailed placement of development infrastructure within the proposed layout. The botanical specialist study provides sensitivity mapping and mitigation guidelines intended to inform the refinement of the development layout during the planning and environmental authorisation process.

The study identifies the presence of protected tree species such as Milkwood (*Sideroxylon inerme*) and Cheesewood (*Pittosporum viridiflorum*) and recommends that these trees should be avoided where feasible during the detailed design phase. Where avoidance is not possible, the removal or disturbance of protected trees would require the appropriate permits in terms of applicable environmental legislation. The purpose of the specialist assessment is to identify ecological constraints and mitigation measures so that the final design can respond appropriately to environmental sensitivities.

The Site Development Plan considered environmental sensitivities identified during the specialist studies. The number of units was reduced from the original layout to 133 units in order to avoid sensitive areas and accommodate environmental considerations.

26. Impact assessment ratings

The impact assessment presented in the Terrestrial Biodiversity (Botanical) Specialist Study was undertaken using a standard Environmental Impact Assessment methodology in which impacts are assessed based on a combination of extent, duration, intensity, probability and reversibility, both before and after the application of mitigation measures.

The impact ratings therefore represent the outcome of a structured assessment process rather than a single factor such as the percentage of vegetation loss. The ratings presented in the impact tables reflect the combined outcome of these factors as required by the Environmental Impact Assessment framework.

The significance ratings reflect the specialist's professional judgement after considering mitigation measures, site conditions, and the extent of development impacts. All recommendations from the specialists were incorporated into the EMPr.

26.1. The provision for the habitat corridor

The proposed habitat corridor along the southern boundary was identified as a mitigation measure intended to retain some ecological connectivity within the broader landscape context. It is acknowledged that the corridor will not fully replicate the ecological function of an intact, undisturbed landscape. However, the surrounding area is already characterised by existing residential development, road infrastructure, and fragmented open space areas. The corridor is therefore considered a partial mitigation measure intended to retain some movement potential and ecological function within a modified landscape rather than a fully intact ecological linkage.

If the property is fully fenced, the fencing will incorporate openings to allow for the free movement of fauna. The Faunal Specialist Report further notes that, where such fencing is implemented, additional

mitigation measures and recommendations may be required, as outlined in Section 8.3 (Layout and Design Phase).

26.2 The development will result in the death of various species

Faunal: The mitigation measures given in the report aim to prevent the death of fauna of conservation concern which is the legislative framework within which the faunal specialist operates (see 2.2 Scope of Work). “Fauna of conservation concern” refers to as threatened animals listed by SANBI, the IUCN, Endangered Wildlife Trust, BirdLife South Africa, and peer-reviewed literature using empirical data. Nonetheless, general recommendations are given for the preservation of the welfare and prevention of death of common fauna. Habitat loss is inevitable, but mitigation measures are assigned to contain this loss to only the footprint of the development (see 8.5.2 Loss of habitat for fauna within the footprint of the proposed development) so that fauna may disperse and make use of refuges in the landscape.

While mortality of some organisms may occur during development activities, the significance of this impact is evaluated within the broader ecological context of the site and its habitat condition. Refer to the faunal specialist report. In addition, Species of Conservation Concern will need to be relocated prior to the commencement of construction as noted in the EMPr.

26.3 Permanent loss of vegetation and residual impacts

The impact assessment presented in the Terrestrial Biodiversity (Botanical) Specialist Study follows a structured Environmental Impact Assessment methodology in which impact significance is determined through the combined consideration of extent, duration, intensity, and probability, both before and after the application of mitigation measures.

The assessment acknowledges that the proposed development will result in the permanent loss of a portion of the remaining Hartenbos Dune Thicket vegetation on the site. This is clearly reflected in the pre-mitigation impact ratings, where the loss of thicket habitat is assessed as a moderate negative impact due to the permanence of the transformation and the ecological value of the vegetation.

Residual impacts refer to the remaining level of impact significance after mitigation measures have been implemented, rather than the absolute absence of impact. In this case, mitigation measures such as the demarcation of construction areas, retention of a vegetation corridor, protection and relocation of selected protected trees, search and rescue of plant material, and long-term management of invasive species are intended to reduce the extent and intensity of ecological disturbance outside the development footprint and maintain some ecological function within the site.

The post-mitigation significance ratings therefore reflect the reduced intensity and extent of impacts following implementation of these measures, while still acknowledging that a portion of the vegetation will be permanently transformed. The residual impact rating should therefore not be interpreted as indicating that no ecological loss will occur, but rather that the remaining impact significance following mitigation is lower than the pre-mitigation scenario within the context of the broader landscape and the already disturbed condition of parts of the site. As per the recommendations for the botanist, a “Search and Rescue” operation will need to take place prior to the commencement of construction. Relocation of these species to other suitable habitats and use in landscaping - therefore remaining impacts on these species will remain as per the findings of the specialist.

26.4. The impacts on the loss of “secondary” Hartenbos Dune Thicket.

The Terrestrial Biodiversity (Botanical) Specialist Study uses the term “secondary Hartenbos Dune Thicket” to describe areas of naturally recovering thicket vegetation that were historically disturbed but are now in the process of natural regeneration. This terminology does not imply that the vegetation is of lower ecological importance; rather, it reflects the vegetation’s structural condition at the time of assessment.

The assessment confirms that most of the site falls within CBA1, with some limited areas classified as CBA2. The use of the term “secondary” in the impact section is consistent with the field observations and the structural condition of the vegetation, as recorded during the May 2024 site verification and updated with reference to the Cape Farm Mapper and the latest WCBSP CBA layers.

The permanent loss and transformation of Hartenbos Dune Thicket within the development footprint, whether classified as secondary or primary in structure, is acknowledged and quantified in the impact tables, with clear pre- and post-mitigation significance ratings (Tables 13). These ratings reflect the high ecological sensitivity of CBA1 areas, the permanence of the disturbance, and the limited potential for on-site mitigation to fully replace lost ecosystem function.

26.5 The result of the approach to the assessment of biodiversity impacts is that CBAs have not been considered

The WCBSP land-use guideline for CBA1 is clear: maintain the area in a natural or near-natural state, with no further habitat loss, and allow only low-impact, biodiversity-sensitive land uses. Because the site is largely mapped as CBA1 and supports Endangered Hartenbos Dune Thicket, the acceptability of a residential layout must therefore be motivated as an exception in a fragmented urban-edge context, not as a use that is inherently aligned with the primary WCBSP management objective. The specialist assessment explicitly recognises the CBA status of the site. The approach does not ignore CBAs, but instead integrates their presence into the impact assessment methodology:

- CBA layers and designations were verified using the most recent WCBSP spatial data (2023 update), confirming that the majority of the site is CBA1, with some CBA2 areas.
- The impact assessment tables (Table 13) incorporate CBA status indirectly through the scoring of extent, intensity, duration, probability, and resource irreplaceability. For example:
 - The “Resource Irreplaceability” metric reflects the scarcity of natural open spaces and habitat connectivity in Tergniet, which is directly linked to CBA status.
 - Pre- and post-mitigation scores for habitat loss consider the permanence of transformation CBA areas.
- The report does not downplay the significance of CBAs; instead, it differentiates between:
 - Loss within the development footprint, where transformation is unavoidable, and
 - Mitigated areas outside the footprint, where ecological function can be partially maintained (e.g., corridor and open space).

While the term “secondary” is used to describe the structural condition of vegetation, the impact assessment accounts for the CBA1 and CBA2 status through its scoring and mitigation logic. The result is that the significance ratings reflect both the ecological value of CBAs and the unavoidable impacts of the proposed development, consistent with standard EIA methodology.

26.6. CBAs and the endangered ecosystem have been inadequately addressed

While some permanent loss is unavoidable, the significance ratings reflect post-mitigation residual impacts, consistent with standard EIA methodology. Residual impact is assessed as moderate where habitat is permanently transformed, but mitigation measures reduce the severity where possible. The assessment does not understate or ignore CBA value; it incorporates CBA sensitivity into the scoring criteria of extent, intensity, reversibility, and irreplaceability.

27–28. Site disturbance and invasive vegetation

The assessment considered the historical disturbance of the site together with the current ecological condition. These factors form part of the overall ecological assessment but do not imply that the site lacks ecological value. Also, historical disturbance and the presence of invasive species are used to contextualize ecological condition, not to dismiss the site's sensitivity. The site is recognised as naturally regenerating Hartenbos Dune Thicket (EN), supporting protected trees and the VU *Hermannia lavandulifolia*.

The assessment explicitly notes that despite secondary growth and invasives, the site retains high conservation value and potential to support species of conservation concern.

While the landowner has a legal obligation under NEM:BA to control invasives, the presence of invasives does not negate ecological sensitivity; mitigation measures have been proposed for both construction and operational phases to address ongoing invasion risk.

29. Habitat connectivity and wildlife movement

The corridor should be viewed as one component of broader landscape-level connectivity, recognising that full movement for all species cannot be guaranteed due to urbanisation pressures. The corridor is not considered to represent the same refuge value as the original vegetation extent for more mobile small mammals (which are not SCCs). However, it will provide habitat for the movement of wildlife, facilitating movement through the urbanised landscape between remaining natural areas. For less mobile species such as moles, their adaptability to these urbanised spaces mean that they could continue to permanently inhabit the corridor area at a reduced extent.

30. Heritage resources

The heritage specialist concluded that no significant heritage resources occur on the site and that the development would have negligible to no impact on heritage resources, subject to implementation of a chance-find procedure.

Heritage Western Cape reviewed the Notification of Intent to Develop and confirmed that no further heritage studies are required, provided that the standard chance-find procedure is included.

31. Subdivision of Agricultural Land Act (SALA)

Any approvals required in terms of the Subdivision of Agricultural Land Act will be addressed through the relevant statutory processes where applicable.

32. Housing need and economic benefits

The need and desirability assessment considers spatial planning frameworks, development context, and

socio-economic considerations. According to the Mossel Bay SDF/EMF, the fact that the site falls inside the urban edge supports consideration of infill development in principle; however, the urban edge does not in itself confer development rights. The same policy framework requires that infill occur in appropriate, less sensitive locations, that urban growth be diverted away from CBAs where possible, and that biodiversity and environmental constraints be addressed through the planning and environmental assessment processes

In this instance, although the site is mapped as CBA1 and supports Endangered Hartenbos Dune Thicket, it is located within an already transformed and fragmented urban-edge landscape, bounded by existing residential development, road infrastructure and a railway line, which limits its ecological connectivity and functional contribution at a landscape scale.

The assessment therefore does not seek to justify development based on the CBA status itself, but rather evaluates the site within its current context, where the ecological functionality has already been compromised relative to intact systems.

The proposed development has been refined to retain habitat features where feasible and incorporate a corridor to maintain some ecological function. The development is therefore presented as a site-specific planning trade-off within the urban edge, where infill pressure, existing fragmentation, and mitigation measures are weighed against biodiversity objectives, and where the final decision rests with the competent authority in balancing these considerations.

33. Mitigation hierarchy

In terms of the mitigation hierarchy (avoid, minimise, rehabilitate, offset), it has been applied within feasible limits. The assessment demonstrates that complete avoidance of impact on Hartenbos Dune Thicket is not possible given the proposed layout, but residual impacts are reduced through Option C corridor, retention of protected trees, and invasive species management. While the development cannot fully achieve CBA or ecosystem conservation objectives, mitigation is designed to minimise residual loss and maintain connectivity where feasible.

34. The visual impact and impact on sense of place have not been assessed.

It is acknowledged that the proposed development would present a change in the visual landscape in the area. However, considering the surrounding residential development, it will fit in well with the land use of the area. A Landscape Plan would be done for units, and this would address the aesthetic component of the proposed development once development. The visual impact was discussed in the DBAR, however it will be elaborated on.

35. Residual Impact

This has been addressed in previous points raised.

36. Thank you for the comment, the error is noted and was corrected in the three relevant paragraphs.

37. Thank you for the comment - however no reference to these figures can be found in the DBAR.

Alternatives

38–39. Development alternatives

The Basic Assessment process requires that alternatives be considered. Multiple development layouts were evaluated, and the preferred layout was selected following environmental and planning considerations.

Environmental impacts and services

40–43. Biodiversity, water and climate considerations

Environmental impacts relating to biodiversity, water availability, and infrastructure capacity were considered within the specialist assessments and supporting studies submitted as part of the DBAR.

In terms of the bulk water availability, the Municipality did formally confirmed that there is sufficient capacity to accommodate the domestic water demand for the proposed development and was submitted in Appendix E16 of the DBAR.

Spatial planning frameworks

44–50. Alignment with spatial frameworks

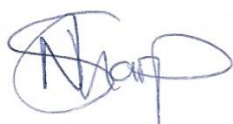
The DBAR assessed the proposed development against relevant municipal spatial planning frameworks. The proposed development is located within the urban edge and is considered consistent with spatial planning policies supporting managed residential development within designated urban areas.

The Basic Assessment process evaluates environmental impacts and mitigation measures while considering applicable spatial planning policies.

Concluding Response: Thank you for your comments. We wish to clarify several points to ensure that the record accurately reflects the assessment process and findings. The specialist studies, including the terrestrial biodiversity and plant species assessments, were conducted using appropriate and methodologically sound approaches. While no assessment can capture all possible changes in a dynamic environment, the data collected provide a robust and defensible basis for the impact assessment.

The sensitivity of the environment, including areas of natural rehabilitation, was thoroughly considered. The assessment specifically evaluates potential impacts, including the effect on natural recovery processes and alien vegetation management. All mitigation measures are aligned with the National Environmental Management: Biodiversity Act and the Alien and Invasive Species Regulations.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Natalie', is written below the 'Yours sincerely' text.

Natalie Sharp

Pri.Sci.Nat (Reg nr. 123443)

Reg. EAP (EAPASA)

Member of IAIAsa (7237)

Re: PRE-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25...



Andrea Beierle <andreabeierle27@gmail.com>

To: Natalie Sharp

You replied to this message on 3/30/2026 8:35 AM.



Sun 8:31 AM

Dear Natalie

Thank you very much for your mail, the contents of which is acknowledged.

As part of the Public Participation Process I trust that all my comments and objections will be submitted to all relevant authorities and that a copy of that will be forwarded to me.

Kind regards

Andrea Beierle

RE: PRE-APPLICATION Public Participation for 16/3/3/6/7/1/D6/35/0133/25...



Natalie Sharp

To: Andrea Beierle



Mon 8:36 AM

Dear Andrea,

Yes, all your comments will be placed in the Comments and Response Report and will be submitted to the DEADP as part of Appendix F of the Draft BAR (v2).

Kind regards



Natalie Sharp

Reg. EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAIAsa (7237)

Omgewingsinpakstudie Tergniet

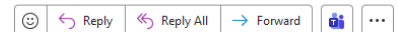


Joey Gouws <poppelai@gmail.com>

To: Natalie Sharp

You replied to this message on 3/9/2026 9:42 AM.

Translate message to: English | Never translate from: Afrikaans | Translation preferences



Sun 3/8/2026 10:30 AM

Ek is woonagtig in Tergniet, naby ontwikkelings area.

Ek deel graag my bekommernis oor die ontwikkeling ten opsigte van die natuur.

Soos ek verstaan was dit deel van n plaas, so vir baie baie jare was dit n ongeboide gebied en tans is daar baie inheemse bome, ook baie melkhoutbome.

Ek bekommer my oor die plantegroei wat verwyder gaan word?

Daar nog redelik wilde diertjies, soos bokkies, baie slange, voels en uile wat al moes padgee met toeboing tussen hulle. So oop areas word aanmekeer weggevat van hulle

Daar ook n spesie paddas wat daar vir baie jare bly(weet nie watter spesie nie) sodra dit reen hoor mens hul duidelik.

Dan, weet nie waar die ingang sal wees nie, maar waar daar nou n toegang hek is dink ek is baie gevaarlik? Die treinspoor oorgang langsaan. Glo dit baie onveilig.

Is dit nie ook soort van n vlei/nat area nie?

Hoop regtig dat daar goed gekyk sal word na bogenoemde.

As ek n voorstel kan maak, kan daar nie n oop area gehou word waar daar weer soos bv n klomp melkhoutbome geplant kan word nie?
N goeie voorbeeld van vervanging van melkhoutbome is by waterfront parkeer area by Hartenbos.

Dankie dat ek my opinie kon lig.

Joey Gouws.

RE: Omgewingsinpakstudie Tergniet

**Natalie Sharp**
To:  Joey Gouws

 Reply  Reply All  Forward  

Mon 3/9/2026 9:42 AM

 Cover letter for pre-applicationDBAR_I&AP.pdf
199 KB

 Background Information Document_Tergniet.pdf
3 MB

 Layout_preferred for environment_FINALOption C.pdf
3 MB

 Translate message to: English | Never translate from: Afrikaans | Translation preferences

Goeiemore Mev. Gouws,

Baie dankie dat u die tyd geneem het om u bekommernisse oor die voorgestelde ontwikkeling te deel. Ons waardeer insette van plaaslike inwoners en neem alle kommentaar ernstig op.

Sien asb aangehegte brief en agtergronds inligting van die projek. As u egter al die dokumente wil studeer, gaan asb gerus na ons webwerf <https://dsafrica.co.za/services/environmental-services/documents-p-de-clerk/> soos aangedui in ons brief.

Die potensiele omgewingsimpakte van die ontwikkeling is deur verskeie onafhanklike spesialiste ondersoek as deel van die omgewingsinpakstudie. Hierdie studies het onder andere 'n botaniese studie, dierspesie-studie, water-/akwatiese studie, erfenisstudie, landbou-studie, sowel as ingenieurs- en verkeersstudies ingesluit.

Met betrekking tot die plantegroei op die terrein is bevind dat daar wel inheemse plantegroei voorkom, maar dat die ekologiese belangrikheid van die terrein oorwegend medium is en dat die plante wat voorkom nie unieke of onvervangbare populasies is nie. Die ontwikkeling se uitleg is aangepas om sensitiewe areas en beskermde bome sover moontlik te vermy en om meer oop ruimtes tussen die erwe te behou.

Wat diere betref, het die spesialisstudie bevestig dat sommige klein diere, voëls en reptiele in die area kan voorkom. Die terrein is egter relatief klein en reeds gedeeltelik geïsoleer van groter natuurlike gebiede. Om potensiele impakte te beperk is die oorspronklike aantal wooneenhede verminder (van 144 na 133 eenhede) en oop ruimtes is in die uitleg ingesluit om beweging van diere te bevorder.

Met betrekking tot moontlike vloed of nat areas, het die akwatiese studie bevestig dat geen waterloop of natland op die eiendom voorkom nie, en dat die akwatiese sensitiviteit van die terrein laag is. Die ontwikkeling stel egter voor dat 4 retensiedamme vir stormwater gebou gaan word wat gerehabiliteer gaan word om natuurlike dammetjies te weerspieël. Sou die projek voortgaan en goedgekeur word, sal die afloop vermeerder en sal daar dus meer stormwater wees wat in die dammetjies sal opgaan en 'n habitat maak vir akwatiese diere.

Verder het die erfenisstudie bevind dat daar geen betekenisvolle erfenishulpbronne op die terrein is nie, en dat die ontwikkeling nie 'n noemenswaardige impak op die erfeniswaarde van die area sal hê nie.

Die voorgestelde ontwikkeling is ook binne die stedelike grens van Mosselbaai geleë en word deur die munisipale ruimtelike ontwikkelingsraamwerk ondersteun as 'n area vir residensiële invulontwikkeling.

Ons neem ook kennis van u voorstel dat oop ruimtes behou moet word en dat inheemse bome geplant kan word. Die spesialiseraanbevelings sluit inderdaad die behoud van sekere plantegroei en die insluiting van oop ruimtes in, wat sal bydra tot die behoud van natuurlike elemente binne die ontwikkeling, sien die uitleg plan.

Baie dankie ook vir u bekommernis oor die veiligheid van die toegang tot die ontwikkeling en die nabyheid van die spoorlyn. 'n Onafhanklike verkeersinpakstudie is deur professionele ingenieurs uitgevoer as deel van die omgewingsproses om die moontlike impak van die ontwikkeling op die bestaande padnetwerk en toegang tot die terrein te evalueer. Hierdie studie het onder andere verkeersgenerering, toegangspunte, sigafstande en die funksionering van nabygeleë kruispunte oorweeg.

Die studie sluit ook aanbevelings in rakende die ontwerp en uitleg van die toegang en verwante verkeersmaatreëls wat in die verdere ontwerpstadium in ag geneem moet word.

Die finale ontwerp van die toegang en padinfrastruktuur sal ook nog deur die Mosselbaai Munisipaliteit en toepaslike owerhede hersien en goedgekeur moet word as deel van die beplannings- en ingenieursprosesse, om te verseker dat die ontwikkeling aan toepaslike verkeers- en veiligheidsvereistes voldoen.

Baie dankie weer vir u insette. Alle kommentaar wat gedurende die openbare deelname proses ontvang word, word aangeteken en aan die bevoegde owerheid voorgelê as deel van die besluitnemingsproses.

Vriendelike groete



PROPOSED RESIDENTIAL DEVELOPMENT OF 5.96HA ON PORTION 38 OF F...

**Tshembhani Ngobeni** <tngobeni@bo
To:  Natalie Sharp
Cc:  Andiswa Sam;  Rudzani Makahane

 Follow up. Completed on Tuesday, March 24, 2026.
You replied to this message on 3/24/2026 1:47 PM.

 4_10_2_K10A_TERGNIET 136_38, Mossel Bay.pdf
243 KB

Dear Natalie

Kindly receive the attached comments for your attention.

Regards,
Ngobeni Tshembhani
Water Use Officer: Breede-Olifants CMA
Tel: 023 346 8000 | Cell: 060 551 0891
Address: 101 York Street, Room 302, George

4_10_2_K10A_Tergniet – Letter from the Breede-Olifants CMA

101 York Street, 3rd Floor Room 302, George 6530, PO Box 1205 George 6530

Enquiries: Tshembhani Ngoben **Tel:** 023 346 8000 **E-mail:** tngobeni@bocma.co.za

Reference: 4/10/2/K10A/TERGNIET 136/38, Mossel Bay

Date: 09 March 2026

McGregor Environmental Services

Attention: Natalie natalie@dsafrical.co.za

COMMENTS ON : PROPOSED RESIDENTIAL DEVELOPMENT OF 5.96HA ON PORTION 38 OF FARM NO. 136, TERGNIET, WESTERN CAPE.

Your application dated 6 February 2026 has reference.

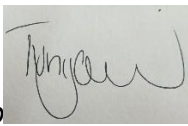
The Breede-Olifants Catchment Management Agency (BOCMA) has evaluated the submitted documents and has the following comments:

1. The Breede-Olifants Catchment Management Agency (BOCMA) acknowledges receipt of your application, dated 06 February 2026, for the aforementioned activity. This application was received by our office on 06 February 2026. Following an evaluation of the proposed activity and its anticipated impact on water resources, BOCMA does not object to the application for Environmental Authorization for the proposed residential development of 5.96ha on portion 38 of farm no. 136, Tergniet, Mossel Bay Municipality Western Cape. This office would like to provide the following comments on the submitted documentation.
2. This office would like to know if the proposed activity will trigger Section 21 water uses of the National Water Act, 1998 (Act 36 of 1998 as amended).
3. A signed letter from the Mossel Bay Municipality must be provided to inform the office if the Municipality have capacity to accommodate a new development in terms of Bulk Services.
4. Please note no abstraction of surface or groundwater may take place or storage of water be created without prior authorisation from this office, unless it is a Schedule 1 or Existing Lawful Use as described in Section 32 of the National Water Act, 1998 (Act No. 36 of 1998) as amended.
5. Please ensure that no waste or water containing waste is disposed in a manner which may detrimentally impact on a water resource without authorisation from the National Water Act, 1998 (Act 36 of 1998) and other related legislations.
6. The applicant should be aware that according to Section 19 (1) of the National Water Act, 1998 (Act No.36 of 1998), *"an owner of land, a person in control of land or a person who occupies or uses the land on which (a) any activity or process is or was performed or undertaken; or (b) any other situation exists, which causes, has caused or is likely to cause pollution of a water resource, must take all reasonable measures to prevent any such pollution from occurring, continuing or recurring". Any pollution incident(s) resulting from the discharge of treated effluent or any activity from the plant must be reported within 24 hours to the relevant authority.*

7. No stormwater runoff from the application premises containing waste, or water containing waste emanating from any activity may be discharged into a water resource without prior treatment.
8. All requirements as stipulated in the National Water Act, 1998 (Act No. 36 of 1998) regarding water use must be adhered to.
9. These comments do not exempt you from complying with other relevant legislations and requirements of other governmental Departments.

The BOCMA reserves the right to revise initial comments and request further information based on any additional information received.

Yours faithfully



p.p

Mr Jan van Staden

Chief Executive Officer (Acting)

RE: PROPOSED RESIDENTIAL DEVELOPMENT OF 5.96HA ON PORTION 38 OF FARM NO. 136, TERGNIET, WESTERN CAPE.



Natalie Sharp

To: Tshembhani Ngobenj

Cc: Andiswa Sam; Rudzani Makahane



Reply



Reply All



Forward



Tue 3/24/2026 1:47 PM



Letter to BOCMA.pdf
259 KB



MB Mun Water&Sewer Approval Mar 2025.pdf
80 KB

Good day Tshembhani,

Thank you for the comments we received on the above application.

Attached, please find our response and letter from the Municipality.

Kind regards



Natalie Sharp

Reg. EAP (EAPASA)

Pri.Sci.Nat (Reg No 123443)

Member of IAASA (7237)

Letter to BOCMA

Breede-Olifants Catchment Management Agency
P O Box 1205
George
6530

24 March 2026

Attention: Tshembhani Ngobeni

Ref: 16/3/3/6/7/1/D6/35/0133/25

RESPONSE TO COMMENTS RECEIVED ON THE DRAFT DOCUMENTS DURING THE PRE-APPLICATION PUBLIC PARTICIPATION PROCESS OF AN ENVIRONMENTAL ASSESSMENT FOR A PROPOSED RESIDENTIAL DEVELOPMENT OF 5.96HA ON PORTION 38 OF FARM NO. 136, TERGNIET, WESTERN CAPE. APPLICANT: MR. P. DE CLERK

Thank you for your review of the documents and for confirming that the Breede-Olifants Catchment Management Agency (BOCMA) has no objection to the proposed development. Your comments are noted and appreciated.

In response to the specific queries raised:

Section 21 water uses:

Based on the findings of the aquatic assessment, no natural watercourses were identified within or adjacent to the development footprint, and the site is classified as having low aquatic sensitivity. As such, no Section 21(c) or (i) water uses are anticipated to be triggered. No abstraction, storage, or discharge of water to a water resource is proposed as part of the development. Should any water uses be identified during detailed design or construction, the relevant authorisation process will be followed.

Bulk services confirmation:

A detailed bulk services capacity assessment has been undertaken, and confirmation has been obtained from Mossel Bay Municipality that sufficient capacity exists to accommodate the proposed development. The requested signed confirmation from the Municipality and attached to this letter for your information.

General NWA compliance:

The requirements relating to pollution prevention, stormwater management, and the handling of waste and wastewater are noted. These have been incorporated into the Environmental Management Programme (EMP), which includes measures to ensure that no contaminated stormwater or waste is discharged into any water resource, and that all activities comply with the National Water Act.

We confirm that all applicable provisions of the National Water Act, 1998 (Act 36 of 1998) will be adhered to throughout the construction and operational phases of the development.

Yours sincerely



Natalie Sharp

Pri.Sci.Nat (Reg nr. 123443)

Reg. EAP (EAPASA)

Member of IAIAAs (7237)

THE BACKGROUND INFORMATION DOCUMENT FOR THE PROPOSED RESI...



Megan Simons <msimons@capenature.co.za>

To: Natalie Sharp



Tue 3/24

 You replied to this message on 3/24/2026 11:31 AM.



136-38_Residential_Mossel Bay_20260324.pdf
385 KB

Dear Ms Sharp,

I trust this email finds you well.

I would like to apologise for CapeNature's delay in submitting our comments. We have a high volume of applications requiring review within the same timeframe, which is creating a temporary bottleneck in providing comments. If you would still accept our comments, kindly find it attached to this email. If you require anything else from CapeNature. Please do not hesitate to contact me.

Kind regards,

Megan Simons
Land Use Scientist – Landscape East
Conservation Operations: Conservation Intelligence



136-38_Residential – Comments from CapeNature

physical 4th Floor, York Park Building,
York Street, George, 6530
website www.capenature.co.za
enquiries Megan Simons
telephone 087 087 3060
email msimons@capenature.co.za
Reference LE14/2/6/1/6/6/38-136_Residential/BID_Tergniet
date 24 March 2026

Digital Soil Africa,
45 Church Street,
Walmer,
6070

Attention: Ms Natalie Sharp
By email: natalie@dsafrica.co.za

Dear Ms Natalie Sharp

**THE BACKGROUND INFORMATION DOCUMENT FOR THE PROPOSED
RESIDENTIAL DEVELOPMENT OF 5.96 HA ON PORTION 38 OF FARM NO.
136, TERGNIET, MOSSEL BAY LOCAL MUNICIPALITY, WESTERN CAPE.**

CapeNature would like to thank you for the opportunity to review the above report. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application. CapeNature wishes to make the following comments:

According to the Western Cape Biodiversity Spatial Plan (CapeNature 2024)¹ the property has Critical Biodiversity Areas (CBA 1: Terrestrial). The fine-scale vegetation map describes the vegetation as Hartenbos Strandveld (Vlok and de Villiers 2007)². According to the updated South African Vegetation Map (Beta VegMap, 2024)³ the vegetation unit is Hartenbos Dune Thicket which is listed as **Endangered** (NEM:BA, 2022)⁴. There are no freshwater features mapped at the property. CapeNature has reviewed the Background Information Document (BID) and has the following comments:

- I. The Western Cape Biodiversity Spatial Plan (CapeNature, 2024) has specific guidelines regarding the management objectives of Critical Biodiversity Areas (CBA). Thus, the proposed development must be guided by those objectives to conserve and protect the CBAs.
 - I.1. Critical Biodiversity Areas are defined as: “Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.” CBA objectives are: “Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.”

¹ CapeNature. 2024. 2023 Western Cape Biodiversity Spatial Plan and Guidelines. Unpublished Report

² Vlok JHJ, de Villiers R (2007) Vegetation Map for the Riversdale Domain. Unpublished 1:50 000 maps and report supported by CAPE FSP task team and CapeNature.

³ South African National Biodiversity Institute (2006-2024). The Vegetation Map of South Africa, Lesotho and Swaziland, Mucina, L., Rutherford, M.C. and Powrie, L.W. (Editors), Online, <https://bgis.sanbi.org/Projects/Detail/2258>, Version 2024.

⁴ National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004). The Revised National List of Ecosystems that are Threatened and in need of protection. 2022. Government Gazette No. 47526

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

2. Satellite imagery and the Department of Forestry, Fisheries and the Environment (DFFE) National Land Cover dataset indicate that the surrounding area has largely been transformed by residential development, with remaining fragments of shrubland and forest on the property. The site is bisected by Robertson Avenue, with a railway line to the south, and these infrastructures have likely already impacted biodiversity. Notwithstanding this, the property still contains ecologically significant features that requires careful consideration.
3. The Hartenbos Dune Thicket is part of the Albany Thicket Bioregion and is endemic to South Africa. This is a poorly protected ecosystem with 79% of its natural extent remaining. The Hartenbos Dune Thicket has not been critically assessed to determine the risks and pressures for this vegetation unit and data on the ecosystems condition (including biotic disturbances, overutilization, and altered fire regimes) is limited (SANBI 2022)⁵.
4. According to iNaturalist, numerous fauna and flora species have been recorded on the property, including Near Threatened to Critically Endangered species and indigenous protected trees⁶. This highlights the site's ecological value despite its fragmented state. As such, specialist assessments must meaningfully inform the Site Development Plan (SDP) prior to any approval being granted.
5. CapeNature recommends that comment be obtained from the DFFE. CapeNature will defer to the comments provided by DFFE, as the Department is the competent authority and custodian of forestry resources in South Africa.
6. The proposed development will result in a definite and irreversible loss of threatened vegetation. CapeNature does not agree with the conclusion in the BID that impacts are limited to “some environmental impacts” that are “low to moderate and manageable.” Given the presence of CBA areas and Endangered vegetation, the proposed development will result in complete transformation and permanent loss of sensitive habitat, which constitutes a high impact from a biodiversity perspective.
7. The proposed retention of “pockets of natural open space” along the pipeline servitude is noted; however, these areas are unlikely to sufficiently offset the loss of intact habitat or maintain ecological functionality, particularly if they are narrow, isolated, and subject to edge effects.
8. In terms of section 12 (1) and 2 (a) of National Veld and Forest Act⁷ adequate firebreak must be prepared and maintained around the property to reasonably prevent the spread of unwanted fires in the area.
9. CapeNature reminds the applicant of Section 28 of National Environmental Management Act (NEMA) (Act 104 of 1998 as amended) (Duty of Care) that states the following:

“Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.”

⁵ Government of South Africa (2022) South African Red List of Terrestrial Ecosystems: assessment details and ecosystem descriptions. Technical Report #7664, SANBI Pretoria, South Africa.

⁶ Notice of the List of Protected Tree Species under the National Forest Act, 1998 (Act No. 84 of 1998).

⁷ National Veld and Forest Act 1998 (Act 101 of 1998) Government Gazette: 19515

The Western Cape Nature Conservation Board trading as [CapeNature](#)

Board Members: Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

Any action that causes wilful degradation of the environment may therefore constitute a breach of this Duty of Care and the penal provisions of NEMA will apply.

In conclusion, CapeNature will provide further detailed comments and recommendations during the public participation process of the Draft Basic Assessment Report, including a review of the specialist assessments.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Megan Simons', with a large, stylized loop at the end.

Megan Simons
For: Manager (Conservation Intelligence)

RE: THE BACKGROUND INFORMATION DOCUMENT FOR THE PROPOSED RESIDENTIAL DEVELOPMENT OF 5.96 HA ON PORTION 38 OF FARM NO. 136, TE...

 Natalie Sharp
To  Megan Simons

Tue 3/24/2026 11:31 AM

Good day Ms Simons,

Thank you for your comments, they are noted and appreciated.

We would just like to clarify whether your comments are based on the Background Information Document (BID) only, or whether you were able to access and review the Draft Basic Assessment Report (DBAR) and specialist studies as well.

For ease of reference, the BID included instructions and a link to download all project documentation from our website, and these documents remain available should you wish to review them.

As this forms part of the pre-application public participation process, you will be formally consulted again once the application is submitted, at which stage the Draft BAR and all supporting specialist reports will be circulated for comment as part of the formal public participation process.

Should you experience any difficulty accessing the documents, please let us know and we will gladly assist.

Kind regards

 Natalie Sharp
Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAIAsa (7237)

RE: THE BACKGROUND INFORMATION DOCUMENT FOR THE PROPOSED R...

 Megan Simons <msimons@capenature.co.za>
To  Natalie Sharp

Wed 3/25

Start your reply all with: [Thank you for your confirmation.](#) [Noted with thanks.](#) [Thank you!](#) [Feedback](#)

Dear Ms Sharp,

Thank you for your email.

Yes, our comments are based on the BID and thank you for informing us of the specialist studies that were undertaken. We will review all the documents as part of the dBAR, once notified. Thank you.

Have a good day.

 Megan Simons
Land Use Scientist – Landscape East
Conservation Operations: Conservation Intelligence



RE: THE BACKGROUND INFORMATION DOCUMENT FOR THE PROPOSED R...

 Natalie Sharp
To  Megan Simons

Tue 3/24

 Letter to CapeNature.pdf
285 KB

Good day Ms Simons,
Thank you for the comments.
Attached, please find our response.
Kind regards

 Natalie Sharp
Reg.EAP (EAPASA)
Pri.Sci.Nat (Reg No 123443)
Member of IAIAsa (7237)

Letter to CapeNature

Cape Nature
Conservation Intelligence: Landscape East
4th Floor, York Park Building
George
6530

24 March 2026

Attention: Megan Simons

Our Ref: 16/3/3/6/7/1/D6/35/0133/25

Your Ref: LE14/2/6/1/6/6/38-136_Residential/BID_Tergniet

RESPONSE TO COMMENTS RECEIVED ON THE DRAFT DOCUMENTS DURING THE PRE-APPLICATION PUBLIC PARTICIPATION PROCESS OF AN ENVIRONMENTAL ASSESSMENT FOR A PROPOSED RESIDENTIAL DEVELOPMENT OF 5.96HA ON PORTION 38 OF FARM NO. 136, TERGNIET, WESTERN CAPE. APPLICANT: MR. P. DE CLERK

Thank you for your detailed comments on the Background Information Document (BID), which are noted and appreciated.

We acknowledge the sensitivity of the site, particularly in relation to the presence of Critical Biodiversity Areas (CBA 1) and the Endangered Hartenbos Dune Thicket, as correctly identified in your correspondence. These aspects have been a key focus of the assessment process.

We would, however, like to clarify that the comments provided appear to be based on the BID only. Subsequent to the BID, detailed specialist studies (terrestrial biodiversity and faunal assessments) have been undertaken, and these form part of the Draft Basic Assessment Report (DBAR), which provides a more refined and site-specific evaluation of biodiversity sensitivities and impacts.

The specialist assessments confirm that while the site does support Endangered vegetation and falls within a CBA, it is also characterised by:

- Historical transformation and disturbance;
- Fragmentation due to surrounding residential development and infrastructure (including the road and railway line);
- Reduced ecological connectivity and edge effects.

Importantly, the specialists did not assess the site as a “no-go” area, but rather identified that development could proceed subject to appropriate mitigation and design refinement.

In response to the specialist findings, the Site Development Plan (SDP) has been revised to reduce ecological impacts, including:

- The incorporation of ecological corridors and open space areas;
- The retention of areas of higher ecological sensitivity where feasible;
- A reduction in development footprint compared to earlier layout options;
- Avoidance, where possible, of identified sensitive features.

It is therefore important to clarify that the conclusion regarding impact significance was not based on the preliminary BID, but on the detailed specialist assessments and the refined development layout.

We acknowledge CapeNature’s concern regarding cumulative biodiversity loss and the irreversible nature of vegetation transformation. This has been considered in the assessment, and the impact is recognised as permanent;

however, the significance of this impact has been evaluated within the context of the already transformed and urbanising landscape, as well as the mitigation measures incorporated into the design.

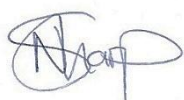
With regard to ecological functionality, the retained open space areas are not intended as a like-for-like offset, but rather as a mitigation measure to maintain some level of ecological connectivity and reduce further fragmentation within the constraints of the site.

The requirements relating to fire management, Duty of Care (Section 28 of NEMA), and general biodiversity protection are noted and have been incorporated into the Environmental Management Programme (EMP).

We note your recommendation that DFFE be consulted, and confirm that the relevant authorities have been included in the pre-application public participation process and will continue to be consulted when the application is submitted.

We welcome the opportunity for CapeNature to review the Draft BAR and specialist reports during the formal public participation phase, where a more detailed and informed assessment of the biodiversity impacts can be undertaken.

Yours sincerely



Natalie Sharp

Pri.Sci.Nat (Reg nr. 123443)

Reg. EAP (EAPASA)

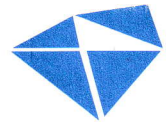
Member of IAIAAsa (7237)

Consultation sent out via Register Post:

List of REGISTERED LETTERS Lys van GEREGISTREERDE BRIEWE (with an insurance option/met 'n versekeringsopsie)

Full tracking and tracing/Volledige volg en spoor

Name and address of sender: Tergniet Pre-application
Naam en adres van afsender: Tergniet Pre-application
for Public participation



Post Office

Enquiries/Navrae
Sharecall
number/nommer

0860 111 502
www.postoffice.co.za

No	Name and address of addressee Naam en adres van geadreseerde	Insured amount Versekerde bedrag	Insurance fee Versekeringsgeld	Postage Posgeld	Service fee Diensgeld	Affix Track and Trace customer copy Plak Volg-en-Spoor-Kliëntafskrif
1	Le Roux PJ, 47 Mackenzie Street, Brooklyn, 0181, Erf no 228					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552368925ZA CUSTOMER COPY
2	Reinders JM, Poste Restante, Mosselbaai, 6500, Erf no 639					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552368939ZA CUSTOMER COPY 301028R
3	Snyman Meg, 712 Libertas Retirement Centre, Goodwood, 7460					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552368942ZA CUSTOMER COPY 301028R
4	Snyders M, 38123, Garsfontein Oos, 0060, Erf no 230					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552368956ZA CUSTOMER COPY 301028R
5	Leipoldt GE & A, Jacqueline's Place 3, Tergniet Hoogte, Grodbrakrivier, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552368960ZA CUSTOMER COPY 301028R
6	Johnston WOB, 4 Jacqueline's Place, Impala Road, Little Brak River, 6503					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552368973ZA CUSTOMER COPY 301028R
7	Aspeling CH & GM, PO Box 33011, Fichardt Park, 9317, Erf no 1176					
8	Bassett JA & HL, Posbus 1066, Kleinbrakrivier, 6503					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552368987ZA CUSTOMER COPY 301028R
9	Machman WS, Posbus 148, Stella 8650					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552368995ZA CUSTOMER COPY 301028R
10	Pelzer CA & S, Klaradynstraat 65, Pellisier, 9301					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369007ZA CUSTOMER COPY 301028R
Total Totaal		R	R	R	R	

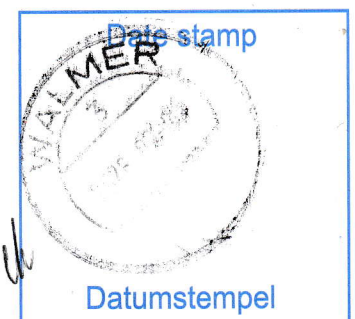
Number of letters posted
Getal briewe gepos

Signature of client
Handtekening van kliënt

Signature of accepting officer
Handtekening van aanneembeampte

The value of the contents of these letters is as indicated and compensation is not payable for a letter received unconditionally. Compensation is limited to R100.00. No compensation is payable without documentary proof.
Optional insurance of up to R2000.00 is available and applies to domestic registered letters only.

Die waarde van die inhoud van hierdie briewe is soos aangedui en vergoeding sal nie betaal word vir 'n brief wat sonder voorbehoud ontvang word nie. Vergoeding is beperk tot R100.00. Geen vergoeding is sonder dokumentêre bewys betaalbaar nie. Opsionele versekering van tot R2000,00 is beskikbaar en is slegs binnelandse geregistreerde briewe van toepassing.

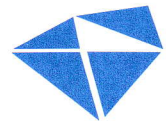


701248

List of REGISTERED LETTERS Lys van GEREGISTREERDE BRIEWE (with an insurance option/met 'n versekeringsopsie)

Full tracking and tracing/Volledige volg en spoor

Name and address of sender: Tegniet Pre-application
Naam en adres van afseender: For Public participation



Post Office

Enquiries/Navrae
Sharecall
number/nommer

0860 111 502
www.postoffice.co.za

No	Name and address of addressee Naam en adres van geadreseerde	Insured amount Versekerde bedrag	Insurance fee Versekeringsgeld	Postage Posgeld	Service fee Diensgeld	Affix Track and Trace customer copy Plak Volg-en-Spoor-Kliëntafskrif
1	Kruger CA, Galjeenstraat 32, Tegniet Groothoekrivier, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369015ZA CUSTOMER COPY 301028R
2	Silverstreams Trust, Posbus 199, Lime Acres, 8410					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369024ZA CUSTOMER COPY 301028R
3	Oudeco Prop (Pty) Ltd. Posbus 23, Boons, 0334					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369038ZA CUSTOMER COPY 301028R
4	Van der Westhuizen C, Seekatstraat 2 Poste Restante, Groothoekrivier, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369041ZA CUSTOMER COPY 301028R
5	Fourie Z & Adkermann, CW, Plaas Zamekamb, Bain's View, 9338					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369055ZA CUSTOMER COPY 301028R
6	Grewar AM & Breytenbach Z, 1 Dolphin Crescent, Tegniet 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369069ZA CUSTOMER COPY 301028R
7	Bosman AH, Posbus 419, Kleinbrakrivier, 6503					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369072ZA CUSTOMER COPY 301028R
8	Ras M, PO Box 456, Brits 0250					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369086ZA CUSTOMER COPY 301028R
9	Cilliers S, 33 Van Zylstraat, Poste Restante, Great Brak River, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369090ZA CUSTOMER COPY 301028R
10	Fordelmann P & Crafford JPA, Van Zylstraat 37, Poste Restante, Groothoekrivier, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369109ZA CUSTOMER COPY 301028R
Total Totaal		R	R	R	R	

Number of letters posted
Getal briewe gepos

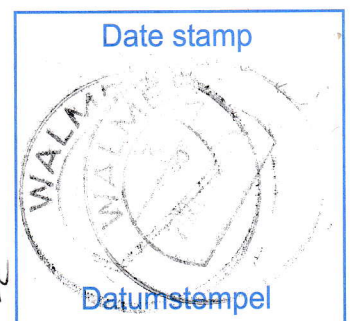
Signature of client
Handtekening van kliënt

Signature of accepting officer
Handtekening van aanneembeampte

The value of the contents of these letters is as indicated and compensation is not payable for a letter received unconditionally. Compensation is limited to R100.00. No compensation is payable without documentary proof.
Optional insurance of up to R2000,00 is available and applies to domestic registered letters only.

Die waarde van die inhoud van hierdie briewe is soos aangedui en vergoeding sal nie betaal word vir 'n brief wat sonder voorbehoud ontvang word nie. Vergoeding is beperk tot R100.00. Geen vergoeding is sonder dokumentêre bewys betaalbaar nie. Opsionele versekering van tot R2000,00 is beskikbaar en is slegs binnelandse geregistreerde briewe van toepassing.

Date stamp



Datumstempel

701248

List of REGISTERED LETTERS Lys van GEREGETREERDE BRIEWE (with an insurance option/met 'n versekeringsopsie)



Post Office

Full tracking and tracing/Volledige volg en spoor

Name and address of sender: Tergriet Pre-application
Naam en adres van afsender: Tergriet Pre-application
For Public participation

Enquiries/Navrae
Sharecall
number/nommer

0860 111 502

www.postoffice.co.za

No	Name and address of addressee Naam en adres van geadreseerde	Insured amount Versekerde bedrag	Insurance fee Versekeringsgeld	Postage Posgeld	Service fee Diensgeld	Affix Track and Trace customer copy Plak Volg-en-Spoor-Kliëntafskrif
1	Lennox WA & TJE, Posbus 898, Grootbrakrivier, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369112ZA CUSTOMER COPY 301028R
2	Rademeyer GT, Posbus 53, Grootbrakrivier, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369126ZA CUSTOMER COPY 301028R
3	Van Zyl A, Posbus 729, George, 6530					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369130ZA CUSTOMER COPY 301028R
4	Gouws JC, Posbus 837, Grootbrakrivier, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369143ZA CUSTOMER COPY 301028R
5	Royal Square Investments 413P PO Box 714, Lydenburg 1120					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369157ZA CUSTOMER COPY 301028R
6	Boesmansberg Trust, Posbus 712 Prieska, 8940					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369165ZA CUSTOMER COPY 301028R
7	Claasen E, P O box 596, Great Brak River, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369174ZA CUSTOMER COPY 301028R
8	Prinsloo B, Posbus 501, Grootbrakrivier, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369188ZA CUSTOMER COPY 301028R
9	Van Smith Family Trust, Oldkersweg 65, Poste Restante, Kleinbrakrivier, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369191ZA CUSTOMER COPY 301028R
10	Keyser JM, Carlylelaan 40, Orkney 2619					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369205ZA CUSTOMER COPY 301028R
Total Totaal		R	R	R	R	

Number of letters posted
Getal briewe gepos

Signature of client

Handtekening van klient

Signature of accepting officer

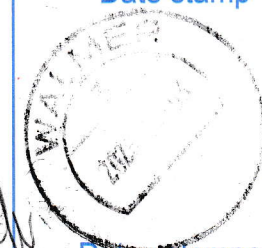
Handtekening van aanneembeampte

The value of the contents of these letters is as indicated and compensation is not payable for a letter received unconditionally. Compensation is limited to R100.00. No compensation is payable without documentary proof.

Optional insurance of up to R2000,00 is available and applies to domestic registered letters only.

Die waarde van die inhoud van hierdie briewe is soos aangedui en vergoeding sal nie betaal word vir 'n brief wat sonder voorbehoud ontvang word nie. Vergoeding is beperk tot R100,00. Geen vergoeding is sonder dokumentêre bewys betaalbaar nie. Opsionele versekering van tot R2000,00 is beskikbaar en is slegs binnelandse geregistreerde briewe van toepassing.

Date stamp



Datumstempel

701248

List of REGISTERED LETTERS Lys van GEREGISTREERDE BRIEWE (with an insurance option/met 'n versekeringsopsie)



Post Office

Full tracking and tracing/Volledige volg en spoor

Name and address of sender: Tergniet Pre-application
Naam en adres van afseender: For Public Participation

Enquiries/Navrae
Sharecall
number/nummer

0860 111 502
www.postoffice.co.za

No	Name and address of addressee Naam en adres van geadreseerde	Insured amount Versekerde bedrag	Insurance fee Versekeringsgeld	Postage Posgeld	Service fee Diensgeld	Affix Track and Trace customer copy Plak Volg-en-Spoor-Kliëntafskrif
1	Van Tubbergh A, Poste Restante, Grootbrakrivier, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369214ZA CUSTOMER COPY 301028R
2	Van Tubbergh A, 3 Mynhardt Close, De Bron, 7530					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369228ZA CUSTOMER COPY 301028R
3	De Lange NC, Kendalstraat 130, Eversdal, 7550					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369231ZA CUSTOMER COPY 301028R
4	Bekha RD & AS, Postbus 390, Grootbrakrivier, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369245ZA CUSTOMER COPY 301028R
5	Latsky M & AJ, Postbus 1193, Grootbrakrivier, 6525					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369259ZA CUSTOMER COPY 301028R
6	Venter PF, Poste Restante, Kleinbrakrivier, 6503					REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC552369262ZA CUSTOMER COPY 301028R
7						
8						
9						
10						
Total Totaal		R	R	R	R	

Number of letters posted
Getal briewe gepos

Signature of client
Handtekening van kliënt

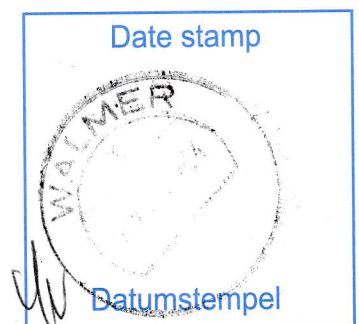
Signature of accepting officer
Handtekening van aanneembeampte

The value of the contents of these letters is as indicated and compensation is not payable for a letter received unconditionally. Compensation is limited to R100.00. No compensation is payable without documentary proof.

Optional insurance of up to R2000,00 is available and applies to domestic registered letters only.

Die waarde van die inhoud van hierdie briewe is soos aangedui en vergoeding sal nie betaal word vir 'n brief wat sonder voorbehoud ontvang word nie. Vergoeding is beperk tot R100.00. Geen vergoeding is sonder dokumentêre bewys betaalbaar nie. Opsionele versekering van tot R2000,00 is beskikbaar en is slegs binnelandse geregistreerde briewe van toepassing.

Date stamp



Datumstempel

701248



HEAD OFFICE
Tel: +27 11 974-3216
✉ 8017 BIRCHLEIGH 1621
ALL HRS Tel: 011 974-3216
www.jkjexpress.co.za
Reg. No. 2018/326634/07
VAT Reg.No. 4120191301



6422982JKJ

CONSIGNEE

SHIPMENT NUMBER

6422982

PLEASE USE A BALLPOINT PEN AND PRESS HARD

ACCOUNT No.

DIG003

FROM: CONSIGNOR

COMPANY NAME

DIGITAL SOILS AFRIKA - 45 CHURCH ROAD

ADDRESS

45 CHURCH ROAD

WALMER

PORT ELIZABETH

CONTACT

082 502 8844

CELL NO.

EMAIL

TO: CONSIGNEE

COMPANY NAME

Element Consulting Engineers

STREET ADDRESS

82 Victoria Street

George 6529

CONTACT

H. Laurens

CELL NO.

044 884 1138

EMAIL

hlaurens@eceng.co.za

Please tick appropriate box

SAME DAY

OVERNIGHT EXPRESS

DAWN DELIVERY

SATURDAY DELIVERY

NEXT DAY DELIVERY

ECONOMY SERVICE

INTERNATIONAL

COURIER AIRFREIGHT

CASH SHIPMENT

R

CHARGES

QUANTITY

DESCRIPTION OF CONTENTS

MASS

DIMENSIONS

VOL.

INSURANCE

1 A3 Notice Board Tergniet

X X

YES

X X

NO

X X

VALUE

TOTAL No. PIECES

TOTAL MASS

TOTAL VOLUME MASS KG

R

Sender's Reference

Tergniet Site Notice Board

I AGREE TO BE BOUND BY THE STANDARD CONDITIONS OF CARRIAGE OVERLEAF

SIGNATURE:

[Signature]

DATE: 3 / 2 / 2026

THIS CONSIGNOR GUARANTEES PAYMENT TO THE COURIER FOR CONSIGNMENT IN THE EVENT THAT THE CONSIGNEE FAILS TO PAY WITHIN 30 DAYS

RECEIVED IN GOOD ORDER BY CONSIGNEE

RECEIVED BY JKJ EXPRESS

SIGNATURE:

SIGNATURE:

[Signature]

PRINT NAME:

DATE:

03/02/2026

DATE:

TIME:

TIME:

12:30

TOTAL

R

FREIGHT

AFTER HOURS

SAT. COLLECTION DELIVERY

OUTLYING AREA

DAWN DELIVERY

FUEL SURCHARGE

INSURANCE

NON-DOC HANDLING FEE

DOC SURCHARGE

TOLL FEES

SUB TOTAL

V.A.T.

R