

Appendix K – Need and Desirability

NEED AND DESIRABILITY

The National EIA Regulations require that the Need and Desirability of a proposed project be outlined as part of the SR. The following section will describe the motivation, benefits, need and desirability of the proposed residential development as set out in General Notice 891 of 2014. The Guideline on need and desirability in terms of the EIA Regulations 2010 will be addressed by answering the questions on the specific impacts.

Key drivers and principles of need and desirability assessment

In the General Notice 891 of 2014, it is stated that, consistent with national priorities, environmental authorities must support “increased economic growth and promote social inclusion”, whilst ensuring that such growth is “ecologically sustainable”. Furthermore, the New Growth Path (2010) highlights that in essence the aim is to target our limited capital and capacity at activities that maximise the creation of decent work opportunities. To that end, we must use both macro and micro economic policies to create a favourable overall environment and to support more labour-absorbing activities. The main indicators of success will be jobs (the number and quality of jobs created), growth (the rate, labour intensity and composition of economic growth), equity (lower income inequality and poverty) and environmental outcomes.

The National Development Plan 2030 (NDP) (2012) stresses that the threat to the “environment and the challenge of poverty alleviation are closely intertwined” and as such environmental policies should not be framed as a choice between the environment or economic growth.

Sustainable development is the process that is followed to achieve the goal of sustainability. Sustainable development implies the selection and implementation of a development option, which allows for appropriate and justifiable social and economic goals to be achieved, based on the meeting of basic needs and equity, without compromising the natural system on which it is based (National Strategy for Sustainable Development and Action Plan 2011 – 2014 (NSSD 1) (2011)).

Consistent with the aim and purpose of EIAs, the concept of “need and desirability” relates to, amongst others, the nature, scale and location of development being proposed, as well as the wise use of land. While essentially, the concept of “need and desirability” can be explained in terms of the general meaning of its two components in which need primarily refers to time and desirability to place, “need and desirability” are interrelated and the two components collectively can be considered in an integrated and holistic manner (GN 891 of 2014).

Motivation for the proposed project

Section 10 describes the current status quo of the IDPs and SDFs of the District and Local municipalities. As can be clearly seen from within the municipalities, there is a combined drive for development of the residential sector. There is a high and urgent need for increased housing facilities, linked to a sustainable utilisation of resources, taking into consideration the land use and job creation opportunities from residential activities.

Benefits of the proposed project

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. A holistic approach towards employment will be implemented as a key focus will be to source around 5260 women and 11 215 youth opportunities.

Need

In providing for the need for a project, the applicant must explain how a development would benefit the local/regional/national community. By emphasising how communities would benefit from the development, the need for a project is emphasized. It will be dealt with by answering the questions as set out in General Notice 891 of 2014, Guideline on need and desirability in terms of the EIA Regulations 2010.

Table 0-1. Needs assessment

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Question		BAR outcome response
1.	How will this development (and its separate elements/aspects) impact on the ecological integrity of the area?	
1.1.	How were the following ecological integrity considerations taken into account? - Threatened Ecosystems; - Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure; - Critical Biodiversity Areas (“CBAs”) and Ecological Support Areas (“ESAs”); - Conservation targets; - Ecological drivers of the ecosystem; - Environmental Management Framework; - Spatial Development Framework; and - Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.)	The proposed project will may have the following impacts on the ecological integrity of the area: - Loss of remaining transformed or semi-natural vegetation - Increased hard surfaces that alter natural hydrology - Localised disturbance of soil and habitat during construction Because the site is not a CBA or ESA and is already disturbed, the impact on regional biodiversity patterns is low.
1.2	- How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity? - What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? - What measures were explored to enhance positive impacts?	The proposed layout ensure that protected tree species are preserved onsite. Because the site is already transformed, within the urban edge, and not located in a Critical Biodiversity Area (CBA) or Ecological Support Area (ESA), the potential for significant biodiversity loss is low. The development includes internal open spaces that can be: - Planted with indigenous vegetation - Managed as ecological “stepping stones” - Used for stormwater attenuation that mimics natural systems This can improve ecological functioning compared to the current disturbed state. Sustainable drainage systems (SUDS) can: - Reduce erosion

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Question			BAR outcome response
			• Improve water quality • Support wetland-like micro-habitats This enhances ecological integrity and protects downstream ecosystems. By developing already-transformed land, the project: • Reduces pressure to develop natural or rural land elsewhere • Prevents fragmentation of intact ecosystems • Supports compact settlement patterns that protect biodiversity at a landscape scale This is consistent with the WCBSP, EMF, and MSDF.
1.3	• How will this development pollute and/or degrade the biophysical environment? • What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? • What measures were explored to enhance positive impacts?		• Construction activities include the removal of vegetation and earthworks required to level the site and to construct the residential development and include, but are not limited to, associated infrastructure such as roads, water reticulation, sewer reticulation, waste collection points and cable ways for electricity and internet. Potential pollution sources identified during the construction phase include: ○ Illegal dumping of building rubble; ○ Risk to air quality due to dust at site preparation; ○ Potential risk for carbohydrate spillages from machinery and vehicles; ○ Pollution of waterbodies. • All mitigation measures outlined in the various specialist reports, as well as the Environmental Management Plan must be implemented. • Exclusion zones / no-development areas as recommended in this report need to be adhered to.
1.4	• What waste will be generated by this development? • What measures were explored to firstly avoid waste, and where waste could not be avoided altogether, what measures were explored to minimise, reuse and/or recycle the waste? • What measures have been explored to safely treat and/or dispose of unavoidable waste?		• During the construction period waste will be limited construction waste and general waste. The Developer and contractors will be responsible for waste management and removal on site in this period. This is also noted in the EMPR.

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Question			BAR outcome response
			• During the operation phase, service level agreements with Mossel Bay Local Municipality indicate that the municipality will collect and manage waste generated by the proposed residential development. • Waste will be managed by the local municipality, as part of their recycling efforts..
1.5	• How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage? • What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? • What measures were explored to enhance positive impacts?		The broader Tergniet–Reebok area forms part of a coastal cultural landscape shaped by: • Fishing communities • Holiday-town development patterns • Scenic coastal views A new residential development may: • Change the visual character of the landscape • Introduce more contemporary architectural forms • Reduce open coastal views from certain vantage points The study area has been impacted by agricultural activities and cultivation since at least 1939 and likely considerably earlier. Because the site is inland of the coastal edge and surrounded by existing housing, the impact on the regional cultural landscape is low. This basic investigation has determined that no colonial or pre-colonial heritage resources of value occur on 38/136. The historic railway to the south and old house on 30/136 to the west are protected by the NHRA but will not be impacted by the proposed development. Chance finds or Fossil Finds Procedure has been included in the Environmental Authorisation / Environmental Management Program (EMPr) for the Construction Phase of the project.
1.6	• How will this development use and/or impact on non-renewable natural resources? • What measures were explored to ensure responsible and equitable use of the resources?		The proposed development will inevitably draw on several non-renewable resources, both during construction and once the homes are occupied.

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Question		BAR outcome response
	- How have the consequences of the depletion of the non-renewable natural resources been considered? - What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? - What measures were explored to enhance positive impacts?	Most conventional building materials rely heavily on non-renewable inputs: Cement and concrete require limestone and large energy inputs for clinker production. Bricks consume clay and coal during firing. Steel depends on iron ore and fossil-fuel-intensive smelting. Glass and aluminium require high-temperature processing powered largely by non-renewables. Construction machinery, transport of materials, and site preparation rely on: - Diesel for earthmoving and transport - Electricity from a grid still dominated by coal in South Africa Although water itself is renewable, the energy used to pump, treat, and distribute water is not. If the development increases demand on Mossel Bay Municipality’s water system, the associated energy footprint rises. If desalination is used during drought periods, the non-renewable energy demand becomes even higher. Once occupied, homes draw electricity for: - Heating and cooling - Geysers - Appliances Unless the development incorporates solar PV, solar geysers, or energy-efficient design, it increases long-term demand on South Africa’s coal-based grid.
1.7	How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part?	Clearing land removes indigenous coastal fynbos and dune vegetation, which are renewable only over long ecological timescales. Landscaping often replaces indigenous species with lawns or ornamentals that require more water and maintenance.

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Question	BAR outcome response
• Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds? • What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources? • What measures were taken to ensure responsible and equitable use of the resources? • What measures were explored to enhance positive impacts? • Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth or does it reduce resource dependency (i.e. de-materialised growth)? (note: sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life). • Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra- and intergenerational equity, and are there more important priorities for which the resources should be used (i.e. what are the opportunity costs of using these resources this the proposed development alternative?) • Do the proposed location, type and scale of development promote a reduced dependency on resources?	Loss of vegetation reduces dune stability, increasing erosion risk. Habitat fragmentation affects pollinators, small mammals, reptiles, and bird species typical of the Garden Route coastal belt. Alien invasive species often establish after disturbance, outcompeting indigenous vegetation. Households draw from municipal water systems fed by rivers, aquifers, and dams — renewable but highly stressed in the Mossel Bay region. Increased abstraction can reduce streamflow, groundwater recharge, and wetland functioning. Stormwater runoff from hardened surfaces reduces natural infiltration and can degrade water quality in nearby wetlands and the ocean. Measures to avoid and minimise the use of natural resources for the project include: • Planning & Design measures that include • Compact site layout to reduce the total footprint, preserving more natural vegetation and soil. • Positioning development outside sensitive dune areas, drainage lines, and high-value vegetation patches. • Retaining natural vegetation corridors to avoid clearing and reduce the need for irrigation-heavy landscaping. • Optimising road and service alignments to avoid duplicate infrastructure and minimise earthworks. • Water use efficiency that include: • Retaining natural vegetation to avoid irrigation demand. • Avoiding water intensive landscaping such as lawns. • Construction phase management • Avoiding unnecessary clearing by pegging the exact construction footprint. • Avoiding double-handling of materials through site planning • Strict waste separation and promoting recycling of materials

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Question			BAR outcome response
			Specialist recommendations have been incorporated into the EMPR. The EMPR include mitigation and management measures.
1.8	- How were a risk-averse and cautious approach applied in terms of ecological impacts? - What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)? - What is the level of risk associated with the limits of current knowledge? - Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?		The site was assessed by qualified specialists, and their recommendations were incorporated into the EMPr. The proposed development has implemented the following precautionary measures: - It respects the coastal management / setback lines and no-go areas. - It does not encroach on coastal public property, estuaries, or dune systems earmarked for protection; and - It aligns with the Mossel Bay SDF's coastal development guidelines.
1.9	- How will the ecological impacts result from this development impact on people's environmental right in terms following: - Negative impacts: e.g. access to resources, opportunity costs, loss of amenity (e.g. open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts? - Positive impacts: e.g. improved access to resources, improved amenity, improved air or water quality, etc. What measures were taken to enhance positive impacts?		The impact of potential pollution of services during the operational phase has been assessed and appropriate mitigation measures have been proposed and incorporated into the EMPR. During the operational phase, all services need to be maintained by the municipality. Trees (especially <i>Sideroxylon inerme</i> and <i>Pittosporum viridiflorum</i>) outside of the SDP footprint, but still within the PAOI must be protected and may not be damaged.
1.10	Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socio-economic impacts (e.g. on livelihoods, loss of heritage site, opportunity costs, etc.)?		The Tergniet–Great Brak coastal strip depends heavily on ecosystem services provided by dune systems, coastal vegetation, marine environments, and freshwater resources. These services directly support human wellbeing, local livelihoods, and the social fabric of the community. Regulating services include dune stabilisation, flood protection, storm-surge buffering, groundwater recharge, and erosion control.

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Question		BAR outcome response
		The Mossel Bay IDP confirms the need for housing in the area, hence the project has a strong motivation for commencing. The potential pollution due to services will be addressed via installation of services at the standard of the municipality. During the operational phase, all services need to be maintained by the municipality.
1.11	Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives/targets/considerations of the area?	• The study site does not overlap with any threatened ecosystem as Section 52 of NEMBA. • The study site does not overlap with any critical or important biodiversity area or any ecological support areas. • The proposed layout excludes the sensitive habitats and will be developed over a previously disturbed agricultural land.
1.12	Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the “best practicable environmental option” in terms of ecological considerations?	• The alternative layouts consider protected tree species and optimising on the conservation of these within the development within the open spaces. • The layout also adhered to the recommendations of the terrestrial and botanical specialist.
1.13	Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and existing and other planned developments in the area?	Cumulative impacts arise when multiple developments, past and future, interact with the proposed project. In Tergniet the coastal environment is already under pressure from residential expansion, infrastructure upgrades, tourism growth and densification. The proposed development on Portion 38 of Farm 136, Tergniet represents a highly efficient use of the municipality’s existing infrastructure network and service capacity. By locating new residential opportunities within an already-serviced urban area, the development supports sustainable growth and reduces the need for costly new infrastructure investment. This include the utilisation of the existing Robertsons Avenue for access, And connecting to the existing infrastructure for sewerage to the Dolphin Crescent Pump Station and the Seester Pump Station.

Desirability

Desirability relates to the placement of an activity. The motivation must indicate why the location of a development in this particular area would be more desirable than establishing in another area. It will be dealt with by answering the questions as set out in GNR 326 of 2014, Guideline on need and desirability in terms of the EIA Regulations 2010. Table 0-2 summarises the key questions and thought process to be followed during the EIA Phase to ensure the desirability of the project has been thoroughly assessed.

Table 0-2. Assessment for desirability

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Question			BAR outcome response
2.	What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?		
2.1	- The IDP (and its sector plans' vision, objectives, strategies, indicators and targets) and any other strategic plans, frameworks of policies applicable to the area; - Spatial priorities and desired spatial patterns (e.g. need for integrated or segregated communities, need to upgrade informal settlements, need for densification, etc.); - Spatial characteristics (e.g. existing land uses, planned land uses, cultural landscapes, etc.); and - Municipal Economic Development Strategy ("LED Strategy").	The Mossel Bay IDP 25/26 sets out the municipality's strategic priorities for spatial development, infrastructure investment, service delivery, and socio-economic growth. The proposed residential development supports these priorities in several keyways. Supports Strategic Objective: Sustainable Human Settlements. The IDP emphasises: - Increasing access to housing; - Promoting orderly settlement growth; - Encouraging densification within existing urban areas.	
2.2	- Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area? - Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?	Tergniet is a low- to medium-density coastal settlement characterised by: - A strong tourism and holiday-home economy - A growing permanent residential population (retirees, remote workers, middle-income families) - Limited local employment opportunities, with most jobs located in Mossel Bay, Great Brak, and George	

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Question			BAR outcome response
			- A municipal focus on sustainable coastal development, water security, economic diversification, and protection of coastal character Positive Socio-Economic Impacts may include: - Short-term employment and local economic stimulation as construction will create temporary jobs for local labour (general labour, artisans & subcontractors), local hardware suppliers will be supported. - Increased municipal revenue will be obtained through property rates, service charges and connection fees. - The development will add to the formal housing stock in a high-demand coastal area. - There will be support for local businesses such as retail, restaurants, personal services and tourism opportunities. Negative Socio-Economic Impacts may include: - Increased pressure on water supply as Mossel Bay is a water-stressed municipality. - Increased traffic and road capacity impacts as increased trips will occur during construction and operation of the development. - There may be pressure on social services such as healthcare, schools and emergency services. - Ecological degradation such as vegetation loss, runoff and dune disturbance may lead to erosion that can translate into higher municipal maintenance costs, reduced tourism appeal and potential property value impacts.
2.3	How will this development address the specific physical, psychological, developmental, cultural and social needs and interests of the relevant communities?		The Tergniet community consist of a mix of permanent residents, retirees, holiday-home owners and local workers. The development will contribute in the following ways:
2.4	- Will the development result in equitable (intra- and inter-generational) impact distribution, in the short- and long-term? - Will the impact be socially and economically sustainable in the short- and long-term?		

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Question			BAR outcome response
			• Provision of formal housing that meets building standards for structural safety. • Improved service infrastructure tht benefin both new and existing residents. • Safe road access and pedestrian movement. • Stormwater management systems that reduce local flooding and protect surrounding properties • Energy efficient designs (solar water heating, insulation) that reduce household cost and improve comfort. The area has a growing population and increasing pressure on infrastructure. Formal, compliant development helps stabilise service delivery and improves physical living conditions.
2.5	• In terms of location, describe how the placement of the proposed development will: ○ result in the creation of residential and employment opportunities in close proximity to or integrated with each other; ○ reduce the need for transport of people and goods; ○ result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport); ○ compliment other uses in the area; ○ be in line with the planning for the area; ○ for urban related development, make use of underutilised land available with the urban edge; ○ optimise the use of existing resources and infrastructure; ○ opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement); ○ discourage “urban sprawl” and contribute to compaction/densification;	The Mossel Bay municipal area prioritises inclusive economic growth and job creation. Even small-scale developments contribute meaningfully to local livelihoods. The study site does not overlap with any threatened ecosystem as Section 52 of NEMBA. The study site does not overlap with any critical or important biodiversity area or any ecological support areas. Tergniet’s cultural identity is tied to its coastline, fishing traditions, and quiet residential character. Developments that align with this strengthen community cohesion. The proposed residential development on Portion 38 of Farm 136 aligns well with the Mossel Bay Municipal Spatial Development Framework (MSDF) because it reinforces the municipality’s spatial vision for compact coastal settlement growth, infrastructure-efficient expansion, and consolidation of the Tergniet–Reebok urban area. The MSDF explicitly identifies this coastal strip as a managed growth area where infill, densification, and orderly residential expansion are preferred.	

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Question		BAR outcome response
	○ contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs; ○ encourage environmentally sustainable land development practices and processes; ○ take into account special locational factors that might favour the specific location (e.g. the location of a strategic mineral resource, access to the port, access to rail, etc.); ○ the investment in the settlement or area in question will generate the highest socio-economic returns (i.e. an area with high economic potential); ○ impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area; and ○ in terms of the nature, scale and location of the development promote or act as a catalyst to create a more integrated settlement?	
2.6	● How were a risk-averse and cautious approach applied in terms of socio-economic impacts? ○ What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)? ○ What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge? ○ Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?	Socio-economic systems are dynamic, and the assessment therefore the following were assessed: ● Considered upper-bound estimates of population growth, traffic volumes, and service demand. ● Evaluated worst-case water-scarcity scenarios, given Mossel Bay's history of drought and supply constraints. ● Assessed cumulative impacts from other developments in Tergniet and Great Brak, not only the project in isolation. Given the municipality's water and wastewater constraints, the approach included: ● Designing for reduced water demand (low-flow fittings, rainwater harvesting readiness). ● Ensuring stormwater attenuation to avoid burdening downstream systems.

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Question			BAR outcome response
			Confirming that the development does not assume future infrastructure upgrades that may not materialise.
2.7	- How will the socio-economic impacts resulting from this development impact on people's environmental right in terms following: - Negative impacts: e.g. health (e.g. HIV-Aids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts? - Positive impacts. What measures were taken to enhance positive impacts?		Section 24 of the Constitution guarantees everyone the right to an environment that is not harmful to their health or wellbeing, and to have the environment protected for the benefit of present and future generations. Socio-economic impacts are therefore directly linked to environmental rights, because health, safety, social stability, and access to a safe living environment are all part of this constitutional protection. Health risks will be prevalent during the construction-phase where workforce movement can increase vulnerability to communicable diseases. Dust, noise, and construction pollution can affect respiratory health and wellbeing. This can be mitigated by: - Limiting construction workforce size and avoiding worker camps. - Mandatory health and safety induction including HIV/AIDS awareness. - Dust suppression, noise control, and strict adherence to construction hours. - Provision of adequate sanitation and waste facilities for workers. Increased construction traffic and movement of workers may raise perceptions of crime or actual safety risks. This can be mitigated by: - Controlled access to the construction site. - Security screening of contractors. - Traffic management plan with speed control and signage. - Clear pedestrian routes and safe access points. Positive impacts include job creation, improved income and employment opportunities. Increased rates and service charges strengthen the municipality's ability to maintain infrastructure, waste management, and environmental services. Formal housing improves physical safety, health, and wellbeing.

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Question			BAR outcome response
	2.8	Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socio-economic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)?	The Mossel Bay municipal area prioritises inclusive economic growth and job creation. Even small-scale developments contribute meaningfully to local livelihoods.
	2.9	What measures were taken to pursue the selection of the “best practicable environmental option” in terms of socio-economic considerations?	The study site does not overlap with any threatened ecosystem as Section 52 of NEMBA. The study site does not overlap with any critical or important biodiversity area or any ecological support areas.
	2.10	- What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)? - Considering the need for social equity and justice, do the alternatives identified, allow the “best practicable environmental option” to be selected, or is there a need for other alternatives to be considered?	Tergniet's cultural identity is tied to its coastline, fishing traditions, and quiet residential character. Developments that align with this strengthen community cohesion. The proposed residential development on Portion 38 of Farm 136 aligns well with the Mossel Bay Municipal Spatial Development Framework (MSDF) because it reinforces the municipality's spatial vision for compact coastal settlement growth, infrastructure-efficient expansion, and consolidation of the Tergniet-Reebok urban area. The MSDF explicitly identifies this coastal strip as a managed growth area where infill, densification, and orderly residential expansion are preferred.
	2.11	What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?	
	2.12	What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle?	- The EMPR also includes operational mitigation measures to deal with the challenges of potential groundwater pollution, should the services not be maintained adequately. - The responsibility of the maintenance of the services should be with the operational phase.
	2.13	- What measures were taken to: - ensure the participation of all interested and affected parties; - provide all people with an opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation; - ensure participation by vulnerable and disadvantaged persons;	- For the proposed project, an English advert will be placed in the Mossel Bay Advertiser. - Site notices will be placed on the borders of the study area. - The notices and BID will be given to all owners and occupiers of land adjacent to the site where the activity is to be undertaken, municipal ward councillor in which the site and alternate site is situated; municipality who has

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Question			BAR outcome response
		○ promote community wellbeing and empowerment through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means; ○ ensure openness and transparency, and access to information in terms of the process; ○ ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge; and ○ ensure that the vital role of women and youth in environmental management and development were recognised and their full participation therein were be promoted?	jurisdiction of the area, any organ of state having jurisdiction in respect of any respect of the activity; and any other party as required by the Competent Authority. • Following publication of the adverts, placing of the site notices and circulation of the BID, numerous I&AP's will be registered. • Comments from registered I&AP will be captured on the CRR with their responses. • All comments from the I&AP will be captured as they were, and responses are also included in the CRR.
2.14	Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community (e.g. a mixture of low-, middle-, and high-income housing opportunities) that is consistent with the priority needs of the local area (or that is proportional to the needs of an area)?		Tergniet and the broader Mossel Bay municipal area have a diverse community profile, including: • Low-income households working in service, construction, domestic work and seasonal tourism • Middle-income families seeking safe, serviced housing close to employment in Mossel Bay, Great Brak and George • Higher-income residents and retirees attracted to the coastal lifestyle and property investment opportunities • Holiday-home owners and tourists who value the area's natural character and tranquillity Although the development is not a formal inclusionary-housing project, it contributes to a balanced housing market by adding to the middle-income housing stock, which is the segment with the highest demand in Tergniet. The development creates opportunities for all segments of the community, not only future homeowners. The development align with the municipal planning documents (SDF, IDP, coastal policies) emphasise: • Sustainable coastal development

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Question			BAR outcome response
			• Efficient use of existing infrastructure • Housing supply for a growing population • Economic stimulation and job creation • Protection of natural and cultural assets
2.15	What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected?		These measures are included in the project specific EMPR included in Appendix H of the BAR.
2.16	• Describe how the development will impact on job creation in terms of, amongst other aspects: ○ the number of temporary versus permanent jobs that will be created; ○ whether the labour available in the area will be able to take up the job opportunities (i.e. do the required skills match the skills available in the area); ○ the distance from where labourers will have to travel; ○ the location of jobs opportunities versus the location of impacts (i.e. equitable distribution of costs and benefits); and ○ the opportunity costs in terms of job creation (e.g. a mine might create 100 jobs, but impact on 1000 residential jobs, etc.).		• The job opportunities created by the proposed project is estimated to be approximately 45 of HDIs of which approximately 48% will be younger than 35 years and approximately 59% female. It is anticipated that about a 100 un-skilled employment opportunities will be created during the construction phase of the project.
2.17	• What measures were taken to ensure: • that there were intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment; and • that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?		• All relevant parties were involved in the stakeholder process. • The issues identified during the public participation process will be assessed in the specialist studies and mitigation measures are included in the EMPR (Appendix H).
2.18	What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people's common heritage?		Measure that will be undertaken include: • Avoidance of sensitive areas such as dune systems, natural drainage lines, and indigenous vegetation patches. • Compliance with coastal management lines to ensure no encroachment into areas that provide public coastal protection and ecological services.

“PROMOTING JUSTIFIABLE ECONOMIC AND SOCIAL DEVELOPMENT”

Question			BAR outcome response
			• Retention of natural vegetation buffers to maintain ecological functioning and protect public environmental assets. • Stormwater systems designed to protect downstream ecosystems, preventing pollution of the marine environment that the public relies on for recreation and wellbeing. • No obstruction of public access to the coast, ensuring that the coastline remains a shared public resource. • Development located within the existing urban edge, ensuring efficient use of existing infrastructure and preventing unnecessary loss of natural land. • Water efficient design (low flow fittings, rainwater harvesting readiness) to reduce pressure on the municipality's scarce water resources. • Energy efficient building design (solar water heating, insulation) that reduces long term demand on the coal based grid, benefiting the wider public through reduced emissions. • Local labour and procurement commitments, ensuring that economic benefits flow to the surrounding community. • Provision of formal, compliant housing, supporting municipal objectives for orderly, sustainable settlement growth. These measures ensure that the development does not privatise or degrade environmental assets that belong to the broader community.
2.19	Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?		• The proposed management measures of all specialists will be included in the EIAR and site-specific EMPr. • The EMPr also includes operational mitigation measures to deal with the challenges of potential groundwater pollution, should the services not be maintained adequately.
2.20	What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment?		

“PROMOTING JUSTIFIABLE ECONOMIC AND SOCIAL DEVELOPMENT”

Question			BAR outcome response
			The responsibility of the maintenance of the services should be with the operational phase applicant.
2.21	Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations?		The alternatives assessment considered site layout, density, infrastructure options, stormwater approaches, landscaping, and the no-go alternative. Each alternative was evaluated against: - Ecological integrity - Biophysical sensitivity - Coastal management constraints - Infrastructure capacity - Socio-economic needs and benefits - Cumulative impacts - Long-term sustainability
2.22	Describe the positive and negative cumulative socio-economic impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and other planned developments in the area?		Socio-economic systems are dynamic, and the assessment therefore the following were assessed: - Considered upper-bound estimates of population growth, traffic volumes, and service demand. - Evaluated worst-case water-scarcity scenarios, given Mossel Bay’s history of drought and supply constraints. - Assessed cumulative impacts from other developments in Tergniet and Great Brak, not only the project in isolation. Given the municipality’s water and wastewater constraints, the approach included: - Designing for reduced water demand (low-flow fittings, rainwater harvesting readiness). - Ensuring stormwater attenuation to avoid burdening downstream systems. Confirming that the development does not assume future infrastructure upgrades that may not materialise.

