Appendix S: NEMA Section 32 Assessment Report

ENVIRONMENTAL AMENDMENT REPORT FOR PART 2 AMENDMENT PROCESS:

PROPOSED AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION DEA&DP REF.: 16/3/1/5/D2/19/0021/12 (2013) TO PERMIT THE PROPOSED RESIDENTIAL DEVELOPMENT ON ERF 28005, GEORGE (BLUE MOUNTAIN).

SCREENING REPORT FOR AN ENVIRONMENTAL AUTHORIZATION AS REQUIRED BY THE 2014 EIA REGULATIONS – PROPOSED SITE ENVIRONMENTAL SENSITIVITY

EIA Reference number: Old 2013 16/3/1/5/D2/19/0021/12

Project name: EA Part 2 Amendment

Project title: Erf 28005, George

Date screening report generated: 10/04/2026 14:40:30

Applicant: George Residential Apartments (Pty) Ltd

Compiler: Dupré Lombaard (Virdus Works (Pty) Ltd) EAP 2019/304

Compiler signature:

Application Category: Transformation of land|Indigenous vegetation

VIRDUS WORKS

Report terms of Regulation 32 of the Environmental Impact Assessment Regulations 2014 (as amended) made in terms of the National Environmental Management Act, 1998, Act 107 of 1998.

Western Cape Department of Environmental Affairs and Development Planning Reference: 16/3/3/6/7/5/D2/19/0099/26

30 July 2026

ENVIRONMENTAL AMENDMENT REPORT FOR PART 2 AMENDMENT PROCESS:

PROPOSED AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION DEA&DP REF.: 16/3/1/5/D2/19/0021/12 (2013) TO PERMIT THE PROPOSED RESIDENTIAL DEVELOPMENT ON ERF 28005, GEORGE (BLUE MOUNTAIN).

SG Code: C02700020002800500000 / Location: Lat: 33° 59' 10.892'' S | Lon: 22° 29' 50.686'' E

Applicant:	**EAP:**
George Residential Apartments (Pty) Ltd Reg. No. 2026/016581/07	**Virdus Works (Pty) Ltd Reg. No. 2018/585747/07**
Represented by: Mr Japie Vos	Represented by: Mr Dupré Lombaard SACPLAN: B/8076/1998 // EAPASA: 2019/304
Telephone: +27 11 300 8700 / +27 72 240 4739 E-mail: japie@century.co.za Address: 5 Lynx Street, Treesbank AH, Midrand, 1682	Mobile: +27 82 895 6362 E-mail: dupre.lombaard@virdus.com Address: 11 Elektron Street, Techno Park, Stellenbosch, 7600

EXECUTIVE SUMMARY

The report is related to an application for a Part 2 Amendment of the Environmental Authorisation (EA) issued on 26 February 2013 with reference: 16/3/1/5/D2/19/0021/12 for the development of Portion 22 of Farm Kraaibosch and Erf 23333, George. The original EA approved a mixed-use development (Business Zone I) on what was then described as Portion 8, now Erf 28005, George. Erf 28005, 5,6987ha in extent, located on the corner of Park Road and Platinum Drive in the Blue Mountain neighbourhood, on the southern side of the Eden Meander Lifestyle shopping centre. It is abutted by residential development inside of the Blue Mountain Estate on the north and southwestern sides, with office development to the south thereof.

The description of the authorised activity under section A of the 2013 EA reads as follows: "*The proposal is for the construction of a mixed development comprising of Portion 1 Business Zone I (i.e. business, townhouses, flats, residential buildings, places of assembly, place of entertainment, place of instruction, institution, bottle store, supermarkets and service trade), Portion 2 - Public Open Space (i.e. remains open space), Portion 3 - Authority Zone (remains as before), Portion 4 - Residential Zone III (accommodates the N2 interchange), Portions 5, 6 and 9 - Business Zone I (business premises, by consent townhouses, flats, residential buildings, place of assembly, place of entertainment, institution, bottle offices, supermarket and service trades etc.), Portion 7 - Transport Zone III. Portion 8 - Business Zone I (building height limited to two storeys). Portion 10 - Business Zone I (building height is limited to three storeys), Portion 11 - Business Zone II (i.e. shop, townhouses by consent, flats, residential buildings, places of assembly, offices, supermarkets and restaurants) on the respective portions, of which the total area proposed for building construction covers approximately 240 000m² and the first phase of the development proposal will consist of approximately 120 000m². Portions 1 - 11 collectively represent the subject property, namely Portion 22 of Farm Kraaibosch and Erf 23333, George.*"

Since the development of Portion 22 of Farm Kraaibosch and Erf 23333, in keeping with the 2013 EA, the site (Erf 28005) was not further developed. It has been fully serviced and can at any time be used for business purposes, for which there appears to be no demand. While standing vacant it has been covered in natural vegetation.

The applicant intends to deviate from the approved double storey business/office use and to use the land purely for residential purposes. As the change results in a change of scope and potentially different impacts, a Part 2 Amendment is required in terms of Regulation 31 of the Environmental Impact Assessment Regulations 2014 (as amended) made in terms of the National Environmental Management Act, 1998, Act 107 of 1998 (NEMA). The description of the activity on Erf 28005 must accordingly change to: Erf 28005, George (previously referred to as Portion 8 of the development of Portion 22 of Farm Kraaibosch and Erf 23333, George) is authorised for residential development in apartment blocks up to four storeys in height.

The proposed development consists of 36 apartment blocks containing 680 residential units for which 870 parking bays are provided. The proposed apartment buildings cover approximately 40% of the site. A clubhouse, gymnasium, padel and tennis court, swimming pool and outdoor recreation area are also proposed for the complex with access off Platinum Drive. The design of the apartment blocks is such that it creates a stepped height towards the abutting Blue Mountain Estate, and it creates garden space around each block, to fit the look and feel of the area and to create distance between the new and the existing residential dwelling units. It is unlikely that the "preferred development" will have a negative effect on the health and well-being of the neighbours or be detrimental to the life or property of the neighbours.

The rights to the development must also be transferred from Laritza Investments 183 (Pty) Ltd to George Residential Apartments (Pty) Ltd, Reg. no. 2026/016581/07.

It is the opinion of the EAP that the proposed amendment to permit the development of four-storey residential units does not represent a significant increase in environmental risk, provided that appropriate mitigation measures are implemented.

CONTENT

TABLE OF FIGURES

1. INTRODUCTION

1.1 Context of the report

This report serves as assessment of the potential impacts related to an application for a Part 2 Amendment of the Environmental Authorisation (EA) issued on 26 February 2013 with reference: 16/3/1/5/D2/19/0021/12. The original EA approved a mixed-use development (Business Zone I) on Erf 28005, George, then described as: Portion 8 of the development of Portion 22 of Farm Kraaibosch and Erf 23333, George.

The applicant now intends to deviate from the approved business/office use to a purely residential model. As this change results in a change of scope and potentially different impacts, a Part 2 Amendment is required in terms of Regulation 31 of the Environmental Impact Assessment Regulations 2014 (as amended) made in terms of the National Environmental Management Act, 1998, Act 107 of 1998 (NEMA).

The amendment concerns the scope of the development and associated description of the listed activity as authorised. The description of the activity under section A of the 2013 EA reads as follows: "*The proposal is for the construction of a mixed development comprising of Portion 1 Business Zone I (i.e. business, townhouses, flats, residential buildings, places of assembly, place of entertainment, place of instruction, institution, bottle store, supermarkets and service trade), Portion 2 - Public Open Space (i.e. remains open space), Portion 3 - Authority Zone (remains as before), Portion 4 - Residential Zone III (accommodates the N2 interchange), Portions 5, 6 and 9 - Business Zone I (business premises, by consent townhouses, flats, residential buildings, place of assembly, place of entertainment, institution, bottle offices, supermarket and service trades etc.), Portion 7 - Transport Zone III. Portion 8 - Business Zone I (building height limited to two storeys). Portion 10 - Business Zone I (building height is limited to three storeys), Portion 11 - Business Zone II (i.e. shop, townhouses by consent, flats, residential buildings, places of assembly, offices, supermarkets and restaurants) on the respective portions, of which the total area proposed for building construction covers approximately 240 000m² and the first phase of the development proposal will consist of approximately 120 000m². Portions 1 - 11 collectively represent the subject property, namely Portion 22 of Farm Kraaibosch and Erf 23333, George.*"

The description of the activity on Erf 28005 (previously Portion 8 of the authorised development) must accordingly change to: <u>Erf 28005, George (previously referred to as Portion 8 of the development of Portion 22 of Farm Kraaibosch and Erf 23333, George) is authorised for residential development in apartment blocks up to four storeys in height.</u>

The rights to the development must also be transferred from Laritza Investments 183 (Pty) Ltd to George Residential Apartments (Pty) Ltd, Reg. no. 2026/016581/07.

1.2 Details of the EAP

Dupré Lombaard, a registered EAP and planner (EAPASA 2019/304 / SACPLAN B/8076/1998) has been appointed by the applicant to undertake the required authorisation process. Dupré Lombaard has been in environmental practice since 2000.

Since then, he has prepared and submitted many environmental authorisation applications and undertaken assessment and management processes.

Education and training:

- M.Sc. (Earth Sciences), 2000 – 2002 (cum laude) - University of the Western Cape. Focus on Fluvial Geomorphology, Hydrogeology, GIS, and Environmental Law.
- M.A. (Geography), 1985 – 1989 - University of the Orange Free State. Research in Urban Geography.
- Honns. B.A. (Geography), 1981 – 1982 - University of South Africa.
- B.Mil. (Economics and Geography), 1978 – 1980 - Military Academy (Faculty of Military Science, University of Stellenbosch).

Other certified training courses:

- Introduction to nature conservation, 1979 - Cape Provincial Administration.
- Transport and traffic engineering, 1991- SA Institute for Town and Regional Planners.
- Project Management for Environmental Managers, 2009 - University of the Free State.
- Integrated Water Resource Management, 2010 - University of the Western Cape.
- Accredited Green Building Professional, 2010 – Green Building Council of South Africa.
- SAMTRAC (SHEQ), 2010 - National Occupational Safety Association.
- Municipal Minimum Competency Training, 2014 - University of Stellenbosch.
- Commercial Mediation, 2016 - University of Cape Town.

Membership of professional and registration bodies:

- Registered Planner - SA Council for Town and Regional Planners since 1998 (B/8076/1998).
- Registered Environmental Assessment Practitioner - Environmental Assessment Practitioners Association of South Africa since 2021 (2019/304).
- Member of IAIA SA since 2001 (member 1060).

1.3 Details of the site

Erf 28005, George, 5,6987ha in extent is located on the corner of Park Road and Platinum Drive in the Blue Mountain neighbourhood, on the southern side of the Eden Meander Lifestyle shopping centre. It is abutted by residential development inside of the Blue Mountain Estate on the north and southwestern sides, with office development to the south thereof.

The site is relatively flat with a slight southeasterly slope of 1:33, draining towards the so-called Schaapkop Dam. It is fully serviced and the George Municipality has confirmed the availability of bulk services to accommodate the proposed development.

Since the development of the site in keeping with the 2013 EA, it was not further developed, and it has been covered in natural vegetation since then.

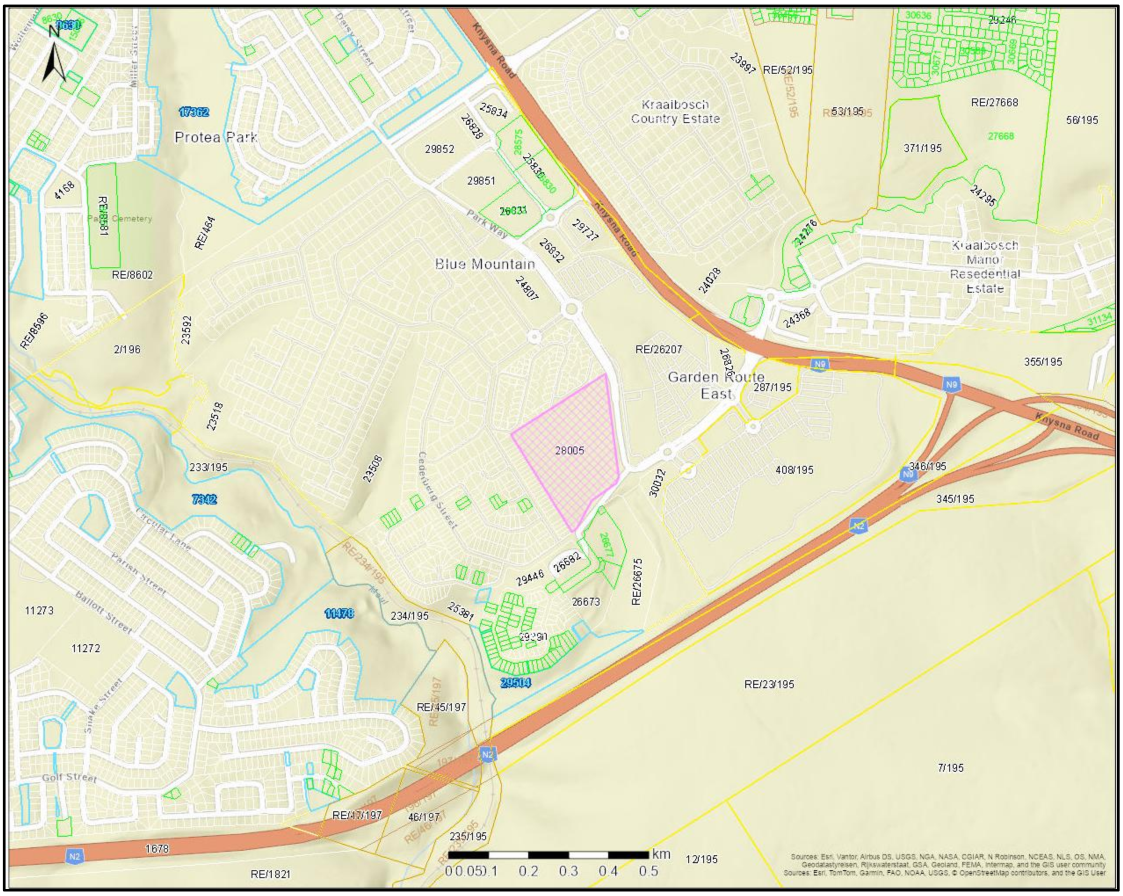

Figure 1: Erf 28005, George locality

Figure 2: Erf 28005, George site situation

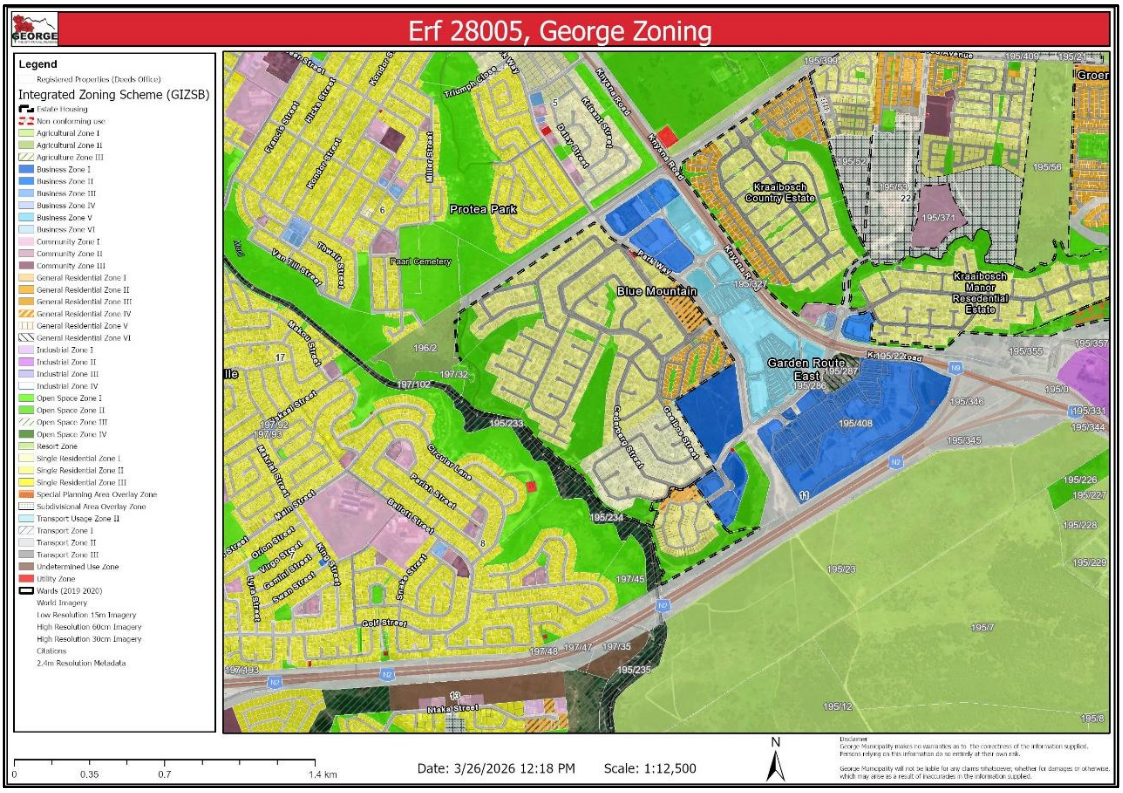

Figure 3: Erf 28005, George zoning

1.4 Site redevelopment proposal

The figure below illustrates the land development parameters of the proposed development, consisting of 36 apartment blocks containing 680 residential units for which 870 parking bays are provided. The proposed buildings cover approximately 40% of the site. A clubhouse, gymnasium, padel and tennis court, swimming pool and outdoor recreation area are also proposed for the complex with access off Platinum Drive.

CONTROL	PROPOSED
HEIGHT	4 STOREY
HEIGHT OF BUILDING	15 METRE
COVERAGE	39,6%
	22539
FAR	0,8
	48003
NO.OF UNITS	680
PARKINGS	870

Figure 4: Proposed residential development parameters

Figure 5: Site development plan (Preferred)

Figure 6: Site development plan (Alternative layout)

The consideration of alternatives for the proposed development is limited to the following:

- Alternative "No-go"

The no-go alternative will cause reversion to the currently authorised development, i.e., two-storey business development with a focus on offices, small-scale retail uses and flats above ground floor as permitted in terms of the current zoning.

- Alternative "Preferred development option"

The preferred option is the development as described above, composed of four-storey residential blocks covering 40% of the site and containing 680 dwelling units and 870 parking bays.

The preferred development option is graphically shown in Figure 5: Site development plan (Preferred) above.

- Alternative "Alternative layout option"

An alternative layout of the development entails the design of smaller blocks along the common boundaries with abutting residential areas, with lower building profiles around the edges. The coverage remains at 40%, containing 680 dwelling units and 850 parking bays.

The alternative layout option is graphically shown in Figure 6: Site development plan (Alternative layout) above.

Considering the specialist assessments as elaborated on below, read with the George Municipality's densification policy as set out in the Spatial Development Framework (SDF), the "preferred development option" and the "alternative layout option" are deemed feasible and viable options for a residential development. A "down-scaled option", for fewer residential units obtained through lowering the buildings to maximum three storeys, is not proposed, as it has no identifiable benefit although it might have insignificant lower potential negative effects on the receiving environment.

The "no-go" option does not entail no development. If the residential development does not occur, the site will be developed as authorised, with double-storey business uses up to 10,5m in building height as permitted by its zoning. Considering that the permitted coverage for business use is 100%, the "no-go" option does not hold any significant benefit

2. PROJECT DESCRIPTION: APPROVED VS. PROPOSED

The table below illustrates the differences between the authorised and proposed development on Erf 28005.

Feature	Approved (2013 EA)	Proposed Amendment
Primary Land Use	Business Zone I (Offices / Retail).	Residential (Apartments only).
Secondary Use	Flats above ground floor.	Private gymnasium, club house tennis and padel court and outdoor recreation area.
Building Height	2 Storeys (Maximum 10,5m height).	4 Storeys (Maximum 15m height).
Development Footprint	5,6987 ha	5,6987 ha (No change to outer boundary).
Coverage	100%	40%
Floor Area Ratio	2 (113 974m²)	0,84 (48 003m²)
Visual Character	Low-rise commercial / mixed.	Mid-rise residential with active recreation facilities / private open space.

3. NEED AND DESIRABILITY

The concept of “need and desirability” relates to, amongst others, the nature, scale and location of the development being proposed, as well as the wise and most beneficial 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 (i.e., is this the right time and is it the right place for locating the type of land-use / activity being proposed?), “need and desirability” are interrelated and the two components collectively can be considered in an integrated and holistic manner. The consideration of “need and desirability” therefore requires the consideration of the strategic context of the activity proposal along with the broader societal needs and the public interest. Ultimately development must not exceed ecological limits, while the proposed actions of individuals must be measured against the short-term and long-term public interest in order to promote justifiable social and economic development.

It must be decided which alternatives represent the “most practicable environmental option”, which in terms of the definition in NEMA and the purpose of the EIA Regulations are that option that provides the most benefit and causes the least damage to the environment as a whole, at a cost acceptable to society, in the long-term as well as in the short-term.

3.1 Need

An assessment of the need was performed by specialist assessment (Appendix P to the amendment application).

Demacon, in its market study indicates an existing demand and indications that demand conditions may continue to improve. Between 2026 and 2031 an estimated 4 095 new households will seek accommodation in the George geographic market area, resulting in an annual growth in demand of approximately 819 units. A portion of this is in the soc-called bonded segment, representing 46,9% of the total, yielding a take-up rate of 384 units per annum. A total of 680 units could therefore be developed and taken-up over the short to medium term, with an estimated 80% take-up of the proposed apartments in the study period.

3.2 Desirability

According to the George Municipality SDF, densification and resulting compaction of development is an approach to be followed to limit the fiscal impact of urban development and to support sustainable development. It increases the opportunities offered to citizens and compels integrated access to opportunities. The Municipality developed a “Fiscal Tool” to inform the SDF in 2019, on the benefits of compact development growth absorption vs urban sprawl. It guided the development of densification and use intensification indicators to come to a model for a more sustainable, integrated growth approach. The result is a “work, live, play” model and for service provision (services and facilities) to the identified densification areas as shown in Table 11 of the SDF. The site falls in the identified Eastern Commercial Node, also serviced by the principal public transport corridors, being within 500m walkable distance. Not only that, but it also within walking distance of a commercial node, open space networks and education facilities, making the site a desirable densification location.

The remaining consideration is whether the proposed development would detrimentally affect the neighbourhood. It refers to the potential impact of the proposal on the socio-economic environment, the compatibility of the proposed development with surrounding uses, its impact on the external engineering services, impact on safety, health and wellbeing of the surrounding community, its potential impact on heritage resources, impact on the biophysical environment, traffic impacts, parking, access and other transport related considerations, and whether the imposition of conditions can mitigate an adverse impact of the proposed use or development of the land.

The general welfare and safety of the abutting Blue Mountain Estate residents and landowners will not be significantly affected by the amended development proposal. The residential use is not objectionable and does not cause any disturbances through the release of fumes or creation of noise. The traffic impacts have no direct effect on the Blue Mountain Estate residents and have in any event been determined to be negligible in the specialist Traffic Impact Assessment.

Given the social economic situation, the scarcity of land as a finite resource, and the proposed development in an identified densification node with good accessibility, it is reasonable to state that the proposed development of an apartment complex in the place of the authorised business development is desirable. The best or maximum utilisation of land is essential to avoid urban sprawl by expansion of urban areas to satisfy the demand in response to population growth. Not only that but the better use of the land will contribute to increased revenue for the Municipality without the need to increase the extent of the urban area or of its infrastructure services required to service additional dwellings without impacting negatively on the capacity of the infrastructure or the service rendered to other citizens.

It then remains to determine whether the proposed "preferred development option" alternative will be of such nature or appearance that the area in which it is to be erected will probably or in fact be disfigured thereby, that it will probably or in fact be unsightly or objectionable, that it will probably or in fact derogate from the value of adjoining or neighbouring properties.

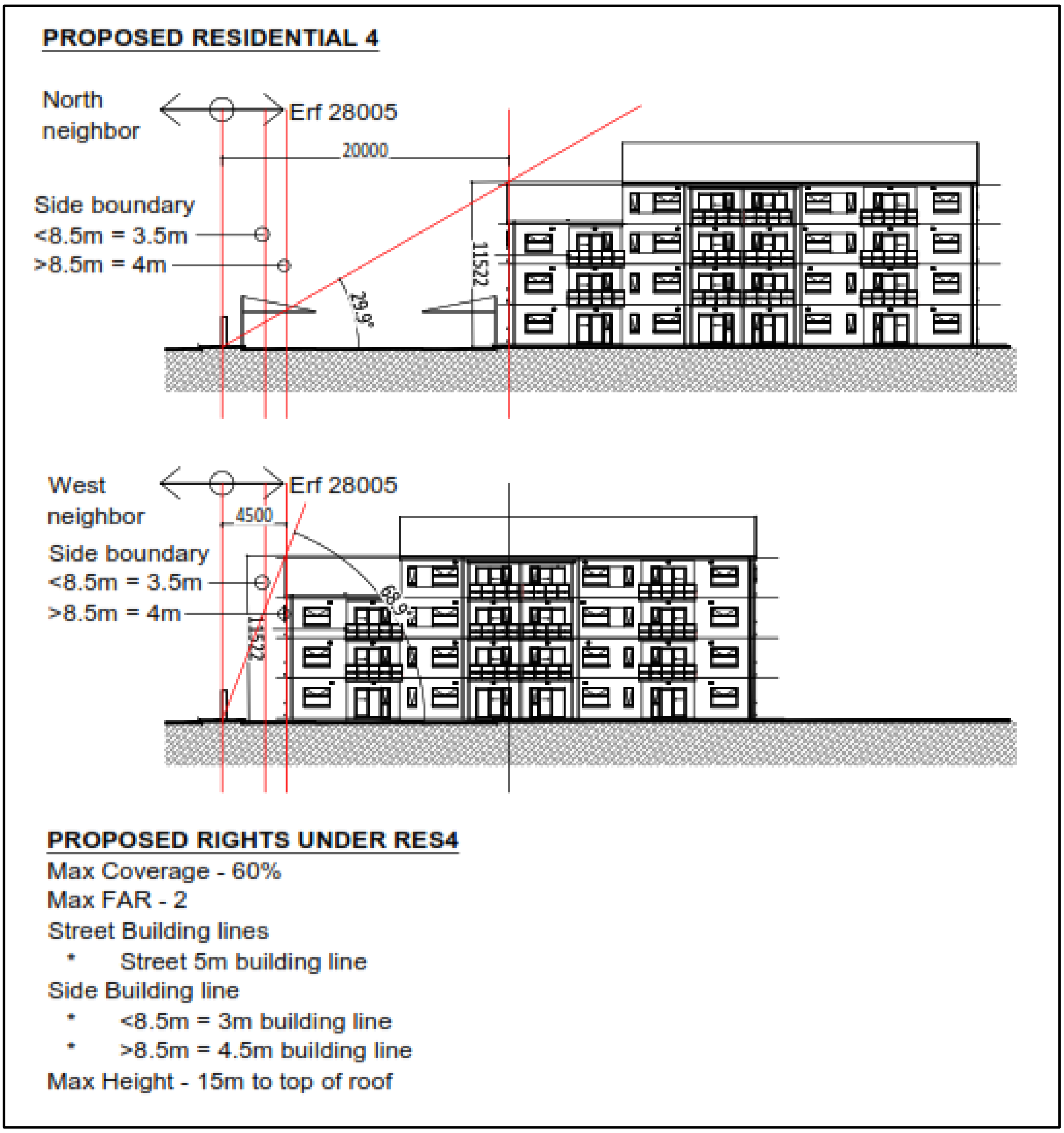

Figure 7: Proposed development design concept

The design of the apartment blocks is such that it creates a stepped height towards the abutting Blue Mountain Estate, and it creates garden space around each block, to fit the look and feel of the area and to create distance between the new and the existing residential dwelling units. It is therefore unlikely that the "preferred development" development will have a negative effect on the health and well-being of the neighbours or be detrimental to the life or property of the neighbours.

4. ASSESSMENT OF IMPACTS (REG 32(1)(A))

4.1 Traffic Impact Assessment (TIA) Update

Approved: Retail/Office trips were calculated as a pro-rata number of the larger Eden Meander development. Trips for offices were calculated at 2,3 trips / 100m² gross lettable floor area (GLA) during morning and evening peak periods. The estimated GLA was 12 500m², i.e., 288 trips would have occurred during the peak periods, with 85% of the trips into the development in the mornings and out in the afternoons.

Proposed: Residential trips (peak morning/afternoon trips and flow) are calculated at a rate of 0,65 trips per unit per peak period, indicating 111 trips inward and 332 outwards in the morning peak and 287 inward and 1 155 outwards in the evening peak.

Assessment: The site falls in a PT1 zone and is only 400m away from the major bus halt next to the Garden Route mall. The parking requirements for Erf 28005 (PT1 Zone) indicate that sufficient parking is provided on site at a rate of 1,28 parking bays per unit. To confirm the sufficiency of the parking provision, parking demand surveys were undertaken at comparable residential developments which are similar in nature and scale. The observed parking rates lead to the conclusion that the proposed parking rate of 1,28 bays/unit for Erf 28005 exceeds the observed average demand at similar developments and meets the parking requirements.

All study intersections are currently operating at acceptable Levels of Service under existing conditions. Under future background conditions, certain intersections are expected to experience increased delays; however, these impacts are primarily attributable to approved and latent developments in the broader area and not the proposed development. Upgrades were also provided in accordance with the Kraaibosch Roads Master Plan and Cost Apportionment (SMEC, 2025). Under total traffic conditions, including the proposed development, the road network is expected to continue operating at acceptable levels, subject to the implementation of the proposed mitigation measures as well as the following upgrades:

- Upgrading the Platinum Drive/Park Road intersection (Int. 9) to a roundabout.
- Dualling of Park Road between Platinum Drive and Blue Mountain Boulevard.

The proposed access will be from Platinum Drive, approximately 10m from Park Road. Adequate storage length is provided at the gatehouse. No right-turn lanes are warranted. The site is well located in relation to existing public transport infrastructure. The Go George bus network and minibus taxi facilities are within approximately 400 m walking distance of the site. No additional facilities are required.

The study is contained in Appendix N of the application.

4.2 Visual Impact Assessment (VIA) Update

Approved: 2 Storeys with 100% coverage, i.e., nil metre building lines.

Proposed: 4 Storeys with 40% coverage with minimum 4,5m building lines.

Assessment: The geographical area from which the proposed development will theoretically be visible, or probable view catchment, is dictated by topography. Theoretically, the development site could be seen from all surrounding areas. However, distance, developments, houses and vegetation will reduce the actual view catchment that the development site will have, to a much smaller area (zone of visual influence).

The zone of visual influence is determined as an area of approximately 0,5 km south, 0,3 km west, 0,9 km north and 0,6 km to the east. High sensitivity receptors are the residential properties directly adjacent to the development described as "Observer location C" in the VIA. The single-storey residential properties located on the southern and western boundary of the site are classified as high sensitivity receptors. These receptors are permanent, long-term residents who occupy their properties and who have a vested interest in the character and quality of their immediate visual environment. Unlike road users who experience views briefly and from a distance, residents at this location are static viewers at close range, with direct lines of sight toward the proposed development. Their existing outlook is oriented toward the Outeniqua Mountains to the north, and the proposed multi-storey apartment blocks introduce a significant change in scale and massing at close range relative to the prevailing single-storey residential character. The sensitivity of these receptors is further elevated by the potential for shadow effects from the taller buildings and the partial obstruction of mountain views. The directly adjacent residential receptors on the southern and western boundary are therefore assigned a high sensitivity rating in the VIA. The mountain backdrop represents the principal scenic resource of value at Observer location C, and any development that introduces built form into the mid-ground of these views has the potential to partially interrupt or reduce the quality of the mountain panorama currently experienced by these residents. Although the proposed apartment blocks at four storeys will not reach the elevation of the mountain skyline, the introduction of multi-storey built form into what is currently an open vegetated setting will reduce the horizontal extent of unobstructed mountain views available from ground level within adjacent single-storey properties.

Visual exposure from Observer location C is assessed as moderate, with the most significant effects confined to the immediately adjacent properties on the southern and western boundary where views of the proposed apartment blocks will be direct and sustained. Appropriate design mitigation measures, including landscaped boundary buffers, stepped massing at the residential interface, and a considered building colour scheme are recommended to reduce the visual dominance of the proposed development as experienced from this observer location.

The assessment supports the conclusion that the proposed development will be visually absorbed to a considerable degree when viewed from the N2 and Knysna Road.

The VIA concludes that the currently zoned Business 1 site, which permits a maximum site coverage of 100% and a maximum building height of 15m, compared to the proposed Residential 4 zone, which permits the same maximum building height of 15m but a reduced maximum site coverage of 60% (although actual proposed coverage is

39,6%) is substantially more obtrusive. The proposal represents urban intensification within an existing commercial and residential node, rather than the introduction of urban development into a natural or undisturbed landscape and is therefore tolerable.

Mitigation measures: The VIA recommends mitigation measures at the residential interface, amongst others that:

- The buildings positioned along the southern and western boundary must incorporate a stepped massing profile, whereby the uppermost storey is set back from the boundary-facing elevation. This stepping reduces the apparent vertical mass of the buildings as seen from adjacent single-storey properties and introduces a degree of visual graduation between the proposed four-storey development and the existing single-storey residential fabric.
- Horizontal articulation of the building facades facing the southern and western boundary must be incorporated into the architectural design. Facades should avoid presenting a single unbroken wall plane to adjacent properties. The use of recessed sections, balcony variations, projecting architectural elements, and varied roofline profiles will break the perceived massing and reduce the visual monotony of the boundary-facing elevations.
- A minimum building setback of 5 m from the shared southern and western boundary is recommended. This setback, combined with the proposed boundary planting buffer, will create a spatial separation between the built form and adjacent residential properties that marginally reduces the perceived height and mass of the apartment blocks as seen from within those properties.
- Flat or low-pitched roof profiles with non-reflective, matte finishes are required on all buildings. Complex roof forms with multiple planes are preferred over simple pitched roofs, as they break up the apparent mass of the building when viewed from below and reduce the sharpness of the silhouette as seen against the sky.
- Landscaping at the southern and western boundary is the primary long-term mitigation measure for the visual impact on adjacent residential properties. While vegetation cannot eliminate the visual impact of four-storey buildings, a well-designed and well-maintained boundary planting buffer will progressively soften the interface between the proposed development and the existing residential fabric and will, over time, screen the lower floors of the apartment blocks from within adjacent properties.

The study is contained in Appendix N of the application and contains a comprehensive list of recommendations for mitigation.

4.3 Socio-Economic Impact

Assessment: The purpose of the Socio-Economic Impact Assessment is to evaluate the anticipated fiscal and socio-economic impact resulting from the full implementation and operation of the proposed residential development. The study concludes that the construction and operation of a proposed residential development could create economy-wide impacts that will benefit local and regional communities and economies. Same probably applies to a business development but with the difference that the demand (need) for housing is not satisfied, i.e., the residential development has additional benefits.

Capital investment during the construction phase and operational revenue during the operational phase are used to quantify the potential impact on the regional, provincial, and national economies. These inputs are informed by the development concept, market study (3.1 above) and DEMACON estimations. This impact refers to the ripple effect throughout the economy caused by investment in a specific economic sector or land use. This impact extends beyond the jobs and income generated by the original project. An input-output model is used to estimate the total fiscal and socio-economic impact.

Within the aforementioned context, the socio-economic and fiscal impact assessment focuses on developing an impact model that measures (for the construction and operational phases) the anticipated direct, indirect, and induced impacts of the proposed project. These impacts include:

- Jobs created, categorized by skill level.
- Impact on GDP.
- Impact on business sales.
- Estimated number of formal SMMEs created (including the estimated number of Black-owned SMMEs).
- Compensation impacts (i.e., wages and salaries).
- Taxes on products (value-added tax, customs duties, excise levies, fuel levies, and other taxes), production, business operations, and employees.
- Impact on property rates.
- Sector profiling.

Impacts generated during the construction phase of the project are once-off and are sustained for as long as construction occurs. These impacts dwindle as construction activity comes to an end and the development becomes operational. Operational impacts are sustained annually. The total CAPEX (Capital Investment) of the project could temporarily add approximately R2,94 billion in additional business sales, R1,25 billion in additional GDP (contributes +1,25% to the provincial economy) and approximately 4 414 once-off jobs (formal and informal) throughout the Western Cape provincial economy. An estimated 12 formal small, medium and micro-enterprise opportunities could be created. Black-owned SMMEs would potentially represent 75% of new formal SMME opportunities, given the prevailing legislative environment. Formal employment during the construction phase represents 3 454 jobs (total direct, indirect and induced). Approximately 21,31% of formal employment opportunities are expected to be filled by skilled labourers compared to 56,75% semi-skilled labourers and 21,95% low-skilled labourers. Additional compensation paid to employees during the construction phase is estimated to be approximately R442,7 million. It is estimated that approximately R360,37 million in additional taxes could be generated during the construction phase. The largest contributor to new taxes is as a result of corporate taxes, contributing 33,44% to all taxes collected economywide.

Operational phase impacts, generated when the productive-land uses of the development commence with operations, are "sustained" impacts. “Sustained impacts” are impacts that are continuously generated (i.e. created and then sustained annually) as soon as the full operation of the project commences (long-term impacts). The total OPEX (operational expenditure) of the project could annually add approximately R188,01 million in additional business sales, R104,06 million in additional GDP (contributes +0.1% to the provincial economy) and approximately 199 sustained jobs (formal and informal) throughout the Western Cape provincial economy. Formal employment opportunities created throughout the lifetime of the project represents 174 jobs (total direct, indirect and induced). Approximately 37,93% of formal employment opportunities are expected to be filled by skilled labourers compared to 41,95% semi-skilled labourers and 20,11% low-skilled labourers. Additional annual compensation paid to employees during the operational phase is estimated to be approximately R29,11 million. It is estimated that approximately R21,99 million in additional taxes could be generated during the operational phase. The largest contributor to new taxes is as a result of personal income tax, contributing 44,65% to all taxes collected economywide.

Overall, the construction and operational phase of the project would have a measurable positive effect on the Western Cape provincial economy, generating sizeable GDP over the short- to long-term, high additional business sales and new business formation and a considerable number of new employment opportunities across all skill levels. Additional taxes can contribute to national and local treasuries and households across the province can increase their livelihoods. The increased demand for social amenities will influence the fiscus and operation of public sector entities. The increased pressure on the fiscus is offset by the addition of productive rateable assets through the envisaged capital investment in the project.

The study is contained in Appendix P of the application.

5. MITIGATION MEASURES (REG 32(1)(C))

From the above specialist studies, it is possible to determine mitigation measures and monitoring requirements to ensure that the proposed development integrates with the receiving environment and does not impose on it.

5.1 Visual Impact Mitigation Measures

The VIA concludes that the proposed development is not more obtrusive than the existing approved business use development and can be accepted / authorised with minor mitigation requirements. The VIA recommends mitigation measures which might not be achievable or desirable, e.g., replacement of the existing solid boundary wall between the Blue Mountain Development and Erf 28005 and use of non-reflective glass in upper storeys. For avoidance of risk, safety glass is used in the upper storeys and accordingly such recommendation cannot be made a condition of authorisation. Thus, the recommendations are noted and where possible will be implemented, but cannot be imposed as conditions.

5.1.1 Massing and Building Design (Residential Interface)

Required to reduce visual massing and scale impacts on the directly adjacent single-storey residential properties along the southern and western boundaries:

- Stepped Massing: Buildings situated along the southern and western boundaries must incorporate a stepped profile, setting back the uppermost storey to create a gradual transition from single-storey dwellings to four-storey blocks.

- Horizontal Articulation: Facades facing the southern and western boundaries must incorporate recessed sections, balcony variations, projecting architectural elements, and varied roofline profiles to break up unbroken wall planes.
- Boundary Setback: Maintain a minimum building setback of 5 metres from the shared southern and western boundaries.
- Roof Profiles: Utilize flat or low-pitched roof profiles with non-reflective matte finishes. Complex roof forms with multiple planes are preferred over simple pitched roofs to break up silhouette lines.

5.1.2 Colour and Material Selection

- Earthy Colour Palette: Exterior walls must be finished in muted, non-reflective earthy tones derived from the Garden Route landscape (e.g., warm greys, sandy beiges, ochres, soft terracottas). Bright white, stark grey, and high-contrast schemes are strictly prohibited.
- Matte Finishes: All exterior wall finishes must be low-sheen or matte to prevent light reflection towards distant view corridors (N2 and Knysna Road) and adjacent homes.
- Tactile Materials: Incorporate textured render, appropriately toned face brick, and natural stone cladding on lower levels and boundary elevations to provide visual warmth and texture.

5.1.3 Boundary Landscaping and Vegetation Management

- Landscape Plan: A detailed landscaping plan prepared by a registered landscape architect must be submitted with the building plan application.
- Landscape Buffer Zone: Establish a minimum 3-metre-wide indigenous landscape buffer along the southern and western boundaries within the development property.
- Planting Mix: Use a combination of fast-growing indigenous pioneer species, medium-growth shrubs, and slower-growing canopy trees to progressively screen and soften lower floors.
- Internal Soft Landscaping: Integrate canopy trees between building blocks alongside a mix of indigenous groundcovers, shrubs, and lawn areas.
- Maintenance: Implement a landscape management plan for a minimum of 5 years post-installation, requiring annual audits and replacement of dead/failed plants.

5.1.4 Glint, Glare and Glazing Management

- Upper-Floor Glazing: Window glass on upper floor elevations (especially facing the N2, Knysna Road, and residential boundaries) must feature low-reflectance coatings or tinted glass with visible light reflectance not exceeding 20%. Standard float glass must be recessed within deep reveals, overhangs, or louvres. Mirror or high-reflectance glass is prohibited.
- Trims and Hardware: Window frames, flashings, gutters, and fascia boards must feature powder-coated or anodised matte finishes in dark or mid-tone colours. Bright mill-finish aluminium and polished stainless steel are not permitted.
- Balustrades: Upper-floor balcony balustrades should utilize vertical powder-coated steel blades/mesh rather than clear glass panels. Where glass

balustrades are used, they must have a frosted or acid-etched finish to diffuse light.
- Rooftops and Solar Panels: Use non-reflective roof coverings (dark concrete tiles, matte fibre-cement, dark membrane). Photovoltaic (PV) solar panels must feature anti-reflective coatings and be oriented/tilted to minimize glare toward neighbours and public roads.

5.1.5 Lighting Design and Light Pollution Control

- Shielded Fixtures: All external lighting along internal roads, parking bays, and walkways must be bollard-type or downward-facing fixtures with full cut-off shielding.
- Perimeter and Gatehouse Lighting: No floodlighting is permitted at the gatehouse. Perimeter security lights must be movement-activated rather than continuously lit overnight.
- Facade Lighting: Uplighting on building facades and roof illumination are prohibited.
- Interior Light Spill: Interior unit lighting layout/design should mitigate mass light spill towards southern and western residential neighbours during evening hours.

5.1.6 Boundary Fencing

To the extent that the site has not been fenced or where existing fences will be replaced, then the following will apply.
- Permeable Fencing: Southern and western boundary fencing must be visually permeable (e.g., palisade or tubular steel) finished in dark, non-reflective colours (charcoal or dark grey) to blend into the landscaping.
- Avoid Solid Walls: Solid masonry boundary walls should be avoided at the residential interface except where structural retaining walls are required, in which case they must feature natural stone cladding or textured render.

5.1.7 Construction Phase Management

- Perimeter Screening: To the extent that the existing solid boundary wall along the residential interface is not sufficient, then install a minimum two-metre-high solid hoarding painted in neutral, non-reflective tones along the southern and western boundaries prior to construction.
- Site Siting and Layout: Position site offices, laydown areas, material storage, and heavy equipment parking on the northern portion of the site, away from the residential boundary.
- Dust and Soil Control: Apply temporary seeding or erosion control matting to cleared ground surfaces not undergoing immediate construction to avoid soil erosion and visual scarring.

5.1.8 Visual Monitoring Programme Requirements

- Construction Monitoring: Ongoing inspection during construction to verify whether hoarding is required and if installed then intact, laydown areas remain in the northern zone, and topsoil/waste stockpiles are managed correctly.

- Pre-Occupancy Audit: A formal visual inspection by the visual specialist prior to building sign-off to verify compliance with exterior colour palettes, matte finishes, stepped massing, facade articulation, full cut-off lighting fixtures, and initial boundary landscaping installation.
- Operational Audits (Years 1 and 5): Landscape maintenance inspections conducted annually for 5 years. Visual specialist re-assessments from key observer viewpoints at Year 1 and Year 5 post-construction to verify screening effectiveness and plant survival rates.

5.2 Traffic Impact Assessment Mitigation Measures

The TIA concludes that the additional traffic from the proposed development can be accommodated on the transport network with minor mitigation requirements. It is recommended that the proposed development be approved from a transportation point of view, provided that the required mitigation, as defined in the TIA and as summarised below, is in place.

5.2.1 Direct Mitigations Required for Erf 28005

To mitigate the traffic impact of the proposed 680 residential units, the TIA recommends the following site-specific upgrades:

- Platinum Drive / Park Road Intersection (Intersection 9): Upgrade to a single-circulating roundabout.
- Site Access and Gatehouse Layout:
  - Construct main access off Platinum Drive, situated approximately 10m from Park Road.
  - Adequate storage length is provided at the gatehouse.
  - No right-turn lanes are warranted..

5.2.2 Parking, Non-Motorised Transport (NMT) and Public Transport

- Parking Allocation: Provide 870 parking bays (1,28 bays/unit). This supply satisfies PT1 (Public Transport Zone 1) requirements and meets or exceeds the 85th percentile peak demand observed at comparable residential developments.
- Pedestrians and Cyclists: Existing sidewalks along Platinum Drive and Park Road are sufficient; no NMT upgrades are required.
- Public Transport: The site is within 400 m walking distance of the Go George bus terminal and minibus taxi public transport interchange at Garden Route Mall. No additional public transport infrastructure is required.

6. ADVANTAGES AND DISADVANTAGES (REG 32(1)(B))

The specialist market analysis and socio-economic impact assessment provide guidance on the advantages and disadvantages of the proposed change in use and development of the property.

The visual and traffic impact assessments provide an indication of the disadvantages which the proposed change in use and development of the property might have. It is apparent from the above mitigation measures that post-mitigation, the effects of the disadvantages could be significantly mitigated and that overall, the advantages outweigh the disadvantages and the change in use and the development as proposed could be authorised.

Advantages	**Disadvantages**
More efficient land use / densification in identified node.	Increased population for which community facilities might not have capacity in the short and medium term.
More efficient land use / densification in identified node.	Potential for overshadowing of neighbouring residential units in Blue Mountain Estate.
Reduced daytime commercial traffic, noise and activity.	Potential for increased peak-hour congestion.
Increased threshold population for public transport.	Population in need of educational and other community facilities potentially exceeds capacity.

7. PUBLIC PARTICIPATION PROCESS (REG 32(1)(E))

7.1 Notification of I&APs:

(Date of advert, site notices to be attached as part of Appendix L to the amendment application).

7.2 Commenting Period: 30-day statutory period.

7.3 Comment and Response Report:

(To be attached as part of Appendix L to the amendment application).

8. CHANGES TO THE EMPr (REG 32(1)(D))

The existing approved Environmental Management Program (EMPr) for the development of Portion 22 of Farm Kraaibosch and Erf 23333, George appropriately deals with all development and does not have to be adapted for purposes of the residential development of Erf 28005.

9. CONCLUSION

It is the opinion of the EAP that the proposed amendment to permit the conversion of the authorised use from business to residential and development of four-storey residential units do not represent a significant increase in environmental risk, and that the advantages outweigh the disadvantages.

It is recommended that the mitigation measures in Section 5.2 be implemented as conditions of authorisation and that where possible those in 5.1 are implemented to minimise the potential visual effects of a development on the site.