

BASIC ASSESSMENT REPORT FOR:

**THE DECOMMISSIONING OF AN AQUACULTURE
FACILITY AND REDEVELOPMENT OF A PORTION
OF FARM 1259, MALMESBURY DIVISION AT
PATERNOSTER**



Report terms of the National Environmental Management Act, Act 107 of 1998 and Environmental Impact Regulations, 2014 (as amended).

Western Cape Department of Environmental Affairs and Development Planning Reference: 16/3/3/1/F4/15/3018/26

15 July 2026



Western Cape
Government

Department of Environmental Affairs and
Development Planning

BASIC ASSESSMENT REPORT

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

APRIL 2024



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APRIL 2024

(For official use only)	
Pre-application Reference Number (if applicable):	
EIA Application Reference Number:	16/3/3/1/F4/15/3018/26
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

GENERAL PROJECT DESCRIPTION

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

Paternoster Groepbelange wishes to redevelop the existing buildings on the site, a portion of Farm 1259, Malmesbury Division, in Paternoster and the Saldanha Bay Municipality. The relevant portion of Farm 1259 has an area of approximately 1,21ha to be rezoned from Industrial Use to Business Zone I for the use thereof as a mixed-use business site integrated with the existing waterfront attraction on the abutting property (Erf 2063, Paternoster).

The redevelopment of the existing buildings will accommodate 11 flats (apartments) at ground floor level, a laundry, and recreational facilities, while retaining some of the existing crayfish tanks and fishery related product storerooms. The property is connected to municipal services infrastructure, which have to be upgraded. None of the upgrades exceed any of the listed activity thresholds. The site is accessible from the nearest streets by way of existing roads and an access servitude over Erf 2063, therefore no new roads are required.

The proposed redevelopment requires Environmental Authorisation (EA) as it entails the decommissioning of the existing aquaculture facility on the property.

A permit in terms of Section 38 of the National Heritage Resources Act, 1999 (Act 25 of 1999), for the rezoning and redevelopment of the property has been issued by Heritage Western Cape.

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

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

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

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

DEADPEIAAdmin@westerncape.gov.za

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

DEADPEIAAdmin.George@westerncape.gov.za

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

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

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

4. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.
5. All applicable sections of this BAR must be completed.
6. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.
7. This BAR is current as of **April 2024**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at <http://www.westerncape.gov.za> to check for the latest version of this BAR.
8. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an environmental authorisation in terms of the NEMA EIA Regulations when the Western Cape Government Department of Environmental Affairs and Development Planning ("DEA&DP") is the Competent Authority.

9. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.
10. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.
11. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.
12. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"), the "One Environmental System" is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department's Circular EADP 0028/2014: One Environmental Management System.
13. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA") is triggered, a copy of Heritage Western Cape's final comment must be attached to the BAR.
14. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link <https://screening.environment.gov.za/screeningtool> to generate the Screening Tool Report. The screening tool report must be attached to this BAR.
15. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA'), the submission of the Report must also be made as follows, for-
Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

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

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

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	
Site Plan:	Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following: • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. • The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. • The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development must be clearly indicated on the site plan. • Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. • Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): ○ Watercourses / Rivers / Wetlands ○ Flood lines (i.e., 1:100 year, 1:50 year and 1:10 year where applicable); ○ Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"); ○ Ridges; ○ Cultural and historical features/landscapes;

	○ Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as Appendix C . The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as Appendix D .
Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as Appendix A3.

ACRONYMS

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

ATTACHMENTS

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

The following checklist of attachments must be completed.

APPENDIX			✓ (Tick) or x (cross)
Appendix A:	Maps		
	Appendix A1:	Locality Map	✓
	Appendix A2:	Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning	✓
	Appendix A3:	Map with the GPS co-ordinates for linear activities	N/a
Appendix B:	Appendix B1:	Site development plan(s)	✓
	Appendix B2	A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;	✓
Appendix C:	Photographs		✓
Appendix D:	Biodiversity overlay map		✓
Appendix E:	Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.		
	Appendix E1:	Final comment/ROD from HWC	✓
	Appendix E2:	Copy of comment from Cape Nature	✓
	Appendix E3:	Final Comment from the DWS	None received
	Appendix E4:	Comment from the DFFE: Oceans and Coast	✓
	Appendix E5:	Comment from the DALRRD	None received
	Appendix E6:	Comment from WCG: Infrastructure	None received
	Appendix E7:	Comment from WCG: DoA	✓
	Appendix E8:	Comment from WCG: DHS	N/a
	Appendix E9:	Comment from WCG: DoH	None received

	Appendix E10:	Comment from DEA&DP: Pollution Management	None received
	Appendix E11:	Comment from DEA&DP: Waste Management	✓
	Appendix E12:	Comment from DEA&DP: Biodiversity	None received
	Appendix E13:	Comment from DEA&DP: Air Quality	N/a
	Appendix E14:	Comment from DEA&DP: Coastal Management	✓
	Appendix E15:	Comment from the local authority	✓
	Appendix E16:	Confirmation of all services (water, electricity, sewage, solid waste management)	✓
	Appendix E17:	Comment from the District Municipality	None received
	Appendix E18:	Copy of an exemption notice	X
	Appendix E19	Pre-approval for the reclamation of land	N/a
	Appendix E20:	Proof of agreement/TOR of the specialist studies conducted.	✓
	Appendix E21:	Proof of land use rights	✓
	Appendix E22:	Proof of public participation agreement for linear activities	N/a
Appendix F:	Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.		✓
Appendix G:	Specialist Report: Demacon Socio-economic Impact Assessment		✓
Appendix H:	EMPr		✓
Appendix I:	Screening tool report (Including specialist compliance statements)		✓
Appendix J:	The impact and risk assessment for each alternative		✓
Appendix K:	Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline		✓
Appendix L:	Site topographical survey		✓

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE: REGION 1		GEORGE OFFICE: REGION 3
	(City of Cape Town, West Coast District)	(Cape Winelands District & Overberg District)	(Central Karoo District & Garden Route District)
Duplicate this section where there is more than one Proponent	Paternoster Groepbelange Ltd		
Name of Applicant/Proponent:	Mr J F (Kobus) Pienaar		
Name of contact person for Applicant/Proponent (if other):	Paternoster Groepbelange Ltd Reg. no. 1984/009223/06		
Company/ Trading name/State Department/Organ of State:	1984/009223/06		
Company Registration Number:	PO Box 1		
Postal address:	Paternoster	Postal code: 7381	
Telephone:	(022) 752 2616	Cell: 082 340 9294	
E-mail:	kobus@paternostergroep.co.za	Fax: ()	
Company of EAP:	Viridus Works Environmental (Pty) Ltd (Reg. No. 2019/133896/07)		
EAP name:	Dupré Lombaard		
Postal address:	11 Elektron Street, Techno Park, Stellenbosch		
Telephone:		Postal code: 7600	
E-mail:	dupre.lombaard@viridus.com	Cell: +27 82 895 6362	
Qualifications:	MA; MSc		
EAP registration no:	EAPASA: 2019/304		
Duplicate this section where there is more than one landowner	Paternoster Groepbelange Ltd		
Name of landowner:	Same as above		
Name of contact person for landowner (if other):			
Postal address:		Postal code:	
Telephone:	()	Cell:	
E-mail:		Fax: ()	
Name of Person in control of the land:	Paternoster Groepbelange Ltd		
Name of contact person for person in control of the land:	Same as above		
Postal address:		Postal code:	
Telephone:	()	Cell:	
E-mail:		Fax: ()	
Duplicate this section where there is more than one Municipal Jurisdiction	Saldanha Bay Municipality		
Municipality in whose area of jurisdiction the proposed activity will fall:	Ms Nazeema Duarte		
Contact person:	12 Main Road, Vredenburg		
Postal address:		Postal code: 7380	
Telephone:	(022) 701 7051	Cell:	
E-mail:	Nazeema.Duarte@sbm.gov.za	Fax: ()	

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

1.	Is the proposed development (please tick):	New		Expansion	
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				
Decommissioning of a brownfield site – existing buildings and structures to be decommissioned and reused for different purpose, mostly residential.					
3.	For Linear activities or developments				
3.1.	Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:				
N/a					
3.2.	Development footprint of the proposed development for all alternatives.				m ²
N/a					
3.3.	Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.				
3.4.	Indicate how access to the proposed routes will be obtained for all alternatives.				
3.5.	SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives				
3.6.	Starting point co-ordinates for all alternatives				
	Latitude (S)	°		'	“
	Longitude (E)	°		'	“
Middle point co-ordinates for all alternatives					
	Latitude (S)	°		'	“
	Longitude (E)	°		'	“
End point co-ordinates for all alternatives					
	Latitude (S)	°		'	“
	Longitude (E)	°		'	“
Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.					
4.	Other developments				
4.1.	Property size(s) of all proposed site(s):				31 200 m ²
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):				12 100 m ²
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:				12 100 m ²
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).				
The site is a part of Remainder Farm 1259, Malmesbury Division in Paternoster. It forms a part of the larger Paternoster Waterfront area (Erf 2063) with access off Kreeffegang. It was until recently used for aquaculture and crayfish holding and packing purposes, currently only for crayfish holding tanks. The farm has an area of 3,12ha. The existing crayfish holding tanks are and the aquaculture facilities were in existing buildings with a floor area of approximately 4 200m² and cover an area of roughly 1,2ha. The first crayfish factory on the land was built in the early 1900's by the Stephan brothers. The Paternoster Visserie company was established in the early 1960's and took over the crayfish operations, by when the original factory no longer existed. New factory buildings were erected in the 1970's and in the mid 1980's the company established the aquaculture (fish farming) activities. The aquaculture activities remained in full operation until its closure in 2019. On average 300 migrant labourers and 500 Paternoster locals were employed at the crayfish factory that processed more than 30 000 crayfish per day in the season in the early years. To process the crayfish, most of which were sold fresh (live) to European buyers, they had to be kept alive in tanks filled with sea water from delivery to packing. The facility consists of large concrete buildings with asbestos-cement roofs. Inside the crayfish holding tank building (approximately 551m²) that was built on land sloping down to the sea, there are twenty concrete tanks (2m² and 1m deep) holding 40m³ of fresh sea water. Water is extracted from the sea on the Bekbaai (western) side of the facility and pumped into the tanks from where the water runs back into the sea under gravity. When crayfish are held in the tanks, fresh sea water is constantly pumped into the tanks. In this way several thousand crayfish can be kept alive for a week or more. Sea water was also pumped into the other buildings for fish farming activities which ceased in 2019, leaving the buildings under-utilised and the pump system operating at approximately 20% of it prior capacity.					

The purpose of the application is to gain approval for the redevelopment of the existing but under-utilised buildings on Farm 1259, Malmesbury RD in Paternoster, and its integration with the abutting waterfront development on Erf 2063, Paternoster. The vacated building space can be better utilised to complement the waterfront development, which has experienced significant growth in visitor numbers since 2021. It is also indicated as a significant opportunity for redevelopment in the Saldanha Bay Municipality Spatial Development Framework, 2025.



Farm 1259 decommissioning site locality



Farm 1259 aquaculture setup

The total allowable crayfish catch has been reduced considerably since 2014 and for the 2022 season alone the quota has been dropped by 21,3%. In an effort to counter the increasing tendency of lower quotas, Paternoster Visserye has entered into an agreement with a service provider to catch, hold, pack, and export crayfish under its quota. As a result, the crayfish tanks are mostly empty and unused and a small number are used if a particularly good catch is landed, but then for no more than five to seven days. During the last decade, the total annual catch for the Group has varied between 21 895 and 70 000 kg, of which approximately 10 – 12% was processed through the facility, i.e., 2,2 – 2,6 tonnes to 7,0 – 8,4 tonnes of crayfish were processed through the facility annually since 2010. The fish and abalone farming activities have ceased completely. The Paternoster Group can therefore better utilise the existing buildings, none of which are older than 60 years.

The proposal is to decommission the aquaculture activities (fish farming and crayfish holding tanks), to convert the existing fish farming buildings that are large warehouse type structures, to contain 11 flats (apartments) at ground level, an exhibition area where the old crayfish tanks are retained and also used as an attraction, a laundry to service the waterfront, recreational facilities, and to upgrade the surrounding area with parking and landscaping. The conversion will occur over time and a smaller more compact aquaculture facility with a maximum capacity of 10 000kg wet weight per annum and related product stores will be retained during the conversion process. The majority of the conversions will occur internally, but the facades of the buildings will also change, with new doors and windows inserted to the walls of the existing building to fit the internal alterations. No construction affecting any asbestos building elements is envisaged, due to the risk and cost related thereto. The buildings will therefore be retained externally and structurally as is with only internal renovations that do not necessitate any work on the asbestos material.

The existing access, parking and loading areas, municipal and other services infrastructure will be retained and improved. The existing labourers' accommodation, laboratories, store rooms, and offices on the site are proposed for upgrading and accommodation purposes. Access will, for the time being, be through the existing waterfront on the registered access servitude using the existing roads.

Potable water infrastructure will be upgraded to achieve the desired fire flow of 25 l/s at the proposed connection point. This requires upgrading of the external water reticulation network by providing a new 160 mm diameter link from the existing 200 mm diameter supply line along Columbine and St Augustine Streets to the proposed development.

Sewage network upgrading for the proposed development consists of a new internal sewer connection (through Erf 2063) to the existing 160 mm diameter gravity sewer running parallel to Sonkwas Street. The upgrading of the existing Begraafplaas Pump Station, replacement of the existing 75 mm diameter rising main at the Begraafplaas PS with a 110 mm diameter pipe, a new 160 mm diameter gravity sewer along Pieter Street and a 315 mm diameter gravity sewer along St Augustine Street up to the Paternoster Main Pump Station. None of these upgrades exceed the 120 l/s listing threshold.

Stormwater is managed on-site in the existing systems, with minor upgrades to increase the capacity thereof to improve the quality of the runoff.

Solid waste will be collected by the Saldanha Bay Municipality as at present with minimal increase in the volume.

Electricity is supplied by the Saldanha Bay Municipality, through an existing 400kVA distribution transformer. The existing waterfront development on Erf 2063 is served by a similar transformer. The estimated current electricity demand is 600kVA. The After Diversity Maximum Demand for the proposed tourist development is 199,6kVA, while the existing Notified Demand is 200kVA. Thus, no upgrading of supply will be required.

The total potential trip generation for the reconfigured buildings is estimated to be 72 Friday PM peak hour trips (33 in, 39 out) and 61 Saturday peak hour trips (36 in, 25 out) according to the TMH17 South African Trip Data Manual. No upgrades to the Kreeftegang (street), Seeduiker Street or R399/Mosselbank Street intersections along St Augustine Road are considered necessary to accommodate the estimated background peak hour volumes. However, the Municipality requires widening of Kreeftegang by approximately 3m over a distance of 45m to mitigate peak period congestion at the waterfront.

4.5.	Indicate how access to the proposed site(s) will be obtained for all alternatives.	
	Via servitude road across Erf 2063 to Kreeftegang.	
4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C04600000000125900000
4.7.	Coordinates of the proposed site(s) for all alternatives:	
	Latitude (S)	32° 48' 22.439" S
	Longitude (E)	17° 52' 59.469" E

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

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

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

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.	YES	
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.		NO
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3.		NO
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.		NO
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")		NO
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").		NO
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").		NO
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.		NO

3. Other legislation

List any other legislation that is applicable to the proposed activity or development.
The Occupational Health and Safety Act, 1993, Act 85 of 1993 (OHS) and all regulations made in terms thereof.
The Act provides for the health and safety of persons at work and for the protection of persons other than persons at work against hazards to health and safety arising out of or in connection with the activities of persons at work with specific reference to handling of the asbestos roofing and dismantling of any pipework. The Department of Employment and Labour (DEL) is the competent authority for consideration of applications to work on asbestos.

4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.
The Saldanha Bay Municipality Spatial Development Framework (SDF) indicates that one of the "main trends experienced by the community is the swing in economic opportunities from fishing to tourism, hospitality and holiday accommodation". The proposed redevelopment accordingly creates an opportunity to respond to the market trends and to better utilise the buildings and existing infrastructure to add to the product offering of Paternoster together with the larger waterfront on Erf 2063 as also shown in Subject property designation in the SDF as tourism node. The redevelopment proposal is in keeping with the SDF proposals which promote the establishment of a tourism hub on the property. The SDF further recommends that development must take cognisance of the alignment of the Coastal Management Line (CML) and "prohibit or restrict erection, alteration or extension of buildings and structures wholly or partially seaward of the Coastal Management Line". The existing buildings to be used for redevelopment are set back from the CML as indicated in the annexed maps showing the Coastal Management Line and risk lines over the Paternoster Peninsula and the site topographical survey (Appendix L). The buildings and infrastructure required for the proposed use are existing and the major changes effected thereto are on existing disturbed areas, internal, and with minimal external works. The majority of the external works would entail parking and roadway upgrading to convert the gravel areas to suitably paved and landscaped areas. The decommissioning and repurposing of the aquaculture facility are born out of economic necessity. On the one hand there is no economic use for more than 3 200m² of the existing floor area in the buildings due to the unsustainability of the fish and abalone farming operations and the continually decreasing crayfish quotas. On the other the Paternoster Waterfront is experiencing a growing visitor demand and its expansion by addition of the under-utilised floor area on the abutting property can satisfy some of the demand and make meaningful contribution to the local economy without increasing any environmental risks or causing significant negative environmental impacts. The buildings are part of the character of the town. The redevelopment and interim use of the existing buildings and infrastructure should contribute to the enhancement of Paternoster as a tourist destination and celebrate some of the historic character of the area by the retention of the crayfish tanks and opening up thereof to the public as an attraction.

5. Guidelines

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal. The following guidelines are applicable to the application and the process, all of which have been duly considered and applied. 5.1 Hinrichsen, E. 2007. Generic Environmental Best Practice Guideline for Aquaculture Development and Operation in the Western Cape: Edition 1. Division of Aquaculture, Stellenbosch University Report. Republic of South Africa, Provincial Government of the Western Cape, Department of Environmental Affairs & Development Planning, Cape Town. The Guideline determines that at decommissioning; all aquaculture organisms must be removed responsibly to eliminate the risk for redistribution into areas where they are not environmentally compatible. It further deals with the removal of insecure or unsafe infrastructure and disposal of rubble. The post-decommissioning site should resemble a state similar to that prior to commencement of any activity in terms of the Guideline. To ensure that decommissioning and rehabilitation are acceptable, an external audit should be conducted according to the Guideline. 5.2 Hinrichsen, E. 2007. Guideline to the Authorisation Requirements for Aquaculture in the Western Cape: Edition 1. Division of Aquaculture, Stellenbosch University Report. Republic of South Africa, Provincial Government of the Western Cape, Department of Environmental Affairs & Development Planning, Cape Town. The authorisation requirements include a plan for the decommissioning of the facility, as applied for in this instance. 5.3 Legal Guide for The Aquaculture Sector in South Africa, First Edition: September 2013, Department of Agriculture, Forestry and Fisheries. The Guide requires inclusion of a plan for the decommissioning of the facility, as applied for in this instance. 5.4 Department of Environmental Affairs, NEMA Environmental Impact Assessment Guideline for Aquaculture in South Africa, Notice 101 of 2013. Same as under 5.1 above. 5.5 DEA&DP (2011) Information Document on the Guidelines, Policies and Decision-Making Instruments Relevant to EIA Applications in the Western Cape, EIA Guideline and Information Document Series. Western Cape Department of Environmental Affairs & Development Planning (DEA&DP), October 2011. All of these have been considered in setting up the process and in undertaking the assessment. 5.6 DEA&DP (2010) Guideline on Public Participation, EIA Guideline and Information Document Series. Western Cape Department of Environmental Affairs & Development Planning (DEA&DP). A plan of study has been submitted, and it included the required public participation process. 5.7 Department of Environmental Affairs (2017), Public Participation guideline in terms of NEMA EIA Regulations, Department of Environmental Affairs, Pretoria, South Africa. As in 5.6 above. 5.8 DEA (2017), Guideline on Need and Desirability, Department of Environmental Affairs (DEA), Pretoria, South Africa, ISBN: 978-0-9802694-4-4. As in 5.5 above. 5.9 The Western Cape Provincial Coastal Management Plan, 2022 – 27, The Plan promotes sustainable coastal livelihood opportunities, projects, and programmes for communities in the Western Cape. Amongst others it addresses the potential threat to coastal areas through pollution as a result of shipping, aquaculture, and commercial fishing activities, as well as from land-based sources. Minimising potential pollution and impacts is a priority.
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6. Protocols

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form The annexed Screening Tool Report generated on 12/05/2026, for classification: Agriculture Forestry Fisheries Aquaculture Marine Indigenous refers. The following is a summary of the development footprint environmental sensitivities identified by the DFFE Screening Tool. Only the highest environmental sensitivity is indicated and all three are contested and should be very low or negligible as detailed in the Site Sensitivity Verification Report (SSVR). • Archaeological and Cultural Heritage: Very High • Terrestrial Biodiversity: Very High • Civil Aviation: High
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The Screening Tool recommends the following specialist assessments:

- Marine Impact Assessment - This assessment will not be conducted as the decommissioning reduces any potential effect on the marine environment, and the redevelopment of the site has no potential effect thereon. Moreover, the marine compliance statement added to the SSVR confirms the lack of need for a MIA.
- Socio-Economic Assessment - This assessment was prepared for the initially proposed larger development, and it has been updated with relation to the decommissioning and limited scale redevelopment.

The protocol applied to the specialist assessments is the SSVR where a Specialist Assessment is required but no Specific Assessment Protocol has been prescribed (2020).

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 1	Describe the portion of the proposed development to which the applicable listed activity relates.
See inserted text and graphics below	See inserted text and graphics below	See inserted text and graphics below
Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 3	Describe the portion of the proposed development to which the applicable listed activity relates.
See inserted text and graphics below	See inserted text and graphics below	See inserted text and graphics below
Note: • The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted. • Where additional listed activities have been identified, that have not been included in the application form and amended application form must be submitted to the competent authority.		

The listed activities associated with the decommissioning and redevelopment of the existing buildings on Farm 1259 are as follows.

Table: Listed activities associated with the development of a portion of Farm 1259, Malmesbury RD

Activity No(s):	Relevant Activity(ies)	Description of project activity
Listing Notice 1 - 31	The decommissioning of existing facilities, structures, or infrastructure for- i) any development and related operation activity or activities listed in this Notice, Listing Notice 2 of 2014 or Listing Notice 3 of 2014. ii) any expansion and related operation activity or activities listed in this Notice, Listing Notice 2 of 2014 or Listing Notice 3 of 2014; iii) ... iv) any phased activity or activities for development and related operation activity or expansion or related operation activities listed in this Notice or Listing Notice 3 of 2014; or v) any activity regardless the time the activity was commenced with, where such activity: (a) is similarly listed to an activity in (i) or (ii) above; and (b) is still in operation or development is still in progress; excluding where— (aa) activity 22 of this notice applies; or (bb) the decommissioning is covered by part 8 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental Management: Waste Act, 2008 applies.	Relates to the decommissioning of the aquaculture facility and redevelopment of the existing buildings and site for a mixed-use development complementary of the waterfront on abutting Erf 2063. The listed activity occurs only on Farm 1259 and has no effect on the coastal public property where the inlet and outlet pipes for the facility are located, and which remain as-is with no change thereto whatsoever.

The applicability of Listing Notice 1, Activity 17 (development within a distance of 100 metres inland of the high-water mark of the sea) has to be considered.

Even though the property is registered as a farm (as opposed to an erf), it was only subdivided in 2018 with the subdivision of the rest of consolidated Portion 1 of Farm 26 and Farm 28, through which were created all the Erven in the abutting town centre residential area.

Moreover, Erf 2063 on which the waterfront is developed was subdivided from the property with confirmation from the Department of Environmental Affairs and Development Planning (DEA&DP) in letter reference 16/3/3/6/1/F4/15/3179/17 that "4.2 The proposed site is located within an urban area on a property zoned Undetermined;"

Thus, it appears that Listing Notice 1 Activity 17 does not apply as indicated under (dd) "where such development occurs within an urban area."

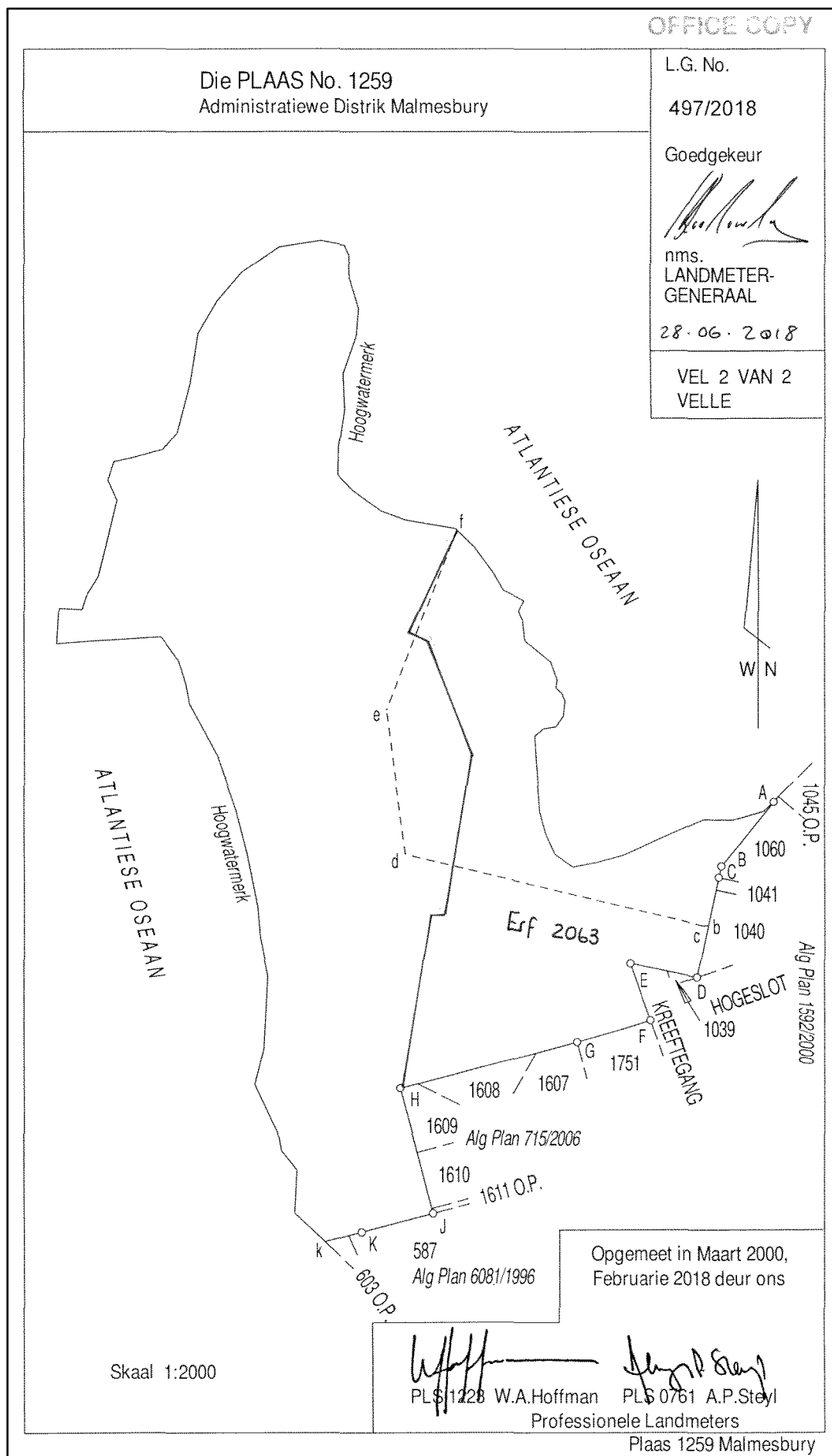


Figure left: Diagram of Farm 1259 showing subdivided Erf 2063



Buildings on Farm 1259 to be converted



Existing buildings used for aquaculture, labourers' accommodation and cold storage



Development setback line over Paternoster Peninsula

The applicability of Listing Notice 1, Activity 19A (infilling or depositing of any material or the excavation, removal or moving of soil, sand, shells, shell grit, pebbles, or rock of more than 5 cubic metres) has to be considered. As indicated, the redevelopment of the existing buildings and aquaculture facility occurs on land where such construction and maintenance activities have

been ongoing since establishment of the facility. The definition of "development" in the EIA Regulations as amended by GN 325/2017, "development" means the building, erection, construction or establishment of a facility, structure or infrastructure, including associated earthworks or borrow pits, that is necessary for the undertaking of a listed or specified activity, but excludes any modification, alteration or expansion of such a facility, structure or infrastructure, including associated earthworks or borrow pits, and excluding the redevelopment of the same facility in the same location, with the same capacity and footprint.

The redevelopment of buildings established prior to 1989 without increasing their capacity or footprint or the capacity or footprint of the transformed area does not constitute a "development" for EIA purposes.

Thus, it appears that Listing Notice 1 Activity 19A does not apply as the activity is not development but a redevelopment.

The only listed activity therefore Listing Notice 1 Activity 31 for decommissioning of a listed activity being Listing Notice 1 Activity 6 (The development and related operation of facilities, infrastructure or structures for aquaculture of — (i) finfish, crustaceans, reptiles or amphibians, where such facility, infrastructure or structures will have a production output exceeding 20 000 kg per annum (wet weight);).

For the avoidance of doubt, no listed activity is undertaken within Coastal Public Property as defined in the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008). The seawater inlet and outlet pipes that traverse Coastal Public Property are existing infrastructure that will be retained unchanged, with no upgrading, expansion or related construction. The decommissioning (Listing Notice 1 Activity 31) and all associated works occur on the subject property and within the existing structures. The Department of Environmental Affairs and Development Planning accordingly remains the Competent Authority for this application, the Listing Notices (GN R983, R984 and R985 of 2014, as amended) assigning the National Minister as Competent Authority only where a listed activity occurs within Coastal Public Property. The Department of Forestry, Fisheries and the Environment has nonetheless been notified of the application in respect of the Coastal Waters Discharge Permit (Section 69 of the NEM:ICMA) and integrated coastal management aspects, and its comment is included in Appendix E4.



Buildings and structures on the project site with the crayfish holding building in the right foreground (circa 1980)

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

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

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

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

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.
Because it is a decommissioning activity, no activity alternatives have been considered. It is not feasible to retain an unused aquaculture facility, i.e., not even the no-go alternative is feasible. Leaving the buildings, infrastructure, and tanks unused will lead to degradation and eventual negative effect on the environment by accumulation of waste. The preferred alternative is the redevelopment of the existing buildings on the site, for a mixed-use business use that can be integrated with the existing waterfront attraction on the abutting property. The preferred alternative entails internal redevelopment of the existing buildings to accommodate 11 flats (apartments) at ground floor level, a laundry, and recreational facilities, while retaining some of the existing crayfish tanks and fishery related product storerooms, in keeping with the Saldanha Bay Municipality (SBM) spatial development framework (SDF) that designates the area as a tourism hub.	
2.	Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21.
The SBM has commenced the process of zoning determination in view of the history of the site that has been used for industrial purposes since before 1976, when at the time it was part of Farm 26 and the larger crayfish factory, and that with the promulgation of LUPO on 01 July 1986, it was utilised for industrial purposes containing three large warehouse type structures in which crayfish were kept in tanks, prepared, packed, and stored and where fish and abalone farming occurred and the products prepared for distribution and sale. Its current zoning is industrial zone. With the envisaged decommissioning of the aquaculture facility, an application for rezoning of the property from industrial use to an appropriate business use zone has been submitted to the SBM in terms of Section 15 of the SBM Bylaw on Municipal Landuse Planning. The Municipality is still in consideration of the application after concluding the public participation process.	
3.	Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved.
No conflict exists. The SBM is considering a rezoning to allow for the reconfiguration of the existing buildings and the use thereof for business and residential purposes instead of the existing permitted industrial use.	
4.	Explain how the proposed development will be in line with the following?
4.1	The Provincial Spatial Development Framework.
Extract from land development application motivation: The Provincial Spatial Development Framework (PSDF) and the supporting and complementary regional spatial development framework as contemplated in Section 18 of the Spatial Planning and Land Use Management Act, 2013 determine principles and the planning and development norms and criteria for tourism related uses in the area. Nothing proposed in this application contradicts any of the said principles or guidelines. As indicated above, the PSDF promotes the development towns and area identified as having high growth potential. The Western Cape Land Use Planning Guidelines for Rural Areas, Chapter 16, further determine the Western Cape Government approach to urban development. It is to channel settlement development pressures into the current footprint of the Western Cape's city, towns, villages, and hamlets. It indicates amongst others that it is critical to maintain existing nodes and a meaningful settlement hierarchy, to prevent urban development encroachment into agricultural areas, scenic landscapes, and biodiversity priority areas, and to promote smart growth by containing urban sprawl and prioritising infill and densification of existing urban areas. Smart growth principles include the efficient use of land and infrastructure by prioritising infill, intensification, integration and restructuring of urban areas, which is core to the development proposal. Densification and integration of higher densities and appropriate development typologies as prescribed in the Guidelines form part of the proposals, which seek to better utilise the land and infrastructure which is of low density, intensity and use in the heart of the tourism node. The role, character, and location of Paternoster in relation to the structural hierarchy of towns and villages, and in relation to historical settlement patterns, as well as its role in the rural economy and emerging rural development initiatives beg for the better utilisation of the land and the resources. The Guidelines indicate that rural development investment based on the economic role and function of settlements in rural areas should be prioritised, acknowledging that agriculture, fishing, mining, and tourism remain important economic underpinnings of rural settlements. An assessment of the above land use proposals show that they meet all of the aforementioned principles and criteria. The proposed development acknowledges the historic use of the site, the need for economic development and the need for public access to the coastal public property. ✓ <u>To offer a range of appropriate facilities.</u> When considering the main attractions of the West Coast District (according to the MERO 2021), where outdoor tourism related activities feature strongly, it is obvious that the Paternoster Peninsula attraction will fit with the market trend and the regional setting. The proposed development adds to the tourism offerings of the Saldanha Bay Municipality. ✓ <u>No compromise to agricultural activities.</u> The proposed development will occur over and in existing, reconfigured buildings and on previously disturbed areas where it has no effect on the agricultural sector. ✓ <u>Provide a range of opportunities.</u> New business and employment opportunities are created, as well as a new attraction for local and foreign visitors. This has significant positive effect on the local economy, which is strongly focused on trade and	

tourism. The proposed activities will add to permanent additional employment opportunities in proximity of the areas of need in the town, albeit significantly less than would the larger Peninsula redevelopment project, but it seems to be delayed due to administrative encumbrances.

Offer access to more people. The redevelopment of the existing buildings will create additional opportunities for residents and visitors to enjoy the environment and to job seekers who could access opportunities more readily without having to incur travel costs.

Improve the economic viability and sustainability of small towns. The addition of the tourist attraction and accommodation would probably contribute to the generation of revenue for the Municipality and allow for direct and indirect benefits in the local economy. More visitors to the area will lead to additional spending and thus economic growth.

Align scale and form of facilities with character of area. The external appearance of the existing buildings will not change significantly and therefore the effect of the redevelopment on the character of the area would be negligible.

Diversify regional income. The proposed building redevelopment will allow for the generation of additional income from the tourism activities to replace the loss of economic opportunities in the fishing industry and more importantly, allow for a development that can contribute to the rates base and local economic activities.

There is therefore a good match between the relevant policies and the proposed redevelopment of the existing buildings on Farm 1259 and related development of the adjacent erven to facilitate infrastructure improvements as required for the redevelopment of the buildings.

4.2 The Integrated Development Plan of the local municipality.

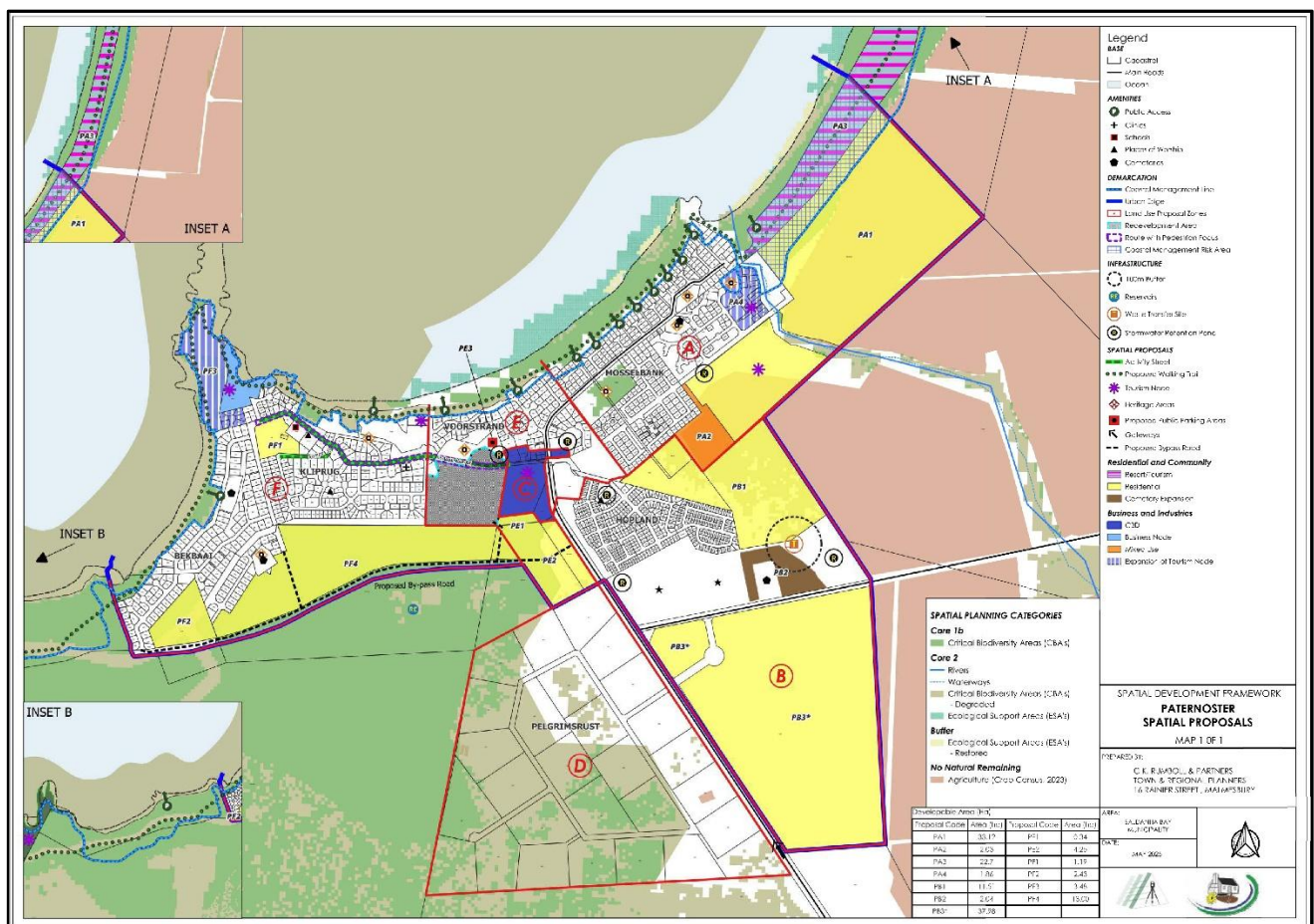
Extract from land development application motivation:

As for the SDF below.

4.3 The Spatial Development Framework of the local municipality.

Extract from land development application motivation:

The Spatial Development Framework (SDF) indicates that one of the "main trends experienced by the community is the swing in economic opportunities from fishing to tourism, hospitality and holiday accommodation".



Subject property designation in the SDF as tourism node

The proposed redevelopment accordingly creates an opportunity to respond to the market trends and to better utilise the buildings and existing infrastructure to add to the product offering of Paternoster while the larger Peninsula development project is being considered. The redevelopment proposal is in keeping with the SDF proposals which promote the establishment of a tourism hub on the property.

The SDF further recommends that development must take cognisance of the alignment of the Coastal Management Line (CML) and "prohibit or restrict erection, alteration or extension of buildings and structures wholly or partially seaward of the Coastal Management Line".

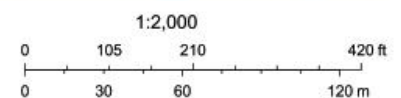
The existing buildings to be used for redevelopment are set back from the CML as indicated in the Coastal Management Line over Paternoster Peninsula. As the buildings are existing and the major changes effected thereto are internal, with no external extensions or additions, it need not be assessed from environmental and heritage perspectives. The buildings are part of the character of the town. The redevelopment and interim use of the existing buildings and infrastructure should contribute to the enhancement of Paternoster as a tourist destination and celebrate some of the historic character of the area by the retention of the crayfish tanks and opening up thereof to the public as an attraction.

Paternoster Groep skiereiland



April 27, 2021

- High Water Mark (1 in 10yr)
- High Risk (1 in 20yr)
- CML Draft



Coastal Management Line over Paternoster Peninsula

4.4.	The Environmental Management Framework applicable to the area.
As indicated above, the site is behind the coastal management line and the development setback line. The Environmental Management Framework (EMF) for the Greater Saldanha Bay Area has specific management guidelines related to the Peninsula. The EMF indicates that Paternoster is under threat from the collapse of fishing which has led to unemployment and therefore neglect and new resort and residential development that is overwhelming and destroying its inherent character. Care must be taken to reflect the history of fishing activity in the area, for which purpose some of the tanks and buildings are being retained in the original form. In this instance there are benefits to the authorisation of the decommissioning and replacement of a large portion of the facility with a tourism-focused development. The crayfish and other aquaculture activities have diminished to the extent that they are no longer a major source of income or employment for the community and, as indicated in the EMF, tourism is gradually taking over as a major economic contributor.	
5.	Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.
Not applicable as indicated above – decommissioning occurs inside of existing buildings. The SSVR confirms that the site is entirely transformed and that appropriate mitigation measures during construction and operations to avoid further transformation of the terrestrial habitat will suffice.	
6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development.
It is not applicable, as the site is fully developed, and the activity is a decommissioning of a facility inside existing buildings. The site is not listed as a critical biodiversity area.	
7.	Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.
As indicated above: over and above consideration of the criteria for assessment of the decommissioning in terms of the Guidelines, there are specific criteria set out in the NEM:ICMA to be considered. The first criterion requires consideration whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and protecting those areas. Decommissioning of the aquaculture facility will not have a negative effect on the coastal public property, the coastal protection zone or coastal access land. Decommissioning is rather beneficial, as where the facility is currently fenced and secured with no public access, the decommissioning and opening up of the land for visitors and tourists would create additional access to the Peninsula and to Bekbaai. Access to the existing sea water pumps and infrastructure will be secured to prevent any potential for injury to visitors or damage to the essential infrastructure required to maintain the smaller facility with a maximum capacity of 10 000kg. Compliance with the objectives of the Coastal Protection Zone (CPZ) in terms of Section 17 of the NEM:ICMA, with reference to the protection of ecological integrity, maintenance of natural coastal processes, and the buffering function of coastal ecosystems is difficult to achieve if at the same time public access must be improved. The ecological specialists made specific recommendations to ensure compliance with the intent of Section 17, amongst others designating the private land around the project site a no-go zone to avoid potential negative biophysical effects. The coastal public property and direct access thereto will however not be restricted and the existing public passage across the property retained. The estuarine management plans, coastal management programmes, coastal management lines and coastal management objectives applicable in the area. As indicated above, the site is behind the coastal management line and the draft development setback line. The Environmental Management Framework (EMF) for the Greater Saldanha Bay Area has specific management guidelines related to the Peninsula. The EMF indicates that Paternoster is under threat from the collapse of fishing which has led to unemployment and therefore neglect and new resort and residential development that is overwhelming and destroying its inherent character. Care must be taken to reflect the history of fishing activity in the area, for which purpose some of the tanks and buildings are being retained in the original form. The CMP for the West Coast District and the SBM both indicate the site area as being landward of the CML and in a low risk zone. The socio-economic impact if the activity — (i) is authorised; or (ii) is not authorised, must be considered. In this instance there are benefits to the authorisation of the decommissioning and replacement of a large portion of the facility with a tourism-focused development. The crayfish activities have diminished to the extent that they are no longer a major source of income or employment for the community and, as indicated in the EMF, tourism is gradually taking over as a major economic contributor. Paragraphs 5.3 and 6.1 of the specialist assessment by Demacon provide the reasoned opinion whether the proposed activity or portions thereof should be authorised and the acceptability thereof. Whether the development or activity — (i) is situated within coastal public property and is inconsistent with the objective of conserving and enhancing coastal public property for the benefit of current and future generations, or (ii) is situated within the coastal protection zone and is inconsistent with the purpose for which a coastal protection zone is established as set out in section 17. The activity does not occur in the coastal public property, although the pump inlet and outlet pipes for the fresh sea water to the tanks and the outflow are situated in the zone. The pump system itself is behind the CML on the property of the applicant. The	

activity occurs in the coastal protection zone and is consistent with the purpose thereof, namely: to protect the economic and social value of the coastal public property.

Whether the development or activity — (iii) is situated within coastal access land and is inconsistent with the purpose for which coastal access land is designated as set out in section 18.

The activity is not situated on land that is designated as coastal access land. A public passage was previously created over a portion of the land along its southern boundary from Bitou Close to Bekbaai, to provide public access between St Augustine Road and the Bekbaai beach or coastal public property. The decommissioning and repurposing of the existing buildings will not have any effect on the coastal access. The biodiversity theme compliance statements also recommend strict management of the coastal public property around the site to reduce any potential negative anthropogenic effects and goes as far as to indicate that the abutting coastal public property should be designated as a no-go zone to prevent potential habitat degradation and loss. Such designation of the coastal public property is however contrary to the intent of Section 18 and it will be made applicable only for construction personnel, machinery, and contractor activities, while the public will be permitted access with appropriate awareness guidance.

Whether the development or activity — (iv) is likely to cause irreversible or long-lasting adverse effects to any aspect of the coastal environment that cannot satisfactorily be mitigated;

The decommissioning and redevelopment of the site for tourism purposes complementary and associated with the abutting waterfront development in the old harbour does not have long-lasting negative effects which need to be mitigated. It will enhance the coastal environment in view of the likely positive impacts. As all redevelopment activities occur within an existing disturbed site and buildings, subject to a recommended no-go zone on the private land around the site, there are no expected negative effects on the coastal environment.

Whether the development or activity — (v) is likely to be significantly damaged or prejudiced by dynamic coastal processes;

No, the reduced area and capacity of the aquaculture facility and the redeveloped tourist accommodation destination will not be significantly prejudiced by the dynamic coastal processes. The granitic structure of the peninsula and the surrounding marine environment creates a stable coastal interface, and the structures are on average 8m above mean sea level (MSL).

Whether the development or activity — (vi) would substantially prejudice the achievement of any coastal management objective.

The decommissioning of the facility does not effectively change the nature of the peninsula. The buildings and infrastructure will remain in place, while the use will change. Where currently the facility is used periodically during the season, it will become used throughout the year for accommodation purposes and as an attraction for the visitors of the waterfront to see the crayfish tanks and experience some of the history of the place. It also allows for public access to the peninsula, which is currently closed to the public in view of the need for bio-security and physical security.

Whether the development or activity — (vii) would be contrary to the interests of the whole community;

The interests of the community are best served by establishing an economic use on the site. Where the current facility does not create any employment, the likelihood of employment creation through transformation and redevelopment of the site is high.

In terms of Section 69 of the NEM:ICMA (Coastal Waters Discharge Permit (CWDP)) the decommissioning relates to the discharge of effluent from a land-based source into coastal waters. Under Section 69(1), no person may discharge effluent from a land-based source into coastal waters except in terms of a general authorisation or a Coastal Waters Discharge Permit. In terms of the CWDP Regulations, the applicant is required to notify the Department of Forestry, Fisheries and the Environment (DFFE) of the decommissioning and lowering of the discharge. The existing permit will either need to be formally amended or reflect the downscaled volume or, if the previous throughput was unpermitted (operating under historical lawful use), the downscaling could trigger an assessment to regularize the lower discharge. The DFFE has been notified of the application and will comment thereon.

The site photograph below shows the seawater pump (inlet) system on the left, the gravity return flow chamber in the centre with the crayfish holding facility on the right. This crayfish holding facility will be retained with a maximum throughput capacity of 10 000kg wet weight per annum that is below the listed activity threshold, hence the decommissioning application. The intake and outlet physical infrastructure on the property date back to the 1970s and will remain unchanged/as-is. Seawater is currently pumped through the crayfish holding tanks at a rate of approximately 40m³ per hour (11l/s) through 120mm pipes. The inlet and outlet systems are installed on the subject property while the inlet and outlet pipes occur on the coastal public property. The system in its current state will be retained as-is for as long as the crayfish quotas or other rational use reasons justify it and the only change is in the volume of seawater that is extracted from and returned to the sea.



The applicant is fully aware of the "Duty of Care" principle regarding the coastal environment and the provisions of Section 58 of the NEM:ICMA that stipulates that any person who causes, has caused, or may cause significant pollution or degradation of the coastal environment must take reasonable measures to prevent, mitigate, or remedy the adverse effects.

8. Explain whether the screening report has changed from the one submitted together with the application form. The screening report must be attached as Appendix I.

The screening outcome has not changed; however, the Screening Tool Report was re-generated and is dated 12 May 2026, and the site sensitivity verification report (SSVR) has been amended. The Department did not accept the specialist input relating to the various themes as assessed by Nicolaas Hanekom and subsequently specialists from the Biodiversity Company were commissioned to confirm the site sensitivities as indicated in the annexed SSVR.

9. Explain how the proposed development will optimise vacant land available within an urban area.

Extract from land development application motivation:

The primary benefit to be derived from the proposed redevelopment of the existing buildings is the beneficial use of resources and existing assets, while simultaneously creating economic opportunities with obvious benefits for the local community. The community has suffered the effects of climate change, over exploitation of the natural resources, and lack of economic growth over the last two or more decades and any investment in local development that would attract more visitors and create economic opportunities should be promoted and supported. The rezoning of the site for the improved use of the existing buildings and infrastructure allows the Paternoster Group to better utilise its land and generate revenue from it, which in turn leads to improved rates and taxes payable to the Municipality.

A further benefit is that the region derives direct and indirect benefits by the creation of a significant tourist attraction. According to the Municipal Review and Outlook (MERO), Paternoster is one of the small tourist towns on the West Coast that has the potential to further develop and attract tourists, thus contributing to the regional and provincial economies. The Municipality is specifically listed in the Growth Potential Study (GPS) of the Western Cape (2018) as an area with high growth potential, meaning that investment in new economic opportunities as is proposed should be supported.

The MERO also indicates that the Saldanha Bay municipal area has regressed in most themes, referring to the various aspects considered in the MERO analysis. The Saldanha Bay and Matzikama municipal areas experienced the lowest number of new employment opportunities between 2015 and 2019, with an average annual increase of 504 and 598 jobs respectively. The trade sector (that includes tourism related activities) was the second-largest contributor to employment across all municipal areas. This sector was of particular importance to employment in the Swartland and Saldanha Bay municipal areas, at 5,3 per cent and 4,9 per cent respectively in 2019. The largest economic sectors contributing to GDP in the municipal area were manufacturing (22,9%), trade (15,5%) and finance (15,1%). The trade sector accounted for 17,2 per cent of total employment in the municipal area in 2019.

Tourism and tourism related development thus makes significant contribution to the local economy. Tourism should however not be seen as providing only for foreign visitors. The MERO 2019 and 2020 clearly indicate the increasing significance of local tourism and short stay visitors who visit rural towns and attractions for active recreation and experiencing scenic drives, culture/heritage, and outdoor activities.

The proposed redevelopment of the existing buildings allows for integration with the existing waterfront development, amongst others by creating short term accommodation opportunities. The visitors making use of the accommodation would also be visitors to the waterfront, with obvious beneficial results. Dr Sue Snyman, a tourism analyst, and economist associated with UCT's Environmental Policy Research Unit (EPRU), found that for every one person employed by hotels and lodges in rural environments, seven people benefit directly from the downstream flow of that income. Moreover, for every night that a tourist stays over at a high-end rural hotel or lodge, 14 people in the surrounding community benefit indirectly from the income generated by the services.

10. Explain how the proposed development will optimise the use of existing resources and infrastructure.

As above – the facility buildings can be put to better use to contribute to the local economy, but this requires decommissioning and redevelopment of the existing buildings complementary to the abutting waterfront development.

11. Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16).

Municipal capacity letters are attached.

Extract from land development application motivation: UDS Africa are the engineering consultants for the project and prepared a services report which contain the relevant capacity confirmation for the proposed development, which is not a listed activity,

and which is not the subject of this basic assessment process. The decommissioning does not require any infrastructure services, however, for completeness, the following is reported.

Electricity is supplied by the Saldanha Bay Municipality, through an existing 400kVA distribution transformer. The existing waterfront development on Erf 2063 is served by a similar transformer. The estimated current electricity demand is 600kVA. The After Diversity Maximum Demand for the proposed tourist development is 199,6kVA, while the existing Notified Demand is 200kVA. Thus, no upgrading of supply will be required.

The existing potable water network cannot provide the required fire flow of 25 l/s at the proposed connection point, and the Paternoster water reticulation network should be upgraded by providing a new 160 mm diameter link pipe from the existing 200 mm diameter supply along Columbine and St Augustine Streets to the proposed development. There is sufficient capacity in the existing Paternoster reservoirs to accommodate the proposed development.

The existing Paternoster sewer reticulation system has insufficient capacity to accommodate the proposed development in the existing sewer system. The following master plan will be required to accommodate the proposed development together with other future development areas, namely: a 315 mm diameter upgrade gravity sewer along St Augustine Street up to the Paternoster Main Pump Station

Storm water will be retained on site to improve the quality of the runoff and to encourage groundwater recharge. Amongst others permeable paving will be used to reduce runoff and promote infiltration into the soil.

Solid waste is removed by the Municipality, which service will continue with an increase in volume.

The total potential trip generation does not require upgrades to the street intersections along St Augustine Road and no upgrades are considered necessary to accommodate the estimated background peak hour volumes. However, to accommodate the full proposed development, assuming all facilities proposed are fully operational, a roundabout at the R399/St Augustine Road/Mosselbank Street intersection is suggested to be considered. Security controls will most likely be implemented at the access, likely in the form of booms, but stacking into St Augustine Road is not expected as result of the proximity of the property boundaries to the edge of the road. Detail with regard to on-site circulation is not yet available but is expected to be within and between parking areas provided, all of which should be addressed during further design stages. Deliveries and refuse removal are anticipated to be handled on-site, similar to current practice. According to the AMG requirements, 46 parking bays are required, and 51 parking spaces will be available on-site, the dimensions and layout of which should be addressed during further design stages.

12.	In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K.
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It is argued that a decommissioning does not fall under the Guideline, as 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. The reconfiguration of the existing buildings occurs due to decreased fishing and crayfish quotas and the unsustainable nature of the fish farming activities that occurred on the site. There is therefore no "right time" to decommission the under-utilised facilities, and the buildings exist, i.e., there is no choice regarding the place for locating the proposed land-use as the existing buildings and infrastructure must be utilised.

Nonetheless, a need and desirability report has been prepared and is annexed hereto.

SECTION F: PUBLIC PARTICIPATION

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

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

N/a

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

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

Cape Nature	Landscape West Conservation Operations	iadams@capenature.co.za
CEO	Heritage Western Cape	Ceoheritage@westerncape.gov.za
DEA&DP	Pollution Management	Amina.Sulaiman@westerncape.gov.za
DEA&DP	Coastal Management	Coastal.Enquiries@westerncape.gov.za
DEA&DP	Air Quality Management	joy.leaner@westerncape.gov.za
DEA&DP	Development Management: Region 2	Kobus.Munro@westerncape.gov.za
DEA&DP	Biodiversity	Marlene.Laros@westerncape.gov.za
DEA&DP	Waste Management Planning	Vishwanath.Gianpersad@westerncape.gov.za
Department of	Environmental Affairs and Development Planning	Natasha.Bieding@westerncape.gov.za
Department of	Water and Sanitation	XongoS@dws.gov.za
Department of Forestry, Fisheries, and the Environment	Oceans and Coasts	rrazack@dfre.gov.za
Department of Health	Environmental Health: West Coast/Winlands	jgoosen@pgwc.gov.za
Department of Infrastructure	Human Settlements	Human.Settlements@westerncape.gov.za
Department of Infrastructure:	Chief Directorate: Road Planning	Vanessa.Stoffels@westerncape.gov.za
Saldanha Bay	Municipality	Nazeema.Duarte@sbm.gov.za
Ward Councillor	Cllr Sharon Scholtz	Sharon.Scholtz@sbm.gov.za
Regional Director:	Department of Public Works	Phucuka.Penxa@dpw.gov.za

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

Those not consulted do not have an interest in the decommissioning.

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

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

Note:

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

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

All the comments received from I&APs on the pre -application BAR (if applicable and the draft BAR must be recorded, responded to and included in the Comments and Responses Report and must be included in Appendix F. All information obtained during the PPP (the minutes of any meetings held by the EAP with I&APs and other role players wherein the views of the participants are recorded) and must be included in Appendix F. Please note that proof of the PPP conducted must be included in Appendix F. In terms of the required "proof" the following is required:

- a site map showing where the site notice was displayed, dated photographs showing the notice displayed on site and a copy of the text displayed on the notice;
- in terms of the written notices given, a copy of the written notice sent, as well as:
 - if registered mail was sent, a list of the registered mail sent (showing the registered mail number, the name of the person the mail was sent to, the address of the person and the date the registered mail was sent);
 - if normal mail was sent, a list of the mail sent (showing the name of the person the mail was sent to, the address of the person, the date the mail was sent, and the signature of the post office worker or the post office stamp indicating that the letter was sent);
 - if a facsimile was sent, a copy of the facsimile Report;
 - if an electronic mail was sent, a copy of the electronic mail sent; and
 - if a "mail drop" was done, a signed register of "mail drops" received (showing the name of the person the notice was handed to, the address of the person, the date, and the signature of the person); and
- a copy of the newspaper advertisement ("newspaper clipping") that was placed, indicating the name of the newspaper and date of publication (of such quality that the wording in the advertisement is legible).

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. Groundwater

1.1.	Was a specialist study conducted?	Yes	
1.2.	Provide the name and or company who conducted the specialist study.		
	The Biodiversity Company (Wesley Black (Pr. Sci. Nat. 147190)).		
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
	No aquifer.		
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.		
	Groundwater not affected.		

2. Surface water

2.1.	Was a specialist study conducted?	Yes	
2.2.	Provide the name and/or company who conducted the specialist study.		
	The Biodiversity Company (Wesley Black (Pr. Sci. Nat. 147190)).		
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		
	None present within 500m.		

3. Coastal Environment

3.1.	Was a specialist study conducted?	Yes	
3.2.	Provide the name and/or company who conducted the specialist study.		
	The Biodiversity Company (Dr Candyce Areington (Pr. Sci. Nat. 167868)).		
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
	See Section E, paragraph 7 above and Section I paragraph 5 below.		
3.4.	Explain how estuary management plans (if applicable) have influenced the proposed development.		
	N/a		
3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.		
	The site contains existing buildings, structures, and infrastructure and is entirely behind the coastal management and risk lines.		

4. Biodiversity

4.1.	Were specialist studies conducted?	Yes	
4.2.	Provide the name and/or company who conducted the specialist studies.		
	The Biodiversity Company (Dr Candyce Areington (Pr. Sci. Nat. 167868)).		
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		
	As detailed in the specialist compliance statement annexed to the SSVR, the site is transformed and does not contain significant biodiversity elements. The decommissioning and subsequent redevelopment of the existing buildings will not have any further effects unless alien species are introduced or construction of operational activities occur outside of the transformed site area.		
4.4.	Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.		
	The BSP had no effect due to the prior existence of the buildings and the aquaculture facility. The specialist compliance statements provide guidance for management of the surrounding dune area where sensitive biodiversity elements occur and where human activity should be discouraged and avoided.		
4.5.	Explain what impact the proposed development will have on the site specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development.		
	The site contains existing buildings, structures, and infrastructure and is entirely transformed. The specialist compliance statements provide guidance for management of the surrounding dune area where sensitive biodiversity elements occur and where human activity should be discouraged and avoided, all of which incorporated into the EMP.		
4.6.	If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.		

N/a.	
4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.
The specialist compliance statements provide guidance for management of the surrounding dune area and littoral active zone where sensitive biodiversity elements occur and where human activity should be discouraged and avoided.	

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.
The site contains existing buildings, structures, and infrastructure and is established between the granite outcrops.

6. Heritage Resources

6.1.	Was a specialist study conducted?		NO
6.2.	Provide the name and/or company who conducted the specialist study.		
None required.			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
None exist as per the HWC permit (Case no. 26550SB1102 issued 18 November 2025).			

7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.
None will be affected as per the HWC permit (Case no. 26550SB1102 issued 18 November 2025).

8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.
The Paternoster community in broad and general terms consists of two diverse groups, being those in the higher income categories who are not in need of employment and those in the lower income categories in need of employment. The major source of employment and sustenance of the lower income categories was related to the fishing industry, which has all but collapsed. Tourism or the trade sector has now become a significantly more important economic contributor to the local economy. See specialist report by Demacon under Appendix G.	
8.2.	Explain the socio-economic value/contribution of the proposed development.
The decommissioning of the facility will allow for the reuse of the existing buildings, structures, and infrastructure as a tourism related attraction and thus increase its economic contribution.	
The reasoned opinion of the specialist assessment in paragraphs 5.3 and 6.1 (Demacon) indicate that decommissioning will create opportunity for the expansion of the existing tourist precinct that will have several impacts on the short-stay accommodation industry during its operational phase. Overall, the proposed development could positively contribute to the expansion and diversification of the local tourism market by introducing an integrated tourist node development that can cater to domestic and international tourists.	
8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.
Better use of the existing assets and resources.	
8.4.	Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development.
The decommissioning will have no direct effect and the indirect effect by the change use will be in line with that of the surrounding area.	

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. Details of the alternatives identified and considered

1.1.	Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.			
Provide a description of the preferred property and site alternative.				
Because the decommissioning is an activity, no activity alternatives have been considered. The facts are that the crayfish quotas have reduced significantly over the last decade, the fish and abalone farming activities were not sustainable or economically feasible, there are no reasonable grounds to retain the unused aquaculture facility and buildings. The only alternative to the decommissioning is the No-Go alternative that is not feasible. Leaving the buildings, infrastructure, and tanks unused will lead to degradation and eventual negative effect on the environment by accumulation of waste.				
The preferred alternative is the decommissioning of the facility to allow for the redevelopment of the existing buildings on the site, for a mixed-use business use that can be integrated with the existing waterfront attraction on the abutting property. The preferred alternative entails internal redevelopment of the existing buildings to accommodate 11 flats (apartments) at ground floor level, a laundry, and recreational facilities, while retaining some of the existing crayfish tanks and fishery related product storerooms.				
Decommissioning can only occur on the site where the aquaculture facility exists and reuse of the existing buildings is also site-bound, hence no site alternatives are considered feasible.				
Provide a description of any other property and site alternatives investigated.				
Impossible as it is a decommissioning of activities on a specific site.				
Provide a motivation for the preferred property and site alternative including the outcome of the site selectin matrix.				
Not applicable to decommissioning, as the aquaculture facility exists on the site and reuse of the existing buildings is also site-bound, hence no site alternatives are considered feasible.				
Provide a full description of the process followed to reach the preferred alternative within the site.				
N/a. The decommissioning creates vacant and under-utilised buildings which will be repurposed to prevent existing assets from becoming maintenance liabilities. Moreover, the decision to repurpose the buildings after decommissioning for business and residential purposes is in line with the SBM spatial planning policies to enhance the tourism hub that exists on the abutting waterfront. The applicant and the Municipality do not envisage industrial development or uses on the site, as that could be detrimental to the waterfront attraction that is currently one of the main economic attractions in the town.				
Provide a detailed motivation if no property and site alternatives were considered.				
It is a decommissioning on an existing site as explained above and therefore no site alternatives are possible.				
List the positive and negative impacts that the property and site alternatives will have on the environment.				
The following direct, indirect and cumulative impacts and risks relating to the decommissioning and subsequent repurposing of the buildings on the site have been identified.				
It is important to note that no work may occur on, or asbestos material may be removed from the site, unless with full prior authorisation by the Department of Employment and Labour (DEL) under the Occupational Health and Safety Act, 1993, Act 85 of 1993, and the Asbestos Abatement Regulations, 2020.				
Potential impact:		Construction Phase	Pre mitigation	Post mitigation
Environmental issue	Activity and significance threshold		Significance Rating	Significance Rating
Impact / Criteria	Description			
1.1.1 Nuisance impacts	Dust and noise during construction.		L	L
· Nature of impact	Demolition of the existing tanks and structures and trenching for sewer and water pipes would cause noise and dust.			
· Extent	Limited to site area in view of distance to neighbours and ambient sound levels.		L	L
· Duration	Short term effects during construction only.		L	L
· Consequence	The construction effects should be minor as the majority of the work is inside existing buildings and services servitudes.		L	L
· Probability	It is unlikely that the surrounding environment will suffer negative effects of the nuisance caused by construction.		L	L
· Reversibility	The effects are quickly reversible.			
· Irreplaceable loss of resources	None.			
· Avoidance	Effects can be mitigated through implementation of an EMPr.			
· Management	EMPr to address potential effects.			

· Mitigation	Limit construction times and movement of vehicles on sand and gravel tracks / roads.		
· Significance rating	L		
1.1.2 Health impacts	Removal of asbestos roofs and sheeting (No asbestos material may be removed from the site unless with full prior authorisation by the Department of Employment and Labour (DEL) under the Occupational Health and Safety Act, 1993, Act 85 of 1993, and the Asbestos Abatement Regulations, 2020).	H	M
· Nature of impact	Asbestos fibres potentially cause serious negative health effects in humans.		
· Extent	The sheets need to be removed from site to a hazardous material landfill, currently Vissershok or Mossgas.	H	M
· Duration	The potential negative effects endure until the waste is disposed of to landfill.	H	M
· Consequence	Asbestos fibre effects are significant and working with the material requires specialist intervention.	H	M
· Probability	Fibres are released into the environment as a result of any disturbance.	H	M
· Reversibility	The effects of asbestos fibres released into the environment are not easily reversed and depending on the volume released, could endure for long periods.		
· Irreplaceable loss of resources	None.		
· Avoidance	Effects can be mitigated through implementation of an EMPr.		
· Management	EMPr to address potential effects.		
· Mitigation	Asbestos roofs and construction elements are to be retained untouched, or, if essential to be removed or altered, then by specialists in compliance with the OHS Asbestos Abatement Regulations, 2020 and only after authorisation by the DEL.		
· Significance rating	H		
1.1.3 Soil and water resource	Contamination and pollution of resources.	L	L
· Nature of impact	Building rubble and construction material could cause negative effects in the biophysical environment. Hydrocarbons from construction vehicles could cause contamination of the soil and the sea.		
· Extent	Rubble and material could build up on site while construction lasts and spills occur where vehicles move.	L	L
· Duration	Short term effects during construction only.	L	L
· Consequence	The potential negative effects should be minor as the majority of the work occurs in existing transformed areas and does not require large machinery or volumes of material.	L	L
· Probability	It is unlikely that the surrounding environment will suffer negative effects caused by build-up of rubble and materials and spillages should be minor.	L	L
· Reversibility	The effects are quickly reversible.		
· Irreplaceable loss of resources	None.		
· Avoidance	Effects can be mitigated through implementation of an EMPr.		
· Management	EMPr to address potential effects.		
· Mitigation	Predetermine construction yard on existing surfaced area where spillages can be contained and effects minimised.		
· Significance rating	L		
1.1.4 Traffic impacts	Movement of construction vehicles.	L	L
· Nature of impact	Construction vehicles using roads could disrupt traffic and pedestrian movement in surrounding area and streets.		
· Extent	Predicted low volumes required for the project might affect the Kreeftegang entrance, but should not affect St Augustine or wider.	L	L

· Duration	Short term effects during construction only.	L	L
· Consequence	The potential negative effects should be minor as the majority of the work does not require large machinery or traffic volumes.	L	L
· Probability	It is unlikely that the surrounding environment will suffer negative effects caused by additional traffic.	L	L
· Reversibility	The effects are immediately reversible.		
· Irreplaceable loss of resources	None.		
· Avoidance	Effects can be mitigated through implementation of an EMPr.		
· Management	EMPr to address potential effects.		
· Mitigation	Set times for movement of vehicles.		
· Significance rating	L		
1.1.5 Socio-economic impacts	Effects on health and well-being of citizens.	L	L
· Nature of impact	The change in use of the buildings could create new opportunities. Alteration of the buildings will not cause any change in the landscape.		
· Extent	The effects of the change in use should have a minor positive effect. Alterations will not be visible.		
· Duration	Medium term positive effects are likely.		
· Consequence	The potential positive socio-economic effects albeit minor will improve the livelihoods of some residents.		
· Probability	It is unlikely that the surrounding environment will suffer negative effects caused by the changes.		
· Reversibility	The effects are not easily reversible and will require a process.		
· Irreplaceable loss of resources	None.		
· Avoidance	Effects need not be mitigated.		
· Management	No measures required in EMPr.		
· Mitigation	None required.		
· Significance rating	L		
1.1.6 Bio-physical environmental impacts	Prevent the direct and indirect loss and disturbance of flora and fauna species and communities	M	L
· Nature of impact	Introduction of alien and invasive species, especially plants and human disturbance of existing intact terrestrial habitat.		
· Extent	Changes will only occur in the affected area and only if there is activity outside of the disturbed site. Internal changes and changes in use will probably have no significant effect.		
· Duration	Long term effects.		
· Consequence	The potential negative effects will be minor if human activities are limited to the existing disturbed area only.		
· Probability	It is unlikely that the bio-physical environment will suffer negative effects caused by internal renovation of the buildings but landscaping might have negative effects.		
· Reversibility	The effects are avoidable and reversible.		
· Irreplaceable loss of resources	None with appropriate mitigation.		
· Avoidance	Potential effects need to be mitigated.		
· Management	Mitigation measures required in EMPr.		
· Mitigation	Do not allow landscaping with non-endemic or translocated vegetation or the introduction of alien animal species and prevent human movement outside of site area.		
· Significance rating	M		
1.1.7 Bio-physical environmental impacts	Prevent the further loss and fragmentation of indigenous vegetation communities within the ecosystem in and around the site.	L	L

· Nature of impact	Negative effects caused by construction and operational activity.		
· Extent	Changes will only occur in the affected area and only if there is activity outside of the disturbed site. Internal changes and changes in use will probably have no significant effect.	L	L
· Duration	Long term effects.	L	L
· Consequence	The potential negative effects will be minor if construction and operational activities are limited to the existing disturbed area only.	L	L
· Probability	It is unlikely that the bio-physical environment will suffer negative effects caused by internal renovation of the buildings and limiting residential activities to existing disturbed area.	L	L
· Reversibility	The effects are avoidable and reversible.		
· Irreplaceable loss of resources	None with appropriate mitigation.		
· Avoidance	Potential effects need to be mitigated.		
· Management	Mitigation measures required in EMPr.		
· Mitigation	Create no-go area on private land around the project site and introduce landscaping and animal management rules.		
· Significance rating	L		
1.1.8 Bio-physical environmental impacts	Reduce the negative fragmentation effects of the development and facilitate the safe movement of fauna species	L	L
· Nature of impact	Introduction of alien and invasive species, especially plants.		
· Extent	Changes will only occur in the affected area and only if there is activity outside of the disturbed site. Internal changes and changes in use will probably have no significant effect.	L	L
· Duration	Long term effects.	L	L
· Consequence	The potential negative effects will be minor if construction and operational activities are limited to the existing disturbed area only.	L	L
· Probability	It is unlikely that the bio-physical environment will suffer negative effects caused by internal renovation of the buildings and limiting residential activities to existing disturbed area.	L	L
· Reversibility	The effects are avoidable and reversible.		
· Irreplaceable loss of resources	None with appropriate mitigation.		
· Avoidance	Potential effects need to be mitigated.		
· Management	Mitigation measures required in EMPr.		
· Mitigation	Introduce landscaping and animal management rules in the EMPr.		
· Significance rating	L		
1.1.9 Bio-physical environmental impacts	Adequately follow the guidelines for interpreting the SEI ratings assigned to the site.	L	L
· Nature of impact	Land clearing, Fire and human presence as well as roads.		
· Extent	Changes will only occur in the affected area and only if there is activity outside of the disturbed site. Internal changes and changes in use will probably have no significant effect.	L	L
· Duration	Long term effects.	L	L
· Consequence	The potential negative effects will be minor if construction and operational activities are limited to the existing disturbed area only.	L	L
· Probability	It is unlikely that the bio-physical environment will suffer negative effects caused by internal renovation of the buildings and limiting residential activities to existing disturbed area.	L	L

· Reversibility	The effects are avoidable and reversible.		
· Irreplaceable loss of resources	None with appropriate mitigation.		
· Avoidance	Potential effects need to be mitigated.		
· Management	Mitigation measures required in EMPr.		
· Mitigation	Create no-go area on private land around the project site and introduce landscaping and animal management rules.		
· Significance rating	L		
1.1.10 Visual impacts	Change in character of the built environment.	L	L
· Nature of impact	The construction activities could cause loss of views and change visual character of the site.		
· Extent	Changes will only occur at the affected buildings and only if they are significantly changed. Internal changes will have no effect.	L	L
· Duration	Short term effects during construction only.	L	L
· Consequence	The potential negative effects are minor as the buildings and structures will be retained during construction.	L	L
· Probability	It is unlikely that the visible character of the site will suffer negative effects caused by internal renovation of the buildings.	L	L
· Reversibility	The effects are quickly reversible.		
· Irreplaceable loss of resources	None.		
· Avoidance	Effects need not be mitigated.		
· Management	No measures required in EMPr.		
· Mitigation	None required.		
· Significance rating	L		
1.1.11 Water pipeline installation	Disruption of services to citizens.	L	L
· Nature of impact	The construction activities will cause water supply disruptions and limit use of the roads where construction occurs.		
· Extent	Pipeline laid along existing roads over 800m distance.	L	L
· Duration	Short term effects during construction only.	L	L
· Consequence	The potential negative effects should be minor as the water supply has redundancy and supply is maintained in network.	L	L
· Probability	It is unlikely that the water supply will suffer negative effects caused by replacement of the existing pipe.	L	L
· Reversibility	The effects are immediately reversible.		
· Irreplaceable loss of resources	None.		
· Avoidance	Effects need not be mitigated.		
· Management	No measures required in EMPr.		
· Mitigation	None required.		
· Significance rating	L		
1.1.12 Sewer pipeline installation	Disruption of services to citizens.	L	L
· Nature of impact	The construction activities will cause disruptions and limit use of the roads where construction occurs.		
· Extent	Pipeline laid along existing roads over 500m distance.	L	L
· Duration	Short term effects during construction only.	L	L
· Consequence	The negative effects are minor as the service is maintained.	L	L
· Probability	It is unlikely that the sewerage will suffer negative effects caused by replacement of the existing pipe.	L	L
· Reversibility	The effects are immediately reversible.		
· Irreplaceable loss of resources	None.		
· Avoidance	Effects need not be mitigated.		
· Management	No measures required in EMPr.		
· Mitigation	None required.		

· Significance rating	L		
1.1.13 Kreeftegang road upgrading	Disruption of services to citizens.	L	L
· Nature of impact	The construction activities will cause disruptions and limit use of the road during construction.		
· Extent	Road upgrading occurs over 50m distance.	L	L
· Duration	Short term effects during construction only.	L	L
· Consequence	The negative effects are minor as the road is maintained.	L	L
· Probability	It is unlikely that the traffic will suffer negative effects.	L	L
· Reversibility	The effects are immediately reversible.		
· Irreplaceable loss of resources	None.		
· Avoidance	Effects need not be mitigated.		
· Management	No measures required in EMPr.		
· Mitigation	None required.		
· Significance rating	L		
Potential impact:	Operational Phase	Pre mitigation	Post mitigation
Environmental issue	Activity and significance threshold	Significance Rating	Significance Rating
Impact / Criteria	Description		
1.2.1 Traffic impacts	Resident traffic.	L	L
· Nature of impact	Residents and visitors using roads.		
· Extent	Low traffic volumes (0,65 trips / household / peak hour (TMH17 SA Trip Data Manual)) do not add to background cause of congestion.	L	L
· Duration	Long term effects.	L	L
· Consequence	Potential effects do not warrant road upgrading. Existing congestion requires mitigation as per municipal requirement.	L	L
· Probability	Unlikely that development traffic will cause negative effects.	L	L
· Reversibility	The effects are reversible with Kreeftegang upgrading.		
· Irreplaceable loss of resources	None.		
· Avoidance	Potential effects mitigated through road upgrading during construction.		
· Management	Potential cumulative effects managed through SBM roads master planning.		
· Mitigation	Widening of Kreeftegang with background traffic growth.		
· Significance rating	L		
1.2.2 Visual impacts	Change in character of the built environment.	L	L
· Nature of impact	The visual character of the site could change if buildings are redeveloped (but no such external alterations are proposed).		
· Extent	Changes will only occur at the affected buildings and only if they are significantly changed. Internal changes will have no effect.	L	L
· Duration	Long term effects.	L	L
· Consequence	The potential negative effects are minor as the buildings and structures will be retained as is.	L	L
· Probability	It is unlikely that the visible character of the site will suffer negative effects caused by internal renovation of the buildings.	L	L
· Reversibility	Negative effects are not readily reversible.		
· Irreplaceable loss of resources	None.		
· Avoidance	Industrial buildings are being converted internally to residential with likely positive effects.		
· Management	No measures required in EMPr.		

· Mitigation	None required.		
· Significance rating	L		
1.2.3 Biophysical impacts	Prevent the further loss and fragmentation of indigenous vegetation communities within the ecosystem in and around the site.	L	L
· Nature of impact	Negative effects caused by human activity.		
· Extent	Losses will only occur if there is activity outside of the disturbed site. Internal building changes and limited landscaping will probably have no significant effect.	L	L
· Duration	Long term effects.	L	L
· Consequence	The potential negative effects will be minor if human activities are limited to the project site area.	L	L
· Probability	It is unlikely that the bio-physical environment will suffer negative effects with appropriate management and mitigation.	L	L
· Reversibility	The effects are reversible.		
· Irreplaceable loss of resources	None with appropriate management measures in place.		
· Avoidance	Potential effects need to be mitigated.		
· Management	Mitigation measures required in EMPr.		
· Mitigation	Limit off-site activities to management and maintenance only.		
· Significance rating	L		
1.2.4 Bio-physical impacts	Reduce the negative fragmentation effects of the development and facilitate the safe movement of fauna species	L	L
· Nature of impact	Introduction of alien and invasive species, especially plants.		
· Extent	Changes will only occur in the affected area and only if there is activity outside of the disturbed site. Internal changes and changes in use will probably have no significant effect.	L	L
· Duration	Long term effects.	L	L
· Consequence	The potential negative effects will be minor if human activities are managed.	L	L
· Probability	It is unlikely that the bio-physical environment will suffer negative effects with appropriate management and mitigation.	L	L
· Reversibility	The effects are reversible.		
· Irreplaceable loss of resources	None with appropriate management measures in place.		
· Avoidance	Potential effects need to be mitigated.		
· Management	Mitigation measures required in EMPr.		
· Mitigation	Management rules must limit the introduction of alien species.		
· Significance rating	L		
1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.		
Provide a description of the preferred activity alternative.			
No feasible or reasonable activity alternative exists. A full explanation is provided above.			
Provide a description of any other activity alternatives investigated.			
N/a as per explanation provided above.			
Provide a motivation for the preferred activity alternative.			
No feasible or reasonable activity alternative exists. A full explanation is provided above.			
Provide a detailed motivation if no activity alternatives exist.			
It is a decommissioning due to the reduced crayfish quotas and unsustainability of the fish and abalone farming activities and therefore no alternatives are possible. Repurposing of the buildings for residential purposes is in line with the Municipality's spatial development policy and repurposing of the buildings for other uses would be contrary thereto and therefore not acceptable. A full explanation is provided above.			
List the positive and negative impacts that the activity alternatives will have on the environment.			
No activity alternatives exist, as explained above and therefore the impacts as indicated above are applicable.			
1.3.	Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts		

Provide a description of the preferred design or layout alternative.	
No design or layout alternatives were considered feasible, as the buildings and infrastructure exist and are covered with asbestos roof sheets. Work on asbestos is not permitted unless with prior authorisation in terms of the Asbestos Abatement Regulations, 2020. The applicant accordingly intends to do internal renovations of the existing buildings only and to avoid any work that would affect the asbestos elements. Moreover, as explained above, the SBM SDF considers the site as core to the tourism hub and the only feasible alternative is to reuse the existing buildings and infrastructure for business and tourism-related purposes rather than the existing permitted industrial purposes which could detract from the attraction of the waterfront on the abutting site.	
In view of the aforementioned, the preferred alternative after decommissioning of the facility is the redevelopment of the existing buildings on the site, for a mixed-use business use that can be integrated with the existing waterfront attraction on the abutting property. The preferred alternative entails internal redevelopment of the existing buildings to accommodate 11 flats (apartments) at ground floor level, a laundry, and recreational facilities, while retaining some of the existing crayfish tanks and fishery related product storerooms.	
Provide a description of any other design or layout alternatives investigated.	
None, as explained above.	
Provide a motivation for the preferred design or layout alternative.	
The preferred alternative requires the least structural changes to the existing buildings and can be achieved without having to do any work on the asbestos roofs and other building elements.	
Provide a detailed motivation if no design or layout alternatives exist.	
As explained above. The refurbishment of the buildings has to occur internally only to avoid any work on asbestos elements. The proposed use of the reconfigured buildings aligns with the Municipality's spatial vision for the area, which is very specific and indicates a tourism-related use as being the only acceptable alternative.	
List the positive and negative impacts that the design alternatives will have on the environment.	
See paragraph 1.1 above where all the potential impacts are listed and Appendix J containing the impact matrix.	
1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred technology alternative:	
N/a	
Provide a description of any other technology alternatives investigated.	
N/a	
Provide a motivation for the preferred technology alternative.	
N/a	
Provide a detailed motivation if no alternatives exist.	
N/a	
List the positive and negative impacts that the technology alternatives will have on the environment.	
N/a	
1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred operational alternative.	
The preferred operational alternative is the use of the existing buildings after renovation and reconfiguration for business use, integrated with the existing Paternoster Waterfront. The use will entail offering 11 flats (apartments) for rental, a laundry, and recreational facilities, while retaining one building of approximately 551m ² with some of the existing crayfish tanks and fishery related product storerooms in another to allow for a maximum wet weight throughput of 10 000kg crayfish / annum.	
Provide a description of any other operational alternatives investigated.	
None were investigated in view of the limited options available for the development of alternatives as explained above. The limitations are the asbestos building elements which allow internal renovations of the existing buildings only and the Municipality's spatial development policy indicating the site as part of a tourism hub and not suitable for further industrial use.	
Provide a motivation for the preferred operational alternative.	
The operational alternative allows the client to generate revenue from the existing buildings and infrastructure by letting residential apartments in a waterfront environment and to maintain a level of economic activity related to the main purpose of the owner, being the production of crayfish. The reuse of the existing buildings without expanding or altering the footprints or the height thereof means that the asbestos roofs can be retained without any disturbance.	
Provide a detailed motivation if no alternatives exist.	
As explained above. There are no feasible alternatives. Not only that but the use of the decommissioned facility for industrial purposes would be contrary to the spatial policies of the Municipality.	
List the positive and negative impacts that the operational alternatives will have on the environment.	
See paragraph 1.1 above where all the potential impacts are listed and Appendix J containing the impact matrix.	
1.6.	The option of not implementing the activity (the 'No-Go' Option).
Provide an explanation as to why the 'No-Go' Option is not preferred.	
Because it is a decommissioning activity, no activity alternatives have been considered as being feasible. It is not feasible to retain an unused aquaculture facility, i.e., not even the no-go alternative is feasible. Leaving the buildings, infrastructure, and tanks unused will lead to degradation and eventual negative effect on the environment by accumulation of waste.	
1.7.	Provide an explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.

The preferred alternative is as indicated above, the decommissioning of the unused components of the under-utilised facility and the redevelopment of the existing buildings to put them to economic use as part of the existing Paternoster Waterfront.

The major environmental issues and risk to consider is that of working with asbestos roof sheets and building elements. The large roof areas and extent of asbestos fittings present a potential risk to the environment if there is any disturbance to the asbestos elements. Accordingly, no work should be undertaken on any asbestos elements unless all asbestos in and on the affected building will be encapsulated, and removed after being permitted in terms of the Asbestos Abatement Regulations as a single short time-span specialist contract and the waste disposed of to the appropriate hazardous waste site immediately on completion of the encapsulation and removal process.

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

As indicated above, the assessment of the impacts indicates that the decommissioning will lead to a better and more economically sustainable use of the aquaculture facility on Farm 1259, Malmesbury Division in Paternoster that is currently under-utilised and makes no meaningful contribution to the socio-economic environment. Allowing it to degrade might cause negative environmental effects and the decommissioning is the best practicable environmental option and creates opportunities for the establishment of economic activity that is likely to bring positive environmental effects. The site is shown in the Farm 1259 decommissioning site locality. It clearly shows the existence of the buildings and structures related to the activity and the existing disturbed nature of the site.

The site does not contain environmental sensitivities, albeit the surrounding (unaffected area) does, e.g., the ocean, coastal area, sand dune, and resident population. As all work related directly to the decommissioning is limited to inside of the existing buildings, with construction related activities occurring on existing surfaced areas and roads in the surrounding area, such as movement of materials to and from the site along, no buffers or no-go areas need to be determined on the site. The surrounding area (dune area and littoral active zone) on the private land, except for the seawater inlet and outlet infrastructure where on-going maintenance is essential, will be demarcated as a no-go area to ensure that the construction and operational activities do not cause negative environmental effects.

Conversion and repurposing of the existing buildings to create residential apartments and related business uses without any floor area expansion and thus avoidance of asbestos-related work, is the most feasible and is aligned to the SBM spatial vision for the area.

All related work for the upgrading of the road, water and sewerage infrastructure, indirectly to the decommissioning, occurs in existing roads. The existing pipelines (sewer and water) will be replaced while Kreeffegang will be widened onto the property of the applicant and therefore have limited effect on any other landowner or on visitors.

2. "No-Go" areas

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

No alternatives have been identified and therefore no related no-go areas.

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

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

The methodology used by Viridus Works Environmental in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risk associated with the alternatives is an accepted methodology of impact and issue identification and assessment. Identification and assessment of direct and indirect environmental impacts is a process during which quantitative and qualitative techniques and evaluations are applied. The application of scientific measurements and / or professional judgement leads to the determination of the significance of the probable environmental impacts associated with the proposal, which in this instance is the decommissioning of the aquaculture facility and the repurposing of the buildings for residential and business use complementary of the abutting waterfront development. Cumulative impacts (that arise as a result of an impact from the activity interacting with the impact of another activity to create an additional, larger, impact) are assessed by considering the impact of the other activity, and whether or not it already exists or is only proposed. Any cumulative impacts to which the proposed activity may contribute will be assessed where practical.

Identified impacts and issues are described in terms of the nature, extent, duration, consequence, and probability, with reversibility and possibility of avoidance or mitigation also considered, as shown in 5.6 above.

Probability	None	Unlikely	Low	Medium	High	Unknown
	0	1	2	3	4	5
Extent	Footprint	Site	Local	Regional	National	Unknown
	0	1	2	3	4	5
Consequences	None	Minor	Low	Medium	High	Very high
	0	1	2	3	4	5

Duration	None	Immediate	Short term	Medium term	Long term	Permanent
	0	1	2	3	4	5

Significance rating SR=(E+C+D)xP	
Low (L)	< 12
Medium (M)	13-27
High (H)	28-48
Very high (VH)	49 <

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

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

See Appendix J and Section H, paragraph 1.1 above.

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

1.	Provide a summary of the findings and impact management measures identified by all Specialist and an indication of how these findings and recommendations have influenced the proposed development.
The possible mitigation measures that could be applied and the level of residual risk are included in the table under Appendix J. The risk of potential negative effects is low, and the decommissioning, redevelopment of the existing buildings, and building use (operations) can be managed by an appropriate environmental management programme (EMPr). Without decommissioning, i.e., the No-Go alternative, there are no benefits derived from the use of the site, as the buildings will remain vacant and economically unproductive other than for the limited space to be used for the crayfish tanks, storage and packing. There are no mitigation measures imposed, and it is only the duty of care principle that applies to the owner who will have to undertake on-going maintenance of the buildings, structures and infrastructure with no economic benefit. The Socio-Economic Impact Assessment recommends repurposing of the existing buildings to make meaningful contribution to the local economy without any significant negative effect.	
2.	List the impact management measures that were identified by all Specialist that will be included in the EMPr
Based on the assessment, impact management measures as indicated under Appendix J (and in the compliance statements with the SSVR) will be included in the EMPr.	
3.	List the specialist investigations and the impact management measures that will not be implemented and provide an explanation as to why these measures will not be implemented.
None.	
4.	Explain how the proposed development will impact the surrounding communities.
The proposed decommissioning holds minor risk for the environment, and the likely positive effects outweigh the potential negatives as explained above.	
5.	Explain how the risk of climate change may influence the proposed activity or development and how has the potential impacts of climate change been considered and addressed.
No effect. The owners have not experienced any over-topping or storm surge damage on the site. While long-term effects cannot be predicted, the short and medium term risk for coastal erosion and storm surge damage remains very low due to the geology of the site and the surrounding ocean that consists of solid granite. The map inserted below shows the official assessment of the coastal risk, which is low. The existing buildings are situated approximately 8m above MSL, approximately 95m from the HWM on the western side of the peninsula and only 18m on the eastern side. Typical storm action occurs on the westerly side driven by the winter westerlies, while the eastern bay side does not pose any wave action threats.	

Paternoster (Farm 1259) Coastal Risk Map



- | | |
|---|--|
| 6. | Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved. |
| None. | |
| 7. | Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development. |
| The recommended mitigation measures of The Biodiversity Company have been incorporated into the EMPr. | |
| 8. | Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option. |
| Not applicable to the decommissioning. | |

SECTION J: GENERAL

1. Environmental Impact Statement

1.1.	Provide a summary of the key findings of the EIA.
The proposed decommissioning of the aquaculture facility holds minor risk for the environment, and the likely positive effects of the repurposing of the existing buildings and infrastructure in line with the SBM spatial planning policy for the strengthening of the tourism hub around the Paternoster Waterfront outweigh the potential negatives as explained above. - The site is fully serviced with municipal services infrastructure and inside of the Paternoster urban area. - The site has been used, and is accordingly zoned, for industrial purposes since the 1970's. - The SBM spatial planning policies designate the site as part of a tourism hub together with the existing waterfront. - The site is fully transformed with approximately 4 200m² of buildings covered with asbestos roof sheets and containing other external asbestos building elements. - Internal renovation of the existing buildings to avoid any asbestos-related work is the most feasible and allows for conversion of the buildings for 11 apartments and related commercial activities complementary of the Paternoster Waterfront while retaining some of the building floor area for crayfish holding tanks and fishery-related stores and packing areas. - An existing aquaculture seawater inlet and outlet system exists and can be retained as-is for the decommissioned facility that will have an annual wet weight throughput below the activity threshold as determined in the NEMA EIA Regulations and a significantly lower water and effluent throughput. - The Municipality requires: - upgrading of the water supply pipelines to ensure appropriate fire-safety supply for residential units in the converted buildings; - upgrading of the sewerage system to accommodate the increased waste water flows from the converted buildings; and - upgrading of Kreeffegang Street to deal with existing peak period congestion. - The services infrastructure and road upgrading will occur by replacement of existing infrastructure and are below the thresholds of listed activities in the EIA Regulations. - There are no biodiversity, heritage, or other sensitivities that are potentially affected by the decommissioning and internal renovation of the buildings to create a commercial use aligned with the spatial planning vision for the area.	
1.2.	Provide a map that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2)
Maps included.	
1.3.	Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.
As indicated above, the assessment of the impacts indicates that the decommissioning is unavoidable due to the reduced fish and crayfish quotas and the unsustainability of the fish and abalone farming activities. Repurposing of the vacated buildings will lead to a better and more economically sustainable use of the aquaculture facility that is currently under-utilised and makes no meaningful contribution to the socio-economic environment. Allowing it to degrade might cause negative environmental effects and the decommissioning is the best practicable environmental option and creates opportunities for the establishment of economic activity that are likely to bring positive environmental effects. The site is shown in the above "Farm 1259 decommissioning site locality". It clearly shows the existence of the buildings and structures related to the activity and the existing disturbed nature of the site. The site does not contain environmental sensitivities, albeit the surrounding (unaffected area) does, e.g., the ocean, coastal area, sand dune, resident population. As all work is limited to inside of the existing buildings, with construction related activities occurring in the surrounding area, such as movement of materials to and from the site along existing roads, no buffers or no-go areas need to be determined on the site. It is however necessary to demarcate all private land outside of the site as no-go area for construction-related activities to avoid potential negative effects to the dunes and littoral active zone. Infrastructure upgrades as required and described occur in existing servitudes, roads and services lines. Existing water and sewer pipes and infrastructure are replaced to improve the capacity and the lifespan thereof, which is beneficial to all citizens. The widening of Kreeffegang will be beneficial to the visitors, businesses in and neighbours of the waterfront development. The negative effects of the infrastructure upgrading will be short-term during construction only. The operational risks involve the introduction of alien species, which will be managed through the EMPr and human-induced degradation of the surrounding environment (private dune area and littoral active zone), which will be designated no-go areas but for management and maintenance activities by the owner (applicant).	

2. Recommendation of the Environmental Assessment Practitioner ("EAP")

2.1.	Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMPr
1.	IMPACT MANAGEMENT OUTCOMES - PRE-CONSTRUCTION ACTIVITIES The following outcomes are desired during the construction planning and preparation phase (following numbered items): 1.1 Pre-operations environmental management planning Prior to commencement of construction, the applicant and/or contractor must:

- Submit this EMPr to the DEA&DP for acceptance / approval, at least seven days before commencement of construction - applicant.
- Submit notice of compliance with the relevant conditions of the EA and intent to commence construction activities to the DEA&DP at least seven days before commencement - applicant.
- Have temporary construction signs made in compliance with the South African Road Traffic Sign Manual, 2000 (as amended), issued by the Department of Transport. These signs must be erected on and around all construction sites - contractor.
- Determine an employment and a communications policy and implement same to avoid on-site congregation of jobseekers and owners or representatives of small enterprises seeking opportunities - contractor.

The desired outcome is an appropriately planned construction phase, where every stakeholder is aware of the need to conserve the environment and mitigate any potential impacts.

1.2 Method statements

Method statements from the contractor will be required for specific sensitive actions on request of the authorities or the ECO. A method statement forms the base line information on which sensitive area work takes place and is a "live document" in that modifications are negotiated between the contractor and ECO, as circumstances unfold. All method statements will form part of the EMPr documentation and are subject to all terms and conditions contained in the original EMPr document. The contractor must submit the method statement to the ECO, who must ensure that it is workable and approve it before any particular construction activity commences. Work may not commence until the method statement has been approved by the ECO, or if it requires a departure from the authorisation / EMPr, then also the authorities.

A method statement describes the scope of the intended work in a step-by-step manner for the ECO to understand the contractor's intentions. This will enable interaction in devising mitigation measures, which would minimise environmental impact during these actions. For each instance where the contractor must submit a method statement, it should clearly indicate the following:

- What: a brief description of the work to be undertaken;
- How: a detailed description of the process of work, methods, and materials;
- Where: a description / sketch of the locality / outcome of work (if applicable);
- When: the sequencing of actions with due commencement dates and completion date estimates; and
- What thereafter: how the work area will be rehabilitated and returned to its original state prior to the activity or the agreed state.

All work in a "no-go" area shall be subject to the prior submission and approval of method statements. A method statement will be specifically required for each of the following:

- Working with asbestos.
- Any construction activities on land other than the site.

1.3 Working with asbestos requirements

No work with or on any asbestos materials is permitted unless so authorised in terms of the OHS Asbestos Abatement Regulations, 2020.

1.4 Environmental awareness training for employees and contract workers

Awareness training should address, but not be limited to, the danger of working with asbestos, demarcation of the site, the erection of the camp site for construction teams, establishment of working and storage areas, training of staff and labourers in emergency responses, protection of the environment, and any archaeological material of significance that may be discovered, cultural issues (e.g. religious activities), landscaping, refuse and waste management, dust and noise control, effluent and storm water management, hazardous material use and handling, fire prevention measures, hygiene, pollution control measures, monitoring and reporting, penalties and the system of claims and damages.

The awareness program must include hygiene, maintenance of the integrity of the environment, waste management and water saving. It should specifically address the demarcation of no-go areas and the prevention of damage to third party property, the routing of construction vehicles, and the handling and removal of all waste.

The contractor and the ESM will be responsible for ensuring that the environmental training or education course and the requirements in the EMPr are presented to the staff and labourers. The contractor will be responsible for training of sub-contractors and their staff and labourers, either by arranging with the ESM to undertake such training whenever new sub-contractors come on site or by presenting the course and confirming such actions with the ECO. During construction, if new labourers arrive on the site, the contractor shall be responsible for ensuring that they are aware of the environmental specifications.

1.5 Site management

1.5.1 Contractor's yard

A suitable contractor's yard must be identified by the contractor on the aquaculture decommissioning site (existing transformed and surfaced area), and its location must be approved by the ECO prior to its establishment.

A suitable contractor's yard for upgrading of the municipal services infrastructure must be identified in the town on transformed and surfaced land by the appointed contractor, and its location must be approved by the ECO prior to its establishment.

The contractor's yards are intended for storage, administration, and the location of facilities for the labourers and staff. Only security personnel may be accommodated in the contractor's yard, with a maximum occupation of five people.

1.5.2 Demarcation of sensitive and out of bounds / no-go areas

The "no-go" area around the decommissioning site (all private land outside of the fenced site area) must be clearly and effectively demarcated (or fenced) prior to the commencement of any construction activities.

"No-go" areas along the infrastructure upgrading routes must also be clearly and effectively demarcated (or fenced) prior to the commencement of any construction activities.

Danger tape attached to a wire fence may be used for this purpose. All demarcation material, items and tape must be maintained for the duration of the construction phase. Signage must be placed on the "no-go" boundary demarcation, to clearly indicate that there shall be no access to the area.

The demarcation and fencing of "no-go" areas on third party property, especially farms and along public roads, must not obstruct the movement of the normal users of the land.

The construction site(s) must also be demarcated as such, to advise the general public not to enter it and of all construction activities that could cause harm.

1.5.3 Hygiene

All staff and labourers must be advised of the unacceptability of defecating and urinating in public and anywhere else than in a toilet or ablution facility. The staff and labourers must be made aware of the importance of waste management, with specific reference to placing of empty food containers and wrappers into refuse bins at clearly defined eating areas.

Toilets, at a ratio of one toilet per 12 people employed on the site (labourers and staff) must be erected for the full duration of construction activities. All employees must be advised to only use the site ablutions for "relief," to specifically prevent the use of the surrounding bush as an informal toilet area. Sanitation provision and servicing of the ablutions must be to the satisfaction of the municipality. The contractor must ensure that toilets are emptied and cleaned weekly and before any builders' holiday and that the service provider uses approved sewerage disposal points for dumping of the waste. Temporary toilets shall be of a neat construction and shall be provided with doors and locks and shall be secured to prevent them blowing over.

1.5.4 Site instruction book and diary

The contractor must keep the site records in the site office. The responsible parties will use the site instruction book entries for the recording of general site instructions. The site instruction book will also be used for the issuing of stop work orders for the purposes of immediately halting any particular activities of the contractor in view of the environmental risk that they may pose. The records must be available to the authorities for inspection or on request to a member of the public. Contractor's meeting minutes must reflect environmental queries, agreed actions and dates of eventual compliance. These minutes form part of the official environmental record and must be recorded in the site diary.

1.5.5 Fires and cooking facilities

The contractor must provide adequate facilities for all staff and labourers so that they need not supplement their comforts on site by accessing what can be taken from the natural surroundings. Fires are not permitted on site, unless in a specially constructed barbeque / braai and limited to a single fireplace. Activities that may pose a fire risk must be identified and suitable preventative measures must be put in place to prevent any possible damage by fire. Contractors must inform the staff of the risk of fire and fire prevention and emergency procedures in the event of a fire. Firefighting equipment shall be supplied by the contractor at suitable locations.

The Contractor shall ensure that energy sources are available at all times for construction and supervision personnel for heating and cooking purposes.

The desired outcome is an approved construction phase, where the contractor and all contract workers are aware of the environmental sensitivities and mitigation measures, and all stakeholders are aware of what the phased construction activities will entail.

2. IMPACT MANAGEMENT OUTCOMES - CONSTRUCTION ACTIVITIES

The following outcomes are desired during the construction phase (following numbered items):

2.1 Management of job seekers

An appropriate employment policy to accommodate and manage local job seekers is required from the contractor.

The contractor must develop and apply an appropriate communications plan and introduce signage at the site to advise job seekers and suppliers of the construction activities and requirements.

The contractor must manage the congregation and movement of job seekers to avoid risks to job seekers and disturbance of traffic, pedestrians, and construction activities by job seekers by appropriate placement of signage, implementation of the communications plan, and active interaction with job seekers.

2.2 Support opportunities for skills development

All stakeholders need to create opportunities for small enterprises and service providers to work with established enterprises and service providers to build skills in keeping with government policy and statutory provisions (Skills Development Act, 1998, Act 97 of 1998 as amended).

2.3 Archaeological resources

Archaeological monitoring of all development within 50m of the existing buildings and structures and excavation must be undertaken with due cognisance of the archaeological significance of the area. The ESM and ECO will be responsible for ensuring that an archaeologist is alerted when any artefacts or archaeological resources are found.

Any archaeological material uncovered should be recorded and photographed unless deemed significant enough to halt construction.

If any human remains are found, work in the immediate vicinity must cease and the prescribed protocols followed, inclusive of notification of Heritage Western Cape.

2.4 Avoid and manage littering by workers

Appropriate signage must be erected by the applicant at strategic places around the dam to warn about the negative effects of littering, together with the signs intended for the management of the use of the area and public safety.

Appropriate refuse bins and receptacles must be placed around the dam along accessible places and pathways for use by people by the applicant and the bins must be maintained regularly.

2.5 Effective water use management

Potable water is a scarce and costly resource, and it must be used sparingly and primarily for the purpose it was purified. Construction activities should make use of the existing boreholes on site and other non-potable water where possible and where not, then consume water from a metered connection only.

2.6 Risk averse materials handling and storage

Construction activities must not have any significant impact on the ecosystem. All materials that are potentially harmful to the aquatic ecosystem must be stored in an appropriately bunded space and containers.

Where hazardous substances and fuels (such as diesel, oil, lubricant, detergent, chemicals, paint, cleaning agents) are to be stored on site for construction purposes, a designated and appropriately enclosed area must be set aside for it in the contractor's yard.

2.7 Fire control and emergency procedures

Appropriate usable and functional fire safety equipment must be present in the construction site, and a fire safety team has to be trained by the contractor to ensure an effective first response when "hot works" (e.g. welding, grinding, cutting) occur and it causes a risk to any buildings, lives, or vegetation.

The contractor must always adhere to the relevant legislation (OHS).

2.8 Solid waste management

An integrated waste management system must be adopted on site. It is the responsibility of the contractor to ensure that a waste minimisation approach is followed, and that reduction, recycling, re-use, and disposal occurs as appropriate. Waste bins for the different categories of recyclable waste (paper, plastic, metal) must be provided on site and effectively maintained with proper records available for the ECO to monitor.

The non-recyclable or reusable waste (builder's rubble, household general waste) must be appropriately contained in bins and regularly disposed of at a licensed landfill in keeping with the relevant legislation (National Environmental Management: Waste Act, 2008, Act 59 of 2008).

Waste management offers economic opportunities for individuals and small businesses with appropriate certification or under appropriate supervision, aligned to a skills and economic development programme.

2.9 Dust management

The surrounding environment, property owners and users must not be exposed to significant dust-related impacts, which cause nuisance and health risks. Dust levels may not exceed that specified in the National Dust Control Regulations (G.N. 827 of November 2013) i.e. 1200mg/m²/day.

2.10 Noise management

The surrounding environment, property owners and users must not be exposed to and impacted by noise arising from the construction activities, which must comply with the relevant legislation (Western Cape Noise Control Regulations, 2013, RN 627/PG 5309/19981120, as amended).

2.11 Storm water management

The contractor must implement appropriate measures to control the flow of storm water across any construction site, to prevent flooding, erosion, sedimentation, and dispersion of pollutants. Surface run-off must be contained and channelled to planned storm water retention facilities.

No unchanneled or unfiltered stormwater may flow off the decommissioning site to prevent degradation of the coastal environment. All stormwater on the decommissioning site must be detained, appropriately filtered and only then released.

2.12 Wastewater management

The contractor must implement appropriate measures manage wastewater. All wastewater from on-site ablutions must be disposed of into the municipal sewerage system after gaining formal approval for such disposal from the Municipality, while wastewater from construction activities (contaminated water) must be contained and disposed of in consultation with the ECO to avoid any negative environmental effects.

The environment must not be contaminated or negatively affected by polluted water.

2.13 Temporary and permanent site closure procedures

The contractor and the ECO must agree on site closure procedures to ensure that no negative effects occur during periods of inactivity on the site. These must take cognisance of all the outcomes as set out herein.

On completion of the construction phase and any related activities, all areas utilised for the construction activities have to be rehabilitated by removal of all rubble, litter, contaminated soils, structures, and infrastructure solely intended for the construction phase and the ECO must certify the site as cleared to the applicant.

3. IMPACT MANAGEMENT OUTCOMES - REHABILITATION OF THE ENVIRONMENT AFTER CONSTRUCTION AND WHERE APPLICABLE POST CLOSURE

The following outcomes are desired after conclusion of the construction activities:

The applicant must ensure that no building rubble and waste remains on site after conclusion of the demolition and construction work. An inspection report must be prepared and submitted to the EAP responsible for the audit and the relevant authorities, also in terms of any other approved licence, e.g., under the Asbestos Abatement Regulations.

Objective	Outcome	Responsible	Timing	Monitoring mechanism
No construction debris left on site	All rubble, litter, contaminated soil and temporary construction infrastructure removed; site returned to a clean, safe state	Contractor	At practical completion	ECO site-clearance certificate issued to the applicant
No-go area undamaged by construction	Dune/littoral no-go area inspected and confirmed undisturbed (or rehabilitated if any incursion occurred) before construction closure is certified	ECO	At practical completion	Closure inspection report, cross-referenced to the pre-construction baseline photographs
Final compliance audit completed	An independent closure audit confirms compliance with the EA conditions and EMP, particularly regarding asbestos (no unauthorised work occurred)	Independent auditor / EAP	Within [X] months of practical completion	Audit report submitted to DEA&DP
Asbestos status certified	Applicant certifies to DEA&DP whether any asbestos-related work occurred during construction, and if so, provides full DEL authorisation and contractor records	Applicant	At closure	Certification letter to DEA&DP, with supporting DEL records attached if applicable

4. IMPACT MANAGEMENT OUTCOMES - OPERATIONAL ACTIVITIES

The following outcomes are desired over a long term as operational activities:

After decommissioning, the retained down-scaled aquaculture operation will exist for as long as quotas permit, while the residential and business use, and the no-go area all continue indefinitely.

Objective	Outcome	Responsible	Timing	Monitoring mechanism
Retained aquaculture facility stays within its authorised scale.	Crayfish holding throughput does not exceed 10 000 kg wet weight per annum.	Owner/Operator	Ongoing, annually verified	Annual production record retained and available on request
Seawater inlet/outlet infrastructure maintained without expansion.	Routine maintenance only; any proposed upgrade or capacity increase to the inlet/outlet system triggers a fresh regulatory check before being undertaken.	Owner/Operator	Ongoing	Maintenance log; any proposed change referred to EAP before implementation
No-go area respected in perpetuity.	Dune/littoral no-go area remains demarcated (formally, not just during construction) and free of unauthorised access, landscaping or structures.	Owner / Management entity	Ongoing	Annual site inspection; incorporated into management rules for the residential component
No new alien vegetation introduced during ongoing landscaping/garden maintenance.	Landscaping maintenance continues to use only indigenous, non-invasive species.	Owner /Management Entity	Ongoing	Annual visual inspection
Operational traffic remains within assessed volumes.	Resident/visitor trip generation does not materially exceed the levels assessed; any future intensification reassessed before implementation.	Owner /Management Entity	Ongoing	Periodic review tied to any future change-of-use application
Stormwater management measures remain functional.	Permeable paving and on-site retention measures inspected and maintained; runoff volume/quality not allowed to degrade from the assessed baseline.	Owner / Facilities management	Ongoing, annual inspection	Maintenance records
Asbestos roofing condition monitored over time.	Periodic visual condition assessment of retained asbestos roofing/building elements to detect deterioration before it becomes a disturbance risk.	Owner / appointed inspector	Annually	Written condition report retained on file; triggers DEL- authorised process if deterioration found
Coastal/sea-level risk monitored.	Periodic review of any change in observed coastal erosion, storm surge or inundation risk at the site, given its proximity to Bekbaai.	Owner / EAP (on request)	Every 3–5 years, or after any significant storm event	Photographic record; informal comparison against the BAR's coastal risk baseline
Heritage/visitor attraction use does not compromise retained structures.	Public access to the crayfish-tank exhibition area managed (e.g. barriers, supervised access) so visitor use does not damage retained infrastructure or create safety risk.	Owner/Operator	Ongoing	Incident log
An integrated waste management approach must be followed to ensure waste minimisation, reuse and recycling. Organic waste must be separated from the general waste stream and beneficiated where possible.	Avoid sending waste to landfill if it can be better utilised through recycling, reuse or beneficiation. A dedicated waste recycling system to be introduced on the site.	Owner/Residents/Visitors/ Operator	Ongoing	Quarterly waste audit by owner
2.2.	Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.			
The approval / authorisation for the decommissioning activity can be granted subject to a condition that no work may be undertaken on any asbestos materials and that should any work thereon be required, then all asbestos from the affected building must be encapsulated, removed and disposed of in keeping with the Asbestos Abatement Regulations, 2020 (GNR1196 in GG 43893, 10 November 2020) and only after approval of the related work plan by the DEL as the competent authority.				

The applicant must be obliged to certify to the competent authority whether or not any asbestos related work occurred on site and if so, provide full details of the work, including, but not limited to indicating which specialist contractor performed the work and all records as prescribed in the Regulations.

2.3. Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.

The proposed decommissioning should be authorised with imposition of the appropriate conditions as indicated in paragraph 2.2 above, as the decommissioning is critical to the future productive use of the buildings and the site for economic activity that results in likely positive effects, whereas the current situation does not and leaving the buildings under-utilised will be likely to lead to their degradation and potential negative environmental effects. For clarity, the environmental authorisation sought relates only to the decommissioning of the aquaculture facility (Listing Notice 1 Activity 31) and does not authorise the rezoning of the property or the subsequent residential, business or other land uses, which remain subject to the separate land use approvals being considered by the Saldanha Bay Municipality.

2.4. Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.

No assumptions were made in the assessment process and there are no uncertainties, or gaps in knowledge which relate to the assessment and mitigation measures proposed.

2.5. The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.

The decommissioning activity does not include operational aspects. Therefore, the decommissioning authorisation can be made valid for a period of five years, and the activity should be concluded within this period.

No post construction monitoring is required.

3. Water

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.

The aquaculture facility uses sea water while the factory buildings and labourers' accommodation is connected to the municipal network.

The redeveloped buildings will continue to use the existing municipal potable water supply system.

4. Waste

Explain what measures have been taken to reduce, reuse or recycle waste.

As indicated in the Draft EMPr. An integrated waste management system must be adopted on site. It is the responsibility of the contractor to ensure that a waste minimisation approach is followed, and that reduction, recycling, re-use, and disposal occurs as appropriate. Waste bins for the different categories of recyclable waste (paper, plastic, metal) must be provided on site and effectively maintained with proper records available for the ECO to monitor.

The non-recyclable or reusable waste (builder's rubble, household general waste) must be appropriately contained in bins and regularly disposed of at a licensed landfill in keeping with the relevant legislation (National Environmental Management: Waste Act, 2008, Act 59 of 2008).

5. Energy Efficiency

8.1. Explain what design measures have been taken to ensure that the development proposal will be energy efficient.

Decommissioning reduces the energy demand of the aquaculture facility, while the alternative use (residential and commercial) will take up the capacity.

SECTION K: DECLARATIONS

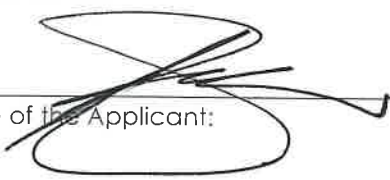
DECLARATION OF THE APPLICANT

Note: Duplicate this section where there is more than one Applicant.

I Jacobus Francois Pienaar, ID number 560817 5119 08 5, duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
 - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
 - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
 - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
 - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
 - Legitimate costs in respect of specialist(s) reviews; and
 - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.


Signature of the Applicant: _____ Date: 03 February 2026

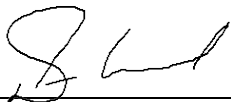
Paternoster Groepbelange Ltd (Reg. No. 1984/009223/06)

Name of company (if applicable): _____

SECTION B: DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (“EAP”)

I Dupré Lombaard, EAPASA Registration number 2019/304 as the appointed EAP hereby declare/affirm the correctness of the information provided or to be provided as part of this application, and that:

- my EAP Registration is current and up to date, and will inform the applicant and Department if the registration should lapse during this pre-application process;
- the information provided or to be provided as part of this Application form, is true and correct;
- in terms of the general requirement to be independent:
 - other than fair remuneration for work performed/to be performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of EIA Regulations, 2014 have been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- in terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed/will disclose, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this Application form;
- I have ensured/will ensure that information containing all relevant facts in respect of the Application Form was/will be distributed or was/will be made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were/will be provided with a reasonable opportunity to participate and to provide comments;
- I have ensured/will ensure that the comments of all interested and affected parties were/will be considered, recorded and submitted to the Competent Authority in respect of this Application form;
- I have ensured/will ensure the inclusion of inputs and recommendations from any specialists in respect of the Application form, where relevant;
- I have kept/will keep a register of all interested and affected parties that participated in the public participation process;
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014; and
- All specialist investigations must comment on how the potential impacts relate to climate change concerns.



Signature of the EAP:

03 February 2026

Date:

Virdus Works Environmental (Pty) Ltd (Reg. No. 2019/133896/07)

Name of company (if applicable):

DECLARATION OF THE SPECIALIST (SOCIO-ECONOMIC)

Note: Duplicate this section where there is more than one specialist.

I, Dr Hein du Toit, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.



08/08/2024

Signature of the EAP:

Date:

DEMACON Research & Projects (Pty) Ltd, trading as DEMACON Market Studies

Name of company (if applicable):