

In terms of the **National Environmental Management Act** and 2014 Environmental Impact Regulations as amended, 2017, for:

ENVIRONMENTAL AUTHORISATION APPLICATION WILL BE SUBMITTED FOR THE SUBDIVISION OF PTN 233 OF FARM GOEDGELOOF 745 AND DEVELOPMENT OF ADDITIONAL DWELLINGS AND JETTY, KROMME RIVER, ST FRANCIS BAY, KOUGA LOCAL MUNICIPALITY, EASTERN CAPE

PREAPPLICATION DRAFT BASIC ASSESSMENT REPORT

INTERESTED AND AFFECTED PARTY REGISTRATION AND INITIAL REVIEW AND COMMENTS: 2 OCTOBER 2025 – 3 NOVEMBER 2025



PREPARED FOR THE APPLICANT:

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PREPARED BY:

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DATE:

2 October 2025

EXECUTIVE SUMMARY

Introduction

Portion 233 Farm Goedgeloof 745 (C0340000000074500233) is situated close to St Francis Bay and is situated on the right (west) bank of the Kromme River estuary in the Kouga Local Municipality (KLM), Eastern Cape. The property is approximately 1.34 ha in extent. One dwelling and a few outbuildings are currently on the northern portion of the site. In terms of the KLM Integrated Land Planning Scheme, 2020, the property falls within the agricultural zone.

The owner of the property is proposing to subdivide the 1.34 ha riverside property and develop an additional 4 (four) dwellings and associated storage, parking and reticulation structures and infrastructure. The area proposed for subdivision and development of new dwellings and internal road is an estimated 4400m². Approximate central coordinates: 34° 7'45.63"S; 24°47'52.91"E

Construction of a communal jetty is proposed to be developed for shared use by owners / tenants of the new dwellings. A pedestrian path to the jetty will be provided. The communal jetty will be sized to moor (secure) two boats per portion: a maximum of up to eight boats. Coordinates of proposed communal jetty location: 34°07'45" S; 24°47'54" E

The proposed development triggers activities in Listing Notice 1 and Listing Notice 3 of the Environmental Impact Assessment Regulations, 2014 (as amended, 2017) published in terms of the national Environmental Management Act (Act 107 of 1998) (NEMA) and therefore requires an environmental authorisation to be issued by the competent authority before development can commence. The competent authority for the application is the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism.

Environmental Sensitivities

A screening tool has been developed by the Department of Forestry, Fisheries and Environmental Affairs (DFFE). The Screening Tool identifies related exclusions and/or specific requirements including specialist studies applicable to the proposed site and/or development, based on the national sector classification and the environmental sensitivity of the site. A screening report was generated for the proposed project; the site verification report is provided as Appendix D1. The sensitivities identified and verified are provided below.

Table 1: Verification of environmental sensitivity identified in DFFE screening tool report

Specialist Study as per Screening Tool Report	Environmental sensitivity as per screening tool report	Verification of environmental sensitivity	
Agriculture Assessment	High	Low	The site is 1.3ha, the water is high saline, and a large area consists of Katspruit soils and accompanying salt marsh vegetation.
Animal Species assessment	High	Low	No specific populations of threatened species were identified within the footprint; the entire footprint is situated within transformed and degraded habitat. The SCC included in the STR are not

Specialist Study as per Screening Tool Report	Environmental sensitivity as per screening tool report	Verification of environmental sensitivity	
			expected to be affected by the proposed development due to the limited footprint and extensive more suitable habitat being present in the surrounding area.
Aquatic Biodiversity Impact Assessment	Very High	Very High	Site is situated between the bank of the Kromme on the east, and a salt marsh on the west. The site likely falls within the 1:100-year floodline. The development is not likely to impact the functioning of the marsh area or the estuarine. Mitigation measures are required to mitigate flood risk.
Archaeological and Cultural Heritage Impact Assessment	Low	Low	No further assessment is deemed necessary, however mitigation measures to prevent unnecessary impact on heritage resources are recommended and will be included in the EMPr submitted with the BAR.
Paleontological Impact Assessment	Medium	Medium	No paleontology assessment is deemed to be necessary for the proposed development and associated services; however, mitigation measures to prevent unnecessary impact on paleontological resources are recommended and will be included in the EMPr submitted with the BAR.
Plant Species Assessment	Medium sensitivity	Low to Medium Sensitivity	No endemic and range restricted species were recorded as being present. Several species are known from the surrounding area, but unlikely to be affected by the proposed activity. No Endangered or Critically Endangered flora species were confirmed to be present nor known to be present in the affected area. PNCO (Provincial Nature Conservation Ordinance) permits are unlikely to be required as no species protected in terms of the provincial PNCO were recorded within the actual proposed footprints. Milkwood trees are present (one large individual and several seedlings associated with the remnant thicket clumps, but these will not be affected and will be retained. Respective permits will be required for removal during site clearing.
Terrestrial Biodiversity Impact Assessment	Very High	Low / medium / high	The historical vegetation mapped on site is Albany Alluvial Vegetation (endangered), however the area proposed for development is confirmed to be secondary degraded vegetation. The site

Specialist Study as per Screening Tool Report	Environmental sensitivity as per screening tool report	Verification of environmental sensitivity	
			<p>verification confirms that while property does fall within a broader designated CBA area, the proposed development footprint falls within old lands with kikuyu grass and thus not deemed to be very high sensitivity. The heavily degraded and invaded nature of the habitat is also unlikely to provide suitable permanent habitat for any flagged fauna species of conservation concern and no flagged plant species of conservation concern were recorded nor are likely to occur in close proximity. HIGH Sensitivity areas including the saltmarsh habitat is identified outside of the proposed footprints as well as remnant thicket clumps that can be avoided.</p> <p>MODERATE Sensitivity habitat includes minor pockets of secondary thicket species with limited ecological value or function.</p> <p>LOW Sensitivity habitat includes all the transformed areas and old lands where no natural vegetation remains. The proposed footprints will fall within this habitat.</p>
Hydrology Assessment	NA	NA	Soil assessment and aquatic assessment have been carried out. An area considered suitable for development has been identified for the placement of the proposed dwellings. No additional assessment considered necessary.
Socio-Economic Impact Assessment	NA	NA	Aspects related to socio-economic impacts will be addressed in the basic assessment, however no specific specialist study is deemed to be required.
Visual Assessment	NA	NA	Aspects related to visual impacts will be addressed in the basic assessment, however no specific specialist study is deemed to be required.
Civil Aviation Assessment	High sensitivity	Low sensitivity	A civil aviation assessment / compliance statement is excluded as the proposed development will not have an impact on civil aviation aerodrome. SACAA will be registered as an interested and affected party.

Specialist Study as per Screening Tool Report	Environmental sensitivity as per screening tool report	Verification of environmental sensitivity	
Defence theme	Low sensitivity	Low sensitivity	A defence them compliance statement is excluded as the proposed development will not have an impact on the defense theme.

Impact Assessment summary

Several impacts were identified for construction phase, and a few were identified in operational phase. Measures are recommended to mitigate anticipated impacts. The potential impacts associated with the proposed development on the Kromme River are considered to be negative of low to medium significance without any mitigation. However, all potential impacts should readily be reduced to low significance provided the construction work and ongoing operation of the development are carried out with due diligence and the appropriate mitigation measures, as recommended in this report, are adhered to. No negative impacts of high or very high significance were identified. The development is expected to have a positive impact on local employment and property value.

The proposed development area currently provides limited value in terms of biodiversity conservation and agricultural production due to the small size (4400m²) and degraded state. A maximum footprint of 1600m² is expected which will occupy approximately 12 % of the land portion but will be high value property.

It is recommended that the proposed dwellings and associated road and driveways and supporting structures be placed at a 16 meter setback from the eastern farm portion boundary and 10 meters from the salt marsh on site. This area is considered to be suitable by the EAP based on the following:

1. The identified area is disturbed (i.e., kikuyu-pasture dominated), meaning there's minimal biodiversity loss. Remnant thicket clumps on site are avoided.
2. The proposed dwellings avoid Katspruit (saturated) soils. Tukulu soils are better drained and structurally more stable
3. While no formal floodline delineation exists for the property, site observations and review of adjacent developments suggest that a de facto development line — aligned approximately with the 3m ASL contour — has been historically respected. This is consistent with practical planning practice given the site's low-lying estuarine position, vulnerability to inundation, and saltmarsh proximity
4. Lower environmental risk as the identified area is outside the immediate flood-prone zone, based on distance from salt marsh and bank. The identified development area is landward of the 3m ASL bank, aligned with the informal setback seen in adjacent properties.
5. A buffered distance is provided from both the estuary and saltmarsh with no encroachment into sensitive zones.

The dwellings are recommended to be raised off ground level with a garage and storeroom, waste area and rainwater tanks only provided on the ground level, and the living area on the first floor. The foundations will need to withstand floodwaters. A floating jetty is recommended to mitigate impact on the estuary. The concept timber dwellings preferred by the applicant is considered to be a low

impact design and fits in with the surrounding area of the site and mitigates the risks identified on the development area.

Public participation

The preapplication draft basic assessment report will be provided at registration of interested and affected parties for initial comment.

Registration date for interested and affected parties: 2 October 2025 – 3 November 2025

The application for EA will then be submitted to the DEDEAT and on acceptance of application the draft BAR will be distributed to interested and affected parties for a 30-day comment and review period. The BAR will then be updated with all comments received and responses, as required. The Final BAR will then be submitted to the DEDEAT for a 107-day decision making by the competent authority.

Conclusion

The draft basic assessment has assessed the no go option, alternative 1 (initial SDP), the preferred concept timber dwellings, the proposed jetty and proposed service options. Measures are recommended to mitigate identified potential impacts, including input into the final SDP and jetty design. With mitigation measures in place the majority of identified direct impacts are expected to be negative of low significance, with positive impacts expected regarding employment creation and property value.