

BASIC ASSESSMENT REPORT

FOR THE ESTABLISHMENT OF BRITS EXTENSION 166 TOWNSHIP

In terms of GN R327 of 7 April 2017 – Listing Notice 1 – Activity 28
Remainder of Portion 85, Farm Hartebeestfontein 445 JQ
Madibeng Local Municipality, North West Province

EA Reference:	NWP/EIA/105/2025
Competent Authority:	Department of Economic Development, Environment, Conservation and Tourism (DEDECT), North West Province
Case Officer:	Mr Olebogeng Marobe OMarobe@nwpg.gov.za 079 908 4547 80 Kerkstraat, Rustenburg, 0299
Applicant:	Merilyn Erasmus P.O. Box 1541, Brits, 0250
EAP:	EHS (Pty) Ltd – RP Colyn & W Riekert wernerriekert@gmail.com rpolyn@telkomsa.net
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Date:	May 2026

Contents

EAP Declaration.....	4
Applicant Declaration	5
Document Control and Version History	6
Glossary and Abbreviations.....	6
Section A: Activity and Proponent Information	8
A1 Activity Information.....	8
A2 Proponent and EAP Information.....	8
A3 Project Description.....	9
A4 Need and Desirability	10
A5 Alternatives.....	10
Section B: Site/Area/Property Description.....	11
B1 Location	11
B2 Topography and Drainage	12
B3 Geology	12
B4 Climate	13
B5 Soil.....	13
B6 Ecology and Vegetation	13
B7 Surface Hydrology and Water Use.....	14
B8 Groundwater	15
B9 Air Quality	15
B10 Visual Aspects	15
B11 Noise	15
B12 Archaeological and Cultural Heritage	15
B13 Palaeontology	15
B14 Sensitive Landscapes and Biodiversity Summary	15
Annexure C: Site Photographs.....	17
Section B15: Motivation for Non-Inclusion of Specialist Reports in the Draft BAR.....	19
B15.1 Background.....	19
B15.2 Specialist Studies Identified	19
B15.3 Motivation for Non-Inclusion.....	20
Section C: Public Participation Process (PPP).....	22
C1 Legislative Requirements.....	22
C2 Pre-Application PPP Actions Completed.....	22
C3 Comment Period and Compliance	23
C4 I&AP Register	23
C5 Comments Received and EAP Response.....	23
C6 Procedural Compliance Summary.....	24
Section D: Impact Assessment and Mitigation	25
D1 Methodology	25
D2 Assessment of Impacts.....	27

D3 Impact Significance Summary.....	31
Section E: Environmental Management Programme (EMPr).....	32
E1 Introduction.....	32
E2 Legislative Framework.....	32
E3 Roles and Responsibilities.....	32
E4 Pre-Construction Preconditions.....	33
E5 Environmental Management Specification Tables.....	34
E6 Environmental Monitoring Programme.....	39
E7 Reporting Schedule.....	40
E8 Adaptive Management and Non-Compliance Protocol.....	41
E9 Grievance Mechanism.....	41
E10 Declarations.....	42
Section F: Recommendations and Conclusion.....	43
F1 Key Findings Summary.....	43
F2 EAP Opinion and Recommended Conditions of Authorisation.....	43
Section G: Annexures.....	45

EAP Declaration

I, the undersigned, hereby confirm that the information contained in this Basic Assessment Report is correct and complete to the best of my knowledge, that I am independent of the applicant as required by the EIA Regulations, 2014, and that this report has been prepared in accordance with the requirements of NEMA, 1998 and the 2014 EIA Regulations as amended.

EAP: RP Colyn | Green Environmental (Pty) Ltd:

_____ Date: _____

Project consultant: W Riekert | EHS (Pty) Ltd:



_____ Date: _____

Applicant Declaration

I, Merylyn Erasmus, as the applicant, hereby confirm that all information provided to the EAP and contained in this BAR is true and correct to the best of my knowledge, and that I am aware of my responsibilities in terms of NEMA and the 2014 EIA Regulations as amended.

Applicant: Merylyn Erasmus:

_____ Date: _____

Document Control and Version History

Version	Date	Description	Author
Draft 1.0	November 2025	Initial draft BAR compiled	EHS (Pty) Ltd
Draft 2.0	April 2026	Full draft BAR – all sections updated; EMPr completed; PPP section populated; Sections F and G completed	EHS (Pty) Ltd
Draft 2.1	May 2026	Maps (Locality, Geology, Topo-Cadastral, Vegetation) and site photographs added; PPP updated with 4 May 2026 I&AP comment; specialist study motivation added; WUL issue flagged following I&AP comment; signatures added	EHS (Pty) Ltd

Glossary and Abbreviations

Abbreviation	Full Term
AIA	Agricultural Impact Assessment
BAR	Basic Assessment Report
BID	Background Information Document
BGIS	Biodiversity Geographic Information System
CBA	Critical Biodiversity Area
C&RR	Comments and Response Report
DALRRD	Department of Agriculture, Land Reform and Rural Development
DEDECT	Department of Economic Development, Environment, Conservation and Tourism (North West Province)
DWS	Department of Water and Sanitation
EAP	Environmental Assessment Practitioner
EA	Environmental Authorisation
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
ESA	Ecological Support Area
HIA	Heritage Impact Assessment
I&AP	Interested and Affected Party
NEMA	National Environmental Management Act, 1998 (Act 107 of 1998)

Abbreviation	Full Term
NEMBA	National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004)
NHRA	National Heritage Resources Act, 1999 (Act 25 of 1999)
NPAES	National Protected Area Expansion Strategy
NWA	National Water Act, 1998 (Act 36 of 1998)
PIA	Palaeontology Impact Assessment
PPP	Public Participation Process
SACAA	South African Civil Aviation Authority
SAHRA	South African Heritage Resources Agency
SANBI	South African National Biodiversity Institute
SPLUMA	Spatial Planning and Land Use Management Act, 2013
WUL	Water Use Licence

Section A: Activity and Proponent Information

A1 Activity Information

The proposed activity is subject to a Basic Assessment because it triggers a listed activity in terms of NEMA, 1998 (Act 107 of 1998) and the EIA Regulations, 2014 (GN R982) as amended by GN R327 of 7 April 2017.

Listing Notice	Activity Number	Description	Trigger
GN R327 of 7 April 2017	28	Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed.	The 13.4779 ha proposed township falls within the size thresholds in both criteria (i) and (ii). The land was used for agricultural/residential purposes on the date of application and has not previously been formally proclaimed as a township.

A2 Proponent and EAP Information

Applicant Name:	Merilyn Erasmus
Postal Address:	P.O. Box 1541, Brits, 0250
Contact Numbers:	012 252 0693 / 083 625 3054 / 078 832 8964
Email:	es@lsprok.com / piet@coastalstruct.co.za
Property:	Remainder of Portion 85 of the Farm Hartebeestfontein 445 JQ
Town Planner:	Platinum Town Planners
Attorneys:	Lourens Prokureurs Ing (CJA Lourens) Ref: CJA LOURENS/fd/ERA012

EAP Firm:	EHS (Pty) Ltd
Contact Persons:	RP Colyn (rpolyn@telkomsa.net) and W Riekert (wernerriekert@gmail.com)
Cell:	083 258 2463
EAPASA Registration:	RP Colyn EAPASA 2020-1358
Independence:	The EAP is appointed independently of the applicant and has no financial interest in the outcome of the application. See Annexure E for EAP independence declarations.

A3 Project Description

Proposed Name:	Brits Extension 166
Location:	Remainder of Portion 85, Farm Hartebeestfontein 445 JQ, Madibeng Local Municipality, North West Province
Total Extent:	Approximately 13.4779 ha
Layout Plan Reference:	BRITS X 166/1
Current Land Use:	Agriculture / vacant/undeveloped land (Peri-Urban Areas Town Planning Scheme, 1975)
Proposed Land Use:	Residential 1 (Erven 1-10) and Business/Special (Erven 11-14)
Approximate Capital Investment:	In excess of R100,000,000
Employment (construction):	Approximately 100 direct jobs
Employment (operational):	Between 150 and 200 permanent jobs

Zone	Erf Count	Area (Ha)	Percentage
Residential 1 (Erven 1-10)	10	8.89	66.0%
Business / Special (Erven 11-14)	4	2.01	14.9%
Public Road	N/A	0.67	5.0%
Remainder / Open Space	N/A	1.90	14.1%
Total	14 erven + roads	13.47	100%

Condition	Erven 1-10 (Residential 1)	Erven 11-14 (Business / Special)
Use Zone	Special	Special
Primary Use	Residential 1 – one dwelling unit per erf	Business
Use with Consent	A second dwelling unit	Per applicable Town Planning Scheme
Height	2 storeys	Per applicable Town Planning Scheme
Coverage	Shall not exceed 30%	Shall not exceed 50%
FAR	Shall not exceed 0.3	Shall not exceed 0.6

Condition	Erven 1-10 (Residential 1)	Erven 11-14 (Business / Special)
Title Deed	No restrictive conditions in the Title Deed (confirmed by Town Planner's Memorandum)	As above

Infrastructure: All engineering services (electricity, stormwater, sewer, roads, water) will be delivered by the Madibeng Local Municipality, confirmed in the Town Planner's Memorandum. Bulk services contributions will be paid per the Town Planning and Townships Ordinance, 1986.

A4 Need and Desirability

- Housing demand: The project provides formally proclaimed, serviced erven for residential and business use in response to population growth and demand in the greater Brits area.
- Optimal land utilisation: The 13.5 ha site is currently vacant/undeveloped and adjacent to established urban development along the R511 corridor.
- Economic benefit: Capital investment exceeding R100 million; approximately 100 construction-phase jobs and 150-200 permanent jobs during operation.
- Municipal support: Madibeng Local Municipality supports the proposed township establishment as confirmed in the Town Planner's Memorandum (Platinum Town Planners).
- Policy alignment: The project aligns with the Madibeng Local Municipality Spatial Development Framework (SDF) and Integrated Development Plan (IDP).

A5 Alternatives

No feasible location alternative exists – the application is site-specific, relating to land already owned by the applicant with an established town-planning process. The No-Go alternative forfeits all socio-economic benefits and is considered unfeasible given the demonstrated need. A layout alternative requiring modification to reduce CBA2 encroachment must be investigated once specialist studies are complete.

Section B: Site/Area/Property Description

B1 Location

The site comprises the Remainder of Portion 85 of the Farm Hartebeestfontein 445 JQ, situated in the Madibeng Local Municipality, North West Province, approximately 7 km east of Brits along the R511 provincial road (centre coordinates: 25 degrees 41 minutes 1.82 seconds S; 27 degrees 51 minutes 36.26 seconds E).

Figure 1: Locality Map – Portion 85, Farm Hartebeestfontein 445 JQ (EHS (Pty) Ltd, E490, January 2026). Scale 1:50 000.

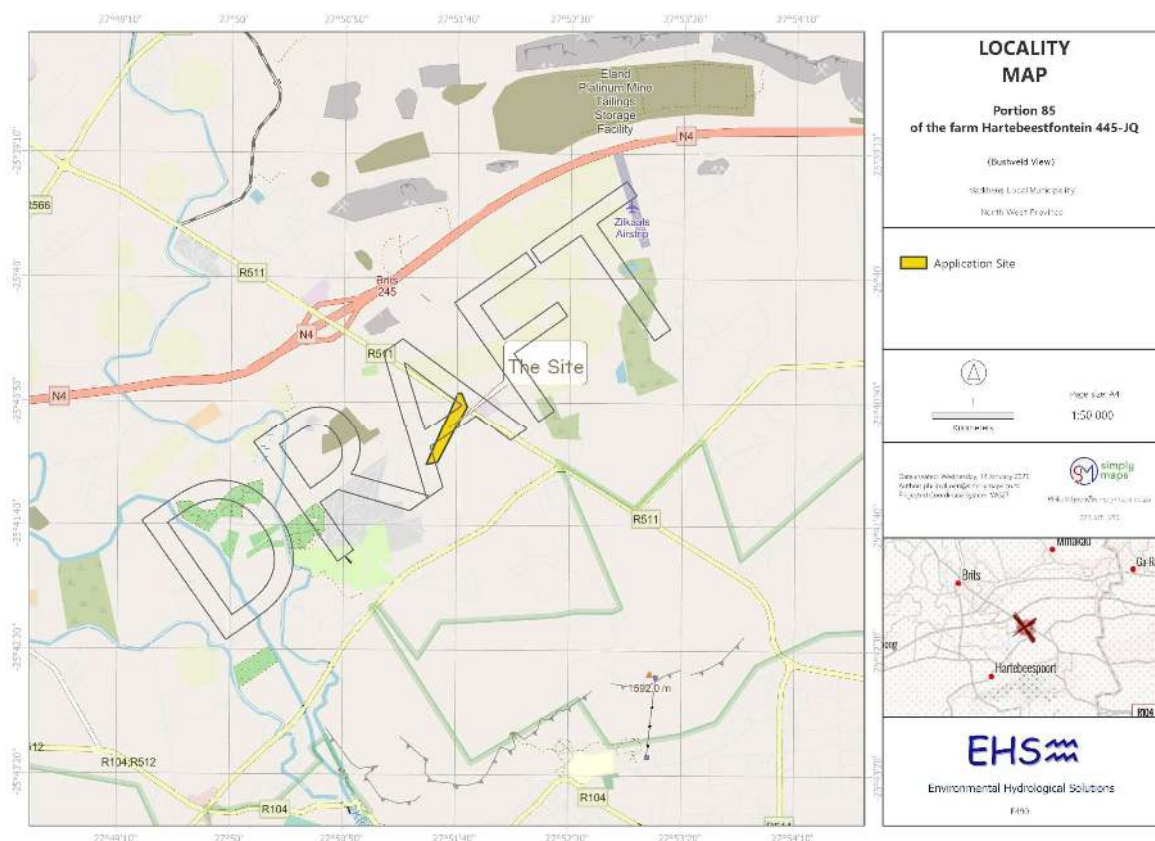


Figure 1: Locality Map – Portion 85, Farm Hartebeestfontein 445 JQ. Prepared by EHS (Pty) Ltd, E490, January 2026. Scale 1:50 000.

Property Attribute	Detail
21-Digit Code (LPI):	T0JQ0000000044500085
Province:	North West
Magisterial District:	Madibeng
Nearest Town:	Brits (~7 km west along R511)
Adjacent Landowners:	Bushveld View Estate (west); Ana AH agricultural holding (south-west); Ziikaatsnek 439 JQ (east); De Kroon 444 JQ (north)

B2 Topography and Drainage

The site is located on a gentle, north-facing slope at the base of a prominent ridge to the south, at elevations of approximately 1158-1172 m above mean sea level. The ridge to the south reaches 1182-1254 m. Drainage is northerly to north-westerly toward a non-perennial watercourse approximately 250 m west of the site boundary, ultimately discharging into the Crocodile River system. No floodlines (1:50 or 1:100 year) occur within the township layout.

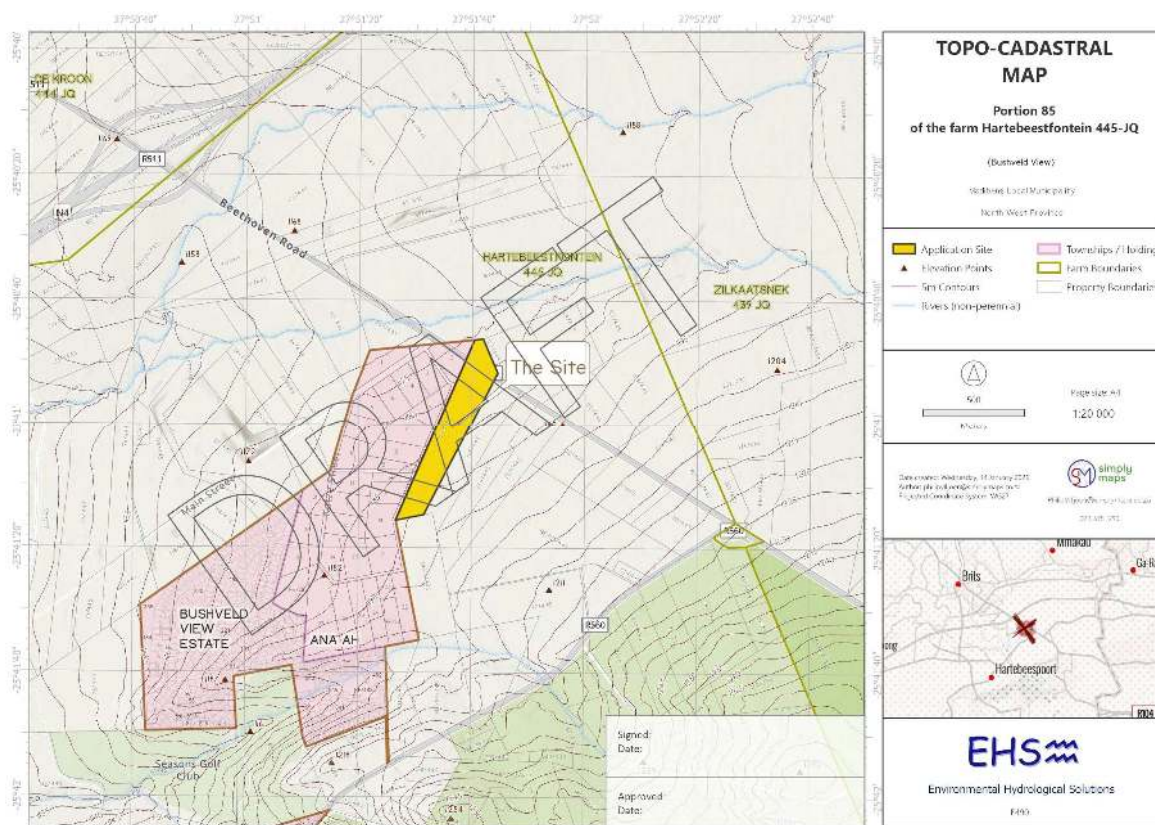


Figure 2: Topo-Cadastral Map – Portion 85, Farm Hartebeestfontein 445 JQ. Prepared by EHS (Pty) Ltd, E490, January 2026. Scale 1:20 000.

B3 Geology

The application site is situated entirely within a zone of Norite (indicated as the dominant geological unit on the Geology Map below), a mafic intrusive igneous rock associated with the Bushveld Igneous Complex (BIC). Surrounding geological units include Quartzite and shale of the Pretoria Group to the south and south-east (Vry, Vmg units), and Diabase intrusions cutting through older sedimentary layers. The site geology results in a fractured-rock (secondary) aquifer system. Borehole yields in Norite are generally low to medium (0.5 to 2.0 l/s).



Figure 3: Geology Map – Portion 85, Farm Hartebeestfontein 445 JQ. Prepared by EHS (Pty) Ltd, E490, January 2026. Scale 1:20 000.

B4 Climate

The site has a typical dry, subtropical Lowveld climate. Mean annual rainfall at Brits weather station is approximately 588 mm (summer rainfall dominant, November-March). Summers are warm (19-29 degrees Celsius); winters are cooler (4-17 degrees Celsius) and dry.

B5 Soil

Soil depths of up to 1.5 m occur in the lower-lying areas of the site. Rocky outcrops dominate the higher ground. Arcadia (vertic) soils occur in the lower-lying areas; Hutton/Shortlands and Mispah forms are associated with rocky outcrop areas. Agricultural potential is low to medium. Soil erodibility is high on slopes, which must be managed during earthworks.

B6 Ecology and Vegetation

The Vegetation Map below shows that the site straddles the boundary between Marikana Thornveld (SVcb 6) in the north and Moot Plains Bushveld in the south. The Marikana Thornveld is characterised by an open Acacia karoo woodland. Site-specific observation confirms that the site is significantly disturbed by historical overgrazing – actual vegetation cover is sparse, with scattered Acacia spp., weedy forbs, and indigenous grasses dominant. Alien invasive species are present along the site boundary (notably dense reed-like growth visible in site photographs, confirmed as *Arundo donax* or *Phragmites australis* type).

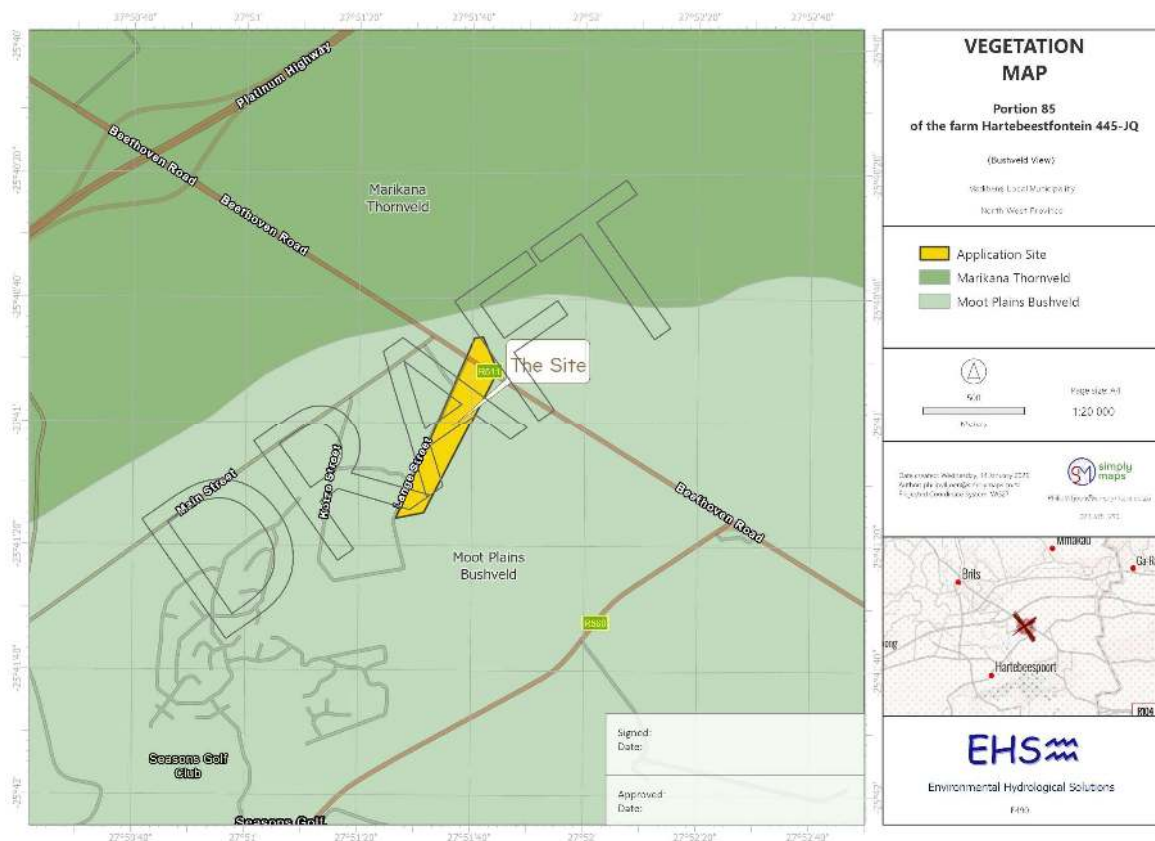


Figure 4: Vegetation Map – Portion 85, Farm Hartebeestfontein 445 JQ. Prepared by EHS (Pty) Ltd, E490, January 2026. Scale 1:20 000.

Sensitive species identified by the EHSSm Screening Report (January 2026) and requiring specialist confirmation:

- Terrestrial Biodiversity: CBA2 – Very High; ESA1 – Very High; NPAES priority – Very High
- Animal Species: Tyto capensis (Cape Grass Owl) – High; Crocidura maquassiensis – Medium; Dasymys robertsii – Medium; Kinixys lobatsiana – Medium
- Plant Species: Xerophyta adendorffii – Medium; Sensitive Species 1248 (identity withheld by SANBI) – Medium
- Aquatic Biodiversity: ESA1 and ESA2 – Very High

B7 Surface Hydrology and Water Use

The site is in quaternary catchment A21J. Surface water drains northerly toward a non-perennial watercourse approximately 250 m from the site boundary, ultimately into the Crocodile River system. An I&AP comment received on 4 May 2026 (see Section C) raises the question of whether a Water Use Licence (WUL) is required for activities on the site. The EAP confirms that certain activities proposed during construction (particularly dewatering of trenches and excavations) and potentially during operation (stormwater management involving watercourse interaction) may constitute water uses in terms of Section 21 of the National Water Act, 1998 (Act 36 of 1998). The applicant is advised to engage the Department of Water and Sanitation (DWS) as a precautionary measure to determine whether a WUL application is required. This has been incorporated as a precondition and monitoring requirement in the EMPr (Section E).

B8 Groundwater

The site is underlain by a secondary fractured-rock aquifer. Groundwater flow is northerly to north-westerly. Vulnerability to contamination is high where the weathered overburden is thin. Groundwater quality is generally good but hard. Contamination management during construction is addressed in the EMPr.

B9 Air Quality

The site falls within the Air Quality Waterberg-Bojanala Priority Area (National Environmental Management: Air Quality Act, 2004). Ambient air quality is consistent with a rural/peri-urban area. Construction-phase dust management is addressed in the EMPr (Section E, item 4).

B10 Visual Aspects

The site is visible from the R511 provincial road to the north. The visual character is semi-rural with increasing development along the R511. The site photographs below document the current visual condition of the site from multiple directions.

B11 Noise

Ambient noise levels are consistent with a rural/peri-urban setting. The nearest sensitive receptor is Damonsville, approximately 1 km to the northeast. Natural topographic features provide some attenuation. Noise management during construction and operation is addressed in the EMPr.

B12 Archaeological and Cultural Heritage

The EHSSm Screening Report (January 2026) identifies the site as within 100 m of an ungraded heritage site (Very High sensitivity). No heritage features were identified during baseline compilation, but a formal Heritage Impact Assessment (HIA) is required as a pre-construction precondition. A Chance Find Protocol must be in place before any ground disturbance.

B13 Palaeontology

The site has medium palaeontological sensitivity per the screening report. A Chance Find Protocol is required as a pre-construction precondition. A Palaeontology Impact Assessment (PIA) is recommended if ground disturbance exceeds 1 m depth over significant portions of the site.

B14 Sensitive Landscapes and Biodiversity Summary

Theme	Sensitivity	Key Feature(s)	Action Required
Agriculture	Very High	Crocodile River Priority Agricultural Area	Agricultural Impact Assessment (AIA) required before EA finalised
Terrestrial Biodiversity	Very High	CBA2; ESA1; NPAES priority area	CBA2 spatial confirmation via BGIS; biodiversity offset motivation if encroachment confirmed

Theme	Sensitivity	Key Feature(s)	Action Required
Aquatic Biodiversity	Very High	ESA1; ESA2	30 m buffer to be delineated by registered aquatic ecologist on site before clearing
Heritage / Archaeology	Very High	Within 100 m of ungraded heritage site	HIA by SAHRA-registered specialist; Chance Find Protocol required
Animal Species	High / Medium	Tyto capensis; Kinixys lobatsiana; Crocidura maquassiensis; Dasymys robertsii	Pre-clearance biodiversity walkthrough; reptile relocation protocol; avifaunal nesting survey
Plant Species	Medium	Xerophyta adendorffii; Sensitive Species 1248	Plant survey per SANBI Gazetted Protocols; SANBI data request submitted
Palaeontology	Medium	Features with medium palaeontological sensitivity	Chance Find Protocol; PIA if ground disturbance >1 m
Civil Aviation	High	Within 8 km of civil aviation aerodrome	Building height and structure plans to be submitted to SACAA for review

Annexure C: Site Photographs

The following photographs were taken at the proposed development site (Remainder of Portion 85, Farm Hartebeestfontein 445 JQ) and document existing site conditions in multiple directions. Photographs were taken in May 2026.



Photo 1: Site interior facing south-east – sparse grass cover with scattered Acacia spp. and weedy forbs. High ground (ridge) visible in background.



Photo 2: Site interior facing east – open grassland with scattered Acacia karroo trees. Rocky ridge visible to south-east.



Photo 3: Site boundary facing south-west – dense alien reed stand (Arundo donax type) along site margin near drainage line. Indigenous Acacia stand beyond.



Photo 4: Site interior facing south – disturbed ground with bare soil patches, scattered forbs, cactus (Opuntia, invasive) and indigenous Acacia karroo trees. Ridge in background.



Photo 5: Site boundary facing west – dense shrub and tree cover at the margin, mixed indigenous and alien species. Disturbed, weedy foreground.



Photo 6: View of site from R511 facing south – site visible from the provincial road; existing business signage (VIBRT Bricks and Paving) on adjacent development. Site appears as vegetated, undeveloped land in a predominantly commercial/residential corridor.

Summary of site photographic observations:

- The site is characterised by a significantly disturbed vegetation matrix of sparse indigenous Thornveld remnants, weedy forbs, and invasive alien plant species.
- Alien invasive species are present along site boundaries, particularly dense reed-like plants consistent with *Arundo donax* and invasive *Opuntia* spp. (prickly pear cactus), which must be addressed in the Alien Invasive Plant Management Plan required by the EMP.

- Indigenous Acacia karroo trees are present and must be surveyed before clearing to ensure retention in terms of the EMPr vegetation mitigation measures.
- The site is clearly visible from the R511, confirming the visual impact description in Section B10.
- Bare soil areas are visible, confirming susceptibility to erosion during earthworks if not managed per the EMPr.

Section B15: Motivation for Non-Inclusion of Specialist Reports in the Draft BAR

B15.1 Background

The Environmental Sensitivity Screening Report (January 2026) identifies a number of specialist assessments that are required to accompany or inform this Basic Assessment Report. In terms of the 2014 EIA Regulations (as amended), the EAP is required to confirm the list of specialist studies required and, where any identified study has not been completed at the time of submission of the Draft BAR, to provide a motivation for its non-inclusion, supported by photographic evidence where applicable.

B15.2 Specialist Studies Identified

No.	Specialist Study	Screening Sensitivity	Status at Draft BAR Stage	Motivation for Non-inclusion / Action Committed
1	Heritage Impact Assessment (HIA)	Very High – within 100 m of ungraded heritage site	Not yet completed	See B15.3 below
2	Agricultural Impact Assessment (AIA)	Very High – Crocodile River Priority Agricultural Area	Not yet completed	See B15.3 below
3	Terrestrial Biodiversity Impact Assessment (incl. CBA2 spatial confirmation)	Very High – CBA2; ESA1; NPAES	Not yet completed	See B15.3 below
4	Aquatic Biodiversity Impact Assessment	Very High – ESA1; ESA2	Not yet completed	See B15.3 below
5	Plant Species Assessment	Medium – Xerophyta adendorffii; Sensitive Species 1248	Not yet completed	See B15.3 below
6	Animal Species Assessment	High / Medium – Tyto capensis; Kinixys lobatsiana; Crocidura maquassiensis; Dasymys robertsii	Not yet completed	See B15.3 below
7	Palaeontology Impact Assessment (PIA)	Medium	Not yet completed	See B15.3 below
8	Hydrology Assessment	General requirement	Not yet completed	See B15.3 below

No.	Specialist Study	Screening Sensitivity	Status at Draft BAR Stage	Motivation for Non-inclusion / Action Committed
9	Landscape / Visual Impact Assessment	General requirement	Addressed in BAR text (Sections B10, D2) with photographic evidence	Addressed in BAR; visual impact is rated Medium Low post-mitigation. Site photographs (Annexure C) provide photographic evidence of the current visual condition. Formal LIA deferred to final BAR if directed by DEDECT.
10	Socio-Economic Assessment	General requirement	Addressed in BAR text (Sections A3, A4, F1)	Addressed in BAR through need and desirability assessment; capital investment and employment data incorporated. Formal SEA deferred to final BAR if directed by DEDECT.

B15.3 Motivation for Non-Inclusion

The specialist studies listed under items 1 through 8 in the table above have not been completed at the time of submission of this Draft BAR for public comment. The EAP provides the following motivation in respect of each study, and defers to the guidance of the competent authority (DEDECT) as to whether the BAR may proceed to decision on the basis of the current information, or whether any study must be completed prior to the submission of the final BAR:

(a) Stage of the Assessment Process

This document is submitted as a Draft BAR for the purposes of public participation in terms of Regulation 21 of the 2014 EIA Regulations (as amended). The Draft BAR is not the final decision document. The public comment period (26 March to 27 April 2026) provides an opportunity for interested and affected parties, including specialist reviewers, to comment on the scope and findings of the assessment. The EAP submits this Draft BAR at this stage to comply with the regulatory requirement to make the draft available for public comment within the prescribed timeframes. The outstanding specialist studies have been initiated and will be commissioned as funding and specialist availability allow.

(b) Precautionary Approach and Pre-Construction Preconditions

In the absence of completed specialist reports, the EAP has adopted a precautionary approach throughout this BAR. All identified specialist studies are incorporated as mandatory pre-construction preconditions in the Environmental Management Programme (EMPr, Section E4). No construction or ground-disturbing activity may commence until each of the listed specialist studies has been completed, the outcomes reviewed by the EAP, and any required layout modifications or additional mitigation measures implemented. This approach ensures that the absence of specialist reports in the Draft BAR does not result in any net reduction in environmental protection.

(c) Site Condition Evidence

The EAP notes that the site has been subject to significant historical disturbance (overgrazing, alien invasive plant colonisation, and historical residential use), as confirmed by the site photographs attached as Annexure C. This disturbed condition reduces the likelihood of undisturbed natural habitats on the main development footprint. Nevertheless, the EAP acknowledges that this does not constitute a substitute for formal specialist assessment, and that the presence of sensitive features (CBA2, heritage site proximity, listed species) cannot be definitively confirmed or excluded without formal surveys.

(d) Deference to the Competent Authority

The EAP respectfully defers to DEDECT as the competent authority in terms of NEMA, 1998 to determine:

1. Whether the outstanding specialist studies must be submitted before DEDECT can accept the final BAR for decision, or whether they may be submitted as supplementary information post-decision as conditions of the Environmental Authorisation;
2. Whether any specific specialist study should be elevated to a pre-submission requirement given the particular sensitivities identified; and
3. Whether the EAP's precautionary approach of incorporating all specialist studies as pre-construction preconditions in the EMPr adequately addresses the regulatory requirements in the interim.

The EAP undertakes to submit all outstanding specialist reports to DEDECT as they become available, and to revise the BAR impact assessment and EMPr if any specialist study reveals impacts or mitigation requirements that materially differ from those assessed in this BAR.

EAP NOTE: The EAP requests that DEDECT provide written guidance on whether any outstanding specialist study must be completed before the final BAR may be submitted for decision. Any such guidance will be actioned immediately and the final BAR revised accordingly before submission.

Section C: Public Participation Process (PPP)

C1 Legislative Requirements

The PPP has been conducted in compliance with NEMA, 1998 (Act 107 of 1998), the EIA Regulations, 2014 (GN R982) as amended by GN R326 of 7 April 2017, and the NEMA Public Participation Guidelines. Regulation 41 requires, as a minimum: (1) written notification to adjacent landowners and organs of state; (2) publication of a notice in a newspaper circulated in the area; (3) site notices at each entrance to and exit from the property; (4) making documents available for public inspection; and (5) a minimum 30-day comment period.

C2 Pre-Application PPP Actions Completed

PPP Action	Details	Date	Status
Legal notice submitted to Brits Pos	Environmental Notice submitted to Brits Pos (Elsabe and Gerald Bothma); pro forma invoice issued and payment made; notice confirmed for placement in Thursday 26 March 2026 edition	24 March 2026	Completed
Advertisement proof approved	Layout proof reviewed and approved by W Riekert (EAP). Confirmation: 'Goedgekeur' (Approved)	24 March 2026	Completed
Environmental Notice published	Brits Pos newspaper, page 11. Notice circulated in the Brits and Madibeng Local Municipality area. Reference: 2026_03_26_BBRPOS0112703	26 March 2026	Completed
Site notices erected	Site notices erected at entrances to and exits from the property, with plastic pouches containing the formal advertisement and I&AP Registration Forms	Week of 23 March 2026	Completed
Documents at Brits Public Library	Background Information Document and project information made available at the Brits Public Library	30 March 2026	Completed
Draft BAR made available	Draft BAR made available for public comment	30 March 2026	Completed
Public comment period closes	Deadline for registration and submission of comments	27 April 2026	Passed
Final BAR submission to DEDECT	After incorporation of C&RR	After 27 April 2026	Pending

The advertisement published in Brits Pos on 26 March 2026 contained: nature and location of the proposed activity; GPS coordinates; EAP contact details (wernerriekert@gmail.com and rpolyn@telkomsa.net); opportunity for I&APs to register and submit comments on or before 27 April 2026; notification that project information was available at the Brits Public Library from 30 March 2026; and a statement that future correspondence would only be sent to registered I&APs. A copy of the published notice is attached as Annexure D.

C3 Comment Period and Compliance

The public comment period ran from 26 March 2026 to 27 April 2026 (32 days), satisfying the minimum 30-day requirement in terms of Regulation 41(5) of the 2014 EIA Regulations as amended.

C4 I&AP Register

An I&AP register has been established and is maintained by EHS (Pty) Ltd. As at the date of this document, one I&AP has formally registered and submitted a comment (Heiletje Pretorius, received 4 May 2026 – see Section C5 below). Organs of state formally notified include DEDECT (Competent Authority), Madibeng Local Municipality, DALRRD, SAHRA, DWS, SACAA, and Eskom. The I&AP register is attached as Annexure D and will be updated in the final BAR.

C5 Comments Received and EAP Response

The following I&AP comment was received during (and shortly after) the public comment period:

Ref	Date Received	From	Contact	Comment (Summary)	EAP Response
PPP-001	4 May 2026	Heiletje Pretorius	heiletje.tes@gmail.com 069 475 7910	Comment received via email (subject: 'Publieke deelname proses'). Re: Remainder of Portion 85 of the Farm Hartebeestfontein 445 JQ. The I&AP enquires whether the applicant should also apply for a Water Use Licence (WUL) for some of the proposed activities. The comment is submitted in Afrikaans: 'Moet die aansoeker nie dalk ook aansoek doen vir 'n waterlisensie vir van die aktiwiteite nie?'	The EAP confirms that certain activities proposed during construction (particularly dewatering of excavations and trenches) and potentially during operation (where stormwater management involves interaction with a watercourse) may constitute Section 21 water uses in terms of the National Water Act, 1998 (Act 36 of 1998). The applicant is advised, as a precautionary measure, to engage the Department of Water and Sanitation (DWS) to determine whether a formal WUL application is required before construction commences. This has been incorporated as a monitoring requirement in the EMPr (Section E, Monitoring Table, item: Water Use Licence compliance) and as a recommended condition of authorisation in Section F2. The EAP thanks Heiletje Pretorius for raising this important point. EAP response email sent 4 May 2026 (subject: 'Re: Publieke deelname proses'; W Riekert to H Pretorius, 17:19).

EAP NOTE: The EAP's response to Heiletje Pretorius (sent 4 May 2026) stated: 'Dit behoort inderdaad die geval te wees dat die aansoeker 'n watergebruiklisensie sal moet bekom.' (Translation: 'It should indeed be the case that the applicant will need to obtain a water use licence.') This response is now formally captured in this C&RR entry. The WUL requirement has been flagged as a recommended condition of EA in Section F2 and incorporated into the EMPr.

C6 Procedural Compliance Summary

Regulatory Requirement	Reference	Action Taken	Status
Newspaper advertisement	Reg 41(2)(a)	Published in Brits Pos, 26 March 2026	Compliant
Site notices at each entrance/exit	Reg 41(2)(b)	Site notices erected week of 23 March 2026	Compliant
Minimum 30-day comment period	Reg 41(5)	26 March to 27 April 2026 = 32 days	Compliant
Documents available for public inspection	Reg 41(2)(c)	Available at Brits Public Library from 30 March 2026	Compliant
I&AP register established and maintained	Reg 41(3)	Register established; 1 I&AP registered (H Pretorius)	Compliant – ongoing
Written notification to adjacent landowners	Reg 41(2)(d)	To be confirmed in final BAR	Pending – final BAR
Written notification to organs of state	Reg 41(2)(d)	Notification to DEDECT, Madibeng LM, DALRRD, SAHRA, DWS, SACAA to be confirmed in final BAR	Pending – final BAR
Comments and Response Report compiled	Reg 41(6)	One comment received (H Pretorius, 4 May 2026); C&RR entry completed in Section C5 above	Compliant for comments received to date; final C&RR in final BAR

Section D: Impact Assessment and Mitigation

D1 Methodology

Impacts are assessed using four criteria: Extent, Duration, Intensity, and Probability. Rating = (Extent + Duration + Intensity) x Probability.

Criterion	Description	Score
Extent	Local (on the property)	1
	Neighbouring (within 1 km)	2
	Regional (within municipal boundaries)	3
	Provincial	4
	National	5
	International	6
Duration	Once-off	1
	Short term (<1 month)	2
	Medium term (>1 month)	3
	Long term (until end of life of activity)	4
	Permanent (persists after all activities cease)	5
Intensity	Undisturbed (natural processes continue undisturbed)	1
	Changed (natural processes continue but are altered)	2
	Stop (natural processes stop)	3
Probability	Impossible	1
	Unlikely (up to 30%)	2
	Likely (up to 60%)	3
	Definite (up to 100%)	4

Rating	Significance	Intervention Required
3	No Impact	No intervention needed
4-11	Low	Very little intervention needed
12-19	Medium Low	Standardised management required
20-26	Medium High	Activity and/or site-specific interventions needed

Rating	Significance	Intervention Required
27-35	High	Aggressive intervention required
36-42	Very High	Alternative activity or location should be considered, unless strategically motivated

D2 Assessment of Impacts

Activity	Environmental Element	Extent	Duration	Intensity	Probability	Rating	Impact	Level of Intervention
Building Construction	Air quality	Neighbouring	Short term	Changed	Likely	18	Medium Low	Standardised management required.
Building Construction	Animal Life	Local	Short term	Stop	Likely	18	Medium Low	Standardised management required.
Building Construction	Geology	Local	Permanent	Changed	Unlikely	16	Medium Low	Standardised management required.
Building Construction	Groundwater	Local	Permanent	Changed	Unlikely	16	Medium Low	Standardised management required.
Building Construction	Heritage Resources	Local	Permanent	Changed	Unlikely	16	Medium Low	Standardised management required.
Building Construction	Noise	Neighbouring	Short term	Changed	Unlikely	12	Medium Low	Standardised management required.
Building Construction	Soil	Local	Permanent	Changed	Unlikely	16	Medium Low	Standardised management required.
Building Construction	Surface Water	Local	Permanent	Changed	Likely	24	Medium High	Activity and/or site-specific interventions needed
Building Construction	Topography	Local	Permanent	Changed	Likely	24	Medium High	Activity and/or site-specific interventions needed
Building Construction	Vegetation	Local	Permanent	Changed	Definite	32	High	Aggressive intervention required
Bulk Infrastructure Installation	Air quality	Neighbouring	Medium term	Changed	Likely	21	Medium High	Activity and/or site-specific interventions needed

Activity	Environmental Element	Extent	Duration	Intensity	Probability	Rating	Impact	Level of Intervention
Bulk Infrastructure Installation	Animal Life	Local	Medium term	Changed	Likely	18	Medium Low	Standardised management required.
Bulk Infrastructure Installation	Geology	Local	Permanent	Undisturbed	Unlikely	14	Medium Low	Standardised management required.
Bulk Infrastructure Installation	Groundwater	Local	Permanent	Changed	Unlikely	16	Medium Low	Standardised management required.
Bulk Infrastructure Installation	Heritage Resources	Local	Permanent	Changed	Unlikely	16	Medium Low	Standardised management required.
Bulk Infrastructure Installation	Noise	Neighbouring	Medium term	Changed	Likely	21	Medium High	Activity and/or site-specific interventions needed
Bulk Infrastructure Installation	Soil	Local	Permanent	Changed	Unlikely	16	Medium Low	Standardised management required.
Bulk Infrastructure Installation	Surface Water	Local	Medium term	Changed	Unlikely	12	Medium Low	Standardised management required.
Bulk Infrastructure Installation	Vegetation	Local	Long term	Changed	Unlikely	14	Medium Low	Standardised management required.
Earthworks	Air quality	Local	Short term	Changed	Unlikely	10	Low	Very little intervention needed
Earthworks	Animal Life	Local	Short term	Changed	Unlikely	10	Low	Very little intervention needed
Earthworks	Geology	Local	Short term	Changed	Unlikely	8	Low	Very little intervention needed
Earthworks	Groundwater	Local	Medium term	Changed	Unlikely	15	Medium Low	Standardised management required.
Earthworks	Heritage Resources	Local	Short term	Changed	Unlikely	10	Low	Very little intervention needed

Activity	Environmental Element	Extent	Duration	Intensity	Probability	Rating	Impact	Level of Intervention
Earthworks	Noise	Neighbouring	Medium term	Changed	Unlikely	15	Medium Low	Standardised management required.
Earthworks	Soil	Local	Medium term	Stop	Likely	18	Medium Low	Standardised management required.
Earthworks	Surface Water	Local	Medium term	Changed	Unlikely	15	Medium Low	Standardised management required.
Earthworks	Vegetation	Local	Long term	Stop	Likely	18	Medium Low	Standardised management required.
Foundations	Air quality	Local	Permanent	Undisturbed	Unlikely	7	No Impact	No intervention needed
Foundations	Geology	Local	Permanent	Undisturbed	Unlikely	7	No Impact	No intervention needed
Foundations	Heritage Resources	Local	Permanent	Undisturbed	Unlikely	7	No Impact	No intervention needed
Foundations	Noise	Neighbouring	Short term	Changed	Unlikely	7	No Impact	No intervention needed
Foundations	Animal Life	Local	Long term	Changed	Unlikely	14	Medium Low	Standardised management required.
Foundations	Groundwater	Local	Permanent	Changed	Unlikely	16	Medium Low	Standardised management required.
Foundations	Soil	Local	Permanent	Changed	Likely	24	Medium High	Activity and/or site-specific interventions needed
Foundations	Surface Water	Local	Permanent	Changed	Likely	24	Medium High	Activity and/or site-specific interventions needed
Foundations	Topography	Local	Permanent	Changed	Unlikely	14	Medium Low	Standardised management required.

Activity	Environmental Element	Extent	Duration	Intensity	Probability	Rating	Impact	Level of Intervention
Foundations	Vegetation	Local	Permanent	Changed	Unlikely	16	Medium Low	Standardised management required.
Site Clearance	Air quality	Local	Permanent	Changed	Unlikely	16	Medium Low	Standardised management required.
Site Clearance	Animal Life	Local	Permanent	Stop	Unlikely	18	Medium Low	Standardised management required.
Site Clearance	Geology	Local	Permanent	Undisturbed	Unlikely	14	Medium Low	Standardised management required.
Site Clearance	Groundwater	Local	Permanent	Changed	Unlikely	16	Medium Low	Standardised management required.
Site Clearance	Heritage Resources	Local	Permanent	Changed	Likely	24	Medium High	Activity and/or site-specific interventions needed
Site Clearance	Noise	Local	Permanent	Changed	Likely	24	Medium High	Activity and/or site-specific interventions needed
Site Clearance	Soil	Local	Permanent	Changed	Unlikely	16	Medium Low	Standardised management required.
Site Clearance	Surface Water	Local	Permanent	Changed	Unlikely	16	Medium Low	Standardised management required.
Site Clearance	Topography	Local	Permanent	Undisturbed	Unlikely	14	Medium Low	Standardised management required.
Site Clearance	Vegetation	Local	Permanent	Stop	Definite	36	Very High	Alternative activity or location should be considered, unless strategically motivated.

D3 Impact Significance Summary

The Very High pre-mitigation rating for Site Clearance – Vegetation (Rating 36) is strategically motivated by:

- (1) demonstrated need for housing and economic development in Madibeng LM;
- (2) the site's significantly disturbed state confirmed by site photographs (Annexure C);
- (3) absence of confirmed rare or endemic plant communities on the main footprint.

Post-mitigation significance is reduced to Medium Low through footprint restriction, indigenous revegetation, and Alien Invasive Plant Management Plan implementation.

Section E: Environmental Management Programme (EMPr)

E1 Introduction

This EMPr has been compiled in accordance with Appendix 4 of the EIA Regulations, 2014 (GN R982) as amended. Should EA be granted under reference NWP/EIA/105/2025, this EMPr becomes a legally binding document.

Case officer: Mr Olebogeng Marobe (OMarobe@nwpg.gov.za, 079 908 4547, 80 Kerkstraat, Rustenburg, 0299).

E2 Legislative Framework

- NEMA, 1998 (Act 107 of 1998) – primary legislation
- EIA Regulations, 2014 (GN R982, R983, R984, R985) as amended by GN R327 of 7 April 2017 – Listing Notice 1, Activity 28
- NEMBA, 2004 (Act 10 of 2004) – listed/protected species; alien invasive species
- NHRA, 1999 (Act 25 of 1999) – heritage and archaeological resources; SAHRA permitting
- NWA, 1998 (Act 36 of 1998) – watercourse buffers; Section 21 water uses; Water Use Licence
- NEMWA, 2008 (Act 59 of 2008) – construction and operational waste
- Air Quality Act, 2004 (Act 39 of 2004) – Waterberg-Bojanala Priority Area
- Bojanala EMF – applicable spatial guidance
- Town Planning and Townships Ordinance, 1986 (Ordinance 15 of 1986) – township conditions

E3 Roles and Responsibilities

Role	Party	Key Responsibilities
Applicant / Developer	Merylén Erasmus (P.O. Box 1541, Brits, 0250)	Ultimate compliance with the EA and EMPr; funding all environmental management activities; appointment of ECO, contractors and specialists; ensuring title deed conditions are passed to purchasers
Environmental Assessment Practitioner (EAP)	EHS (Pty) Ltd – RP Colyn & W Riekert	Compilation and updating of the EMPr; specialist coordination; liaison with DEDECT; submission of quarterly and annual reports to DEDECT
Environmental Control Officer (ECO)	To be appointed before construction commences	Day-to-day on-site monitoring of all EMPr measures; site inspection records; enforcement of EMPr conditions; maintaining Environmental File; reporting to EAP and Developer
Principal Contractor	To be appointed	Implementation of all construction-phase mitigation measures; briefing sub-contractors; maintaining site records; reporting to ECO
Heritage Specialist	To be appointed (SAHRA-registered)	Conducting HIA; managing Chance Find Protocol; SAHRA permit liaison; training ECO and contractor on heritage sensitivity

Role	Party	Key Responsibilities
Ecologist / Botanist / Aquatic Specialist	To be appointed (registered specialists)	Pre-clearance biodiversity survey; listed species relocation; aquatic buffer delineation; CBA2 spatial analysis; post-clearance monitoring
Agricultural Specialist	To be appointed	Agricultural Impact Assessment per Gazetted Protocols; DALRRD engagement; quantification of agricultural land loss
Madibeng Local Municipality	Municipality	Operational phase infrastructure maintenance (stormwater, waste, roads); enforcement of township conditions and noise regulations

E4 Pre-Construction Preconditions

The following must be completed and confirmed in writing by the EAP before any ground disturbance or vegetation clearing may commence:

- Environmental Authorisation (EA) issued by DEDECT and all conditions confirmed in writing
- ECO appointed, site briefing conducted, and EMPr issued to all sub-contractors
- Heritage Impact Assessment (HIA) completed; SAHRA response received; Chance Find Protocol adopted
- Pre-clearance biodiversity survey (fauna and flora) completed; listed species protocols finalised
- Agricultural Impact Assessment completed and submitted to DEDECT; DALRRD engagement completed
- CBA2 and NPAES spatial extent confirmed on BGIS; any required layout modifications incorporated and approved by DEDECT
- Stormwater Management Plan approved by Madibeng Local Municipality
- SANBI data request submitted for Sensitive Species 1248 and response received
- WUL requirement confirmed by DWS; if required, WUL application submitted before construction commences
- Site boundary pegged and confirmed against approved development footprint; no-go zones demarcated on site
- Registered waste contractor with valid NEMWA licence appointed
- Designated bunded refuelling and maintenance area established before any plant mobilises on site

E5 Environmental Management Specification Tables

Potential Impact	Phase	Mitigation Measure	Responsible Party	Monitoring Indicator	Frequency	Post-mitigation Significance
1. VEGETATION & LAND TRANSFORMATION						
Loss of indigenous vegetation cover (Very High; Rating 36)	Construction	Limit clearing to approved development footprint only. Peg and fence boundaries before clearing. Retain all trees >100 mm trunk diameter unless within approved building envelope. Implement Alien Invasive Plant Management Plan before clearing. Re-vegetate disturbed areas with indigenous ground cover within 30 days of earthworks completion. ECO present during initial clearing.	Contractor / ECO	Photographic site record; cleared area vs approved footprint; tree retention survey	Weekly during clearing	Medium Low
Spread of alien invasive plant species	Construction & Operation	No untreated fill or topsoil imported without ECO approval. Record alien species before clearing. Implement eradication per NEMBA 2004. Monitor and re-treat quarterly for first two operational years.	Contractor / Developer	Alien invasive species register; photographic treatment evidence	Quarterly (first 2 yrs)	Low
2. SOIL & TOPOGRAPHY						
Soil erosion and topsoil loss (Medium High; Rating 24)	Construction	Strip and stockpile topsoil separately (max 1.5 m height). Cover exposed surfaces with erosion matting within 7 days. Install silt fences at all drainage lines before earthworks. Dewater trenches into settlement ponds.	Contractor / ECO	Post-rainfall erosion inspection; topsoil stockpile condition	After each rainfall >10 mm	Low
Soil compaction and altered drainage (Medium High; Rating 24)	Construction	Restrict heavy vehicles to designated haul roads. No earthworks during saturated conditions. Stabilise internal roads before occupation. Implement approved Stormwater Management Plan.	Contractor / ECO	Haul road condition log; stormwater inspection	Monthly	Low

Potential Impact	Phase	Mitigation Measure	Responsible Party	Monitoring Indicator	Frequency	Post-mitigation Significance
3. SURFACE WATER & GROUNDWATER						
Sedimentation of watercourses (Medium High; Rating 24)	Construction	Maintain minimum 30 m no-disturbance buffer from all watercourses (NWA 1998). Install sediment control at all stormwater outlets. No cement mixing or washout within 50 m of any drainage feature.	Contractor / ECO	Turbidity measurements at drainage outlet; silt fence inspection	After rainfall >10 mm; monthly	Low
Groundwater contamination	Construction	Establish bunded refuelling area with drip trays and impermeable surface. Store fuels and chemicals in bunded areas. Spill kits on site. Remediate all spills within 24 hours.	Contractor	Spill incident register; bunded area inspection	Monthly	Low
Increased post-development stormwater runoff (Rating 16)	Operation	Implement approved Stormwater Management Plan. Maintain retention/detention infrastructure annually. Connect all impervious surfaces to approved stormwater infrastructure only.	Developer / Municipality	Annual stormwater inspection; drainage records	Annually	Low
4. AIR QUALITY & DUST						
Dust generation from earthworks (Rating 18)	Construction	Water active surfaces and unpaved roads twice daily in dry conditions. Enforce 20 km/h on unpaved surfaces. Cover all vehicles transporting loose material. Record and respond to complaints within 2 working days.	Contractor / ECO	Visual dust observation log; complaint register	Daily during earthworks	Low
Vehicle and machinery emissions	Construction	Maintain all plant to manufacturer specifications. Valid roadworthy certificates on site. Switch off idling engines. Minimise diesel generator use.	Contractor	Maintenance records; fuel consumption log	Monthly	Low
5. NOISE						
Construction noise affecting residents (Medium High; Rating 24)	Construction	Construction restricted to 07:00-17:00 weekdays and 07:00-13:00 Saturdays. No construction on Sundays or public holidays. All plant to comply with SANS 10103. Maintain noise complaint register; resolve complaints within 5 working days.	Contractor / ECO	Noise complaint register; working hours log	Daily during construction	Low

Potential Impact	Phase	Mitigation Measure	Responsible Party	Monitoring Indicator	Frequency	Post-mitigation Significance
Operational noise from business erven (Erven 11-14)	Operation	Business uses shall not operate between 22:00 and 06:00 in a manner generating noise exceeding ECA Noise Regulation limits at any residential erf boundary. Incorporate noise conditions in title deeds.	Developer / Municipality	Noise complaints log	Ongoing	Low
6. HERITAGE RESOURCES & ARCHAEOLOGY						
Damage to ungraded heritage site (Very High sensitivity; Rating 24)	Pre-construction & Construction	HIA by SAHRA-registered specialist required before any ground disturbance within 100 m of heritage feature. Chance Find Protocol to be adopted before clearing. Any exposure of archaeological material requires immediate work stoppage and SAHRA/ECO notification within 48 hours.	EAP / Heritage Specialist / Contractor / ECO	HIA approval letter on file; Chance Find Protocol adopted; daily site inspection near heritage zone	Pre-construction; daily during earthworks near heritage zone	Medium Low (subject to HIA outcomes)
Exposure of palaeontological material (Medium sensitivity)	Construction	Cease excavation if fossils found, secure site, notify registered palaeontologist and SAHRA within 48 hours. Implement Chance Find Protocol. PIA required if ground disturbance exceeds 1 m depth over significant portions of site.	Contractor / ECO / Palaeontologist	Chance Find incident log; palaeontologist notification records	Ongoing during earthworks	Low
7. BIODIVERSITY & ANIMAL LIFE						
Displacement/mortality of sensitive fauna: Tyto capensis, Kinixys lobatsiana, Crocidura maquassiensis, Dasymys robertsii (High to Medium sensitivity)	Pre-construction & Construction	Registered ecologist to conduct pre-clearance biodiversity walkthrough before clearing. Reptile relocation protocol under herpetologist supervision for Kinixys lobatsiana. Tyto capensis roost/nesting survey; delay clearing of affected habitat until after breeding season if confirmed. Submit protocols to DEDECT for concurrence.	Ecologist / Contractor / ECO	Pre-clearance walkthrough report; species relocation records; avifaunal survey on file	Pre-clearance (once); monitoring during clearing	Medium Low

Potential Impact	Phase	Mitigation Measure	Responsible Party	Monitoring Indicator	Frequency	Post-mitigation Significance
Loss of aquatic biodiversity (ESA1 and ESA2; Very High)	Construction & Operation	Maintain 30 m no-disturbance buffer from all watercourses as delineated by registered aquatic ecologist. No stormwater discharge to drainage lines without silt filtration. Eradicate alien riparian vegetation; replant with indigenous riparian species.	Contractor / ECO / Developer	Buffer zone photographic monitoring; drainage outlet water quality	Quarterly (construction); semi-annually (operation)	Medium Low
Disturbance to sensitive plant species: Xerophyta adendorffii, Sensitive Species 1248 (Medium sensitivity)	Pre-construction	Plant species survey per SANBI Gazetted Protocols before clearing zones finalised. SANBI data request for Sensitive Species 1248 submitted. Mark and fence confirmed individuals before clearing; explore transplanting.	Botanist / ECO	Plant survey report; SANBI correspondence; species fencing records	Pre-construction (once)	Low
8. TERRESTRIAL BIODIVERSITY – CBA2 & NPAES						
Impact on CBA2 and NPAES priority area (Very High sensitivity)	All phases	Confirm CBA2 and NPAES spatial overlap with township footprint on current BGIS mapping before site development plan is finalised. Submit biodiversity offset/avoidance motivation to DEDECT if confirmed encroachment. Investigate and implement layout modifications to reduce footprint within CBA2. This is a pre-condition to finalising the layout plan.	EAP / Ecologist / Developer	BGIS overlay on file; design modification records; DEDECT written concurrence	Pre-design (critical); annually during operation	Medium Low (contingent on layout modification)
9. AGRICULTURE						
Permanent loss of agricultural land (Crocodile River PAA; Very High sensitivity)	Pre-construction & Operation	Complete AIA per Gazetted Agricultural Assessment Protocols before EA is finalised. Quantify extent and class of agricultural land permanently lost. Engage DALRRD for concurrence. Motivate need and desirability comprehensively in BAR and AIA.	EAP / Agricultural Specialist / Developer	AIA report on file; DALRRD correspondence record	Pre-construction (once)	Medium Low (subject to AIA outcome)

Potential Impact	Phase	Mitigation Measure	Responsible Party	Monitoring Indicator	Frequency	Post-mitigation Significance
10. WASTE MANAGEMENT						
Construction waste generation	Construction	Separate waste at source. Remove via registered waste contractor (valid NEMWA permit) to licensed facility. No burning on site. Maintain waste manifest register.	Contractor / ECO	Waste manifest records; site tidiness inspection	Monthly	Low
Operational solid waste generation	Operation	Residents and businesses to subscribe to Madibeng Local Municipality waste collection. Developer to provide refuse enclosures per erf. No open dumping on any erf.	Developer / Residents	Municipality waste collection records; site observations	Annually	Low
11. SOCIO-ECONOMIC						
Employment creation and local economic benefit (POSITIVE)	Construction & Operation	Prioritise local labour from Madibeng Local Municipality (target minimum 70% local content). Implement skills development component. Preference local SMMEs for materials and services.	Developer / Contractor	Employment records; BBBEE compliance; local procurement records	Monthly during construction	Positive
Disruption and inconvenience to I&APs during construction	Construction	Maintain active I&AP register. Acknowledge all grievances within 5 working days. Post grievance contact on site hoarding. Provide written responses to all formal complaints.	EAP / Developer / ECO	Grievance register; acknowledgement and response records	Ongoing	Low
12. VISUAL IMPACT						
Visual intrusion from construction and permanent structures	Construction & Operation	Maintain tidy construction site. Remove portacamps and hoardings within 30 days of practical completion. Building heights and finishes to comply with township conditions. Implement landscaping on each erf within 6 months of occupation.	Contractor / Developer	Monthly site inspection photographs; ECO visual audit	Monthly	Low

E6 Environmental Monitoring Programme

Environmental Aspect	Monitoring Method	Frequency	Reporting Responsibility
Vegetation clearance compliance	Site inspection; photographic record; cleared area vs approved footprint	Weekly during clearing	ECO / EAP
Alien invasive plant management	Species register; photographic treatment evidence	Quarterly (first 2 yrs)	ECO / Developer
Soil erosion control	Post-rainfall visual inspection; turbidity at drainage outlets	After rainfall >10 mm	ECO
Surface water quality	Visual inspection; turbidity at drainage outlets	Monthly (construction); semi-annually (operation)	ECO / Developer
Groundwater contamination risk	Bunded area inspection; spill incident log	Monthly	Contractor / ECO
Stormwater infrastructure	Annual inspection of retention/detention facilities	Annually	Developer / Municipality
Dust and air quality	Visual dust assessment; complaint register review	Daily (earthworks); monthly otherwise	Contractor / ECO
Construction noise	Working hours log; complaint register review	Daily	ECO
Heritage – HIA compliance and Chance Finds	HIA approval on file; Chance Find Protocol adopted; site inspection log	Pre-construction; daily near heritage zone	ECO / Heritage Specialist
Palaeontology – Chance Finds	Chance find incident log; specialist notification records	Ongoing during earthworks	ECO
Biodiversity – pre-clearance survey	Pre-clearance report; species relocation records	Pre-clearance (once)	Ecologist / ECO
CBA2 / NPAES spatial compliance	BGIS overlay on file; layout plan review; DEDECT concurrence	Pre-design; annually during operation	EAP / Ecologist
Aquatic biodiversity buffer integrity	Buffer zone photographic monitoring; drainage outlet observations	Quarterly (construction); semi-annually (operation)	ECO
Sensitive plant species protection	Plant survey report; fencing records; SANBI correspondence	Pre-construction (once)	Botanist / ECO

Environmental Aspect	Monitoring Method	Frequency	Reporting Responsibility
Water Use Licence compliance	Confirm WUL application submitted to DWS; track progress; implement licence conditions once granted	Pre-construction application; monitoring ongoing	EAP / Developer
Waste management	Waste manifest review; site tidiness inspection	Monthly	Contractor / ECO
Grievance mechanism	Grievance register review; response turnaround audit	Ongoing	EAP / Developer

E7 Reporting Schedule

Report Type	Content Summary	Frequency	Submitted To
Environmental Compliance Report (ECR)	Summary of monitoring results; mitigation compliance; incidents; corrective actions	Quarterly (construction); annually (operation)	DEDECT NWP/EIA/105/2025 – Mr O Marobe; EAP
Chance Find / Environmental Incident Report	Event description; GPS location; action taken; specialist confirmation; remediation record	Within 48 hours of event	DEDECT; SAHRA; EAP
Pre-clearance Biodiversity Report	Pre-clearance walkthrough findings; listed species confirmed or absent; relocation records	Once, before vegetation clearing commences	DEDECT; EAP
Agricultural Impact Assessment Report	Quantification of agricultural land affected; DALRRD engagement; need and desirability motivation	Before EA finalisation	DEDECT; DALRRD
Heritage Impact Assessment (HIA) Report	Heritage features assessed; SAHRA permit status; Chance Find Protocol; recommended conditions	Before ground disturbance near heritage feature	DEDECT; SAHRA; EAP
Water Use Licence (WUL) Application update	Status of WUL application and any conditions imposed by DWS	At submission; annually thereafter	DEDECT; DWS; EAP
Annual Environmental Audit Report	Comprehensive EMPr implementation review; monitoring results; adaptive management recommendations	Annually (operational phase)	DEDECT; Developer
Construction Completion / Handover Report	Confirmation all construction-phase EMPr conditions met; specialist sign-off	At practical completion	DEDECT; Developer

E8 Adaptive Management and Non-Compliance Protocol

Where monitoring demonstrates that mitigation measures are inadequate, the ECO shall notify the EAP within 48 hours and a corrective action plan shall be implemented within 5 working days. Significant environmental incidents in terms of section 30 of NEMA shall be notified to DEDECT within 14 days. Formal EMPr review trigger points: (1) prior to operational phase; (2) annually during operation; (3) following any significant environmental incident or Chance Find; (4) following any amendment to the EA or relevant legislation.

E9 Grievance Mechanism

- Dedicated grievance contact details to be publicised on site boarding and in estate communication once operational.
- All grievances to be acknowledged within 5 working days and responded to in writing within 15 working days.
- Unresolved grievances escalated to EAP; if unresolved after 30 days, escalated to DEDECT.
- Grievance register submitted with each quarterly compliance report.

E10 Declarations

Applicant: Marilyn Erasmus: _____ Date: _____

EAP: RP Colyn | EHS (Pty) Ltd: _____
Date: _____

EAP: W Riekert | EHS (Pty) Ltd: _____
Date: _____

Section F: Recommendations and Conclusion

F1 Key Findings Summary

Finding	Detail
Listed activity triggered	GN R327 of 7 April 2017, Listing Notice 1, Activity 28. EA required from DEDECT (NWP/EIA/105/2025). Application accepted 05 March 2026; assigned to Mr Olebogeng Marobe.
Environmental sensitivity	Very High sensitivity features per EHSSm Screening Report (January 2026): Crocodile River Priority Agricultural Area; CBA2 and NPAES; ESA1 and ESA2 (Aquatic); within 100 m of ungraded heritage site. All require specialist studies as pre-construction preconditions.
Outstanding specialist studies	All 8 specialist studies identified by the screening tool are outstanding at the Draft BAR stage. Motivation provided in Section B15. All studies are incorporated as mandatory pre-construction preconditions in the EMPr (Section E4).
Water Use Licence	I&AP comment (Heiletje Pretorius, 4 May 2026) raises the question of whether a WUL is required. The EAP confirms that construction dewatering and operational stormwater management may constitute Section 21 water uses under the NWA, 1998. Applicant to engage DWS. Incorporated as a recommended condition of authorisation (see below) and EMPr monitoring requirement.
Highest pre-mitigation impacts	Site Clearance – Vegetation: Very High (Rating 36). Building Construction – Vegetation: High (Rating 32). Both reduced to Medium Low post-mitigation. Strategic motivation provided: site significantly disturbed; demonstrated housing need in Madibeng LM.
Public participation	Advertisement published in Brits Pos (26 March 2026). Site notices erected. Documents at Brits Public Library from 30 March 2026. Comment period: 26 March to 27 April 2026 (32 days). One I&AP comment received (H Pretorius, 4 May 2026) – WUL query, addressed in Section C5.
Municipal and planning support	Madibeng Local Municipality supports the township establishment per the Town Planner's Memorandum. Engineering services can be delivered by the Municipality. No restrictive conditions in the Title Deed.
Socio-economic benefits	Capital investment exceeding R100 million; approximately 100 construction-phase jobs; 150-200 permanent operational jobs.

F2 EAP Opinion and Recommended Conditions of Authorisation

Based on the findings of this Basic Assessment, and subject to the completion of the outstanding specialist studies and the satisfactory resolution of all pre-construction preconditions, the EAP is of the preliminary opinion that Environmental Authorisation for the proposed establishment of Brits Extension 166 Township may be granted, subject to the following recommended conditions:

4. 1. All pre-construction preconditions listed in EMPr Section E4 must be completed and confirmed in writing by the EAP before any ground disturbance or vegetation clearing commences.
5. 2. A Heritage Impact Assessment (HIA) must be completed by a SAHRA-registered specialist and submitted to SAHRA before any ground disturbance within 100 m of the identified ungraded heritage site.

6. 3. An Agricultural Impact Assessment (AIA) must be completed per the Gazetted Agricultural Assessment Protocols and submitted to DEDECT and DALRRD before the final EA is granted.
7. 4. The CBA2 and NPAES spatial extent must be confirmed against the township layout plan via current BGIS mapping. If significant encroachment is confirmed, the layout plan must be modified and approved by DEDECT before construction commences.
8. 5. The applicant must engage the Department of Water and Sanitation (DWS) to determine whether any Section 21 water uses in terms of the National Water Act, 1998 are triggered by the proposed activities (particularly construction dewatering and operational stormwater management). If a Water Use Licence (WUL) is required, the WUL application must be submitted to DWS before construction commences, and compliance with the WUL conditions must be reported in all quarterly Environmental Compliance Reports.
9. 6. The SANBI data request for Sensitive Species 1248 must be submitted and the response incorporated into the pre-clearance biodiversity management measures before clearing commences.
10. 7. An ECO must be appointed, with confirmed qualifications and experience, before construction commences. ECO appointment details must be submitted to DEDECT for the record.
11. 8. All Environmental Compliance Reports must be submitted quarterly during construction and annually during operation to DEDECT (Ref: NWP/EIA/105/2025).
12. 9. The EMPr (Section E of this BAR) forms a legally binding component of the Environmental Authorisation and must be implemented in full throughout all project phases.
13. 10. Building heights and structures on any erf within the Civil Aviation sensitivity zone must be submitted to SACAA for review prior to the approval of building plans.
14. 11. The Stormwater Management Plan must be approved by Madibeng Local Municipality before the commencement of civil construction works.

IMPORTANT: This is a Final BAR submitted for Competent Authority Input. The EAP recommendation in Section F2 represents a preliminary opinion only. The final BAR incorporating the completed C&RR, all specialist study outcomes, and the WUL determination will be submitted to DEDECT for decision after the public comment period has closed and all outstanding information has been incorporated.

EAP Recommendation Confirmed: RP Colyn | Green Environmental (Pty) Ltd:

_____ Date: _____

Project Consultant Recommendation Confirmed: W Riekert | EHS (Pty) Ltd:



_____ Date: _____

Section G: Annexures

Annexure	Description	Status
A	Locality Map (A3, 1:50 000) – Figure 1 in Section B1	Included in Section B1 of this BAR
B	Site Development Plan / Layout Plan: BRITS X 166/1 (1:500 scale)	To be attached – Platinum Town Planners
C	Site Photographs – six photographs documenting existing site conditions	Included in Annexure C section of this BAR
D	PPP Documentation: Published Brits Pos advertisement (26 March 2026); site notice photographs; I&AP Register; C&RR (Section C5 of this BAR – 1 comment received from H Pretorius, 4 May 2026)	Advertisement attached; I&AP register and formal C&RR to be finalised in final BAR
E	EAP and Specialist Declarations: EAP independence declarations (RP Colyn and W Riekert); CVs demonstrating competence in terms of Regulation 13 of GN R326	To be attached – declarations to be signed
F	Authority Correspondence: DEDECT acceptance letter (NWP/EIA/105/2025, 06 March 2026, Ms Ellis Nkau pp); Lourens Prokureurs correspondence (16 March 2026); EAP responses (24 and 26 March 2026)	Attached
G	Specialist Reports: HIA; AIA; Pre-clearance Biodiversity Report; Aquatic Biodiversity Report; CBA2 Spatial Confirmation; Plant Species Assessment; Animal Species Assessment; PIA; Hydrology Assessment. [All outstanding – pre-construction preconditions per EMPr Section E4. See Section B15 for motivation.]	Outstanding – to be submitted to DEDECT separately where required.
H	Title Deed and Conditions: Town Planner's Memorandum (Platinum Town Planners); Proposed Township Conditions (Erven 1-14, Brits X 166); SG diagram; Madibeng SPLUMA documentation	To be attached – Lourens Prokureurs Ing
I	EHSSm Environmental Sensitivity Screening Report (26 January 2026, compiled by W Riekert, EHS (Pty) Ltd)	Attached – submitted with application per Regulation 16(1)(v)
J	EIA Application Form (completed, DEDECT 2014 format; Declaration by Merilyn Erasmus; accepted by DEDECT 05 March 2026)	Attached

EAP Firm:	EHS (Pty) Ltd
Contact:	RP Colyn (rpolyn@telkomsa.net) / W Riekert (wernerriekert@gmail.com)
Tel:	083 258 2463
EA Reference:	NWP/EIA/105/2025
Document Reference:	2026_05_04_Erasmus_BritsX166_BAR_Final
Date:	May 2026
Status:	Draft for Public Comment – Updated with maps, photographs, PPP email response, and specialist study motivation

Final BAR submitted by (EAP): RP Colyn / W Riekert | EHS (Pty) Ltd:

Date: _____