

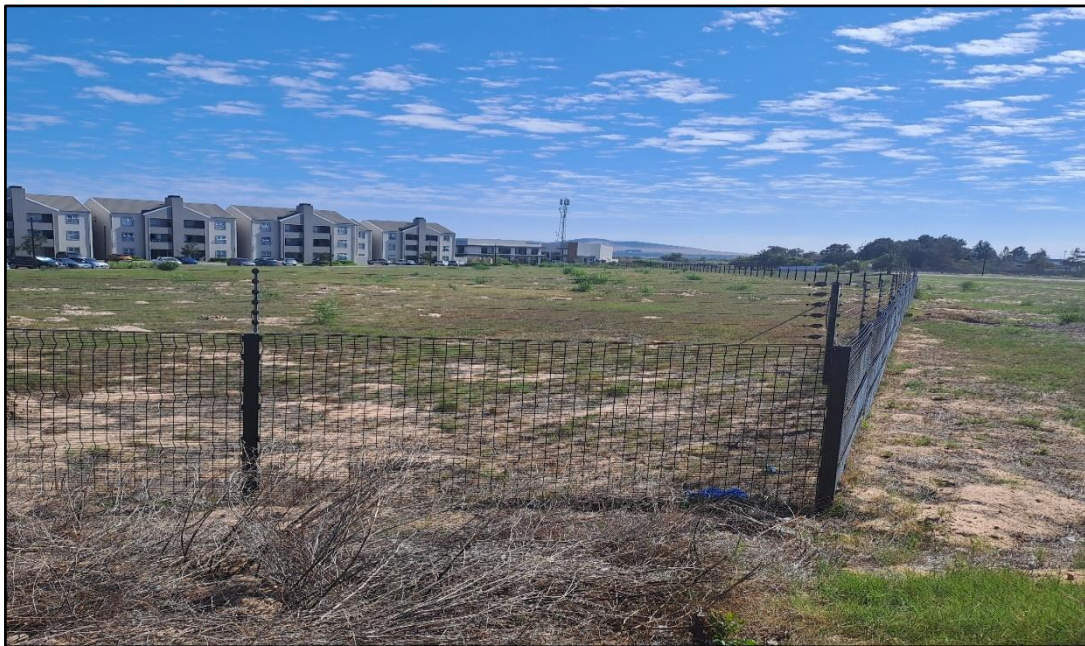
DRAFT AMENDMENT REPORT FOR A PART 2 AMENDMENT OF VALID ENVIRONMENTAL AUTHORISATIONS

**Ref No 16/3/3/1/A5/40/2028/17 dated 6 FEBRUARY 2018
and**

Ref No 16/3/3/5/A5/40/2011/20 dated 15 OCTOBER 2020

STONEWOOD ESTATE

**Proposed addition of 96 flats on Erf 38791 above the
adjusted 1:100year flood line**



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and
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Date: August 2026

1. INTRODUCTION

1.1 Background

The Stonewood Estate Mixed Use Development on original Erf 37119, Kraaifontein, consists of an industrial portion and residential portion, respectively. The residential portion consists of duplex units, group houses and flats. The environmental authorisations are silent on the numbers of each of these typologies. The eastern boundary of the Estate, fronts onto a fully canalised section of the Mosselbank River, also known as the Maastricht Canal.

The Stonewood Estate consists of several precincts one of which is Erf 38791. This erf is zoned General Residential Subzone 2 (GR2) in the land use planning approval. (See [Appendix J](#)). In accordance with this zoning 15 blocks of flats with a total of 90 flats were developed above the 1:100yr flood line as stipulated in the original Environmental Authorisation. The rest of Erf 38791 below the 1:100yr flood line was landscaped and mowed regularly to keep the vegetation, mainly grasses, low.

The EA was amended in 2020 to allow parking with permeable pavers below the 1:100yr flood line, as the EA of 2018 restricted development to above the 1:100yr flood line with only landscaping authorised below this flood line.

Bo Mo Property Developers (Pty) Ltd. Reg No 2014/148198/07 are the developers of the completed Stonewood Estate, excluding Erf 38791, which was sold off.

Development of the Le Coste Estate, necessitated the extension of Stonewood Drive, including a bridge across the canalised section of the Mosselbank River and a traffic circle on the intersection of Sarel Van Deventer Drive and Stonewood Drive. The designs of all this infrastructure were approved by the relevant Departments of the City of Cape Town.

Construction of Stonewood Drive and the bridge, however, allowed extreme storm events to overtop the road with resultant flooding of Stonewood Estate. This prompted a supplementary flood line study commissioned by the Stonewood and Le Coste Estates in late 2025. See [Appendix R](#). This study recommended a mitigation measure in the form of a 155m concrete berm along the southern side of Stonewood Drive. This altered the flood lines resulting in the section of Erf 38791 that was previously below the 1:100yr flood line now being above this flood line and thus developable.

After protracted discussions and negotiations between the CoCT Stormwater Directorate and the two large estates involved, the altered flood line regime and mitigation measures were agreed upon. See [Appendix P](#).

Erf 38791 was sold to a new development company, I and C Property Investors (Pty) Ltd, by Bo Mo Property Developers (Pty) Ltd on 7 June 2021. (See Title Deed [Appendix Q](#))

The owners of Erf 38791 propose developing an additional 96 flats in 13 blocks on this, previously undevelopable, section of the said Erf. See [Appendix I](#) for the site development plan for the proposed additional 96 flats.

Erf 38791 remains part of the Stonewood Estate and the 90 existing flats are accessed through the main entrance gate of the Estate. This access will remain available for both the existing 90 flats and the proposed 96 additional flats.

A new separate left-in / left-out access is proposed directly from Stonewood Drive. This access will be electronically controlled and will only be for residents of the existing 90 and proposed 96 flats.. Visitors will have to use the main entrance to the estate. See TIA in [Appendix N](#).

Civil services for the additional flats are fully described in the Civil Engineering Report by PSP Consult. [Appendices L and L1](#). Electrical services are covered in [Appendix M](#). A Landscape Plan for the additional 96 flats was prepared. See [Appendix O](#)

1.2 Administrative Requirements for this Amendment Report

The competent authority (CA) responsible for the consideration of the amendment proposal is the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP). The CA ruled that the additional 96 flats were not assessed during the initial EIA for the project. The Part 2 process, in terms of Section 31 and Section 32 of Government Notice (GN) No. R. 982 of 4 December 2014, as amended, must be followed.

The layout of this report further partially follows the requirements of a Basic Assessment Report (BAR), suitably modified to suit the needs of the Part 2 Amendment requirements. Table 1 indicates the regulations which have been addressed and the section of the Amendment Report where these requirements can be found.

Table 1. Requirements of Section 32 of GNR 982 (as amended)

GNR 982 as amended Section and Subsection		Description of regulation	Section	Page
32(1)(a)	(i)	Assessment of the impacts of the proposed change. The impacts and risks identified including nature, significance, consequence, extent, duration and probability of impacts, including the degree to which these impacts can be reversed, cause irreplaceable loss of resources and can be avoided, managed or mitigated.	8	9
32(1)(a)	(ii)	Advantages and disadvantages of the proposed change.	6	8
32(1)(a)	(iii)	Measures to ensure avoidance, management and mitigation of impacts associated with such proposed change.		
32(1)(a)	(iv)	Any changes which have been made to the EMP	See Appendix H Original Construction EMP no changes required	
32(1)(a)	(aa)	Details of the public participation process undertaken in terms of regulation 41 of the Regulations, including supporting documents and inputs.	7	9
32(1)(a)	(bb)	Summary of the issues raised by interested and affected parties and an indication of the manner in which the issues were incorporated, or the reasons for not including them.	To be included in Final Report	To be included in Final Report

1.3 Environmental Assessment Practitioner

Dr Johan Neethling is the sole member of Johan Neethling Environmental Services cc. (JNES). He started the business in 1997 after retiring from a career of more than 30 years in the formal environmental and nature conservation fields.

After founding his environmental practice more than nearly 25 years ago he has executed more than 250 Basic Assessment/Scoping and EIA processes for large and small developments.

Professional Registration

IAIAsa. He is a member of the South African Branch of the International Association of Impact Assessment. Registration No 1619

EAPASA. EAP Registration No 2020/1228.

2. PROJECT LOCATION

The Stonewood Estate is located on the north-eastern edge of the Cape Town suburb of Kraaifontein. It borders in the south on the Bonnie Brae suburb of the latter, Okavango Road to the west, the Kraaifontein WWTW to the north and the Mosselbank Canal to the east.

Figure 1

The proposed additional flats are located on Erf 38791. The latter was sold to I and C Property Investors (Pty) Ltd by Bo Mo Property Developers (Pty) Ltd, but it remains part of the Stonewood Estate.



Figure 1. Location of Erf 387914



Figure 2: Location (blue circle) of proposed additional flats. The red circle denotes the residential portion of Stonewood Estate.

The geographical coordinates approximately at the centre of the site for the additional flats

Latitude/Longitude	Degrees	Minutes	Seconds
South	33	49	41.27
East	18	42	17.98

SG Code C05500050003879100000

3. DESCRIPTION OF THE AMENDMENT PROPOSAL

The Stonewood Estate Mixed Use Development on original Erf 37119, Kraaifontein, consists of an industrial portion and residential portion, respectively. The residential portion consists of duplex units, group houses and flats. The environmental authorisations are silent on the numbers of each of these typologies. The eastern boundary of the Estate fronts onto a fully canalised section of the Mosselbank River, also known as the Maastricht Canal.

The Holder of both the EA dated 6 February 2018 and the Amended EA dated 15 October 2020 is Bo Mo Property Developers (Pty) Ltd. Reg No 2014/148198/07. The latter is also the developers of the completed Stonewood Estate, excluding Erf 38791, which is now owned by I and C Property Investors (Pty) Ltd.:

The amendment application will entail the following:

3.1 Bo Mo Property Developers (Pty) Ltd as the holder of both the original EA and the Amended EA will apply to split the rights and obligations of the EAs between Bo Mo Property Developers (Pty) Ltd and I and C Property Investors (Pty) Ltd. If the application is successful, two amended

EAs will be issued namely for original Erf 37119 (larger Stonewood Estate, excluding the flats) and Erf 38791 (existing 90 flats and proposed new 96 flats) respectively.

3.2 Part 2 amendment application for the additional proposed 96 flats on Erf 38791. This report deals with the latter.

3.3 The approved Environmental Management Programme is still valid and will not be amended. The Rights and obligations in the EMPr will likewise be split between the two entities.
Appendix H

It is proposed that the wording in the Amended EA dated 15 October 2020:

“This is the preferred alternative since all the units are situated above the 1:100-year flood line of the Maastricht Canal. The areas below the 1:100-year and above the 1:20-year flood lines, respectively, will in places, be used for parking. The parking areas will be paved with permeable paving to optimise water penetration and to allow for smooth blending into the landscaped open space area on the rest of the flood plain. All residential units are outside the 3 Odour Units contour line”

be replaced in the proposed amended EA with

“This is the preferred alternative since all the units are situated above the 1:100-year flood line of the Maastricht Canal. All residential units are outside the 3 Odour Units contour line.”

4. RECEIVING ENVIRONMENT

The additional 96 flats are proposed for a flat and sandy area with no natural vegetation. Photograph in **Appendix B**

4.1 Bio-physical environment

4.1.1 Climate

The climate of the general area can be described as winter rainfall with dry windy summers.

4.1.2 Geology topography and soils

The site is covered with a thick layer of Tertiary sands.

4.1.3 Vegetation

The site was extensively disturbed during development related activities such as the placing of services and roads and the smoothing of the flood lines. The site is regularly mowed as part of the open space area. No natural vegetation remains on site

4.2. Existing infrastructure

Since the issuing of the EA the Stonewood Estate has been fully developed. The whole estate is walled and/or fenced with a security entrance and guard house from Stonewood Drive.

The zoning for Erf 38791 is General Residential Subzone 2 (GR2) in the land use planning approval. (See Zoning Plan **Appendix J**). In accordance with this zoning 15 blocks of flats with a total of 90 flats were developed above the original 1:100yr flood line.

4.3 Infrastructure for proposed additional 96 flats

4.3.1 Access Roads

The major feeder road, Stonewood Drive, connecting Stonewood Estate and beyond, has been constructed to link up with Okavango, Hex River and Sarel van Deventer Roads. Erf 38791 remains part of the Stonewood Estate and the 90 existing flats are accessed through the main entrance gate of the Estate.

A new separate left-in / left-out access is proposed for Erf 38791, directly from Stonewood Drive. This access will be electronically controlled and will only be for residents of the existing 90 and proposed 96 flats. Visitors will use the main entrance to the estate. See TIA [Appendix N](#).

4.3.2 Storm Water Drainage

The stormwater from the additional 96 flats and associated infrastructure is channelled to a stormwater swale and detention pond before being released to the Maastricht Canal. See [Appendix L1](#).

4.3.3 Potable water.

The existing water supply point for the existing Stonewood Flats is located inside the larger Stonewood development, therefore part of the existing private services. The private potable and fire water reticulation pipes inside the Stonewood Flats development will be extended to supply the new proposed 96-flats development. No new bulk water connection off the private network will be required. The new internal water network for the proposed development will consist of uPVC pipes, air valves, fire hydrants and metered water connections.

4.3.4 Sewerage

The estimated peak dry weather sewage flow of the development is calculated to be 46 kℓ/day (for the 96 new units).

The internal sewer network will be a gravitational pipe system that will discharge foul sewer into the larger Stonewood Estate's pipe network.

4.3.5 Household Refuse

Refuse trucks enter the estate for the collection of refuse from the refuse yard located at the entrance of the flat's development, for disposal at the municipal landfill site. A new refuse bin room is proposed at the entrance to the newly proposed flats within the existing flats development, for storage of refuse bins.

4.3.6 Communication network

The communication (data & telephone) cabling network within the development will be via an underground sleeve system with draw boxes. The existing private internal sleeve network will be extended to provide a connection to each of the new flats.

5. LEGAL FRAMEWORK

5.1. National Environmental Management Act (NEMA), Act 107 of 1998

The National Environmental Management Act ([NEMA] Act 107 of 1998) is an all-encompassing act regulating various aspects of natural resource use, integrated environmental management and pollution control.

5.1.1. NEMA Regulations listing notices

The proposed amendment of the EA dated 6 February 2018 and the Amended EA dated 15 October 2020 does not trigger any new listed activities..

5.2. Other applicable legislation

5.2.1 National Water Act, 1998 (Act No. 36 of 1998)

In terms of GN509 of 2016 as it relates to the National Water Act, 1998 (Act No. 36 of 1998), a regulated area of a watercourse in terms of water uses as listed in Section 21c and 21i is defined as:

- the outer edge of the 1 in 100-year flood line and/or delineated riparian habitat, whichever is the greatest distance, measured from the middle of the watercourse of a river, spring, natural channel, lake or dam;
- in the absence of a determined 1 in 100-year flood line or riparian area the area within 100 m from the edge of a watercourse where the edge of the watercourse is the first identifiable annual bank fill flood bench; or
- a 500 m radius from the delineated boundary (extent) of any wetland or pan in terms of this regulation.

A freshwater ecological verification assessment for the Maastricht Canal was conducted by FEN Consulting (Pty) Ltd during the previous amendment of the EA in 2020. See [Appendix C](#). This study found in Par 2.2.1 “It is the opinion of the ecologist that the Maastricht Canal, from an ecological perspective, does not conform to the ecological definition of a watercourse which supports aquatic ecosystems with an associated riparian zone”

In the EAP’s opinion the proposed additional flats, being situated above the 1 :100yr flood line in an area with terrestrial vegetation with no riparian zone are not situated within the regulated area in terms of water uses as listed in Section 21c and 21i of the National Water Act.

5.2.2 National Heritage Resources Management Act

Heritage Western Cape originally issued a Record of Decision dated 24 Sept 2014 indicating that the Stonewood Development will not affect heritage resources and that no further heritage studies are required. See [Appendix F](#)

6. ADVANTAGES AND DISADVANTAGES

The National NEMA Regulations require that the Advantages and Disadvantages of the proposed project be outlined as part of the Amendment Report. The following section will describe the advantages and disadvantages of the proposed additional 96 flats.

6.1 Advantages of the proposed amendment

The result of the altered flood lines is that the section of Erf 38791 that was previously below the 1:100yr flood line is now above this flood line and thus developable. The amendment would allow 96 additional flats to be constructed in this area. The proposed additional flats are in accordance with the GR2 zoning for Erf 38791. Services are all available from the Stonewood Estate, rendering the proposed site a fully serviced area within the urban edge.

Apart from making the development more viable for the developer, amending the EA to allow the additional flats is in line with the City of Cape Town's densification policy on land within the urban edge. Especially fully serviced land.

The additional 96 flats will add to the full spectrum of housing stock in the area, especially in the more affordable range.

The site for the additional flats is heavily disturbed with no indigenous vegetation remaining.

6.2. Disadvantages of the proposed amendment

The site of the additional flats, although not zoned as open space, may have been seen by some I&APs as open space.

7. PUBLIC PARTICIPATION PROCESS (PPP)

7.1 Registered I&APs and Organs of State

All registered I&AP's, including Organs of State, will be informed by email of the amendment application with a copy of the Draft Amendment Report attached to the email. Their attention will be drawn to the JNES website where the appendices to the Draft Amendment Report can be found. A comment period of 30 days will be stipulated.

7.2 Notice Board on Site.

A Notice Board will be placed on site.

The objective of the site notice is to:

- Inform I&APs of the proposed amendment to the EA;
- Inform I&APs of the availability of the Draft Amendment Report and the way in which the report can be accessed;
- How I&APs could provide comments. Within a 30-day comment period.

7.3 Comments received on the Draft Amendment Report

Issues and concerns raised will be compiled into a Comments and Responses Report and these will be incorporated into the Final Amendment EIA Report to be submitted to the Competent Authority for decision making.

8. IMPACT ASSESSMENT

8.1. Methodology in assessing potential impacts

Nature of the Impact:

Description of the type of effect the activity would have on the affected environment.

Extent of the Impact:

Reflects the importance of the environment on:

- ◆ a local (site area);
- ◆ surrounds (site area and its surroundings);
- ◆ regional (Western Cape) or
- ◆ a national scale.

Duration of the Impact:

- ◆ Short term (0-5 years);
- ◆ Medium term (6-15 years);
- ◆ Long term (16-30 years);
- ◆ Permanent (mitigation, either human or natural, will not occur in such a way or in such time span that the impact can be considered transient).

Intensity of the Impact:

- ◆ Low (affects the environment such that natural functions or processes are not affected, or not degraded significantly more than their present state);
- ◆ Medium (affected environment is altered but natural functions or processes continue, albeit in a modified/ increasingly modified way);
- ◆ High (natural functions or processes are altered to the extent that they will temporarily or permanently cease).

Probability of Occurrence:

- ◆ Improbable (low likelihood of the impact occurring);
- ◆ Probable (distinct possibility of the impact occurring);
- ◆ Highly probable (the impact will most likely occur).
- ◆ Definite (impact will occur regardless of any prevention measures)

Status of the Impact:

- ◆ Negative
- ◆ Positive
- ◆ Neutral

Significance of impact (Degree to which the impact will cause irreplaceable loss of resources):

- ◆ No significance: the impacts do not influence the environment in any way.
- ◆ Low significance: the impacts will have a minor influence on the environment. These impacts require some attention to modification of the project design where possible, or alternative mitigation.
- ◆ Moderate significance: the impacts will have a moderate influence on the environment. The impact can be ameliorated by a modification in the project design or implementation of effective mitigation measures.
- ◆ High significance: the impacts will have a major influence on the environment.
- ◆ No development: the impacts will have the “no-go” implication on the development or portions of the development regardless of any mitigation measures that could be implemented. This level of significance must be well motivated.

Degree to which impact can be reversed:

- ◆ Low (can only be removed with great difficulty and expense)
- ◆ Medium (can be removed with moderate difficulty and expense)
- ◆ High (can easily and cheaply be removed)

8.2. Impact Assessment of the Proposed Amendment of the EAs to add 96 additional flats in an area above the 1:100yr flood line.

Potential impacts on geographical and physical aspects:	Loss of area for green landscaping.
Nature of impact:	Negative
Extent and duration of impact:	Local and permanent
Probability of occurrence:	High
Degree to which the impact can be reversed:	Low
Degree to which the impact may cause irreplaceable loss of resources:	Low
Cumulative impact prior to mitigation:	Low.
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be mitigated:	High
Proposed mitigation:	The landscape plan makes provision for lawns and linings of trees. The storm water swale and retention pond are designed as "dry" ponds. To be used by residents for recreational purposes.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Potential impacts on geographical and physical aspects:	Use of heavy transport vehicles on roads in Stonewood and surrounding public roads during construction.
Nature of impact:	Low Negative
Extent and duration of impact:	Local and temporary
Probability of occurrence:	High
Degree to which the impact can be reversed:	High
Degree to which the impact may cause irreplaceable loss of resources:	Negligible
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be mitigated:	High
Proposed mitigation:	Roads in Stonewood are all paved up to the site. Vehicles will be subject to speed restrictions.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Potential impact on geographical and physical aspects:	Dust generation during construction
Nature of impact:	Negative
Extent and duration of impact:	Local and Temporary
Probability of occurrence:	Low
Degree to which the impact can be reversed:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be mitigated:	High

Proposed mitigation:	Tarred roads in Stonewood. Dust suppression measures are prescribed in the EMPr. These will be strictly enforced by the appointed ECO.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Potential impacts on geographical and physical aspects:	Noise impact during construction of the flats.
Nature of impact:	Negative
Extent and duration of impact:	Local and Short-term
Probability of occurrence:	Probable
Degree to which the impact can be reversed:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Medium-low
Degree to which the impact can be mitigated:	Medium
Proposed mitigation:	Working hours will be restricted to normal working hours. • All noise and sounds generated by plant or machinery must adhere to SABS specifications for the maximum permissible noise levels for residential areas. • All plant and machinery are to be fitted with adequate silencers. • No sound amplification equipment such as sirens, loud hailer or hooters may be used on site, after normal working hours, except in emergencies. • If work is to be undertaken outside of normal work hours, permission must be obtained from the Local Authority.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Potential impacts on geographical and physical aspects:	Visual impact of machinery on site.
Nature of impact:	Low Negative
Extent and duration of impact:	Local and Temporary
Probability of occurrence:	Low
Degree to which the impact can be reversed:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be mitigated:	High
Proposed mitigation:	Machinery on site to be stored the construction camp at night
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Potential impact on biological aspects:	Impact on natural habitat
Nature of impact:	No Impact. No indigenous vegetation left on site.
Extent and duration of impact:	
Probability of occurrence:	

Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential impacts on socio-economic aspects:	Creation of construction job opportunities
Nature of impact:	Positive
Extent and duration of impact:	Local and short-term
Probability of occurrence:	High
Degree to which the impact can be reversed:	This is a positive impact
Degree to which the impact may cause irreplaceable loss of resources:	None
Cumulative impact prior to mitigation:	Medium positive
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	None
Degree to which the impact can be mitigated:	Low positive
Proposed mitigation:	Create construction jobs
Cumulative impact post mitigation:	Medium positive
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	High

Potential impacts on cultural-historical aspects:	No impact See Appendix F.HWC ROD.
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

- (b) **Impacts that may result from the operational phase (briefly describe and compare the potential impacts (as appropriate), significance rating of impacts, proposed mitigation and significance rating of impacts after mitigation that are likely to occur as a result of the operational phase.**

Potential impacts on the geographical and physical aspects:	Storm water management. Impact on water quality. Stormwater swale
Nature of impact:	Positive
Extent and duration of impact:	Permanent

Probability of occurrence:	Medium
Degree to which the impact can be reversed:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be mitigated:	High
Proposed mitigation:	The most important mitigation measures for reducing the potential operational-phase impacts on storm water quality is the regular inspection of storm water traps and maintenance of the parking areas storm water management system.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Potential impact biological aspects:	Invasive alien plants escaping from the residential development. area
Nature of impact:	Negative
Extent and duration of impact:	Local and Temporary
Probability of occurrence:	Medium
Degree to which the impact can be reversed:	High
Degree to which the impact may cause irreplaceable loss of resources:	Medium-Low
Cumulative impact prior to mitigation:	Medium
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	No planting of CARA listed alien invasive plants in landscaping.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Potential impacts on socio-economic aspects:	Creation of opportunities for SME entrepreneurs such as plumbers, electricians' garden services.
Nature of impact:	Positive
Extent and duration of impact:	Local and medium-term
Probability of occurrence:	High
Degree to which the impact can be reversed:	This is a positive impact
Degree to which the impact may cause irreplaceable loss of resources:	None
Cumulative impact prior to mitigation:	Medium positive
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	None
Degree to which the impact can be mitigated:	Low positive
Proposed mitigation:	Create ongoing entrepreneurial opportunities.
Cumulative impact post mitigation:	Medium positive
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	High

Potential impacts on socio-economic aspects:	Creation of temporary and permanent job gardening and domestic job opportunities
Nature of impact:	Positive
Extent and duration of impact:	Local and medium-term
Probability of occurrence:	High
Degree to which the impact can be reversed:	This is a positive impact

Degree to which the impact may cause irreplaceable loss of resources:	None
Cumulative impact prior to mitigation:	Medium positive
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	None
Degree to which the impact can be mitigated:	Low positive
Proposed mitigation:	Create job opportunities.
Cumulative impact post mitigation:	Medium positive
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	High

Potential impact on socio-economic Aspects:	Impact of traffic generated by the 96 flats.
Nature of impact:	Impact on surrounding roads by additional traffic generated by the 96 flats. According to the Traffic Assessment in Appendix N the additional units will add 63 trips during both the AM and PM peak hours. The additional trips will have a minor impact on the external road network. Two access option will be available for residents.
Extent and duration of impact:	Local and permanent
Consequence of impact or risk:	Minor impact on surrounding roads
Probability of occurrence:	High
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources
Degree to which the impact can be reversed:	Partially
Indirect impacts:	None
Cumulative impact prior to mitigation:	None
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Unavoidable
Degree to which the impact can be managed:	Can be fully managed
Degree to which the impact can be mitigated:	High
Proposed mitigation:	None. No specific road improvement in surrounding roads will be required to accommodate the additional traffic generated by the 96 flats
Residual impacts:	None
Cumulative impact post mitigation:	Very Low negative
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low negative to negligible

Potential impacts on socio-economic aspects:	Potential noise impact from occupied flats. This noise will be of a residential nature.
Nature of impact:	Potentially negative
Extent and duration of impact:	Local and permanent
Probability of occurrence:	Low
Degree to which the impact can be reversed:	High
Degree to which the impact may cause irreplaceable loss of resources:	None
Cumulative impact prior to mitigation:	Very low negative
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Degree to which the impact can be mitigated:	High
Proposed mitigation:	The HOA rules must regulate noise generation by the residents
Cumulative impact post mitigation:	Very low
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Potential impacts on socio-economic aspects:	Visual impact. The additional 13 blocks of 3 and 4 storey flats will have a visual impact
Nature of impact:	Potentially negative to Neutral
Extent and duration of impact:	Permanent
Probability of occurrence:	Probable
Degree to which the impact can be reversed:	High
Degree to which the impact may cause irreplaceable loss of resources:	Low
Cumulative impact prior to mitigation:	Low against the existing 90 flats in 15 blocks
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be mitigated:	High
Proposed mitigation:	Landscaping and planting of many trees. See Landscape Plan in Appendices O and O1
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Low

Potential impacts on the cultural-historical aspects:	None See ROD from HWC Appendix F
Nature of impact:	
Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

(c) **Impacts that may result from the decommissioning and closure phase (briefly describe and compare the potential impacts (as appropriate), significance rating of impacts, proposed mitigation and significance rating of impacts after mitigation that are likely to occur as a result of the decommissioning and closure phase.**

NB The additional blocks of flats will not be decommissioned in the foreseeable future.

(d) **Any other impacts:** N/A

“No-Go Alternative”. Do not construct additional 96 flats in 15 blocks above the 1:100yr flood line.

Potential impact biological aspects:	No impact. The blocks of flats will not be constructed and there will be no impact.
Nature of impact:	

Extent and duration of impact:	
Probability of occurrence:	
Degree to which the impact can be reversed:	
Degree to which the impact may cause irreplaceable loss of resources:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	

Potential impacts on socio-economic aspects:	Not constructing the additional 96 flats. will lead to non-optimum usage of serviced land within the urban structure. Negative economic outcome.
Nature of impact:	Negative
Extent and duration of impact:	Local and permanent
Probability of occurrence:	High
Degree to which the impact can be reversed:	High
Degree to which the impact may cause irreplaceable loss of resources:	High
Cumulative impact prior to mitigation:	Medium
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, or Very-High)	High (Opportunity cost)
Degree to which the impact can be mitigated:	High
Proposed mitigation:	Construct the 96 flats. This will ensure optimum use of serviced land in the urban edge. Job creation and increase supply of housing stock.
Cumulative impact post mitigation:	Positive
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, or Very-High)	Positive

8.2.1. Summary of impact assessment

The NEMA Regulations require that an Environmental Impact Assessment (EIA) process be undertaken to support an application for a Part 2 application for EA amendment. A key component of this process is the identification and assessment of *potential impacts* of the proposed amendment. In this case, the construction of 96 additional flats on serviced land within the urban edge above the 1:100yr flood line.

No negative **biophysical impacts** and **cultural heritage impacts** are expected, and the other impacts identified above are of a low negative to high positive nature.

8.3. Mitigation and management actions for the proposed amendment

The approved EMPr for the Stonewood Estate Development is still valid. No amendment to the EMPr is necessary to manage the construction or operation of the flats.

9. ASSUMPTIONS, UNCERTAINTIES AND GAPS IN KNOWLEDGE

9.1 Assumptions

The following assumptions are made:

- ♦ All information provided to the EAP by the Applicant is true and correct.

- ♦ All mitigation, management, and monitoring measures prescribed in this Report and EMPr will continue to be implemented.

9.2 Uncertainties

Uncertainties result when mitigation measures are proposed and must be implemented. The management and implementation of these mitigation measures must be monitored and managed correctly to ensure that all mitigation measures identified are brought to fruition.

9.3 Gaps in Knowledge

At this stage there are no identified gaps in knowledge in this report. However, input from I&AP's and Organs of State during the public participation and review processes may highlight some gaps in knowledge– which would then be addressed in the final Amendment Report. The nature of the proposed amendment and the expected very limited scale of impacts would likely not reveal large gaps in knowledge.

10. CONCLUSION

This Amendment Report was undertaken in line with the requirements of the NEMA EIA Regulations R 982, as amended, for a Part 2 Amendment. The proposed additional flats do not trigger any new EIA listed activities.

The information contained in this Amendment Report provides a description of the advantages and disadvantages which the amendment of the subject EA would have.

An important part of any Environmental Authorisation Process is the public participation process. This Draft Amendment Report will be made available for public and stakeholder review for a period of 30 days. All comments received and issues raised will be documented and addressed and responded to in the Comments and Responses Report and included in the Final Amendment Report.

The original construction EMPr is still valid and does not need revision. **Appendix H.**

11. RECOMMENDATION BY THE EAP

The Stonewood Estate is fully fenced and walled, and all infrastructure such as water, storm water management, electricity and sanitation is installed and available for the additional flats.

The EAP thus supports the proposed amendment to, and splitting of the subject EAs between I and C Property Investors (Pty) Ltd and Bo Mo Property Developers (Pty) Ltd.



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Reg EAP No 2020/1228 EAPASA
Aug 2026

Appendices

Appendix A Location of additional flats
Appendix A1 Location of Erf 38791
Appendix B Photograph of site
Appendix C Watercourse verification
Appendix D National Screening Tool Report
Appendix E Site Sensitivity Verification by EAP
Appendix F HWC Record of Decision
Appendix G Environmental Authorisations
Appendix H EMPr
Appendix I Site Development Plan
Appendix J Zoning Map
Appendix K Need and Desirability
Appendix L Civil Services Report
Appendix L1 Civil Services Layout
Appendix M Electrical Services Report
Appendix N Transport Impact Assessment
Appendix O Landscape SDP
Appendix P Flood Line Approval CoCT
Appendix Q Title Deed
Appendix R Supplementary Flood Line Study

The above appendices are available for download on www.jnes.co.za under Current Projects