DRAFT BASIC ASSESSMENT REPORT

Draft Basic Assessment Report (DBAR) for The Proposed Whetstone Phase 3 Mixed-Use Development located within the eThekwini Municipality (Ward 58), KZN

A Project of the Cedar Point Trading (Pty) Ltd

June 2026

THIS REPORT WAS COMPILED BY WALLACE AND GREEN (PTY) LTD. IN TERMS OF APPENDIX 1 TO GNR 326 (AS AMENDED)

2014 NEMA EIA Regulations (As amended 2017), Appendix 1- 3(a) a basic assessment report must contain the information that is necessary for the competent authority; (i) EAP who prepared the report and (ii) the expertise of the EAP, including curriculum vitae. 3 (1) (a) details of (i) the EAP who prepared the report; and (ii) the expertise of the EAP. Please see Appendix H for EAP Declaration and full Curriculum Vitae.

DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONERS

Table 1: Details of the Environmental Assessment Practitioner

Contact Persons	Ms. Perushni Nicole Naidoo
Postal Address	10 Cherron Avenue, La Lucia, 4051
Telephone	031 563 4466
Facsimile	086 613 8535
E-mail	nicolen@wallaceandgreen.co.za
Qualification	BSc Honours in Environmental Management
Professional Registrations	Reg. EAP (EAPASA)
Experience	11 years

Table 2: Details of the Project Applicant

DETAILS OF THE PROJECT APPLICANT

Applicant	Cedar Point Trading (Pty) Ltd
Representative	Mr. Gavin Strydom

EXECUTIVE SUMMARY

Wallace and Green (Pty) Ltd., were appointed by Cedar Point Trading (Pty) Ltd to provide Independent Environmental Consulting Services for the Proposed establishment of the Whetstone Phase 3 Mixed-Use Development, by conducting a Basic Assessment (BA) study in terms of the Environmental Impact Assessment (EIA) Regulations of 2014 (GNR 326 of December 2014 as amended), as promulgated under the National Environmental Management Act (NEMA) (Act No. 107 of 1998).

Project Description

As per **Figure 1**, the proposed project is located on the properties described as Portions 247 and 2101 of Lot 1575 Cottonlands, eThekwini Municipality (Ward 58). The proposed site boundary is approximately 5 hectares (ha) in extent of which 3.95 ha is earmarked for development.

The project site is bordered by the R102 to the east, Old Main Road to the west and Dube Boulevard to the south. The site is geographically located at the following co-ordinates (central point): 29°36' 46.29"S; 31° 5' 11.31" E.

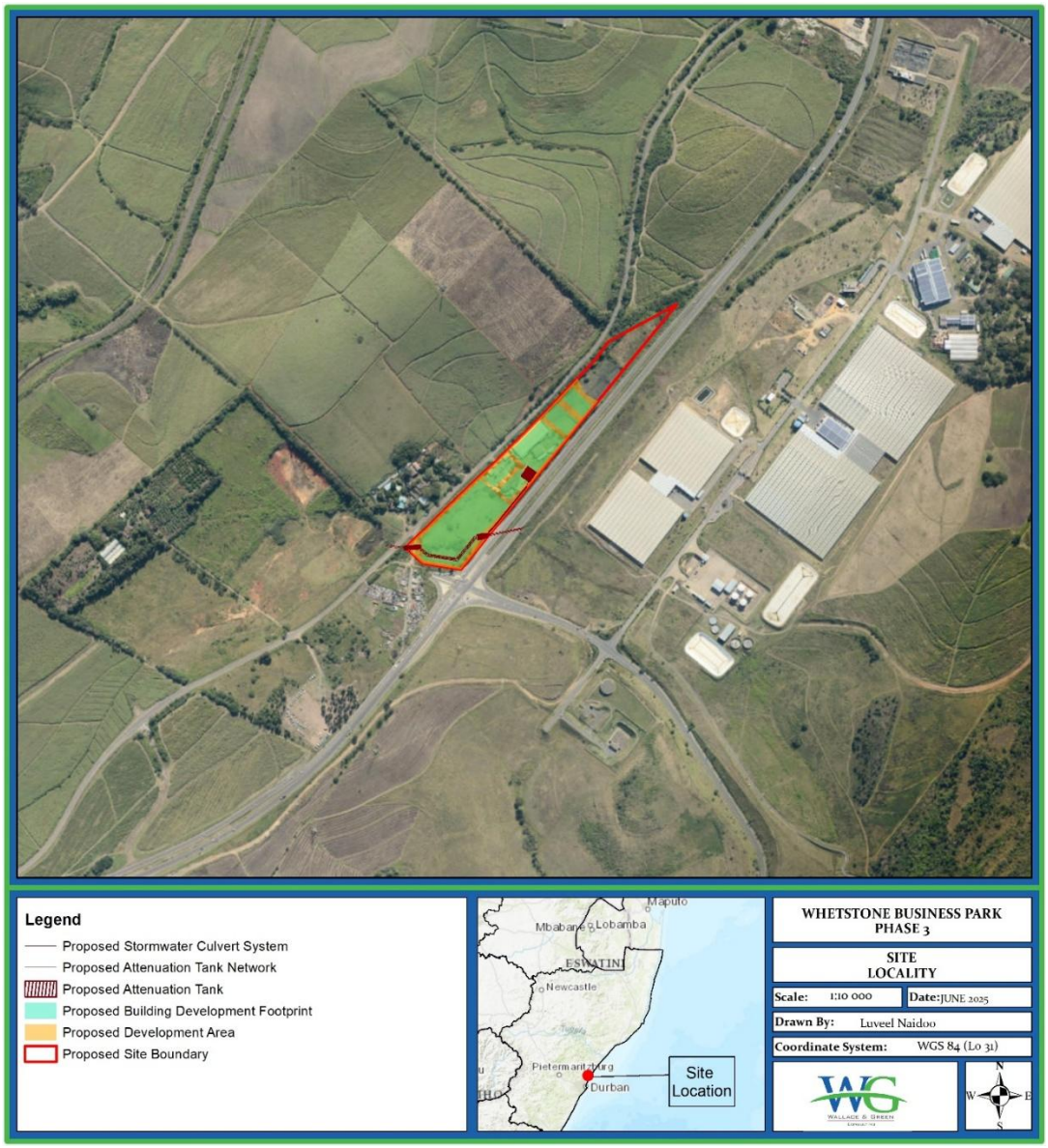

Figure 1: Locality Map

The site earmarked for the proposed development is currently disturbed by past horse farming and comprises of several buildings situated centrally which includes a coffee shop and portal frame/structure shed. The site is relatively flat with gentle gradients and is characterized by Wetland Systems to the south and north of the site.

As per **Figure 2 – Preliminary Layout**, the applicant intends on establishing a light industrial warehousing and/or commercial and associated facilities situated on the properties included within the site. The total area of the development footprint is approximately 3.95 ha of the total site boundary of 5 ha.

To the south of the site, the stormwater emanating from the surrounding area and southern portion discharges via an existing two-portal box culvert (Dimensions: 2 x 1.5 x 1.5m) that conveys the stormwater under the R102 and into the wetland system. However, heavy periodic rainfall events have resulted in the existing culvert unable to cope with the high flows and resulting in flooding of the R102. To address this, the applicant intends of establishing a culvert (Dimensions: 2 x 2.5 x 1.5) adjacent to the delineated channelled valley-bottom wetland system. It is important to note that as per the Stormwater Management Plan, dated April 2026, the wetland system will be infilled and compacted to cater for the proposed development.

To further manage the stormwater on the site the applicant also intends on establishing a concrete stormwater attenuation tank (Dimensions: 460m^2 (area) and 3m (depth). A stormwater attenuation tank is an underground reservoir that captures excess surface water run-off during heavy rain and releases it at a safe, controlled rate. This prevents municipal drainage systems from being overwhelmed, reducing the risk of localized flooding and downstream erosion.

Wetland Offset Strategy

An agreed approach for dealing with residual impacts to wetlands that cannot be avoided or mitigated is to compensate for these losses through the establishment of wetland offsets. Wetland offsets are measurable conservation outcomes resulting from actions designed to compensate for significant residual adverse impacts on wetlands (including all impacts on water resources, including hydrological and ecological processes and function, and wetland biodiversity including ecosystems, habitats and species) (SANBI & DWS, 2014).

As per the Wetland Offset Strategy Report, dated May 2026 the proposed Whetstone operations will result in the loss of 0.31 ha of wetland (i.e., Wetland Areas HGM (2) – Depression and HGM (3) – Channeled Valley Bottom). Loss of **0.14** functional hectare equivalents, consisting of the following: Loss of **0.01** functional hectare equivalents of a depression wetland and Loss of **0.13** functional hectare equivalents of a channelled valley bottom wetland. For this aspect, the functional offset targets are equal to the residual impact as the offset multiplier / ratio is 1. Thus, the offset target is to **gain and secure 0.14 functional hectare equivalents in the region through the rehabilitation and protection of wetlands.**

Based on the application of the offset site selection criteria of the tool above, the following one (1) potential offset site was identified for further screening according to the same tool (**Table 3**).

Table 3: List of preliminary offset candidate sites identified for screening

Offset Site	Area (Ha)	Property Description	Offset Action
HGM 1	1.1	• Farm Cotton Lands 1575 ○ Portion 1575/250 ○ Portion 1575/2101 ○ Portion 1575/248	• Rehabilitation and enhancement • Protection

The identified wetland (HGM 1) scored as 'Ideal for wetland habitat and HGM type, land-legal issues and rehabilitation opportunities to achieve measurable functional gains. Furthermore, the wetland condition, local biodiversity and downstream demand scored as 'acceptable'. Majority of the wetland has been historically

modified through crop fields and road developments (PES – class E) and therefore, the wetland condition post-rehabilitation will most likely be class D.

It is important to note that site HGM 1 is highly favourable with great rehabilitation and enhancement potential. This wetland may also be favourable for meeting all three dimensions of the offset targets although there are limitations, as this wetland is located between and in proximity of roads. This limitation resulted in reduced ecological viability ratings.

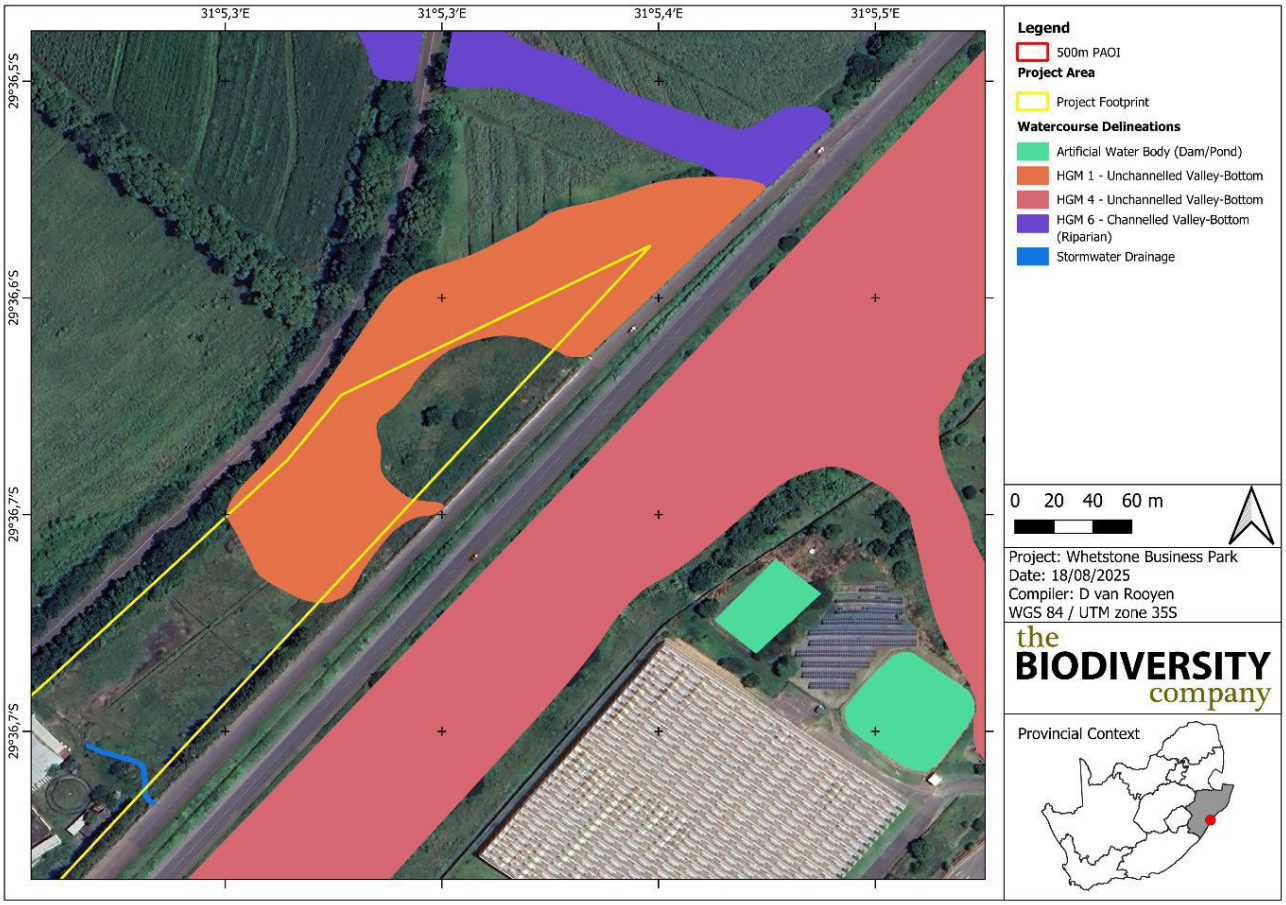

Figure 2: Overview of potential candidate offset site HGM 1

It is important to note that this approach and management plan was presented and submitted to KZN Ezemvelo and received positive support.

Bulk Services

The Bulk Services Report is attached as **Appendix D8** to this report. A Services Report was prepared by SiVEST (2026) to assess the availability and adequacy of bulk and internal engineering services required to support the proposed Whetstone Business Park Phase 3 development. The assessment considered transportation infrastructure, sanitation, sewage demands, water supply, bulk water demand, emergency services such as firefighting requirements, stormwater management, electrical supply, and telecommunications services.

Water Supply

The Services Report confirmed that municipal bulk water infrastructure is available within the surrounding area and that potable water can be supplied to the development through connections to the existing municipal

network. Internal water reticulation infrastructure will be designed in accordance with eThekwini Municipality standards and will provide for both domestic water demand and firefighting requirements.

Sanitation

The proposed development will connect to the existing municipal sewer network serving the broader Whetstone Business Park development. The assessment confirmed that sewer infrastructure is available within the vicinity of the site and that wastewater generated by the development can be accommodated through the existing network, subject to the detailed engineering design requirements.

Electrical Supply

The Services Report confirmed that electrical infrastructure is available within the surrounding area and that the proposed development can be serviced through connections to the existing municipal electricity network. Detailed electrical infrastructure requirements will be confirmed during the detailed design phase in consultation with the eThekwini Electricity High Voltage Planning Department.

Solid Waste Management

Solid waste generated will fall within the business and commercial non-hazardous industrial waste categories. During the operational phase will be collected and disposed of through approved waste management service providers and municipal facilities. Waste storage areas will be incorporated into the development design and managed in accordance with applicable municipal requirements.

Telecommunications

Telecommunications and service duct infrastructure will be incorporated into the development during construction to facilitate future connection to telecommunications service providers and support the operational requirements of the proposed business park.

Alternatives

- **Design Alternatives:**

The following design alternatives were investigated for the proposed stormwater culverts:

- **Culvert Design Option 1 (Preferred)** – The proposed establishment of a 2 x 2.5 x 1.5m box culvert and a 460m^2 attenuation tank. The existing 1400 x 1100m and the 2 x 900Ø culvert will be removed and the existing channelled valley bottom wetland system (HGM 2) and depression wetland system (HGM 3) will be infilled to cater for the proposed development. From an engineering perspective this option was considered as more viable to manage the pre-development and post-development stormwater flows. Furthermore, the option is more economically viable and suitable to cater for the proposed development.

- **Culvert Design Option 2 (Not Supported)** – The proposed establishment of a 2 x 2.5 x 1.5m box culvert and a 460m^2 attenuation tank. The existing 1400 x 1100m and the 2 x 900Ø culvert will be removed and the existing channelled valley bottom wetland system will be infilled to cater for the proposed culvert. This option was not considered economically viable due to routing of the culvert system to manage the stormwater flow rates and the accessible impacts to cater for the mixed-use development.

EIA Process

Based on the project activities and consultation with the KZN Department of Economic Development, Tourism and Environmental Affairs (EDTEA), the proposed project will require Environmental Authorisation via a Basic Assessment Process due to the following listed activities in terms of the NEMA EIA Regulations 2014 (as amended):

- Activity 19 of Listing Notice 1 (GNR327) – The proposed establishment of a 2 x 2.5 x 1.5m stormwater culvert and a 460m^2 attenuation tank will result in the infilling of approximately 4110m^3 of Wetland Systems HGM 2 and HGM 3.
- Activity 27 of Listing Notice 1 (GNR327) – The clearance of between 1 ha to 4 ha of indigenous vegetation (degraded grassland).

This BA follows the legislative process prescribed in the Environmental Impact Assessment (EIA) Regulations (2014). This report constitutes the Draft Basic Assessment Report which details the environmental outcomes, impacts and residual risks of the proposed activity. The report aims to assess the key environmental issues and impacts associated with the development and to document Interested and Affected Parties' (I&APs) issues and concerns.

To protect the environment and ensure that the development is undertaken in an environmentally responsible manner, there are several significant portions of environmental legislation and specialist studies that were taken into consideration during this assessment and are elaborated on in this report.

The KZN EDTEA is the competent authority for this Basic Assessment process, and the development needs to be authorised by this Department.

Public Participation Process

The public participation process comprised of the following:

- Notification and distribution of the Background Information Document (this document) to identified stakeholders and I&APs on the 26th February 2026 to announce the project and inviting stakeholders to register as an I&AP and participate in the public participation process;
- Placement of an advertisement in the local/regional newspaper. An advertisement in the local language (i.e., English) was placed in the Bugle on the 25th February 2026;
- Placement of site notices at conspicuous locations on site. Six site notices in English were erected at conspicuous locations of the site on the 06th February 2026 notifying I&APs of the proposed activity and inviting them to register; and
- Relevant I&AP's consultation to address issues and concerns raised.

Specialist Studies

The following specialist studies have been undertaken and reviewed as part of the Basic Assessment process:

- **Terrestrial Biodiversity Compliance Statement:**

The Project Area of Influence (PAOI) exists in a predominantly modified and degraded state, having been subjected to various anthropogenic impacts such as paddock creation, severe overgrazing, human and animal ingress, modification to construct roads, buildings, gardens and lawns, littering, high numbers of alien and invasive and the edge effects associated with the nearby activities. This habitat is unlikely to recover without human intervention and will continue to degrade further without active rehabilitation. The amount of indigenous vegetation remaining within the ca. 8.25 ha PAOI is quite limited and scattered. However, since most development will take place in areas that have already been modified, it is estimated that the clearance of indigenous vegetation (viz. in the Degraded Grassland) will be between 1 ha and 4 ha (using the precautionary principle).

Completion of the terrestrial biodiversity assessment led to the dispute of the 'Very High' classification for the terrestrial biodiversity theme sensitivity as allocated by the National Environmental Screening Tool. The PAOI is instead assigned an overall terrestrial sensitivity of 'Very Low' to 'Medium'.

The current PAOI in inundated with AIPs and therefore there is need for an alien management plan. Also, areas that are cleared for construction should be rehabilitated post construction to avoid soil erosion.

It is the opinion of the specialist that the proposed development is favourable only if all mitigation measures provided in this and other specialist reports are implemented.

- **Wetland Delineation and Functional Assessment:**

The project area is situated within the North Eastern Coastal Belt Ecoregion of the Pongola-Mtamvuna Water Management Area and falls within the U30D quaternary catchment. The freshwater assessment included the delineation, classification and ecological assessment of wetlands and associated drainage features occurring within the Project Area of Influence.

Desktop assessment and field verification identified several freshwater features associated with the site, including wetlands, riparian systems and artificial drainage features. In addition, several "A-Section" drainage channels were identified. These features convey stormwater runoff immediately after rainfall events and are not associated with sustained baseflow conditions.

Seven Hydrogeomorphic (HGM) wetland units were identified within the Project Area of Influence which comprise:

- Three Unchanneled Valley-Bottom Wetlands (HGMs 1, 4 and 5);
- One Depression Wetland (HGM 2); and
- Three Channelled Valley-Bottom Wetlands (HGMs 3, 6 and 7).

- **Heritage Impact Assessment and Desktop Paleontological Assessment:**

A heritage impact assessment (HIA) was undertaken for the proposed development site, the site was found to comprise a historically modified property previously utilised as a horse-riding facility incorporating stables, paddocks, and social facilities. It was noted that extensive historical site modification, has significantly altered natural ground conditions across much of the property. These activities have reduced the likelihood of intact archaeological deposits remaining within the development footprint.

A field survey identified no heritage sites or artefacts within the proposed development area. Existing structures on the property are not older than 60 years and therefore are not protected.

Thus, the Heritage assessment concluded that:

- No heritage resources occur within the proposed development footprint;
- No archaeological mitigation is required;
- No palaeontological mitigation is required; and
- The proposed development may proceed from a heritage perspective.

Although the probability of encountering heritage resources or fossil material during construction is considered very low, the specialist recommended that a Chance Find Protocol be incorporated into the Environmental Management Programme (EMPr).

The Heritage Impact Assessment concluded that the proposed development is acceptable from a heritage perspective and may be favourably considered for authorisation.

- **Geotechnical Investigation:**

The proposed site occupies a locally depressed area associated with the Hlawu River system and is susceptible to periodic inundation resulting from stormwater accumulation and overbank flood events. The investigation found that approximately 50% of the developable footprint has previously been raised through the placement of engineered fill. Fill thicknesses encountered during the investigation ranged between approximately 1.1m and 2.9m. Natural alluvial clay deposits encountered near surface level are generally soft to very soft and highly compressible. Underlying clay-rich residual soils are typically firm to stiff but remain moderately compressible. The presence of fissures, slickensides and shrink-swell characteristics indicates that seasonal moisture fluctuations may result in volumetric changes within the clay profile.

Groundwater seepage was encountered within portions of the investigation area at depths ranging from approximately 1.3m to 3.6m below existing ground level. Groundwater levels are expected to fluctuate seasonally and may rise following prolonged rainfall events.

Excavation conditions across most of the site are anticipated to comprise soft excavation through fill materials, clayey soils and weathered shale horizons. Localised hard excavation may be required where less-weathered shale or dolerite is encountered. Large dolerite boulders may also be present within historical fill materials and may require removal where encountered during foundation excavations.

The investigation further concluded that:

- Dolerite-derived fill materials are generally suitable for reuse as engineered fill;
- Shale-derived fill materials are generally unsuitable for engineered reuse;
- Natural clay-rich soils are unsuitable for engineered fill applications;
- Imported granular fill material will likely be required during construction;
- Stormwater management and erosion control measures will be essential throughout the development lifecycle.

Overall, the site is considered suitable for the proposed development from a geotechnical perspective, provided that the recommendations contained within the Geotechnical Investigation are incorporated into the feasibility and preliminary design phases.

- **Wetland Offset Strategy:**

A Wetland Offset Strategy was prepared by The Biodiversity Company (2026), to address residual impacts associated with HGM 2 and 3 respectively. The assessment considered the extent of wetland loss, ecological condition, ecosystem service provision, conservation importance and opportunities for ecological improvement within the broader wetland system.

The assessment concluded that onsite rehabilitation represents the most appropriate offset mechanism for the project and proposed a rehabilitation-to-impact ratio of approximately 5:1. Rather than establishing an offset site elsewhere within the catchment, the strategy focuses on improving the ecological condition and functioning of retained wetlands associated with HGM 1 and adjacent wetland habitat.

The proposed offset measures are intended to compensate for residual impacts associated with HGM 2 and HGM 3 while generating a net ecological improvement within the broader wetland system.

- **Wetland Rehabilitation:**

A Wetland Rehabilitation Plan was prepared by The Biodiversity Company (2026) to support implementation of the proposed offset strategy. The rehabilitation area comprises approximately 10 523m² and includes portions of HGM 1 (6 371m²), the associated wetland island (3 195m²), and adjacent wetland buffer areas (958m²).

The rehabilitation programme focuses on improving the ecological condition and functioning of historically disturbed wetland habitat through measures including alien invasive vegetation control, revegetation with indigenous wetland species, erosion control and stabilisation, restoration of natural drainage processes, and long-term monitoring. The rehabilitation area was selected based on its ecological importance and potential for ecological recovery.

- **Hydrological Assessment:**

The project falls within the U30D quaternary catchment of the Pongola-Mtamvuna Water Management Area and it is characterised by a combination of agricultural land, transformed grassland, freshwater systems and associated drainage features. Regional runoff ultimately contributes to the Tongati River system before discharging into the Indian Ocean.

The site occurs within a low-lying landscape position that is susceptible to stormwater accumulation and periodic inundation. Flood risk is therefore a key design consideration. The hydrological assessment indicates that stormwater attenuation and controlled discharge infrastructure are necessary to minimise erosion, flooding and downstream impacts.

The specialist recommended that stormwater generated within the northern section be attenuated and discharged towards HGM 1, while stormwater generated within the southern section be attenuated and directed towards the channel associated with HGM 4. Ongoing monitoring of discharge points is required to ensure that erosion and sedimentation do not occur.

Water quality sampling undertaken as part of the hydrological assessment identified several parameters that exceeded applicable target water quality ranges. As a result, elevated levels of electrical conductivity, total dissolved solids, sodium, calcium, magnesium, chloride and turbidity were recorded. These findings are considered indicative of existing catchment-level influences associated with surrounding land uses and historical disturbance within the broader area.
The Hydrological Assessment identified moderate flood risk within portions of the site and recommends that the 1:100-year floodline be treated as a flooding exclusion zone and avoidance area. The assessment further recommends the implementation of appropriate flood protection, stormwater attenuation and erosion prevention measures where development occurs adjacent to flood-prone areas.

Additional recommendations include undertaking construction activities during the dry season where practicable, establishing stabilised site access points, implementing erosion and sediment control measures, appropriately managing stockpiles and waste materials, and rehabilitating disturbed areas through revegetation following construction.

Subject to implementation of the recommended mitigation measures and EMPr requirements, the assessment concluded that authorisation of the proposed development may be considered.

Main findings of the EIA

Construction and operational phase impacts ranged from High - Low pre-mitigation. All the anticipated impacts can however be significantly reduced through the mitigation measures provided to Low - Minor levels of impact significance ratings.

Residual risks are expected to be of short duration and of Low - Minor impact significance, provided that the mitigation measures in this report are implemented. No significant cumulate effects on the environment (i.e., sensitive terrestrial habitats and species) are anticipated.

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APPENDIX 1: NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998): ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS 2014 (AS AMENDED)

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3e	Description of the policy and legislative context within which the development is proposed and how is each one applicable to the proposed activity	Section 3
3f	The motivation for the need and desirability (including the development at that specific location)	Section 4
3g	The motivation for the preferred site, activity, and technology alternative	Section 4.2
3h (i)	Details of all the alternatives considered	Section 1.5
3h (ii)	Details of the Public Participation Process (PPP) undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs	Section 5
3h (iii)	A summary of the issues raised by interested and affected parties, and an indication of the way the issues were incorporated, or the reasons for not including them	Section 5
3h (iv)	The environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects	Section 2
3h (v)	The impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration, and probability of the impacts, including the degree to which these impacts- (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed, or mitigated;	Section 6.2
3h (vi)	The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives	Section 6.1
3h (vii)	Positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects	Section 6.2
3h(viii)	The possible mitigation measures that could be applied and the level of residual risk	Section 6.2
3h(ix)	The outcome of the site selection matrix	Section 6.2
3h(x)	If no alternatives, including alternative locations for the activity, were investigated, the motivation for not considering such	Section 1.5
3h(xi)	A concluding statement indicating the preferred alternatives, including the preferred location of the activity	Sections 4.2 and 6.3
3i	A full description of the process undertaken to identify, assess and rank the impacts the activity will impose on the preferred location through the life of the activity, including-	Section 6.2

SECTION OF APPENDIX 1 OF THE EIA REGULATIONS	DESCRIPTION OF THE SECTION	ASSOCIATED SECTION WITHIN THE BAR
	(i) a description of all environmental issues and risks that were identified during the environmental impact assessment process; and (ii) an assessment of the significance of each issue, risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures	
3j	An assessment of each identified potentially significant impact and risk	Section 6.2
3k	Where applicable, a summary of the findings and impact management measures identified in any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final report	Section 2
3l	An environmental impact statement containing a map and a summary of the positive and negative impacts of the proposed development and alternatives	Section 6.3
3m	Based on the assessment, and where applicable, impact management measures from specialist reports, the recording of the proposed impact management objectives, and the impact management outcomes for the development for inclusion in the EMPr	Section 6.4
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3o	A description of any assumptions, uncertainties, and gaps in knowledge which relate to the assessment and mitigation measures proposed	Section 6.5.
3p	A reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation	Section 6.8
3q	Where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required, the date on which the activity will be concluded, and the post-construction monitoring requirements finalised	Section 6.6
3r	An undertaking under oath or affirmation by the EAP	Refer to Appendix H
3s	Where applicable, details of any financial provisions for the rehabilitation, closure, and ongoing post decommissioning management of adverse environmental impacts	Not Applicable

SECTION 1: DESCRIPTION OF THE PROPOSED ACTIVITY & LOCALITY

1.1 PROJECT TITLE

The Proposed Whetstone Phase 3 Mixed-Use Development located within the eThekwini Municipality (Ward 58), KZN.

1.2 DESCRIPTION OF THE ACTIVITIES TO BE UNDERTAKEN INCLUDING ASSOCIATED STRUCTURE AND INFRASTRUCTURE AS PER SECTION 3(D) (II)

2014 EIA Regulations (as amended), Appendix 1- 3(d) a description of the scope of the proposed activity, including (ii) a description of the activities to be undertaken including associated structures and infrastructure.

As per **Figure 4 – Preliminary Layout**, the applicant intends on establishing a light industrial warehousing and/or commercial and associated facilities situated on the properties included within the site. The total area of the development footprint is approximately 3.95 ha of the total site boundary of 5 ha.

To the south of the site, the stormwater emanating from the surrounding area and southern portion discharges via an existing two-portal box culvert (Dimensions: 2 x 1.5 x 1.5m) that conveys the stormwater under the R102 and into the wetland system. However, heavy periodic rainfall events have resulted in the existing culvert unable to cope with the high flows and resulting in flooding of the R102. To address this, the applicant intends of establishing a culvert (Dimensions: 2 x 2.5 x 1.5) adjacent to the delineated channelled valley-bottom wetland system. It is important to note that as per the Stormwater Management Plan, dated April 2026, the wetland system will be infilled and compacted to cater for the proposed development.

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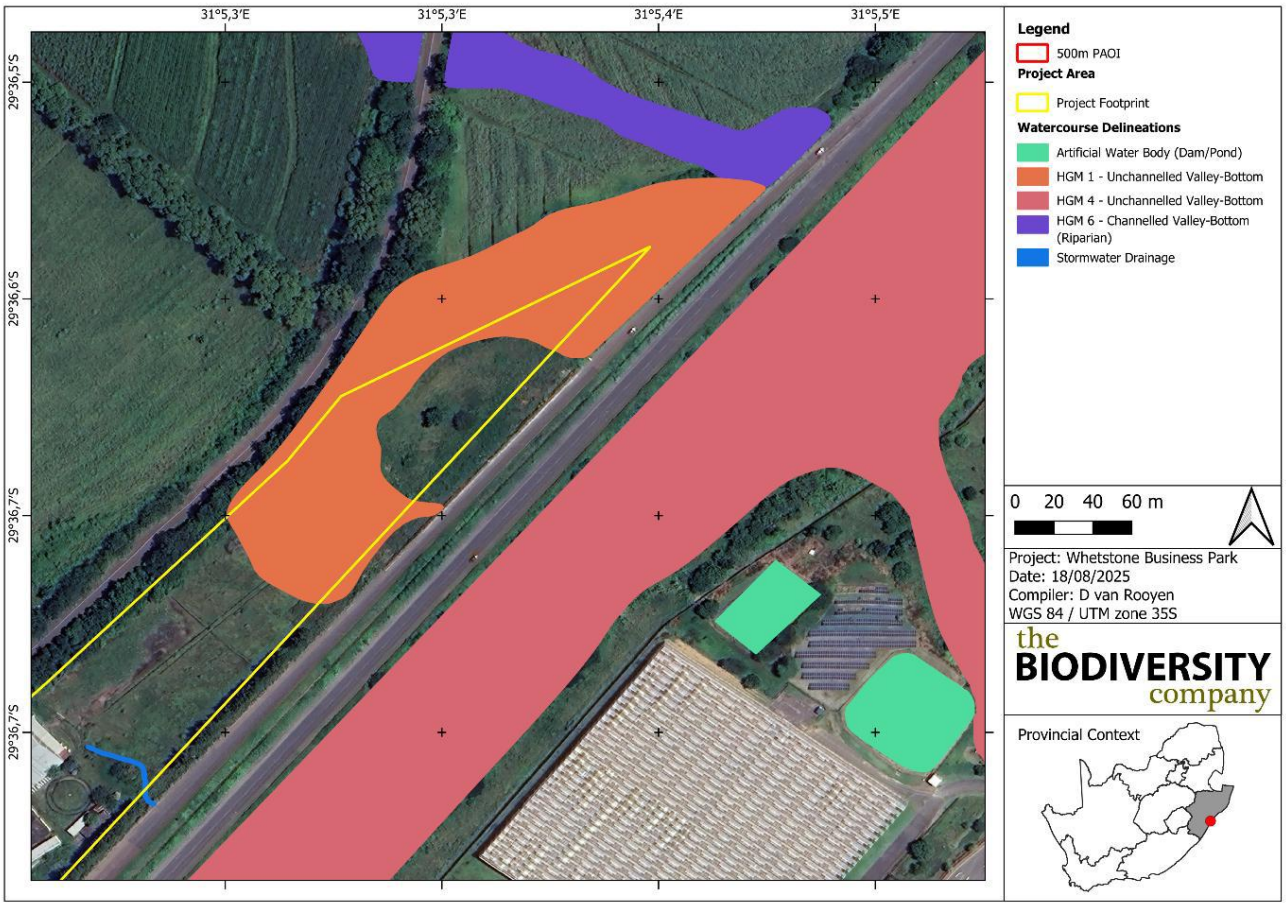

Figure 3: Overview of potential candidate offset site HGM 1

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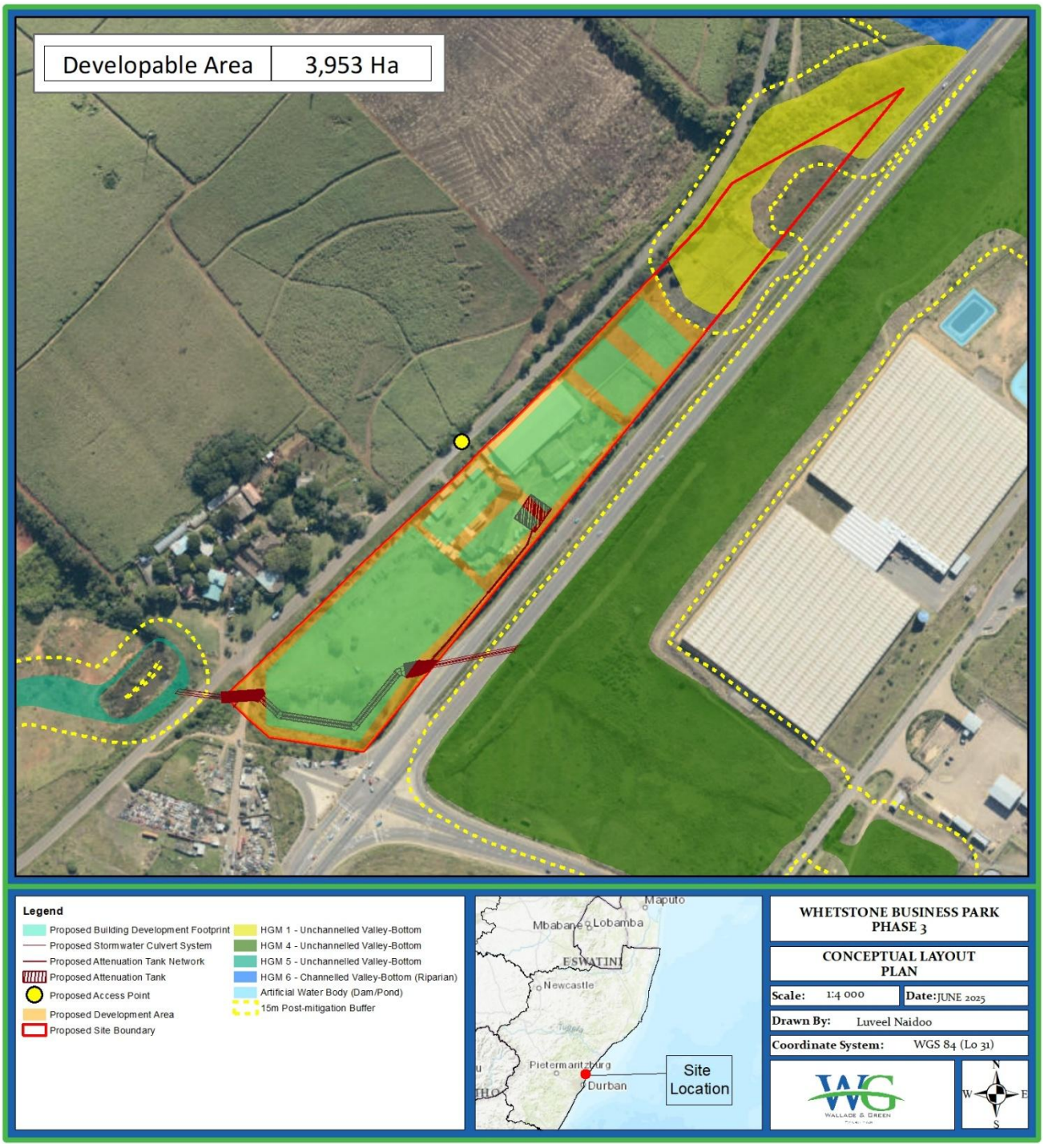

Figure 4: Preliminary Layout

Table 5: Property Details

Province/s	KwaZulu Natal
District Municipality/ies	eThekwini Metropolitan Municipality
Local Municipality/ies	eThekwini Metropolitan Municipality
Ward number/s	58
Nearest town/s	Verulam
Portion number/s	Portion 2101 of Lot 1575 Cotton Lands and Portion 247 of Lot 1575 Cotton Lands

Table 6: Surveyor General 21-digit code

N	0	F	U	0	0	0	0	0	0	0	0	1	5	7	5	0	2	1	0	1
N	0	F	U	0	0	0	0	0	0	0	0	1	5	7	5	0	0	2	4	7
1	**2**			**3**				**4**								**5**				

Table 7: Geographical location the Proposed Infrastructure

FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Building Footprint	29°	36´	46.29˝	31°	5´	11.31˝
Stormwater Culvert	29°	36´	51.75˝	31°	5´	6.56˝
Stormwater Attenuation Tank	29°	36´	46.32˝	31°	5´	12.89˝

1.3 SPECIALIST STUDIES

The following specialist assessments were conducted and the major findings of each specialist assessment are presented as per the following:

Geotechnical Assessment

A Geotechnical Investigation was undertaken by Drennan Maud in October 2025. The findings of the assessment are summarised below:

- Groundwater is present at shallow to moderate depth, with gradual seepage to higher energy flows being noted during inspection pitting.
- The on-site material has been classified in terms of their suitability for reuse as engineered fill during construction. The materials have been classified as according to both the TRH14 Classification (1985) and AASHTO Soil Classification System.
- Natural alluvial clay deposits encountered near surface level are generally soft to very soft and highly compressible. Underlying clay-rich residual soils are typically firm to stiff but remain moderately compressible.
- Groundwater seepage was encountered within portions of the investigation area at depths ranging from approximately 1.3m to 3.6m below existing ground level. Groundwater levels are expected to fluctuate seasonally and may rise following prolonged rainfall events
- Overall, the site is considered suitable for the proposed development from a geotechnical perspective, provided that the recommendations contained within the Geotechnical Investigation are incorporated into the feasibility and preliminary design phases

Please refer to **Appendix D1 – Geotechnical Assessment**

Terrestrial Compliance Statement

A Terrestrial Compliance Statement was undertaken by The Biodiversity Company in May 2026. The findings of the assessment are summarised below:

- The project area exists predominantly in a modified and degraded ecological condition as a result of historical land use activities, including severe grazing pressure, landscaping, road construction, buildings, alien invasive vegetation and associated edge effects.
- The degraded grassland habitat provides limited ecological functioning and offers restricted grazing, movement and foraging opportunities for indigenous fauna. The modified and disturbed habitat type is

characterised by extensive transformation, compacted surfaces, historical earthworks, buildings and disturbed vegetation, resulting in substantially reduced ecological integrity

- Indigenous vegetation was noted within the project area and it is limited, fragmented and generally degraded. Most of the proposed development footprint is situated within areas that have already been transformed, thereby limiting the extent of direct impacts on remaining indigenous vegetation.
- The project area is heavily invaded by alien invasive plant species, which have become established throughout disturbed portions of the site.
- No fatal terrestrial biodiversity constraints were identified within the preferred development footprint.
- The specialist concluded that the proposed development may proceed from a terrestrial biodiversity perspective, provided that appropriate mitigation measures are implemented during construction and operation.

Please refer to **Appendix D4 – Terrestrial Compliance Statement**

Wetland Delineation and Functional Assessment:

The Wetland Delineation and Functional Assessment was undertaken by The Biodiversity Company in May 2026. The findings of the assessment are summarised below:

- The project area is situated within the North Eastern Coastal Belt Ecoregion of the Pongola-Mtamvuna Water Management Area and falls within the U30D quaternary catchment.
- Seven Hydrogeomorphic (HGM) wetland units were identified within the Project Area of Influence (**Figure 12**). These wetland units comprised of three (3) unchanneled valley-bottom wetlands (HGMs 1, 4 and 5), one (1) depression wetland (HGM 2); and three (3) channelled valley-bottom wetlands (HGMs 3, 6 and 7).
- The Present Ecological State (PES) classifications ranging from C (Moderately Modified) to E (Seriously Modified). This is a result of the wetlands being subjected to varying degrees of historical disturbance associated with agricultural activities and infrastructure development and associated anthropogenic pressures.
- It was further indicated that HGM 1, 4 and 6 as important freshwater systems that contribute significantly to flood attenuation, downstream hydrological functioning and ecological connectivity. These systems continue to provide valuable ecosystem services despite their modified ecological condition. HGM 3 has experienced greater levels of historical disturbance and consequently provides reduced ecosystem functionality relative to the other valley-bottom systems. The depression wetland (HGM 2), although likely artificial in origin, continues to provide localised water storage, habitat and water quality benefits. The development is supported provided that mitigation measures are implemented and adhered to, which will be considered favourable due to the water challenges experienced on site.

Please refer to **Appendix D5 – Wetland Assessment**

Wetland Rehabilitation Plan:

The Wetland Rehabilitation Plan was undertaken by The Biodiversity Company in May 2026. The findings of the assessment are summarised below:

- The project area is situated within the North Eastern Coastal Belt Ecoregion of the Pongola-Mtamvuna Water Management Area and falls within the U30D quaternary catchment.
- The proposed rehabilitation area comprises approximately 10 523m² and includes portions of HGM 1 (6 371m²), the associated wetland island (3 195m²) and associated buffer zones (958 m²).
- The rehabilitation programme focuses on improving the ecological condition and functioning of historically disturbed wetland habitat through measures including alien invasive vegetation control,

revegetation with indigenous wetland species, erosion control and stabilisation, restoration of natural drainage processes, and long-term monitoring.

Please refer to **Appendix D7 – Wetland Rehabilitation Plan.**

Wetland Offset Strategy:

The Wetland Offset Strategy Report was undertaken by The Biodiversity Company in May 2026. The findings of the assessment are summarised below:

- The strategy focuses on improving the ecological condition and functioning of retained wetlands associated with HGM 1 and adjacent wetland habitat The proposed rehabilitation area comprises approximately 10 523m² and includes portions of HGM 1 (6 371m²), the associated wetland island (3 195m²) and associated buffer zones (958 m²).
- As per the assessment, it was concluded that the rehabilitation onsite rehabilitation represents the most appropriate offset mechanism for the project and proposed a rehabilitation-to-impact ratio of approximately 5:1
- The proposed offset measures are intended to compensate for residual impacts associated with HGM 2 and HGM 3 while generating a net ecological improvement within the broader wetland system.

Please refer to **Appendix D6 – Wetland Offset Strategy Report.**

Hydrological Assessment:

The Hydrological Assessment was undertaken by GCS Water and Environmental Consultants in June 2024. The findings of the assessment are summarised below:

- The project falls within the U30D quaternary catchment of the Pongola-Mtamvuna Water Management Area.
- The hydrological environment is characterised by a combination of agricultural land, transformed grassland, freshwater systems and associated drainage features. Regional runoff ultimately contributes to the Tongati River system before discharging into the Indian Ocean.
- Water quality sampling undertaken as part of the hydrological assessment identified several parameters that exceeded applicable target water quality ranges. Elevated levels of electrical conductivity, total dissolved solids, sodium, calcium, magnesium, chloride and turbidity were recorded which is indicative of existing catchment-level influences associated with surrounding land uses and historical disturbance within the broader area.
- It is identified that there is moderate flood risk within portions of the site and recommends that the 1:100-year floodline be treated as a flooding exclusion zone and avoidance area
- The assessment further recommends the implementation of appropriate flood protection, stormwater attenuation and erosion prevention measures where development occurs adjacent to flood-prone areas
- Subject to implementation of the recommended mitigation measures and EMPr requirements, the assessment concluded that authorisation of the proposed development may be considered.

Please refer to **Appendix D3: Hydrological Assessment**

Heritage Impact and Desktop Paleontological Impact Assessment

A Heritage Impact Assessment was undertaken by Umlando: Archaeological Surveys and Heritage Management in February 2026. The findings of the assessment are summarised below:

- As per the HIA, the project site was found to comprise a historically modified property previously utilised as a horse-riding facility incorporating stables, paddocks, and social facilities.

- It was noted that extensive historical site modification, has significantly altered natural ground conditions across much of the property. These activities have reduced the likelihood of intact archaeological deposits remaining within the development footprint.
- A field survey identified no heritage sites or artefacts within the proposed development area. Existing structures on the property are not older than 60 years and therefore are not protected.
- Although the probability of encountering heritage resources or fossil material during construction is considered very low, the specialist recommended that a Chance Find Protocol be incorporated into the Environmental Management Programme (EMPr).
- The Heritage Impact Assessment concluded that the proposed development is acceptable from a heritage perspective and may be favourably considered for authorisation.

Please refer to **Appendix D2 – Heritage Impact Assessment**

Table 8 below makes reference to specialist studies identified in the NEMA Screening Tool (**Appendix J2**). As per the Screening Tool, it is the responsibility of the EAP to confirm the list and to motivate in the assessment report, the reason for not including any of the identified specialist study.

Table 8: Specialist Studies from the NEMA Screening Tool

Specialist Study	Motivation
Landscape/Visual Impact Assessment	This assessment was not undertaken as the proposed development will not result in any landscape / visual impacts.
Archaeological and Cultural Heritage Impact Assessment	Please refer to **Appendix D2** – Heritage Impact Assessment. A field survey identified no heritage sites or artefacts within the proposed development area. Existing structures on the property are not older than 60 years and therefore are not protected. The Heritage Impact Assessment concluded that the proposed development is acceptable from a heritage perspective and may be favourably considered for authorisation.
Palaeontology Impact Assessment	Please refer to **Appendix D2** – Heritage Impact Assessment. A field survey identified no heritage sites or artefacts within the proposed development area. Existing structures on the property are not older than 60 years and therefore are not protected. The Heritage Impact Assessment concluded that the proposed development is acceptable from a heritage perspective and may be favourably considered for authorisation.
Terrestrial Biodiversity Impact Assessment	Please refer to **Appendix D4** – The project area exists predominantly in a modified and degraded ecological condition as a result of historical land use activities, including severe grazing pressure, landscaping, road construction, buildings, alien invasive vegetation and associated edge effects.
Aquatic Biodiversity Impact Assessment	Please refer to **Appendix D5** – Watercourse Assessment.
Hydrology Assessment	Please refer to **Appendix D3** – Subject to implementation of the recommended mitigation measures and EMPr requirements, the assessment concluded that authorisation of the proposed development may be considered.
Socio-Economic Assessment	The proposed mixed-use development will have a positive socio-economic benefit. Phases 1 and 2 have already initiated critical infrastructure, such as roads, bulk services (i.e., water and sewer), and street lighting, demonstrating feasibility for the proposed development and continuity with surrounding land uses. Furthermore, the proposed project is in close proximity to major transport routes (i.e., R102 and Old Main Road), King Shaka International Airport, and South African logistics corridors. This makes it an attractive investment choice for occupiers requiring efficient access to both local and international markets which is

	often a fundamental requirement for logistics, manufacturing, and commercial businesses. The proposed development is justified by past and future demand, strategic economic positioning, and alignment with regional planning objectives. It provides necessary land for industrial, commercial, and mixed-use activities that will generate employment opportunities and broaden economic opportunities. Whetstone Business Park Phase 3 should be recognised as a continuation of Whetstone's phased development, supporting spatial integration.
Plant Species Assessment	Please refer to **Appendix D4** – The project area exists predominantly in a modified and degraded ecological condition as a result of historical land use activities, including severe grazing pressure, landscaping, road construction, buildings, alien invasive vegetation and associated edge effects.
Animal Species Assessment	Please refer to **Appendix D4** – The project area exists predominantly in a modified and degraded ecological condition as a result of historical land use activities, including severe grazing pressure, landscaping, road construction, buildings, alien invasive vegetation and associated edge effects.

1.4 All Listed and Specific Activities Triggered and Applied for as per Section 3(d) (i)

2014 NEMA EIA Regulations (as amended), Appendix 1- 3(i) all listed and specified activities triggered and being applied for:

Table 9: Listed and specified activities triggered and being applied for

GNR	Activity Number	Activity as per legislation	Activity applicability
Listing Notice 1 (Basic Assessment)			
Government Notice Regulation (GNR) No. 327 of the EIA Regulation (2014)	Activity 19	*The development of infrastructure exceeding 1 000 metres in length for the bulk transportation of water or storm water—* *(i) with an internal diameter of 0,36 metres or more; or* *(ii) with a peak throughput of 120 litres per second or more;* *excluding where—* *(a) such infrastructure is for bulk transportation of water or storm water or storm water drainage inside a road reserve or railway line reserve; or* *(b) where such development will occur within an urban area.*	**The proposed establishment of a 2 x 2.5 x 1.5m stormwater culvert and a 460m^2 attenuation tank will result in the infilling of approximately 4110m^3 of Wetland Systems HGM 2 and HGM 3.**
	Activity 27	*The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for—* *(i) the undertaking of a linear activity; or* *(ii) maintenance purposes undertaken in accordance with a maintenance management plan.*	**The clearance of between 1 ha to 4 ha of indigenous vegetation (degraded grassland).**

1.5 Description of Feasible Alternatives as per Section 3(h) (i)

2014 NEMA EIA Regulations (as amended), Appendix 1- 3(H) a full description of the process followed to reach the proposed preferred alternative within the site, including (i), (iv).

*"**Alternatives**", in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to —*

(a) The property on which or location where it is proposed to undertake the activity

Alternative S1 (Only Site Alternative):
The proposed project is located on the properties described as Portions 247 and 2101 of Lot 1575 Cottonlands, eThekwini Municipality (Ward 58). The proposed site boundary is approximately 5 ha in extent of which 3.95 ha is earmarked for development. The property details are provided in **Table 10**.

Table 10: Property Details

District Municipality	eThekwini Municipality
Local Municipality	eThekwini Munciipality
Ward	58
Area / Town / Village	Verulam
Property Description	Portion 2101 of Lot 1575, Cotton Lands Portion 247 of Lot 1575, Cotton Lands
SG Codes	N0FU00000000157502101
	N0FU00000000157500147

No Site Alternatives were considered for the proposed project as the project is required at this location.

(b) The type of activity to be undertaken

The proposed development will include the following:

- Mixed-use development.
- Construction of a stormwater culvert.
- Construction of an attenuation tank.

To the south of the site, the stormwater emanating from the surrounding area and southern portion discharges via an existing two-portal box culvert (Dimensions: 2 x 1.5 x 1.5m) that conveys the stormwater under the R102 and into the wetland system. However, heavy periodic rainfall events have resulted in the existing culvert unable to cope with the high flows and resulting in flooding of the R102. To address this, the applicant intends of establishing a culvert (Dimensions: 2 x 2.5 x 1.5) adjacent to the delineated channelled valley-bottom wetland system. It is important to note that as per the Stormwater Management Plan, dated April 2026, the wetland system will be infilled and compacted to cater for the proposed development.

To further manage the stormwater on the site the applicant also intends on establishing a concrete stormwater attenuation tank (Dimensions: 460m^2 (area) and 3m (depth). A stormwater attenuation tank is an underground reservoir that captures excess surface water run-off during heavy rain and releases it at a safe, controlled rate. This prevents municipal drainage systems from being overwhelmed, reducing the risk of localized flooding and downstream erosion.

(c) The design or layout of the activity

- **Design Alternatives:**

The following design alternatives were investigated for the Proposed Culvert:

- **Culvert Design Option 1 (Preferred)** – The proposed establishment of a 2 x 2.5 x 1.5m box culvert and a 460m^2 attenuation tank. The existing 1400 x 1100m and the 2 x 900Ø culvert will be removed and the existing channelled valley bottom wetland system (HGM 2) and depression wetland system (HGM 3) will be infilled to cater for the proposed development. From an engineering perspective this option was considered as more viable to manage the pre-development and post-development stormwater flows. Furthermore, the option is more economically viable and suitable to cater for the proposed development.

Please refer to **Figure 5 – Culvert Design Option 1 (Preferred).**

- **Culvert Design Option 2 (Not Supported)** – The proposed establishment of a 2 x 2.5 x 1.5m box culvert and a 460m^2 attenuation tank. The existing 1400 x 1100m and the 2 x 900Ø culvert will be removed and the existing channelled valley bottom wetland system will be infilled to cater for the proposed culvert. This option was not considered economically viable due to routing of the culvert system to manage the stormwater flow rates and the accessible impacts to cater for the mixed-use development.

Please refer to **Figure 6 – Culvert Design Option 2 (Not Supported).**

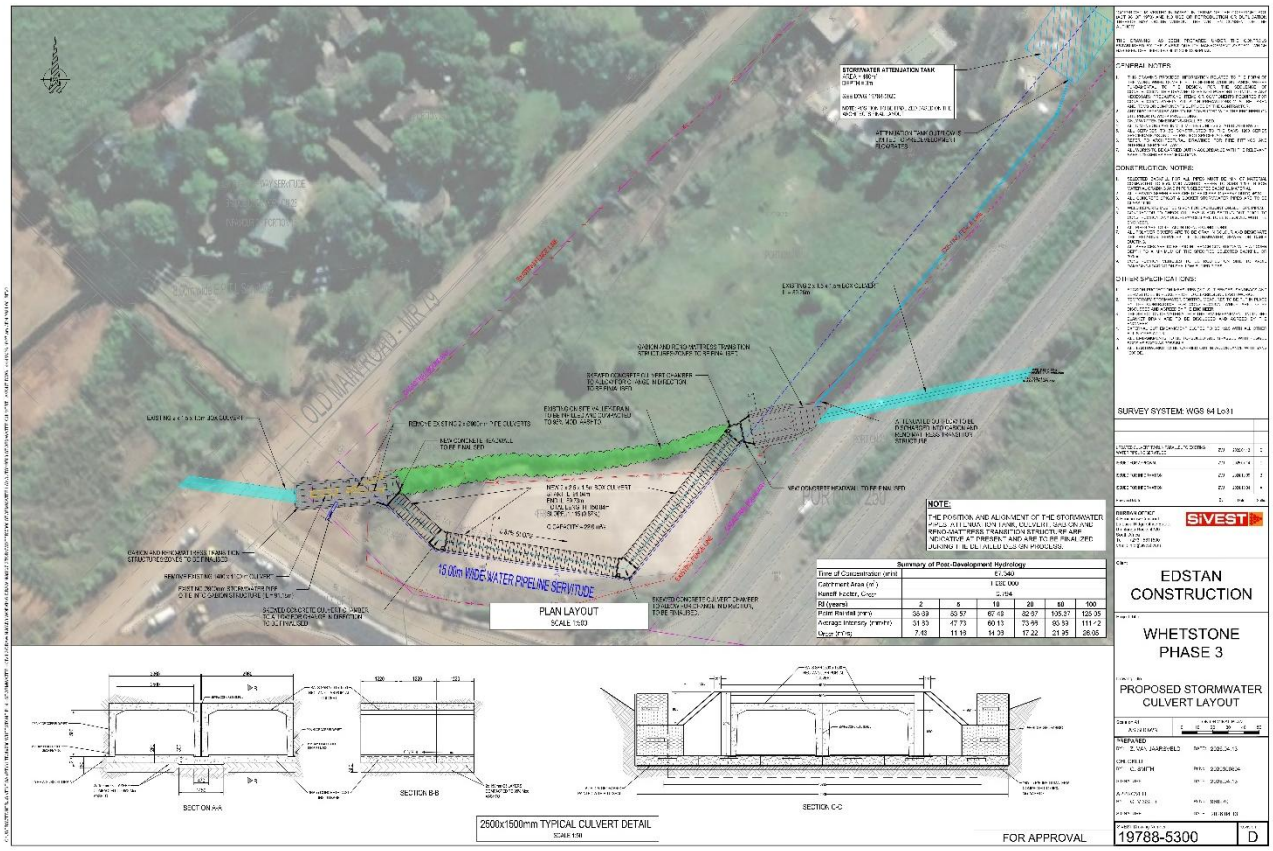

Figure 5: Culvert Design Option 1 (Preferred)

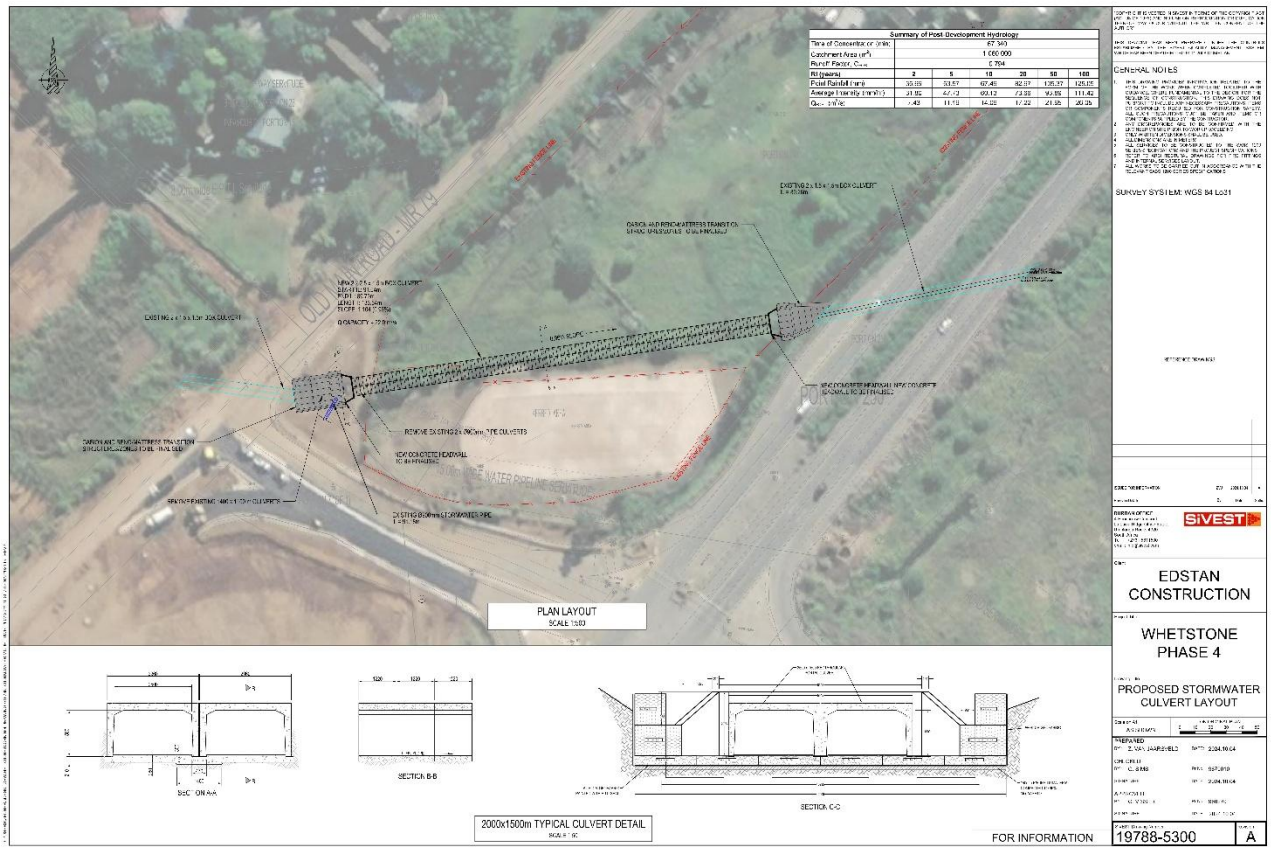

Figure 6: Culvert Design Option 2 (Not Supported)

(d) The technology to be used in the activity

It must be noted that no technology alternatives are applicable to this development.

(e) The operational aspects of the activity

The operational aspects relate to the daily operations of the Mixed-Use Development. The management aspects relating to the operational aspects, e.g., stormwater management, waste management, water abstraction management have been addressed in the Specialist Studies (**Appendix D**) and incorporated in the site-specific EMPr – **Appendix G**.

(f) The option of not implementing the activity

The no-go alternative implies that the status quo remains, meaning that the proposed site will remain undeveloped.

The proposed development is in alignment with the 2025/26 Integrated Development Plan (IDP), as it puts emphasis on prioritising strategic and catalytic projects for long-term growth. The IDP promotes spatial restructuring by coordinating land use and infrastructure investment to encourage development in areas with transport connectivity and economic potential. Whetstone Business Park is positioned near King Shaka International Airport and major freight routes, which supports these spatial objectives due to its strategic location in the northern development corridor.

Phases 1 and 2 have already initiated critical infrastructure, such as roads, bulk services (i.e., water and sewer), and street lighting, demonstrating feasibility for the proposed development and continuity with surrounding land uses. Furthermore, the proposed project is in close proximity to major transport routes (i.e., R102 and Old Main Road), King Shaka International Airport, and South African logistics corridors. This makes it an attractive

investment choice for occupiers requiring efficient access to both local and international markets which is often a fundamental requirement for logistics, manufacturing, and commercial businesses.

The proposed development is justified by past and future demand, strategic economic positioning, and alignment with regional planning objectives. It provides necessary land for industrial, commercial, and mixed-use activities that will generate employment opportunities and broaden economic opportunities. Whetstone Business Park Phase 3 should be recognised as a continuation of Whetstone's phased development, supporting spatial integration.

1.6 Project Locality as per Section 3(b) (i) – (iii)

2014 EIA Regulations, Appendix 1- 3(b) the location of the activity, including: (i) the 21 Surveyor General code of each cadastral land parcel.

Table 9: Location of the Proposed Activity

District Municipality	eThekwini Metropolitan Municipality
Local Municipality	eThekwini Metropolitan Municipality
Ward	58
Area / Town / Village	Verulam
Property Description	Portion 2101 of Lot 1575, COTTON LANDS Portion 247 of Lot 1575, COTTON LANDS
SG Codes	N0FU00000000157502101
	N0FU00000000157500147

Physical Size of the Activity

Site Alternative

Table 10: Site Alternative (only one site alternative considered)

Alternative S1:	Size of the Activity	Co-ordinates	
Building Footprint	Size – 112m^2 Length – 34m Height – 20m	27°19'39.58''S	32°43'36.95''E
Stormwater Culvert	1440m^2	29°36'51.75"S	31° 5'6.56"E
Stormwater Attenuation Tank	460m^2	29°36'46.32"S	31° 5'12.89"E

Design or Layout Alternative

Indicate the physical size of the preferred activity/technology as well as alternative activities/technologies (footprints):

Table 11: Design Alternatives

Zone:	Size of the site/servitude (m^3):	
	Alternative A1 (Preferred)	Alternative A2 (Not Supported)
Stormwater Culvert	Total Area – 1 440m^2	Total Area – 1 440m^2

1.7 Site Access

Does access to the site exist?	YES ■
If NO, what is the distance over which a new access road will be built	n/a
Describe the type of access road planned: A Traffic Impact Assessment (TIA) was undertaken by Fulcrum Development Consultants (2025) to assess the potential transportation impacts associated with the proposed Whetstone Business Park Phase 3	

development and to determine whether the surrounding road network has sufficient capacity to accommodate the anticipated traffic generated by the development.

The proposed development comprises a maximum Gross Leasable Area (GLA) of approximately 30 000 m² consisting of:

- 25 500 m² Light Industrial Warehousing (85%);
- 3 000 m² Office Space (10%); and
- 1 500 m² Retail Space (5%).

The site forms part of the broader Whetstone Business Park development and is strategically located within the Dube TradePort economic node.

The TIA assessed the operational impacts of the development within a study area encompassing the:

- R102;
- P79 Old Main Road;
- Link Road between the P79 and R102;
- M65 Dube Boulevard;
- Whetstone Access Road 1; and
- Associated intersections within the surrounding road network.

The development will be accessed via the P79 Old Main Road (**Figure 7**). For assessment purposes, the TIA assumed a single access point located on the P79 at the previously approved access position associated with the adjacent Whetstone Phase 2 development. This approach represents a conservative "worst-case" assessment scenario. Importantly, the exact quantity and locations of various site access points will be confirmed at a later stage.

The traffic assessment considered existing traffic conditions, approved developments within the surrounding area, future background traffic growth and the cumulative impacts associated with the broader Dube TradePort precinct. Previous approved transportation studies, including the Dube TradePort TradeZone 2 TIA, Whetstone Phase 1 TIA and Whetstone Phase 2 TIA, were incorporated into the assessment.

The TIA identified several transportation upgrades that have either already been implemented or are planned as part of the broader Whetstone development and surrounding road network improvement programme.

These include:

- A traffic circle at the P79 / Access Road 1 intersection; and
- Widening of the P79 between Access Road 1 and Link Road.

The overall traffic demand was estimated for two Scenarios – Scenario 1 (without development) and Scenario 2 (with development). The assessment concluded that the proposed development can be accommodated within the planned transportation network, subject to the implementation of the identified road and intersection upgrades. The proposed development is therefore not anticipated to result in unacceptable traffic impacts and no fatal transportation constraints were identified.

Refer to **Appendix D10 – Traffic Impact Assessment**

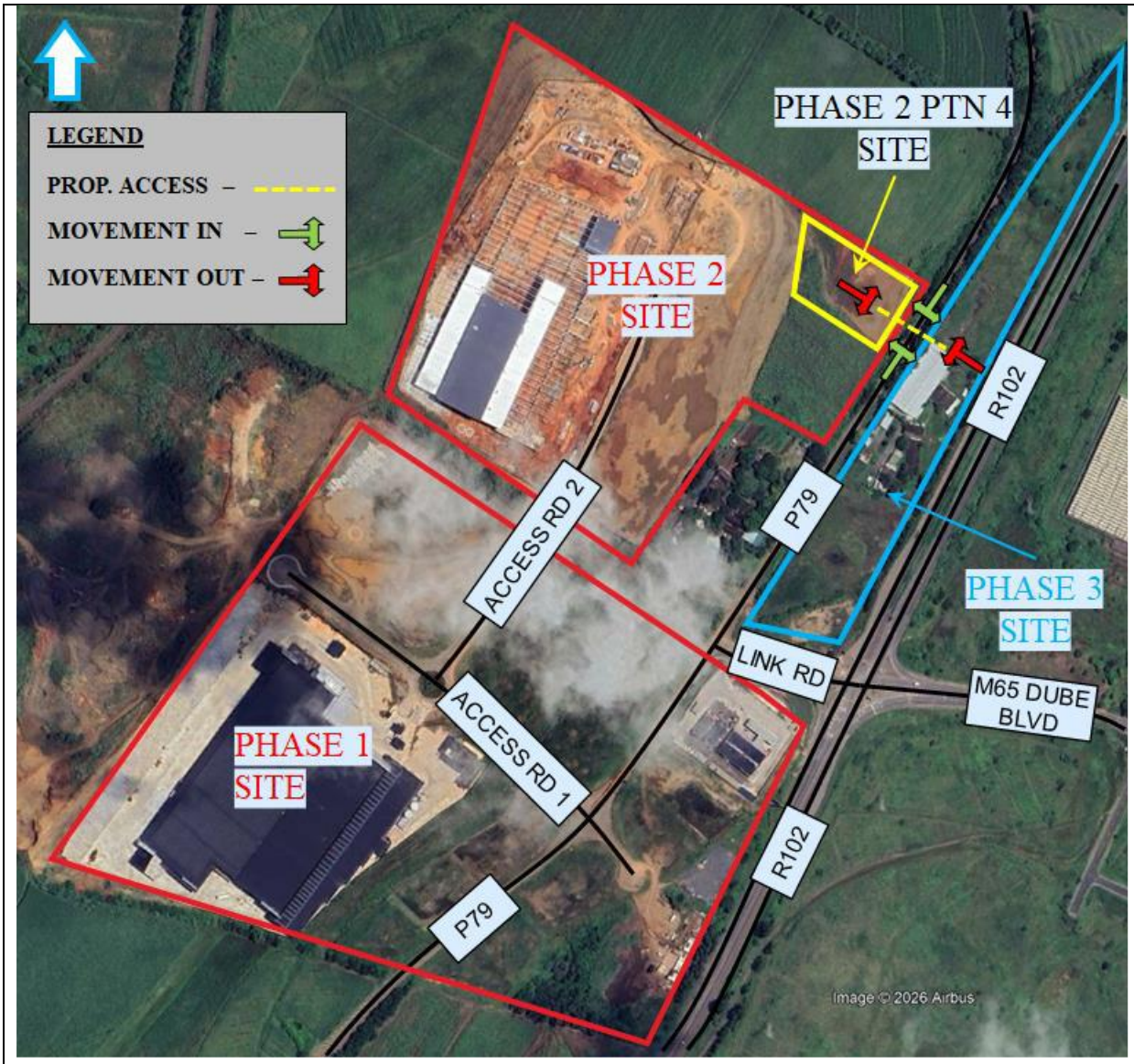

Figure 7: Site Access

1.8 Zoning and Land Use Rights

What is the land currently zoned for? Rural settlement, small-scale subsistence farming and livestock grazing		
Will any person's rights be negatively affected by the proposed activity/ies?	[redacted]	NO
Will the activity be in line with the following?		
The Provincial and Local Spatial Development Framework	YES	[redacted]
The Provincial and Local Integrated Development Framework	YES	[redacted]

The broader Durban Aerotropolis framework envisages development that enhances urban and economic competitiveness by leveraging multi-modal transport access and integrated land use near the airport. Whetstone Business Park contributes directly to this by activating developable land around these transport nodes. Whetstone Business Park is part of a strategically positioned development corridor adjacent to King Shaka International Airport and the Dube Trade Port Special Economic Zone (SEZ), a core component of the Durban Aerotropolis concept, aimed at promoting economic growth, industrial diversification, and global connectivity. This location advantage supports logistics, light industrial, commercial, and mixed-use development that aligns with broader regional and national economic strategies.

Whetstone Business Park Phase 3 responds to existing and projected demand for industrial, logistics, commercial, and mixed-use land in the eThekwini region. The surrounding north-coastal corridor, including Ballito and uMhlanga areas, has been experiencing strong economic and property growth, with accelerating demand for industrial and logistics space to support supply chain, manufacturing, and distribution sectors. Whetstone Business Park is designed to expand socio-economic opportunities, attract investment, and support diversification of the local economy. Phase 3 will build on this by offering additional serviced platforms and mixed-use opportunities, including warehousing, light manufacturing, offices and retail amenities, thus introducing additional employment opportunities and business activity. Phase 3 will further contribute to municipal revenue through rates and services, which supports eThekwini's economic development objectives.

The phased development approach is consistent with approved spatial strategies and municipal planning instruments. The SPLUMA and eThekwini Land Use Schemes encourage the phased introduction of mixed-use and industrial development within the Whetstone precinct, signalling its appropriateness in terms of spatial planning policy. Section 6.4 of eThekwini Municipality's Spatial Development Framework (SDF 2025/26) describes Whetstone Business Park as one of several catalytic economic projects, introducing investment attraction and socio-economic benefits. The SDF further characterises the Whetstone area as an industrial node with investment opportunities. Whetstone Business Park aligns with the SDF as it emphasises addressing spatial inefficiencies and historical imbalances by encouraging development in areas that:

- Are near key transport and economic infrastructure (i.e., King Shaka Internation Airport);
- Support intensification and densification of economic activity; and
- Encourage equitable access to jobs and services.

The proposed development is in alignment with the 2025/26 Integrated Development Plan (IDP), as it puts emphasis on prioritising strategic and catalytic projects for long-term growth. The IDP promotes spatial restructuring by coordinating land use and infrastructure investment to encourage development in areas with transport connectivity and economic potential. Whetstone Business Park is positioned near King Shaka International Airport and major freight routes, which supports these spatial objectives due to its strategic location in the northern development corridor.

Phases 1 and 2 have already initiated critical infrastructure, such as roads, bulk services (i.e., water and sewer), and street lighting, demonstrating feasibility for the proposed development and continuity with surrounding land uses. Furthermore, the proposed project is in close proximity to major transport routes (i.e., R102 and Old Main Road), King Shaka International Airport, and South African logistics corridors. This makes it an attractive investment choice for occupiers requiring efficient access to both local and international markets which is often a fundamental requirement for logistics, manufacturing, and commercial businesses.

The proposed development is justified by past and future demand, strategic economic positioning, and alignment with regional planning objectives. It provides necessary land for industrial, commercial, and mixed-use activities that will generate employment opportunities and broaden economic opportunities. Whetstone Business Park Phase 3 should be recognised as a continuation of Whetstone's phased development, supporting spatial integration.

1.9 Water Use and Bulk Service Availability

Please indicate the source(s) of water that will be used for the activity.

The Services Report confirmed that municipal bulk water infrastructure is available within the surrounding area and that potable water can be supplied to the development through connections to the existing municipal network. Internal water reticulation infrastructure will be designed in accordance with eThekwini Municipality standards and will provide for both domestic water demand and firefighting requirements. Refer to **Appendix D8 - Engineer Services Report**

If water is to be extracted from groundwater, river, stream, dam, lake or any other natural feature, please indicate the volume that will be extracted per month.

Not Applicable – There will be no abstraction of water for the purpose of the construction or operational phases of this development.

Does the activity require a water use authorisation (general authorisation or water use license) from the Department of Water & Sanitation? Please provide proof that the application has been submitted to the Department of Water & Sanitation.

Yes, the proposed infilling of the wetland systems (i.e., Wetland Areas HGM (2) – Depression and HGM (3) – Channeled Valley Bottom) will require Water Use Authorisation (WUA) from the Department of Water and Sanitation (DWS). The application with DWS is currently underway.

Are the necessary services with adequate capacity currently available (at the time of application), or must additional capacity be created to cater for the development? (Confirmation by the relevant Municipality in this regard must be attached to the final Basic Assessment Report as an Appendix).

The Bulk Services Report is attached as **Appendix D8** to this report. A Services Report was prepared by SiVEST (2026) to assess the availability and adequacy of bulk and internal engineering services required to support the proposed Whetstone Business Park Phase 3 development. The assessment considered transportation infrastructure, sanitation, sewage demands, water supply, bulk water demand, emergency services such as firefighting requirements, stormwater management, electrical supply, and telecommunications services.

Water Supply

The Services Report confirmed that municipal bulk water infrastructure is available within the surrounding area and that potable water can be supplied to the development through connections to the existing municipal network. Internal water reticulation infrastructure will be designed in accordance with eThekwini Municipality standards and will provide for both domestic water demand and firefighting requirements.

Sanitation

The proposed development will connect to the existing municipal sewer network serving the broader Whetstone Business Park development. The assessment confirmed that sewer infrastructure is available within the vicinity of the site and that wastewater generated by the development can be accommodated through the existing network, subject to the detailed engineering design requirements.

Stormwater Management

Stormwater management represents an important design consideration due to the presence of wetlands, drainage features and low-lying areas associated with the site. A dedicated Stormwater Management Plan has therefore been prepared for the development. The stormwater design has been aligned with the findings of the hydrological and wetland specialist studies.

Electrical Supply

The Services Report confirmed that electrical infrastructure is available within the surrounding area and that the proposed development can be serviced through connections to the existing municipal electricity network. Detailed electrical infrastructure requirements will be confirmed during the detailed design phase in consultation with the eThekwini Electricity High Voltage Planning Department.

Solid Waste Management

Solid waste generated will fall within the business and commercial non-hazardous industrial waste categories. During the operational phase will be collected and disposed of through approved waste management service providers and municipal facilities. Waste storage areas will be incorporated into the development design and managed in accordance with applicable municipal requirements.

Telecommunications

Telecommunications and service duct infrastructure will be incorporated into the development during construction to facilitate future connection to telecommunications service providers and support the operational requirements of the proposed business park.

The Services Report concluded that the proposed development can be adequately serviced by existing and planned municipal infrastructure. Subject to the implementation of the recommended engineering designs, municipal approvals and infrastructure upgrades where required, no fatal engineering services constraints

were identified, subject to the limitations discussed in the Services Report, that would preclude the proposed development from proceeding.

1.10 Energy Efficiency

Describe the design measures, if any, which have been undertaken to ensure that the activity is energy efficient.

In terms of energy efficiency, the proposed development should be undertaken during regular working hours to reduce the use of artificial lighting, if need be. Additionally, the contractor will be advised to transport all construction materials on-site at the same time wherever possible; the collection of waste material must be conducted simultaneously with other activities to reduce the amount of fuel usage for such transportation. Waste management methods (i.e., recycling and reusing), as well as water conservation measures are recommended and included in the EMPr (see Appendix G).

The proposed building will be certificated using the V2 Greenstar tool from the Green Building Council of South Africa. It will be targeting a 6-star Greenstar rating which is the highest possible rating. There are multiple measures targeted within the design of the building which minimizes the impact on the services from the municipality. The building will have a significant PV array allowing the building to be SANS10400 XA compliant and ensure the minimal use of power needed from the grid. Included in the design are LED lights, energy efficiency appliances and sensors and timers to ensure energy isn't used unnecessarily.

On the water side of the design, the building will be fitted with low-flow fittings which optimises water usage. Rainwater harvesting allows the reuse of water in the building and minimise the demand on the municipality. All services will be smart metered allowing for accurate data to be collected and ensuring that any leaks or issues are identified early and minimise loss.

Describe how alternative energy sources have been considered or been built into the design of the activity if any.

It is recommended that:

- All light fittings should be of the LED (Light Emitting Diodes) technology type, which are extremely energy efficient and consumes up to 90% less power than incandescent bulbs.
- Consideration should be given to solar-powered LED lighting wherever applicable.
- The proposed building will be certificated using the V2 Greenstar tool from the Green Building Council of South Africa. It will be targeting a 6-star Greenstar rating which is the highest possible rating. There are multiple measures targeted within the design of the building which minimizes the impact on the services from the municipality. The building will have a significant PV array allowing the building to be SANS10400 XA compliant and ensure the minimal use of power needed from the grid. Included in the design are LED lights, energy efficiency appliances and sensors and timers to ensure energy isn't used unnecessarily.
- On the water side of the design, the building will be fitted with low-flow fittings which optimises water usage. Rainwater harvesting allows the reuse of water in the building and minimise the demand on the municipality. All services will be smart metered allowing for accurate data to be collected and ensuring that any leaks or issues are identified early and minimise loss.

SECTION 2: SITE DESCRIPTION OF SURROUNDING LAND USE AS PER SECTION 3(H) (IV) AND (K)

2014 NEMA EIA Regulations (as amended), Appendix 1- 3(H) a full description of the process followed to reach the proposed preferred alternative within the site, including (iv) and 3 (K) a summary of findings and impact management measures identified in any specialist report complying with Appendix 6 to these regulations and an indication as to how these findings and recommendations have been included in this report.

2.1. Climate

Temperature

The proposed Whetstone Business Park Phase 3 development is situated within the coastal zone on the North Coast of KwaZulu-Natal within a warm temperate and humid climate. Climatic conditions in the area are strongly influenced by the proximity of the Indian Ocean, resulting in relatively moderate seasonal temperature variation and elevated humidity levels throughout much of the year.

Based on the Hydrological Assessment (GCS Water and Environmental Consultants, 2024), average annual temperatures within the project area range between approximately 24°C and 39°C during summer months and between 4°C and 19°C during winter months (**Figure 8**).

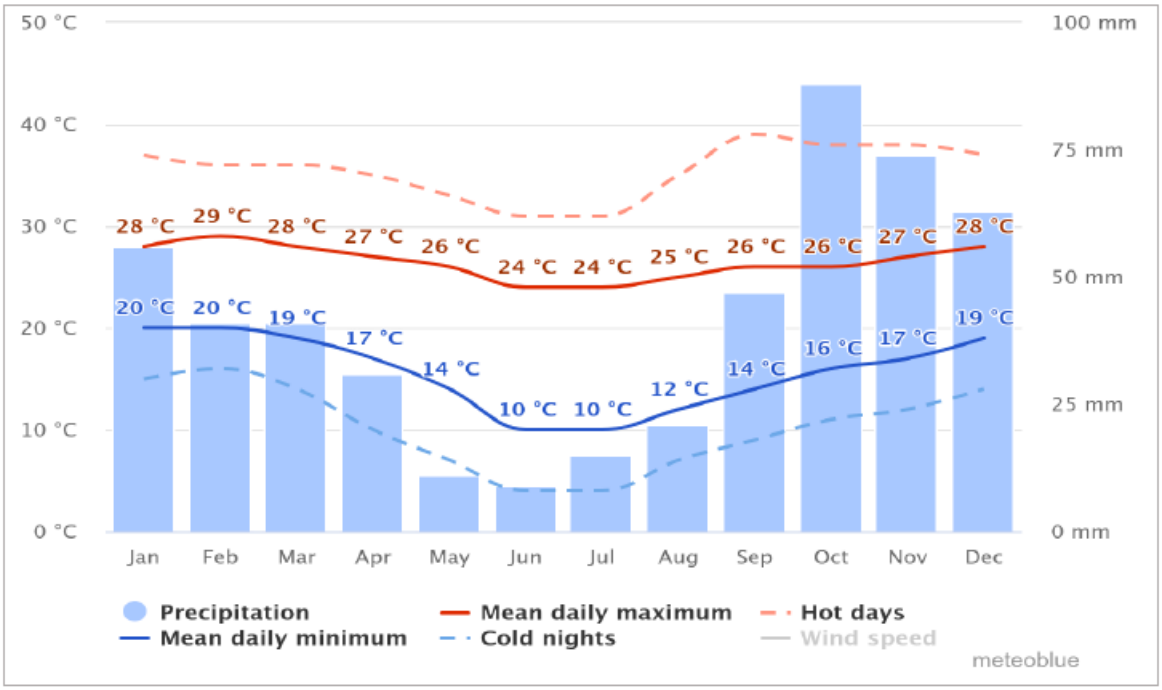

Figure 8: Average yearly temperatures for the project area (Metablue, 2024)

Rainfall

According to the Hydrological Assessment (GCS Water and Environmental Consultants, 2024), the project area falls within Rainfall Zone U3A. Rainfall data obtained from the Inyaninga Rainfall Station (0241131_MP), located less than 1 km from the site, indicates a Mean Annual Precipitation (MAP) of approximately 931.7 mm per annum. The majority of annual rainfall occurs during the summer months in the form of convective thunderstorms and high-intensity rainfall events.

The project area falls within Evaporation Zone U3A, with a Mean Annual Evaporation (MAE) of approximately 1 200 mm per annum. The MAE exceeds the MAP, indicating that evaporative losses generally exceed annual rainfall inputs.

Rainfall events within the region are often short in duration but of high intensity and may result in localised flooding, erosion and increased stormwater runoff. This is particularly relevant to the proposed development due to the presence of wetlands, drainage features and low-lying areas within and adjacent to the site.

Relative Humidity
Relative humidity levels are generally moderate to high throughout the year, particularly during summer, reflecting the site's proximity to the Indian Ocean. Prevailing onshore winds contribute to temperature moderation and atmospheric dispersion.

Please refer to **Appendix D3 - Hydrological Assessment (GCS Water and Environmental Consultants, 2024).**

2.2. Geology and Soils

The proposed Whetstone Business Park Phase 3 development is situated within an area underlain by sedimentary rocks of the Vryheid Formation of the Ecca Group, Karoo Supergroup. The Vryheid Formation comprises interbedded sandstone, siltstone and shale units and is extensively intruded by Karoo-aged dolerite within the broader project area (**Figure 9**).

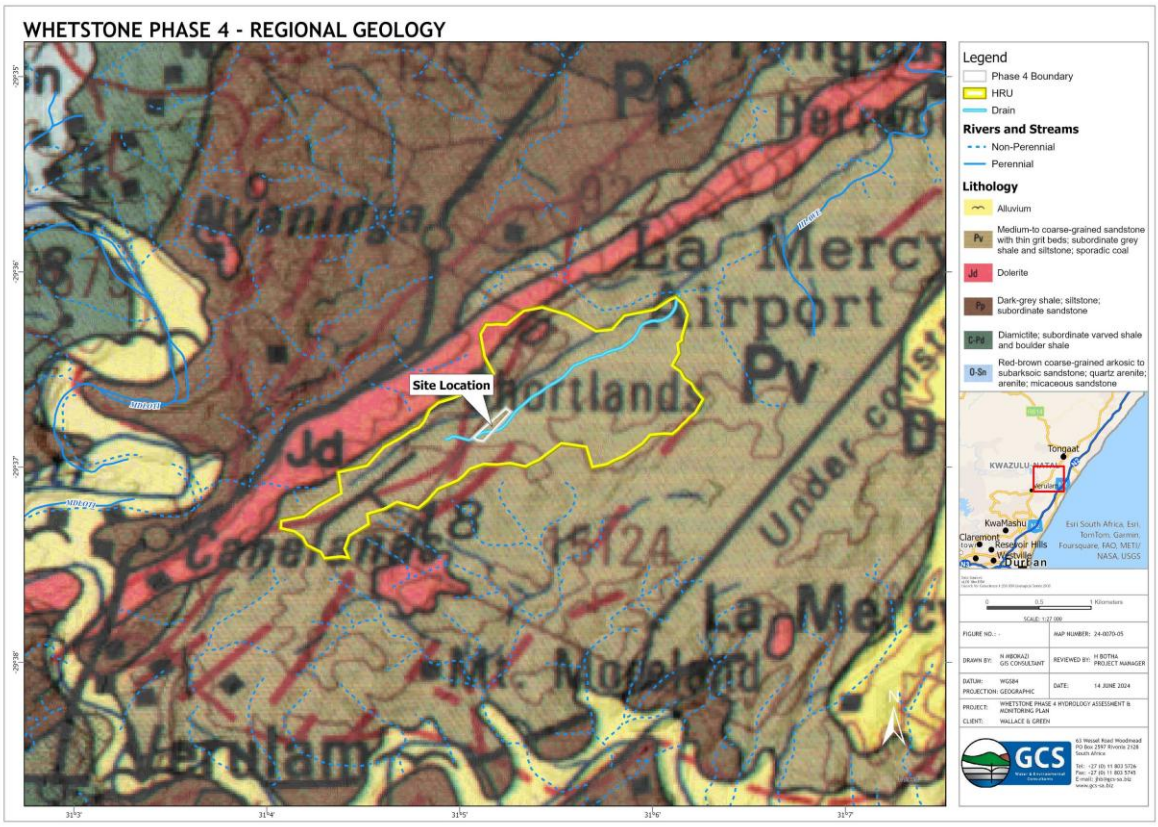

Figure 9: Regional Geology Map (GCS Water and Environmental Consultants, 2024)

According to the Geotechnical Investigation (Drennan Maud, 2025), the site is underlain by a combination of fill materials, alluvial deposits and weathered bedrock derived primarily from shale and dolerite. Geological conditions across the site have been influenced by both natural processes and historical earthworks associated with previous land use activities.

The Hydrological Assessment (GCS Water and Environmental Consultants, 2024), indicates that soils within the broader catchment possess a low erosion potential. Hydrological soil groups within the catchment are

classified as Group B/C, indicating moderately low to moderately high runoff potential when soils become saturated. Consequently, appropriate stormwater management and erosion control measures will be required during both construction and operation of the development.

2.3. Topography and Biophysical Environment

The proposed Whetstone Business Park Phase 3 development is situated within the Indian Coastal Belt Biome and is associated with the KwaZulu-Natal Coastal Belt Grassland vegetation type. The site occurs within a transformed landscape that has historically been modified through agricultural activities, buildings, access roads, landscaping, and the placement of engineered fill. Consequently, much of the original ecological character of the site has been altered.

According to the Geotechnical Investigation (Drennan Maud, 2025), the site occupies a locally depressed topographical setting through which the Hlawu River system and associated wetland features occur. Owing to this low-lying position, portions of the site are susceptible to periodic inundation associated with stormwater accumulation and overbank flooding events. The site is also indicated by available municipal mapping to occur within areas influenced by the 100-year floodline.

Approximately 50% of the site has previously been raised through the placement of engineered fill, with fill thicknesses generally ranging between 1 m and 3 m. Lower lying portions of the site, particularly within the northern and eastern areas, remain close to natural ground level and are characterised by seasonally wet and boggy conditions (Drennan Maud, 2025).

The Terrestrial Biodiversity Compliance Statement (The Biodiversity Company, 2026), confirmed that the majority of the project area is currently represented by modified and degraded habitat resulting from historical land use practices and ongoing anthropogenic disturbance. Existing ecological functioning is therefore substantially reduced relative to natural reference conditions

2.4. Terrestrial Biodiversity Compliance Statement

A Terrestrial Biodiversity Compliance Statement was undertaken by The Biodiversity Company (2026) to assess the ecological characteristics and terrestrial biodiversity sensitivity of the proposed development area. The assessment confirmed that the project area exists predominantly in a modified and degraded ecological condition as a result of historical land use activities, including severe grazing pressure, landscaping, road construction, buildings, alien invasive vegetation and associated edge effects.

Three broad habitat types (See **Figure 10**) were identified within the project area, namely:

- Degraded Grasslands;
- Modified and Disturbed Areas; and
- Freshwater Features and Associated Riparian Habitat.

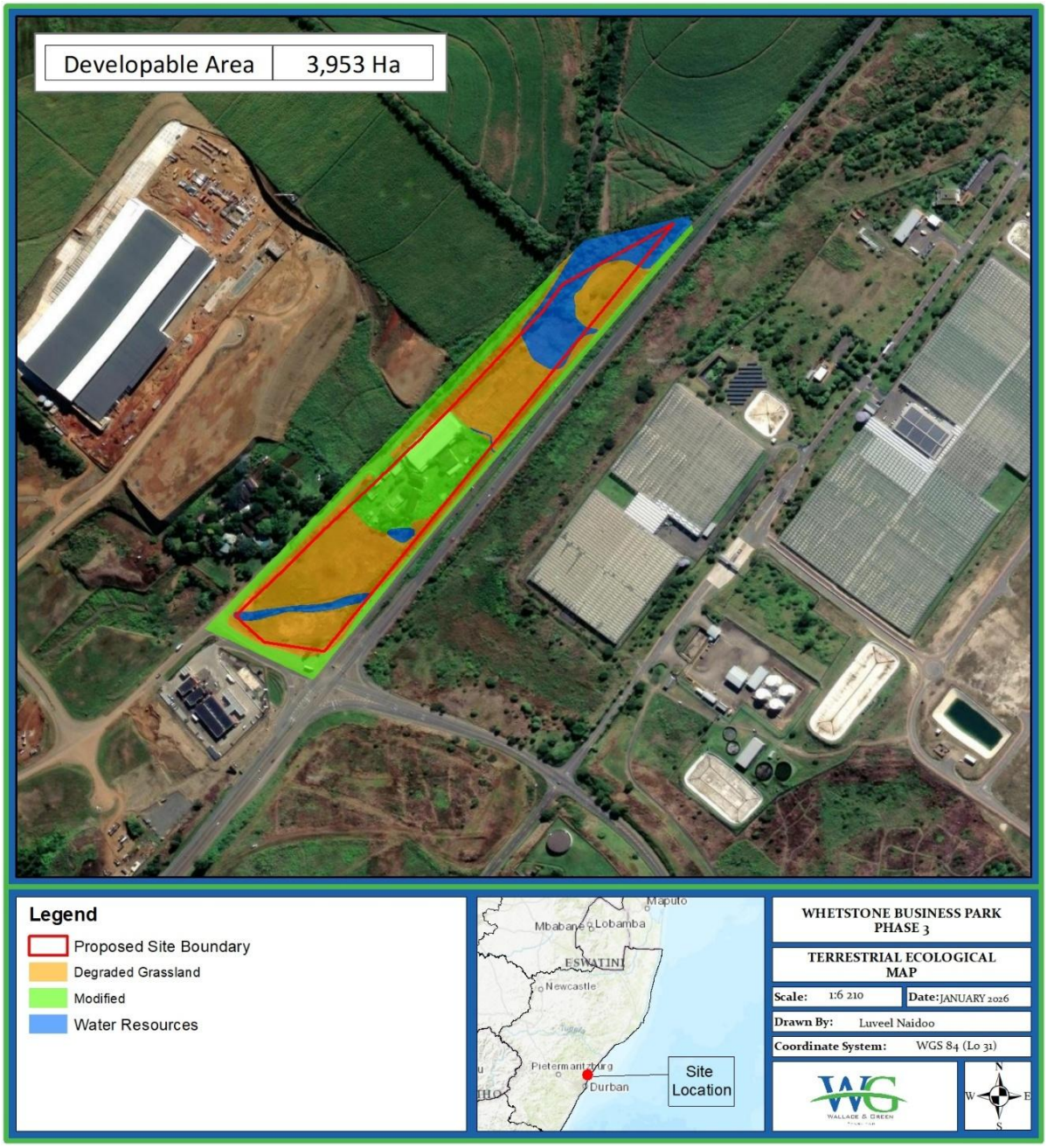

Figure 10: Habitat types within the project area based on the Terrestrial Biodiversity Compliance Statement undertaken by The Biodiversity Company (2026)

The degraded grassland habitat provides limited ecological functioning and offers restricted grazing, movement and foraging opportunities for indigenous fauna. The modified and disturbed habitat type is characterised by extensive transformation, compacted surfaces, historical earthworks, buildings and disturbed vegetation, resulting in substantially reduced ecological integrity. Freshwater habitats associated with wetlands and drainage features provide localised ecological connectivity, and contribute to sediment retention, and fauna movement through the landscape.

The assessment found that indigenous vegetation within the project area is limited, fragmented and generally degraded. Most of the proposed development footprint is situated within areas that have already been transformed, thereby limiting the extent of direct impacts on remaining indigenous vegetation.

The project area is heavily invaded by alien invasive plant species, which have become established throughout disturbed portions of the site. Ongoing alien invasive plant management and rehabilitation are therefore recommended as essential components of environmental management for the project.

Based on the specialist assessment, the project area was assigned:

- A Terrestrial Biodiversity Theme sensitivity rating of “Very Low”;
- A Plant Species Theme sensitivity rating of “Very Low”; and
- An animal species sensitivity of “Low”.

No fatal terrestrial biodiversity constraints were identified within the preferred development footprint. The specialist concluded that the proposed development may proceed from a terrestrial biodiversity perspective, provided that appropriate mitigation measures are implemented during construction and operation.

Recommended mitigation measures include:

- Restricting vegetation clearance to approved construction footprints;
- Preventing unnecessary disturbance outside designated work areas;
- Implementing an Alien Invasive Plant Management Programme;
- Implementing a Hydrocarbon Spill Management Plan;
- Rehabilitating all temporarily disturbed areas following construction;
- Re-establishing indigenous vegetation where practical;
- Implementing erosion prevention measures; and
- Ensuring ongoing environmental monitoring during construction activities.

Please refer to **Appendix D4 - Terrestrial Biodiversity Compliance Statement (The Biodiversity Company, 2026).**

2.5 Geotechnical Considerations

A Geotechnical Investigation was undertaken by Drennan Maud (Pty) Ltd in October 2025 to assess the engineering geological conditions and geotechnical suitability of the site for the proposed development.

The investigation confirmed that the site occupies a locally depressed area associated with the Hlawu River system and is susceptible to periodic inundation resulting from stormwater accumulation and overbank flood events. Effective stormwater control and management is therefore considered critical to the successful development of the site. Stormwater generated by the proposed development should be appropriately collected, attenuated and discharged in a controlled manner to prevent erosion, flooding and downstream impacts.

The investigation found that approximately 50% of the developable footprint has previously been raised through the placement of engineered fill. Fill thicknesses encountered during the investigation ranged between approximately 1.1m and 2.9m. While the existing fill appears generally well compacted, it remains susceptible to erosion, particularly along embankments and exposed slopes where evidence of localised rutting and gully formation was observed. (See **Figure 11** below for site investigation locations).

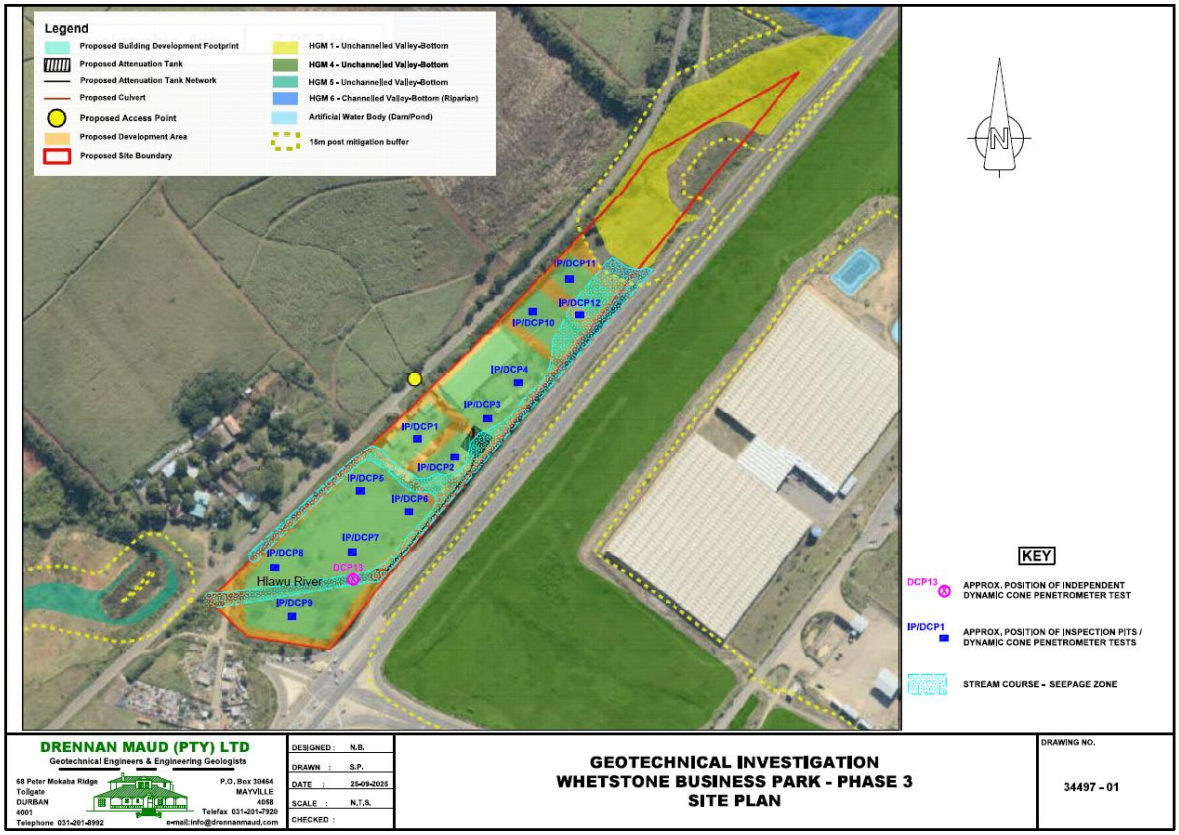

Figure 11: Geotechnical Investigation Layout Plan (Drawing 34497-01) showing investigation locations and site conditions (Drennan Maud, 2025)

Natural alluvial clay deposits encountered near surface level are generally soft to very soft and highly compressible. Underlying clay-rich residual soils are typically firm to stiff but remain moderately compressible. The presence of fissures, slickensides and shrink-swell characteristics indicates that seasonal moisture fluctuations may result in volumetric changes within the clay profile.

Groundwater seepage was encountered within portions of the investigation area at depths ranging from approximately 1.3m to 3.6m below existing ground level. Groundwater levels are expected to fluctuate seasonally and may rise following prolonged rainfall events. The potential influence of groundwater should therefore be considered during detailed design and construction planning.

Excavation conditions across most of the site are anticipated to comprise soft excavation through fill materials, clayey soils and weathered shale horizons. Localised hard excavation may be required where less-weathered shale or dolerite is encountered. Large dolerite boulders may also be present within historical fill materials and may require removal where encountered during foundation excavations.

The investigation further concluded that:

- Dolerite-derived fill materials are generally suitable for reuse as engineered fill;
- Shale-derived fill materials are generally unsuitable for engineered reuse;
- Natural clay-rich soils are unsuitable for engineered fill applications;
- Imported granular fill material will likely be required during construction;
- Stormwater management and erosion control measures will be essential throughout the development lifecycle.

Overall, the site is considered suitable for the proposed development from a geotechnical perspective, provided that the recommendations contained within the Geotechnical Investigation are incorporated into the feasibility and preliminary design phases.

Please refer to **Appendix D1 - Geotechnical Investigation (Drennan Maud, 2025).**

2.6 Wetland Environment

A Wetland Functional and Impact Assessment was undertaken by The Biodiversity Company in May 2026, to assess the aquatic biodiversity characteristics, ecological functioning and sensitivity of freshwater resources associated with the proposed Whetstone Business Park Phase 3 development.

The project area is situated within the North Eastern Coastal Belt Ecoregion of the Pongola-Mtamvuna Water Management Area and falls within the U30D quaternary catchment. The freshwater assessment included the delineation, classification and ecological assessment of wetlands and associated drainage features occurring within the Project Area of Influence.

Desktop assessment and field verification identified several freshwater features associated with the site, including wetlands, riparian systems and artificial drainage features. In addition, several "A-Section" drainage channels were identified. These features convey stormwater runoff immediately after rainfall events and are not associated with sustained baseflow conditions.

Seven Hydrogeomorphic (HGM) wetland units were identified within the Project Area of Influence (**Figure 12**). These comprise:

- Three Unchanneled Valley-Bottom Wetlands (HGMs 1, 4 and 5);
- One Depression Wetland (HGM 2); and
- Three Channelled Valley-Bottom Wetlands (HGMs 3, 6 and 7).

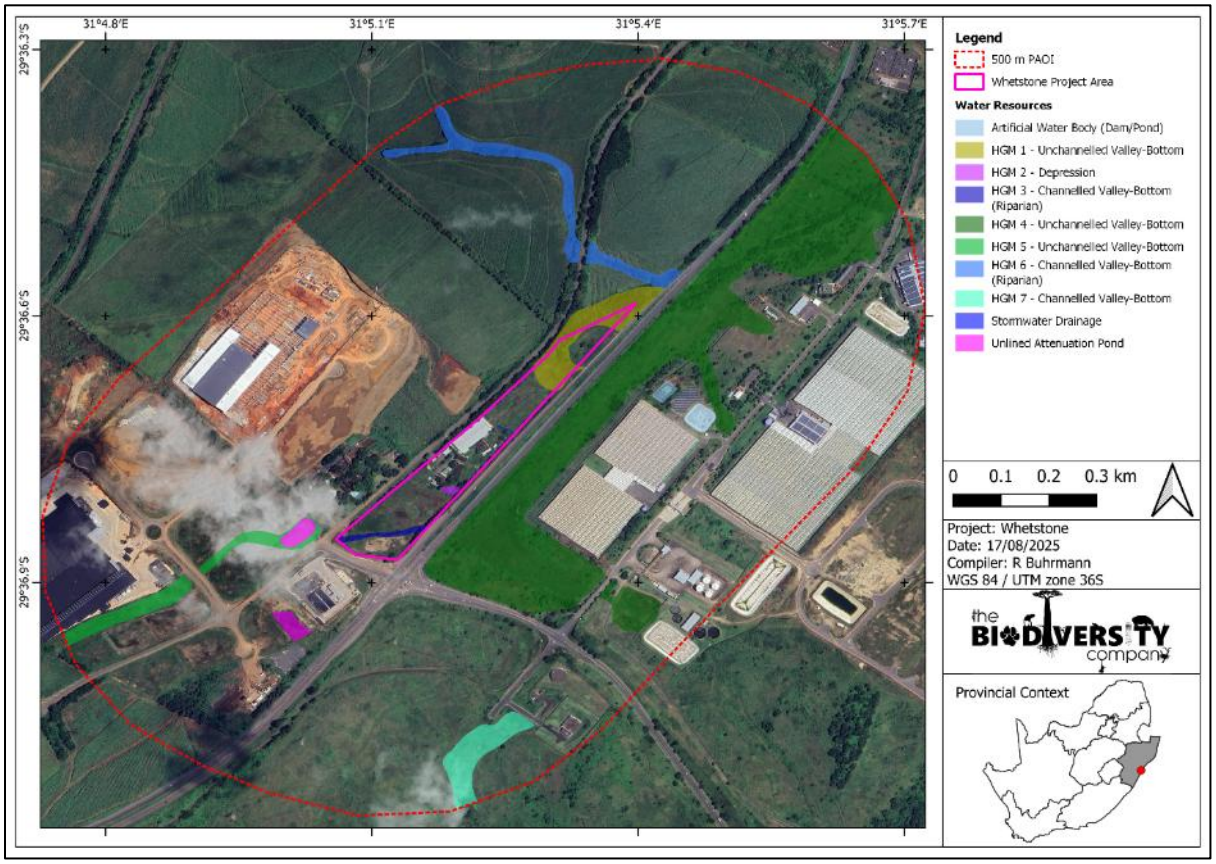

Figure 12: Wetland Delineation Map (The Biodiversity Company, 2026)

The wetlands identified within the study area have been subjected to varying degrees of historical disturbance associated with agricultural activities and infrastructure development and associated anthropogenic pressures. As a result, the wetlands exhibit Present Ecological State (PES) classifications ranging from C (Moderately Modified) to E (Seriously Modified). Despite this modification, the wetlands continue to provide important ecological functions and ecosystem services including habitat provision and biodiversity support.

The Ecological Importance and Sensitivity (EIS) assessment determined that:

- HGM 1 possesses High ecological importance and sensitivity;
- HGM 2 possesses Moderate ecological importance and sensitivity;
- HGM 3 possesses High ecological importance and sensitivity;
- HGM 4 possesses High ecological importance and sensitivity; and
- HGM 6 possesses High ecological importance and sensitivity.

HGM 5 and HGM 7 occur outside the proposed development area, upslope of the development, due to their position within the landscape and separation from the development footprint, were not considered to be at risk. Consequently, no detailed impact assessment was required for these systems.

The specialist assessment identified HGM 1, HGM 4 and HGM 6 as important freshwater systems that contribute significantly to flood attenuation, downstream hydrological functioning and ecological connectivity. These systems continue to provide valuable ecosystem services despite their modified ecological condition. HGM 3 has experienced greater levels of historical disturbance and consequently provides reduced ecosystem functionality relative to the other valley-bottom systems. The depression wetland (HGM 2), although likely artificial in origin, continues to provide localised water storage, habitat and water quality benefits.

A site-specific buffer assessment determined that a pre-mitigation buffer width of approximately 32m would be appropriate. However, with the implementation of the proposed mitigation measures, the specialist concluded that a reduced post-mitigation buffer width of 15m may be considered acceptable. The preferred layout has been designed to incorporate these buffer requirements and minimise direct impacts on retained freshwater features.

Please refer to **Appendix D5 - Wetland Functional and Impact Assessment (The Biodiversity Company, 2026).**

2.7 Wetland Rehabilitation

A Wetland Rehabilitation Plan was prepared by The Biodiversity Company (2026) to support the implementation of the proposed offset strategy. The rehabilitation area comprises approximately 10 523m² and includes portions of HGM 1 (6 371m²), the associated wetland island (3 195m²), and adjacent wetland buffer areas (958m²) (refer to **Figure 13)**.

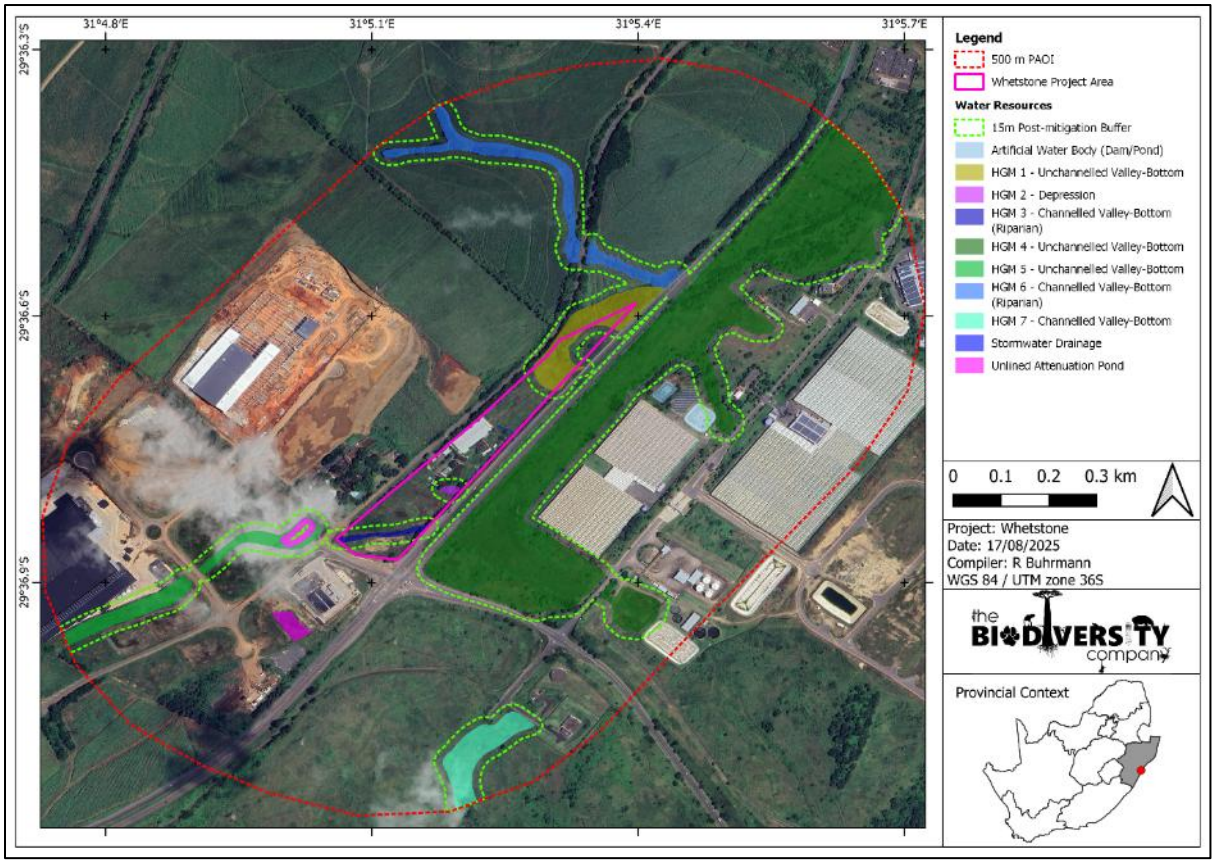

Figure 13: Wetland Buffer Map (The Biodiversity Company, 2026).

The rehabilitation programme focuses on improving the ecological condition and functioning of historically disturbed wetland habitat through measures including alien invasive vegetation control, revegetation with indigenous wetland species, erosion control and stabilisation, restoration of natural drainage processes, and long-term monitoring. The rehabilitation area was selected based on its ecological importance and potential for ecological recovery.

Please refer to **Appendix D7 - Wetland Rehabilitation Plan (The Biodiversity Company, 2026).**

2.8 Wetland Offset Strategy

To address residual impacts associated with HGM 2 and HGM 3, a Wetland Offset Strategy was prepared by The Biodiversity Company (2026). The assessment considered the extent of wetland loss, ecological condition, ecosystem service provision, conservation importance and opportunities for ecological improvement within the broader wetland system.

The assessment concluded that onsite rehabilitation represents the most appropriate offset mechanism for the project and proposed a rehabilitation-to-impact ratio of approximately 5:1. Rather than establishing an offset site elsewhere within the catchment, the strategy focuses on improving the ecological condition and functioning of retained wetlands associated with HGM 1 and adjacent wetland habitat (refer to **Figure 14).** The proposed offset measures are intended to compensate for residual impacts associated with HGM 2 and HGM 3 while generating a net ecological improvement within the broader wetland system.

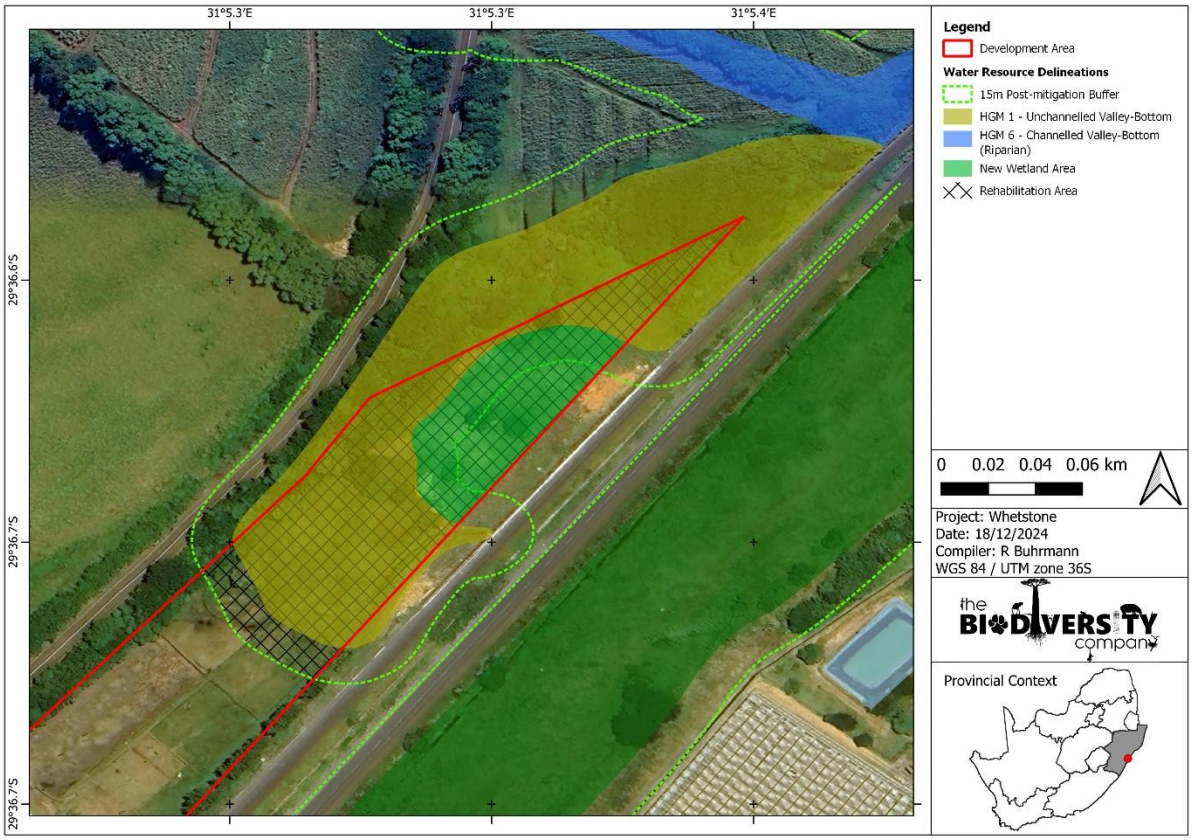

Figure 14: Proposed wetland rehabilitation and offset areas associated with HGM 1, including the wetland island and surrounding rehabilitation buffer (Total Rehabilitation Area = 10 523 m²) (The Biodiversity Company, 2026).

Please refer to **Appendix D6 - Wetland Offset Strategy (The Biodiversity Company, 2026).**

2.9 Hydrology

A Hydrological Assessment was undertaken by GCS Water and Environmental Consultants (2024) to assess the hydrological characteristics, flooding behaviour, water quality and stormwater management requirements associated with the broader Whetstone Business Park area. The project falls within the U30D quaternary catchment of the Pongola-Mtamvuna Water Management Area.

The hydrological environment is characterised by a combination of agricultural land, transformed grassland, freshwater systems and associated drainage features. Regional runoff ultimately contributes to the Tongati River system before discharging into the Indian Ocean.

The site occurs within a low-lying landscape position that is susceptible to stormwater accumulation and periodic inundation. Flood risk is therefore a key design consideration. The wetland assessment, geotechnical investigation and hydrological assessment collectively indicate that stormwater attenuation and controlled discharge infrastructure are necessary to minimise erosion, flooding and downstream impacts.

The Wetland Functional and Impact Assessment incorporated the findings of the project-specific Stormwater Management Plan (Edstan Construction, 2026) which divides the site into northern and southern catchments. The specialist recommended that stormwater generated within the northern catchment be attenuated and discharged towards HGM 1, while stormwater generated within the southern catchment be attenuated and directed towards the channel associated with HGM 4. Ongoing monitoring of discharge points is required to ensure that erosion and sedimentation do not occur.

Water quality sampling undertaken as part of the hydrological assessment identified several parameters that exceeded applicable target water quality ranges. Elevated levels of electrical conductivity, total dissolved solids, sodium, calcium, magnesium, chloride and turbidity were recorded. These findings are considered indicative of existing catchment-level influences associated with surrounding land uses and historical disturbance within the broader area.

Soils within the catchment have moderate erodibility and moderately low to moderately high runoff potential when saturated. Effective stormwater management, erosion control and maintenance of attenuation infrastructure are therefore essential components of the proposed development.

The Hydrological Assessment identified moderate flood risk within portions of the site and recommends that the 1:100-year floodline be treated as a flooding exclusion zone and avoidance area (**Figure 15**). The assessment further recommends the implementation of appropriate flood protection, stormwater attenuation and erosion prevention measures where development occurs adjacent to flood-prone areas. Additional recommendations include undertaking construction activities during the dry season where practicable, establishing stabilised site access points, implementing erosion and sediment control measures, appropriately managing stockpiles and waste materials, and rehabilitating disturbed areas through revegetation following construction. Subject to implementation of the recommended mitigation measures and EMPr requirements, the assessment concluded that authorisation of the proposed development may be considered.

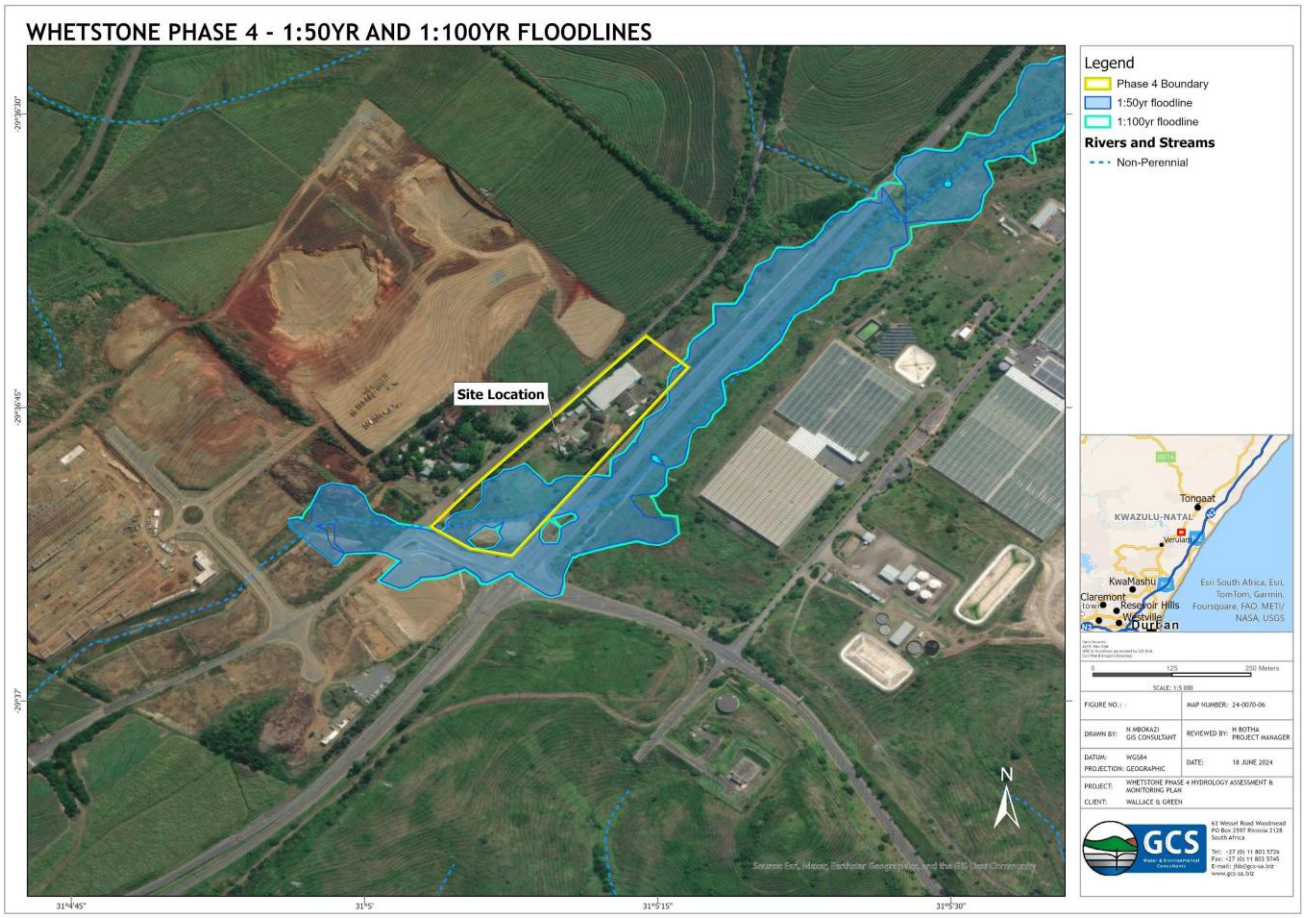

Figure 15: Simulated 1:50 and 1:100-year flood inundation zones (GCS Water and Environmental Consultants, 2024).

Please refer to **Appendix D3 - Hydrological Assessment (GCS Water and Environmental Consultants, 2024).**

2.10 Climate Change

Climate change considerations for the proposed development have been assessed in accordance with the National Climate Change Response White Paper (2011) and the Draft Guideline for the Consideration of Climate Change Implications in Environmental Authorisation Applications (2021). Increased rainfall variability, more frequent extreme storm events, prolonged dry periods, and rising temperatures have the potential to influence both the development and the functioning of affected aquatic ecosystems.

The wetland assessment identified impacts to wetland habitat, specifically HGM 2 (0.05ha) and HGM 3 (0.26ha). Of this extent, approximately 0.31ha of wetland habitat will be permanently transformed. Overall, the following residual impacts are associated with the proposed development:

- Loss of 0.14 functional hectare equivalents;
- Loss of 0.15 carbon hectare equivalents; and
- Loss of 0.19 habitat hectare equivalents.

To minimise impacts on wetland functioning and enhance climate resilience, the development incorporates a range of mitigation and rehabilitation measures. These include restricting disturbance to the approved development footprint, implementing erosion and sediment control measures, maintaining hydrological connectivity across affected wetland systems. Additionally, offset targets were calculates as the following:

- Gain and secure 0.14 functional hectare equivalents;
- Gain and secure 0.15 carbon hectare equivalents; and
- Secure and Protect 0.03 habitat hectare equivalents of an intact and representative depression wetland and 0.16 habitat hectare equivalents of an intact and representative channelled valley bottom and/or un-channelled valley bottom wetland.

The proposed rehabilitation measures are expected to improve the ecological condition and resilience of affected wetland areas, thereby reducing the significance of impacts on the identified hydrological regimes and supporting the continued provision of wetland ecosystem services under changing climatic conditions.

2.11. Cultural / Historical Features

A Heritage Impact Assessment (HIA) was undertaken by Umlando: Archaeological Surveys and Heritage Management in February 2026 to determine whether any heritage sites occur within the proposed development footprint. The assessment included both a desktop study and field survey of the project area. The site was found to comprise a historically modified property previously utilised as a horse-riding facility incorporating stables, paddocks, and social facilities.

The specialist noted that extensive historical site modification, has significantly altered natural ground conditions across much of the property. These activities have reduced the likelihood of intact archaeological deposits remaining within the development footprint. Noting however that isolated stone tools are expected to occur, though in a secondary context.

The field survey identified no heritage sites or artefacts within the proposed development area. Existing structures on the property are not older than 60 years and therefore are not protected.
The assessment concluded that:

- No heritage resources occur within the proposed development footprint;
- No archaeological mitigation is required;
- No palaeontological mitigation is required; and
- The proposed development may proceed from a heritage perspective.

Although the probability of encountering heritage resources or fossil material during construction is considered very low, the specialist recommended that a Chance Find Protocol be incorporated into the Environmental Management Programme (EMPr).

The Heritage Impact Assessment concluded that the proposed development is acceptable from a heritage perspective and may be favourably considered for authorisation.

Are there any signs of culturally or historically significant elements, as defined in section 2 of the National Heritage Resources Act, 1999, (Act No. 25 of 1999), including archaeological or paleontological sites, on or within 20m of the site?	[redacted]	**NO**
If YES, contact a specialist recommended by AMAFA to conduct a heritage impact assessment. The heritage impact assessment must be attached as an appendix to this report. **N/A**		
Briefly explain the recommendations of the specialist:	**N/A**	
Will any building or structure older than 60 years be affected in any way?	[redacted]	**NO**
Is it necessary to apply for a permit in terms of the National Heritage Resources Act, 1999 (Act 25 of 1999)?	[redacted]	**NO**
If YES, please submit the necessary application to AMAFA and attach proof thereof to this report. **N/A**		

Please refer to **Appendix D2 - Heritage Assessment (Umlando: Archaeological Surveys and Heritage Management, 2026).**

2.12. Socio-economic Environment

Anticipated CAPEX value of the project on completion	**R43 138 000,00**
Expected annual turnover to be generated by or as a result of the project	**R0,00**
New skilled employment opportunities created in the **construction** phase of the project	**10**
New skilled employment opportunities created in the **operational** phase of the project	**3**
New un-skilled employment opportunities created in the **construction** phase of the project	**15**
New un-skilled employment opportunities created in the **operational** phase of the project	**1**
Expected value of the employment opportunities during the operational and construction phase	**R1 080 000,00**

2.13. Surrounding Environment and Land Uses

Cross the land uses and/or prominent features that currently occur within a 500m radius of the site and give a description of how this influences the application or may be impacted upon by the application:

Land use character	YES or NO		Description
Natural area	[redacted]	NO	The project area is located within 100m of a CBA however the proposed development will not impact the CBA due to intervening roads
Low-density residential	YES	[redacted]	

Land use character	YES or NO		Description
Medium-density residential	YES	[redacted]	Medium density residential units are located more than 2Km from the proposed development.
High density residential	YES	[redacted]	High density residential units are located more than 2Km from the proposed development.
Informal residential	YES	[redacted]	Informal residential units are located more than 2Km from the proposed development.
Retail commercial & warehousing	[redacted]	NO	The proposed development is located within an industrial area with various food takeaways and warehouses, e.g., Frimax, KFC, and Steers.
High Impact Industrial	YES	[redacted]	
Power station	YES	[redacted]	
Office/consulting room	[redacted]	NO	The proposed development is located within an industrial area with various businesses and offices, e.g., House of Hemp and Dube TradePort AgriHouse.
Military or police base/station/compound	YES	[redacted]	
Spoil heap or slimes dam	YES	[redacted]	
Quarry, sand or borrow pit	[redacted]	NO	Flanders quarry is located approximately 2Km away from the proposed development.
Dam or reservoir	[redacted]	NO	The nearest dam (i.e., Hazelmere Dam) is approximately 4Km away from the proposed development.
Hospital/Medical Centre	YES	[redacted]	
School/ crèche	YES	[redacted]	
Tertiary education facility	YES	[redacted]	
Church	YES	[redacted]	
Old age home	YES	[redacted]	
Sewage treatment plant	YES	[redacted]	
Train station or shunting yard	YES	[redacted]	
Railway line	[redacted]	NO	The nearest railway line is approximately 600m from the proposed development.
Major road (4 lanes or more)	[redacted]	NO	The proposed development is adjacent to the R102.
Airport	[redacted]	NO	King Shaka International Airport is approximately 3Km away from the proposed development.
Harbour	YES	[redacted]	
Sport facilities	YES	[redacted]	

Land use character	YES or NO		Description
Golf course	YES	■	
Polo fields	YES	■	
Filling station	■	NO	A Shell garage is located approximately 350m from the proposed development.
Landfill or waste treatment site	YES	■	
Plantation	YES	■	
Agriculture	YES	■	The proposed site has been disturbed by past horse farming.
River, stream, or wetland	■	NO	Hlawu River traverses the southern portion of the site.
Nature conservation area	■	NO	The project area is located within 100m of a CBA however the proposed development will not impact the CBA due to intervening roads.
Mountain, hill, or ridge	YES	■	
Museum	YES	■	
Historical building	YES	■	
Protected Area	YES	■	
Graveyard	YES	■	
Archaeological site	YES	■	
Other land uses (describe)	YES	■	

2.14. Nuisance Considerations

Solid waste management

Will the activity produce solid construction waste during the construction/initiation phase?	**YES**	■
If yes, what estimated quantity will be produced per month?	**Approximately 5m^3**	
How will the construction solid waste be disposed of? (describe)		

- **Waste hierarchy would be applied when managing construction waste. The first objective will be to reuse and recycle as much waste as possible and whatever cannot be reused or recycled will be disposed of at one of the registered licensed landfills.**

- **Waste skips/bins will be provided throughout the working servitude with separate skips/bins made available for construction debris and solid waste. The waste will be recycled or reused whenever possible, and the rest disposed to the registered waste. Small amounts of hazardous waste such as discarded oil or grease may be generated on-site. Hazardous waste will be disposed of at an appropriately licensed and registered hazardous waste disposal facility. Waste management will be dealt with more extensively within the EMPr for the relevant phases of the project. Refer to Appendix G – Environmental Management Programme.**

Where will the construction solid waste be disposed of? (Provide details of landfill site) ❖ **Solid Waste will be disposed of at a registered licensed landfill site. In the unlikely event that hazardous waste is produced it will be collected by a competent waste service provider and disposed of at the nearest licensed general waste disposal facility.**		
Will the activity produce solid waste during its operational phase?	YES	[redacted]
If yes, what estimated quantity would be produced per month?	**Approximately 15 kg**	
How will the solid waste be disposed of in the operational phase? (Provide details of landfill site) ❖ **Waste hierarchy would be applied when managing waste throughout the operational phase. The first objective will be to reuse and recycle as much waste as possible and whatever cannot be reused or recycled will be disposed of at one of the registered licensed landfills.** ❖ **Waste bins will be provided throughout the development. The waste will be recycled or reused whenever possible, and the rest disposed to the registered waste. Waste management will be dealt with more extensively within the EMPr for the operational phase of the project. Refer to Appendix G – Environmental Management Programme.**		
If the solid waste (construction or operational phases) will not be disposed of in a registered landfill site or be taken up in a municipal waste stream, then the applicant should consult with the competent authority to determine the further requirements of the application.		
Can any part of the solid waste be classified as hazardous in terms of the relevant legislation?	[redacted]	**NO**
If yes, contact the competent authority to obtain clarity regarding the process requirements for your application.		
Is the activity that is being applied for a solid waste handling or treatment facility?	[redacted]	**NO**
If yes, contact the competent authority to obtain clarity regarding the process requirements for your application.		

Liquid effluent

Will the activity produce effluent, other than normal sewage, that will be disposed of in a municipal sewage system?		[redacted]	**NO**
If yes, what estimated quantity will be produced per month?		**N/A**	
Will the activity produce any effluent that will be treated and/or disposed of on-site?		[redacted]	**NO**
If yes, contact the competent authority to obtain clarity regarding the process requirements for your application.			
Will the activity produce effluent that will be treated and/or disposed of at another facility?		[redacted]	**NO**
If yes, provide the particulars of the facility: -		**N/A**	
Facility name:	**N/A**		
Contact person:	**N/A**		
Postal address:	**N/A**		
Postal code:	**N/A**		
Telephone:	**N/A**	Cell:	**N/A**
E-mail:	**N/A**	Fax:	**N/A**

Describe the measures that will be taken to ensure the optimal reuse or recycling of wastewater, if any:
N/A

Emissions into the atmosphere

Will the activity release emissions into the atmosphere?	**YES**	
If yes, is it controlled by any legislation of any sphere of government?		**NO**
If yes, contact the competent authority to obtain clarity regarding the process requirements for your application.		
If no, describe the emissions in terms of type and concentration:		
❖ **Limited dust liberation and emissions during the construction phase due to the off-loading of construction materials, movement of construction vehicles and clearing activities. Emissions generated will be in the form of dust, carbon dioxide (CO_2) and other vehicle emissions generated by diesel-powered machinery and trucks during the construction process (i.e., tip trucks, TLBs). These emissions will be composed primarily of CO_2 and will be of a low concentration. Proper maintenance of vehicles will mitigate high concentrated vehicle emissions. Dust generation can be mitigated by either water spraying and/or dust suppressants or by minimising the area that is cleared and re-vegetating exposed areas as quickly as possible. The speed of construction vehicles and other vehicles should be strictly controlled to avoid excessive dust generation and adhere to the speed limits as per the site-specific EMPr. Refer to Appendix G – Environmental Management Programme**		

Generation of noise

Will the activity generate noise?	YES	
If yes, is it controlled by any legislation of any sphere of government?		**NO**
If yes, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.		
If no, describe the noise in terms of type and level:		

Construction Phase:

- ❖ **Noise associated with normal construction activities, i.e., vehicles, generators and plant equipment will be used on the site.**
- ❖ **Noise levels are to be kept within the legislated limits for the area, following the requirements of the relevant national and local noise control statutes.**
- ❖ **Other noise disruptions could potentially be experienced during the construction phase through activities such as drilling. This will be a temporary disturbance.**
- ❖ **Measures to minimise noise generation during construction are contained in the EMPr.**

Operational Phase:

- ❖ **The business park will generate minimal noise.**
- ❖ **Noise levels are to be kept within the legislated limits for the area, following the requirements of the relevant national and local noise control statutes.**

SECTION 3: POLICY AND LEGISLATIVE FRAMEWORK

2014 NEMA EIA Regulations (as amended), appendix 1- 3(e) a description of the policy and legislative context within which the development is proposed including – (i) an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks, and instruments that are applicable to this activity and have been considered in the preparation of the report (ii)

3.1. Identification of All Legislation, Policies, Plans, Guidelines, Spatial Tools, Municipal Development Planning Frameworks and Instruments as per Section 3(e)(i) and Compliance of Proposed Activity with Legislation and Policy 3(e)(ii)

Legislation	Section	Relates to
The Constitution (No 108 of 1996)	Chapter 2	Bill of Rights.
	Section 24	Environmental rights.
National Environmental Management Act (No 107 of 1998 [as amended])	Section 2	Defines the strategic environmental management goals and objectives of the government. Applies throughout the Republic to the actions of all organs of state that may significantly affect the environment.
	Section 24	Provides for the prohibition, restriction and control of activities that are likely to have a detrimental effect on the environment.
	Section 28	The developer has a general duty to care for the environment and to institute such measures as may be needed to demonstrate such care.
	Section 30	Deals with the control of emergency incidents, including the different types of incidents, persons responsible for the incidents and reporting procedures to the relevant authority.
National Environmental Management: Waste Act (No 59 of 2008)		Provides specific waste management measures and the remediation of contaminated land.
		Regulations for waste management licensee activities
National Environmental Management: Biodiversity Act (No 10 of 2004) **Threatened or protected species (GN 388)** **Lists of species that are threatened or protected (GN 389)** **Alien and invasive species regulations (GNR 506)** **Publication of exempted alien species (GNR 509)** **Publication of National list of invasive species (GNR 507)** **Publication of prohibited alien species (GNR 508)**		Provides for the management and conservation of biodiversity, protection of species and ecosystems, and sustainable use of indigenous biological resources – provisions re alien and invasive species?
Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983)		The objects of this Act are to provide for the conservation of the natural agricultural resources of the Republic by the maintenance of the production potential of land, by combating and preventing of erosion and weakening or

Legislation	Section	Relates to
		destruction of the water sources, and by the protection of the vegetation and the combating of weeds and invader plants. Section 5 details measures for the prohibition of the spreading of weeds.
National Environmental Management: Air Quality Act (No 39 of 2004)	Section 32	Control of dust
	Section 34	Control of noise
	Section 35	Control of offensive odours
National Noise Control Regulations (1992) in terms of Section 25 of the Environmental Conservation Act (Act 73 of 1989)		General prohibitions and restrictions on noise pollution.
National Heritage Resources Act (No 25 of 1999) and regulations	Section 34	No person may alter or demolish any structure or part of a structure that is older than 60 years without a permit issued by the relevant provincial heritage resources authority.
	Section 35	No person may, without a permit issued by the responsible heritage resources authority destroy, damage, excavate, alter, deface, or otherwise disturb any archaeological or paleontological site.
	Section 36	No person may, without a permit issued by the South African Heritage Resource Agency (SAHRA) or a provincial heritage resources authority destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority. "Grave" is widely defined in the Act to include the contents, headstone, or other markers of such a place, and any other structure on or associated with such place.
	Section 38	This section provides for Heritage Impact Assessments (HIAs), which are not already covered under the ECA. Where they are covered under the ECA, the provincial heritage resources authorities must be notified of a proposed project and must be consulted during the HIA process. The Heritage Impact Assessment (HIA) will be approved by the authorising body of the provincial directorate of environmental affairs, which is required to take the provincial heritage resources authorities' comments into account prior to making a decision on the HIA.
KwaZulu-Natal Heritage Resources Act (No 4 of 2008)		Provides for the conservation, protection and administration of both the physical and the living or intangible heritage resources of the Province of KwaZulu-Natal.
Occupational Health and Safety Act (No 85 of 1993)	Section 8	General duties of employers to their employees
	Section 9	General duties of employers and self-employed persons to persons other than their employees
National Water Act (No 36 of 1998) and regulations	Section 19	Prevention and remedying the effects of pollution
	Section 20	Control of emergency incidents
	Section 21	Licenses for water use
National Water Resource Strategy (2013)		The objects of this strategy are to facilitate proper management of water resources and provide a framework for protection, use, development, conservation, management, and control of water resources for the country as a whole.

Legislation	Section	Relates to
Hazardous Substances Act (No 15 of 1973) and regulations		Provides for the definition, classification, use, operation, modification, disposal or dumping of hazardous substances
Hazardous Chemical Agents Regulations (2021)		Regulations for the classification, labelling, packaging, disclosure of ingredient identity and disposal of HCA's.
National Veld & Forest Fire Act		Provides for a variety of institutions, methods, and practices to prevent and combat veld, forest, and mountain fires.
National Road Traffic Act (No 93 of 1996)		Provides for controlling transport of dangerous goods, hazardous substances, and general road safety
Spatial Planning and Land Use Management Act (No. 16 of 2013).		Provides the framework for spatial planning and land use management in South Africa at the different spheres of government and for the establishment, functions, and operations of Municipal Planning Tribunals.
Occupational Health and Safety Act (No 85 of 1993) and regulations		Addresses occupational health and safety aspects
SANS 10103 (Noise Regulations)		The measurement and rating of environmental noise with respect to annoyance and to speech communication
National Climate Change Response Plan White Paper (2011)		The White Paper presents the South African Government's vision for an effective climate change response and the long-term, just transition to a climate-resilient and lower carbon economy and society.
Construction Regulations (2003)		Regulations for ensuring safe working conditions.

Table 12: Current Environmental Legislation

Regulations and Guidelines
Environmental Impact Assessment Regulations, 2014 (as amended).
Internal Guideline: Generic Water Use Authorisation Application Process, August 2007 by DWA.
The General Policy on Environmental Conservation (January 1994).
DEA (2017), Guideline on Need and Desirability, Department of Environmental Affairs (DEA), Pretoria, South Africa.
Department of Environmental Affairs (2017), Public Participation guideline in terms of NEMA EIA Regulations, Department of Environmental Affairs, Pretoria, South Africa.

Table 13: Current Municipal By-Laws

By-Laws
eThekwini Municipality – Spatial Planning and Land Use Management Second Amendment By-law (2021)
eThekwini Municipality – Water By-law (2022)
eThekwini Municipality – Fire Safety By-law (2022)
eThekwini Municipality – Stormwater Management By-law (2020)
eThekwini Municipality – Waste Removal By-law (2016)
eThekwini Municipality – Sewage Removal By-law (2016)
eThekwini Municipality – Nuisance By-law (2016)

SECTION 4: MOTIVATION, NEED AND DESIRABILITY

4.1. Need and Desirability as per Section 3(f)

The broader Durban Aerotropolis framework envisages development that enhances urban and economic competitiveness by leveraging multi-modal transport access and integrated land use near the airport. Whetstone Business Park contributes directly to this by activating developable land around these transport nodes. Whetstone Business Park is part of a strategically positioned development corridor adjacent to King Shaka International Airport and the Dube Trade Port Special Economic Zone (SEZ), a core component of the Durban Aerotropolis concept, aimed at promoting economic growth, industrial diversification, and global connectivity. This location advantage supports logistics, light industrial, commercial, and mixed-use development that aligns with broader regional and national economic strategies.

Whetstone Business Park Phase 3 responds to existing and projected demand for industrial, logistics, commercial, and mixed-use land in the eThekwini region. The surrounding north-coastal corridor, including Ballito and uMhlanga areas, has been experiencing strong economic and property growth, with accelerating demand for industrial and logistics space to support supply chain, manufacturing, and distribution sectors. Whetstone Business Park is designed to expand socio-economic opportunities, attract investment, and support diversification of the local economy. Phase 3 will build on this by offering additional serviced platforms and mixed-use opportunities, including warehousing, light manufacturing, offices and retail amenities, thus introducing additional employment opportunities and business activity. Phase 3 will further contribute to municipal revenue through rates and services, which supports eThekwini's economic development objectives.

The phased development approach is consistent with approved spatial strategies and municipal planning instruments. The SPLUMA and eThekwini Land Use Schemes encourage the phased introduction of mixed-use and industrial development within the Whetstone precinct, signalling its appropriateness in terms of spatial planning policy. Section 6.4 of eThekwini Municipality's Spatial Development Framework (SDF 2025/26) describes Whetstone Business Park as one of several catalytic economic projects, introducing investment attraction and socio-economic benefits. The SDF further characterises the Whetstone area as an industrial node with investment opportunities. Whetstone Business Park aligns with the SDF as it emphasises addressing spatial inefficiencies and historical imbalances by encouraging development in areas that:

- Are near key transport and economic infrastructure (i.e., King Shaka Internation Airport);
- Support intensification and densification of economic activity; and
- Encourage equitable access to jobs and services.

The proposed development is in alignment with the 2025/26 Integrated Development Plan (IDP), as it puts emphasis on prioritising strategic and catalytic projects for long-term growth. The IDP promotes spatial restructuring by coordinating land use and infrastructure investment to encourage development in areas with transport connectivity and economic potential. Whetstone Business Park is positioned near King Shaka International Airport and major freight routes, which supports these spatial objectives due to its strategic location in the northern development corridor.

Phases 1 and 2 have already initiated critical infrastructure, such as roads, bulk services (i.e., water and sewer), and street lighting, demonstrating feasibility for the proposed development and continuity with surrounding land uses. Furthermore, the proposed project is in close proximity to major transport routes (i.e., R102 and Old Main Road), King Shaka International Airport, and South African logistics corridors. This makes it an attractive investment choice for occupiers requiring efficient access to both local and international markets which is often a fundamental requirement for logistics, manufacturing, and commercial businesses.

The proposed development is justified by past and future demand, strategic economic positioning, and alignment with regional planning objectives. It provides necessary land for industrial, commercial, and mixed-use activities that will generate employment opportunities and broaden economic opportunities. Whetstone

Business Park Phase 3 should be recognised as a continuation of Whetstone's phased development, supporting spatial integration.

4.2. Motivation for the Preferred Site, Activity and Technology as per Section 3(g)

As per **Figure 4 – Preliminary Layout**, the applicant intends on establishing a light industrial warehousing and/or commercial and associated facilities situated on the properties included within the site. The total area of the development footprint is approximately 3.95 ha of the total site boundary of 5 ha.

To the south of the site, the stormwater emanating from the surrounding area and southern portion discharges via an existing two-portal box culvert (Dimensions: 2 x 1.5 x 1.5m) that conveys the stormwater under the R102 and into the wetland system. However, heavy periodic rainfall events have resulted in the existing culvert unable to cope with the high flows and resulting in flooding of the R102. To address this, the applicant intends of establishing a culvert (Dimensions: 2 x 2.5 x 1.5) adjacent to the delineated channelled valley-bottom wetland system. It is important to note that as per the Stormwater Management Plan, dated April 2026, the wetland system will be infilled and compacted to cater for the proposed development.

To further manage the stormwater on the site the applicant also intends on establishing a concrete stormwater attenuation tank (Dimensions: 460m^2 (area) and 3m (depth). A stormwater attenuation tank is an underground reservoir that captures excess surface water run-off during heavy rain and releases it at a safe, controlled rate. This prevents municipal drainage systems from being overwhelmed, reducing the risk of localized flooding and downstream erosion.

The following design alternatives were investigated for the proposed stormwater culverts:

- **Culvert Design Option 1 (Preferred)** – The proposed establishment of a 2 x 2.5 x 1.5m box culvert and a 460m^2 attenuation tank. The existing 1400 x 1100m and the 2 x 900Ø culvert will be removed and the existing channelled valley bottom wetland system (HGM 2) and depression wetland system (HGM 3) will be infilled to cater for the proposed development. From an engineering perspective this option was considered as more viable to manage the pre-development and post-development stormwater flows. Furthermore, the option is more economically viable and suitable to cater for the proposed development.

- **Culvert Design Option 2 (Not Supported)** – The proposed establishment of a 2 x 2.5 x 1.5m box culvert and a 460m^2 attenuation tank. The existing 1400 x 1100m and the 2 x 900Ø culvert will be removed and the existing channelled valley bottom wetland system will be infilled to cater for the proposed culvert. This option was not considered economically viable due to routing of the culvert system to manage the stormwater flow rates and the accessible impacts to cater for the mixed-use development.

SECTION 5: PUBLIC PARTICIPATION

5.1. Notification of Interested and Affected Parties (I&APs)

(a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of—

(i) the site where the activity to which the application or proposed application relates is or is to be undertaken; and

(ii) any alternative site.

Four (4) site notices were placed on the 6th of February 2026 at the following locations:

1. **Southern Boundary of the project area;**
2. **T-Junction of the Dube Boulevard and Old Main Road;**
3. **Adjacent to the access road leading to the project area;**
4. **Along Old Main Road near the northern boundary of the project area.**

The site notice detailed the proposed activity and invited stakeholders and I&APs to register. Refer to Appendix E2 for a copy of the site notice Appendix E3 for proof of placement of the site notice boards.

(b) giving written notice, in any of the manners provided for in section 47D of the Act, to—

(i) the occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken and to any alternative site where the activity is to be undertaken;

(ii) owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken and to any alternative site where the activity is to be undertaken;

(iii) the municipal councillor of the ward in which the site and alternative site is situated and any organisation of ratepayers that represent the community in the area;

(iv) the municipality which has jurisdiction in the area;

(v) any organ of state having jurisdiction in respect of any aspect of the activity; and

(vi) any other party as required by the competent authority;

Stakeholders and I&APs were notified about the Environmental Process, through the distribution of the Background Information Document (BID) via email on the 26th of February 2026. With regards to authority communications, all relevant authorities have been notified of the application.

Refer to Appendix E5 – Background Information Document.

(c) placing an advertisement in—

(i) one local newspaper; or

(ii) any official *Gazette* that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;

(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken: Provided that this paragraph need not be complied with if an advertisement has been placed in an official *Gazette* referred to in paragraph (c)(ii);

An advertisement was placed in the Tongaat & Verulam Tabloid on the 25th of February 2026 which provides information on the project dates and requested for potential I&APs to register themselves in order to get further information on the project and the Basic Assessment process.

Refer to **Appendix E4 - Proof of the Advertisement.**

I&AP Public Feedback Meeting

Stakeholder engagement will continue throughout the Basic Assessment process.

5.2. Authority Notification

A pre-application consultation was conducted with the Department of Economic Development, Tourism and the Environment (EDTEA) on the 9th of September 2025.

Refer to **Appendix I1** for a copy of the Meeting Minutes.

5.3. Registered Interested and Affected Parties

A proponent or applicant must ensure the opening and maintenance of a register of interested and affected parties and submit such a register to the competent authority, which register must contain the names, contact details and addresses of—

(a) all persons who, as a consequence of the public participation process conducted in respect of that application, have submitted written comments or attended meetings with the proponent, applicant or EAP;
(b) all persons who have requested the proponent or applicant, in writing, for their names to be placed on the register; and
(c) all organs of state which have jurisdiction in respect of the activity to which the application relates.

Refer to **Appendix E6 – I&AP database**

5.4. Draft Basic Assessment Report

The Draft Basic Assessment was distributed to all relevant stakeholders and I&APs for the regulated 30-day comment period. The comment period commenced from the 18th June 2026 and ended on the 27th July 2026.

5.5. Comments and Responses Report

(1) The applicant must ensure that the comments of interested and affected parties are recorded in reports and plans and that such written comments, including responses to such comments and records of meetings, are attached to the reports and plans that are submitted to the competent authority in terms of these Regulations.

(2) Where a person desires but is unable to access written comments as contemplated in sub-regulation due to -
  (a) a lack of skills to read or write;
  (b) disability; or
  (c) any other disadvantage;
  (d) reasonable alternative methods of recording comments must be provided for.

All concerns, comments and questions (collectively referred to as “issues”) have been documented and responded to adequately in a Comment and Response Report, attached as **Appendix E8**.

SECTION 6: IMPACT ASSESSMENT

6.1. Methodology to Determine and Rank Significance and Consequences of Impacts Associated with all Alternative as per Section 3(h)(vi)

2014 NEMA EIA Regulations (As Amended), Appendix 1- 3(H) (vi) the methodology used in determining and ranking the nature, significance, consequence, extent, duration and probability of potential environmental impacts and risks associated with the alternatives, (v) the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts can be reversed, may cause irreplaceable loss of resources and can be avoided, managed and mitigated. Appendix 1- 3 (I) A full description of the process undertaken to identify, assess and rank the impacts the activity will impose on the preferred location through the life of the activity- (i)- (ii). Appendix 1- 3 (J) an assessment of each identified potentially significant impact and risk (i)- (vii)

Scoring of Impacts	
Consequence	
Severity	1 – Insignificant / Non-harmful 2 – Small / Potentially harmful 3 – Significant / Slightly harmful 4 – Great / Harmful 5 – Disastrous / Extremely harmful
Duration	1 – Up to 1 month 2 – 1 month to 3 months 3 – 3 months to 1 year 4 – 1 to 10 years 5 – Beyond 10 years / Permanent
Spatial Scale	1 – Immediate, fully contained area 2 – Surrounding area 3 – Within business unit area or responsibility 4 – Within mining boundary area / Beyond BU boundary 5 – Regional, National, International
Overall Consequence = (Severity + Duration + Extent) / 3	
Likelihood	
Frequency of the Activity	1 – Once a year or once / more during operation / LOM 2 – Once / more in 6 months 3 – Once / more a month 4 – Once / more a week 5 – Daily / hourly
Probability of the Incident / Impact	1 – Almost never / almost impossible 2 – Very seldom / highly unlikely 3 – Infrequent / unlikely / seldom 4 – Often / regularly / likely / possible 5 – Daily / highly likely / definitely
Overall Likelihood = (Frequency + Probability) / 2	
Overall Environmental Significance = Overall Consequence * Overall Likelihood	
Overall Environmental Significance	
0 - 2.9	Very Low
3 - 4.9	Low
5 - 6.9	Medium - Low
7 - 8.9	Medium
9 - 10.9	Medium - High

6.2. Impacts that may result from the Planning and Design, Construction, Operational, Decommissioning and Closure Phases as well as Proposed Management of Identified Impacts and Proposed Mitigation Measures

Provide a summary and anticipated significance of the potential direct, indirect and cumulative impacts that are likely to occur as a result of the planning and design phase, construction phase, operational phase, decommissioning and closure phase, including impacts relating to the choice of site/activity/technology alternatives as well as the mitigation measures that may eliminate or reduce the potential impacts listed. This impact assessment must be applied to all the identified alternatives to the activities.

Refer to **Appendix F - Impact Assessment Matrix.**

6.3. Environmental Impact Statement as per Section 3(1)

Alternative S1 (Only Site Alternative):
The proposed project is located on the properties described as Portions 247 and 2101 of Lot 1575 Cottonlands, eThekwini Municipality (Ward 58). The proposed site boundary is approximately 5 hectares (ha) in extent of which 3.95 ha is earmarked for development. The property details are provided in **Table 8**.

The following design alternatives were investigated for the proposed stormwater culverts:

- **Culvert Design Option 1 (Preferred)** – The proposed establishment of a 2 x 2.5 x 1.5m box culvert and a 460m^2 attenuation tank. The existing 1400 x 1100m and the 2 x 900Ø culvert will be removed and the existing channelled valley bottom wetland system (HGM 2) and depression wetland system (HGM 3) will be infilled to cater for the proposed development. From an engineering perspective this option was considered as more viable to manage the pre-development and post-development stormwater flows. Furthermore, the option is more economically viable and suitable to cater for the proposed development.

The Basic Assessment considered relevant environmental aspects and impacts from the proposed development and proposed mitigation during the planning, construction and operational phases.

The applicant intends on establishing a light industrial warehousing and/or commercial and associated facilities situated on the properties included within the site. The total area of the development footprint is approximately 3.95 ha of the total site boundary of 5 ha.

To the south of the site, the stormwater emanating from the surrounding area and southern portion discharges via an existing two-portal box culvert (Dimensions: 2 x 1.5 x 1.5m) that conveys the stormwater under the R102 and into the wetland system. However, heavy periodic rainfall events have resulted in the existing culvert unable to cope with the high flows and resulting in flooding of the R102. To address this, the applicant intends of establishing a culvert (Dimensions: 2 x 2.5 x 1.5) adjacent to the delineated channelled valley-bottom wetland system. It is important to note that as per the Stormwater Management Plan, dated April 2026, the wetland system will be infilled and compacted to cater for the proposed development.

To further manage the stormwater on the site the applicant also intends on establishing a concrete stormwater attenuation tank (Dimensions: 460m^2 (area) and 3m (depth). A stormwater attenuation tank is an underground reservoir that captures excess surface water run-off during heavy rain and releases it at a safe, controlled rate. This prevents municipal drainage systems from being overwhelmed, reducing the risk of localized flooding and downstream erosion.

A summary of the impacts associated with the alternatives are outlined below:

Project Phase	Activity	Impact
Construction of the Whetstone Development – Phase 3	Vehicle access	Wetland soil compaction and vegetation disturbance.
		Altered overland flow from increased hardened surfaces.
		Subsequent induced erosion and sedimentation.
		Water quality impairment from stochastic fuel and oil spills.
		Introduction and / or proliferation of alien invasive vegetation.
	Excavating and stockpiling of soil	Altering overland flow characteristics.
		Water quality impairment from increased turbidity.
		Erosion of wetland and stockpiles and subsequent downstream sedimentation.
	Construction of platforms	Altered overland flow characteristics.
	Stormwater management and erosion control	Wetland sedimentation and degradation.
		Altered overland flow from increased hardened surfaces inducing erosion and sedimentation.
	Mixing and pouring of concrete	Wetland degradation.
		Water quality impairment from accidental spills of construction material.
	Use of machinery and equipment in proximity to wetlands	Soil compaction leading to altered overland flow
		Subsequent erosion and sedimentation.
		Water quality impairment from stochastic fuel and oil spills.
	Indiscriminate dumping of waste or construction materials	Wetland degradation.
		Water quality impairments.
		Proliferation of invasive alien plants.
	Wetland Offset	Improvement in Ecosystem Services and PES of HGM 1
Operation of Whetstone Development – Phase 3	On going operation of the development (including stormwater management)	Altered overland flow from increased hardened surfaces.
		Subsequent induced erosion and sedimentation.
		Water quality impairment from stochastic fuel and oil spills.
		Introduction and / or proliferation of alien invasive vegetation.

		Pollution from waste disposal.
	System failures (sewerage spills into downstream water resources)	Increase in pathogens entering the downstream systems.
		Water quality impairment from sewerage inflow.
		Change in systems chemistry
	Increase in hardened surfaces	Wetland sedimentation and degradation.
		Altered overland flow from increased hardened surfaces.
		Altering overland flow characteristics.
	Anthropogenic disturbance in or near watercourses	Wetland degradation.
		Soil compaction leading to altered overland flow
	Waste production and contamination	Contamination of groundwater.
		Increase in pathogens entering the downstream systems.

Construction and operational phase impacts ranged from High - Low pre-mitigation. All the anticipated impacts can however be significantly reduced through the mitigation measures provided to Low - Minor levels of impact significance ratings.

Residual risks are expected to be of short duration and of Low - Minor impact significance, provided that the mitigation measures in this report are implemented. No significant cumulate effects on the environment (i.e., sensitive terrestrial habitats and species) are anticipated.

A Wetland Offset Strategy was prepared by The Biodiversity Company (2026), to address residual impacts associated with HGM 2 and 3 respectively. The assessment considered the extent of wetland loss, ecological condition, ecosystem service provision, conservation importance and opportunities for ecological improvement within the broader wetland system.

The assessment concluded that onsite rehabilitation represents the most appropriate offset mechanism for the project and proposed a rehabilitation-to-impact ratio of approximately 5:1. Rather than establishing an offset site elsewhere within the catchment, the strategy focuses on improving the ecological condition and functioning of retained wetlands associated with HGM 1 and adjacent wetland habitat.

The proposed offset measures are intended to compensate for residual impacts associated with HGM 2 and HGM 3 while generating a net ecological improvement within the broader wetland system.

A Wetland Rehabilitation Plan was prepared by The Biodiversity Company (2026) to support implementation of the proposed offset strategy. The rehabilitation area comprises approximately 10 523m² and includes portions of HGM 1 (6 371m²), the associated wetland island (3 195m²), and adjacent wetland buffer areas (958m²).

The rehabilitation programme focuses on improving the ecological condition and functioning of historically disturbed wetland habitat through measures including alien invasive vegetation control, revegetation with indigenous wetland species, erosion control and stabilisation, restoration of natural

drainage processes, and long-term monitoring. The rehabilitation area was selected based on its ecological importance and potential for ecological recovery.

Alternative S2 (Not Applicable) – An alternative site is NOT APPLICABLE

Culvert Design Option 2 (Not Supported) – The proposed establishment of a 2 x 2.5 x 1.5m box culvert and a 460m^2 attenuation tank. The existing 1400 x 1100m and the 2 x 900Ø culvert will be removed and the existing channelled valley bottom wetland system will be infilled to cater for the proposed culvert. This option was not considered economically viable due to routing of the culvert system to manage the stormwater flow rates and the accessible impacts to cater for the mixed-use development.

The Basic Assessment considered relevant environmental aspects and impacts from the proposed development and proposed mitigation during the planning, construction, and operational phases.

Culvert Design Option 2 (Not Supported) – The proposed establishment of a 2 x 2.5 x 1.5m box culvert and a 460m^2 attenuation tank. The existing 1400 x 1100m and the 2 x 900Ø culvert will be removed and the existing channelled valley bottom wetland system will be infilled to cater for the proposed culvert. This option was not considered economically viable due to routing of the culvert system to manage the stormwater flow rates and the accessible impacts to cater for the mixed-use development.

6.4. Impact Management Measures from Specialist Reports for the Development for Inclusion in the EMPr as per Section 3(m)

2014 NEMA EIA Regulations (as amended), Appendix 1- 3(M) based on the assessment, and where applicable, impact management measures from specialist reports, the recording of the proposed impact management outcomes for the development for inclusion in the EMPr.

The following outcomes must be considered as per the Geotechnical Investigation:

Excavatability:

- 'Soft excavation' according to SANS1200D can be expected through the fill, natural subsoils and very soft to soft shale bedrock horizons. Hard excavation is only expected where medium hard/hard rock shale is encountered, or where localised zones of moderately to slightly weathered dolerite are present in-situ.
- Dolerite Derived Fill is suitable for reuse as engineered fill and could potentially be stockpiled where excavated out to accommodate the construction of new footings/installation of subsurface services.

Site Filling:

- Owing to the general position of the site and presence of locally depressed areas within the developable footprint, additional bulk filling would likely be necessary prior to the commencement of top structure developments.
- Where new fills are to be placed over natural ground/undisturbed areas, boxing out of the clayey subsoils by 0.5 to 1.0m is recommended.
- Where engineered fills are to be placed within seepage zones/areas with shallow groundwater, consideration should be given to the use of suitable quality free-draining granular material towards the base of the fill.
- Should new fills be placed over existing shale derived fill, it is recommended the material be undercut by at least 0.5m prior to the placement of new fills.
- Ground preparation in areas which are presently underlain by dolerite derived fill should comprise general grubbing and the boxing out zones which exhibit noticeable rutting or localised depressions. Undercutting by 0.5m is recommended in such areas, with replacement materials being of a G10 or better.

- It is recommended that bulk earthworks be undertaken during drier climatic periods (i.e. winter) and that seepage be dealt with symptomatically where encountered.
- New fills should conform to a maximum slope batter of 1:2 (V:H) considering the stability of these fills have been analysed and acceptable factors of safety are achieved.
- The removal of oversized rock fragments (i.e. two thirds of layer thickness) is recommended to ensure the desired compactive effort is achieved and subsequently reduce the likelihood of obstructions being encountered during foundation construction.
- The sloping back of fill platform surfaces is recommended to ensure no ponding occurs within the platform areas.

Piled Foundations

- It is recommended that piles be designed as being 'end-bearing'. Pile lengths are estimated to be in the order of 10 to 15m, however, actual lengths will be governed by depth to bedrock and achievable socket lengths.
- Should piling be considered, it is recommended the appointed piling contractor drills a number of test pile holes prior to formal foundation construction, so as to confirm bedrock levels and obtain an indication of achievable socket lengths.

Conventional Shallow Foundations

- Footings seated within engineered fill should be embedded at least 1m below final platform level. Temporary batters of 1:1 to 1:1.5 (V:H) could be adopted for these shallow excavations.
- Care should be taken to not infringe with the underlying clayey subsoils and it is recommended that footings remain at least 1m above such horizons.
- Footings should remain above the local groundwater table where reasonably practical to ensure adequate bearing capacity is maintained.

New Surface Beds

- Additional compaction of the supporting subgrade material to at least 95% Mod AASHTO density is recommended prior to the installation of steel and casting of footings.
- In instances where compact structures are required, or settlement magnitudes fall outside of tolerable limits, the use of stiffened/piled raft foundations could be considered.
- Surface beds should be sufficiently reinforced and articulated in order to accommodate some post construction movement within the subgrade. Additionally, surface beds should be constructed independent of the surrounding footings and walls to further accommodate such movements.

Site Drainage

- Accumulated stormwater and river flows should be diverted and deposited into appropriately sized attenuation tanks prior to controlled release into the municipal stormwater network/natural drainage lines
- Further investigation would be necessary where sensitive top structures are to be considered, with the deep piling conditions needing to be verified in these areas.

Refer to **Appendix D1** – Geotechnical Assessment

The following outcomes must be considered as per the Heritage Impact and Desktop Paleontological Assessment

- The chances of heritage sites and fossiliferous material occurring within the study areas is very low. No further mitigation is required. However, a Chance Find Protocol will be initiated and needs to form part of the EMPr.

Refer to **Appendix D2** – Heritage Impact and Desktop Paleontological Assessment

The following outcomes must be considered as per the Hydrological Assessment:

- The 1:50 and 1:100-year flood lines suggest that the stream crossing Phase 4 will pose some risk of flooding to Phase 4 and the associated infrastructure, especially towards the south of the project area where flooding will be greater due to the contributing catchment size. The 1:100-year flood line can be considered as the flooding exclusion zone at the site.
- A low probability of erosion of the banks of the rivers/streams associated with the project area is anticipated. The 1:100-year flood line should be considered an avoidance area (buffer area).
- A flood wall or an earth flood protection barrier can be installed to reduce the flood risk. Construction of this protective structure should change the flood line completely, to only push up to the base of the structure and not overtop and flood the area as predicted by the flood model.

Refer to **Appendix D3** – Hydrological Assessment

The following outcomes must be considered as per the Terrestrial Compliance Statement:

Overall Mitigations

- ❖ Prevent the further loss and fragmentation of indigenous vegetation communities within the ecosystem in the vicinity of the project area of influence;
- ❖ Reduce the negative fragmentation effects of the development and enable the safe movement of fauna species;
- ❖ Prevent the direct and indirect loss and disturbance of flora and fauna species and communities; and
- ❖ Adequately follow the guidelines for interpreting the Site Ecological Importance ratings assigned to the project area of influence.

Vegetation and Habitats

- Areas of indigenous vegetation, even secondary communities outside of the direct project footprint, should under no circumstances be fragmented or disturbed. It is recommended that areas to be developed be specifically demarcated so that during the construction phase, only the demarcated areas be impacted upon.
- All construction/operational and access must make use of the existing roads as much as possible, the creation of new roads should be limited.
- All laydown, chemical toilets etc. should be restricted to already modified areas. Any materials may not be stored for extended periods of time and must be removed from the project area once the construction/closure phase has been concluded.
- Areas that are denuded during construction need to be re-vegetated with indigenous vegetation to prevent erosion. This will also reduce the likelihood of encroachment by alien invasive plant species.
- Rehabilitation of the disturbed areas existing in the project area must be made a priority. Topsoil must also be utilised, and any disturbed area must be re-vegetated with plant and grass species which are endemic to this vegetation type.
- A hydrocarbon spill management plan must be put in place to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas.
- Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use.

Fauna

- All construction and maintenance motor vehicle operators should undergo an environmental induction that includes instruction on the need to comply with speed limits, to respect all forms of wildlife. Speed limits must still be enforced to ensure that road killings and erosion is limited.

Alien Vegetation

- An Alien Invasive Plant (AIP) Management Plan must be compiled and implemented. This should regularly be updated to reflect the annual changed in AIP composition.

- The footprint area of the construction should be kept to a minimum. The footprint area must be clearly demarcated to avoid unnecessary disturbances to adjacent areas. Footprints of the roads must be kept to prescribed widths.

Refer to **Appendix D4** – Terrestrial Compliance Statement

The following outcomes must be considered as per the Wetland Impact Assessment:

- Prevent the unnecessary destruction of, and fragmentation, of the vegetation community of the perennial drainage system and downstream wetland areas; and
- Limit the construction area to the defined project areas and only impact those areas where it is unavoidable to do so otherwise.
- A wetland offset plan must be compiled and implemented for the complete loss of HGM 2 and 3;
- Adherence to the buffer areas for the remaining areas. These should be visibly demarcated to avoid encroachment into these areas;
- Silt traps and sediment trapping berms must be in place around stormwater drainage within the construction site to prevent the movement of contaminated or sediment laden runoff from entering the wetlands;
- Add green/soft engineering methods to the design and layout of the development;
- Erosion prevention and sediment control measures (wetland and instream) are imperative and need to be implemented throughout the entire project footprint area of the proposed development, access roads and temporary laydown / storage sites. Temporary erosion control methods may include silt fences, interceptor ditches, seeding and sodding, riprap of exposed embankments, erosion mats, and mulching;
- Stormwater infrastructure should be maintained regularly and allow for only the release of clean water into the environment; and
- All removed soil and material must not be stockpiled within the watercourse and buffers. Stockpiles must be protected from erosion, stored on flat areas where run-off will be minimised, and be surrounded by bunds.

Loss/Degradation of Wetland Habitat and Vegetation

- Restrict unauthorised and unnecessary activities within the wetlands and their respective buffers;
- Educate staff and relevant contractors on the location and importance of the identified wetlands through toolbox talks and by including them in site inductions as well as the making them aware of the overall site plan which should indicate sensitive areas, waste disposal areas and any other relevant project specifics;
- Promptly control the spread of alien vegetation;
- Landscape and re-vegetate all denuded areas as soon as possible; and
- Implement measures to remove any dense stands of alien vegetation thereby preventing further colonisation of these species in disturbed areas. Mechanical removal is suggested as herbicides (unless proved to be unharmful) should not be used a control measure within the delineated wetland areas.

Alteration of flows

- Design and implement an effective stormwater management system;
- Promote water infiltration into the ground by revegetating disturbed or compacted areas;
- Minimise the extent of ground compaction or hardened surfaces by designating routes for the vehicles and machinery used on site; and
- Regularly clear drains to prevent uncalled for accumulation of surface water and the establishment of concentrated flow paths out of the accumulation areas.

Contamination of Wetlands

- All chemicals and toxicants to be used for the construction must be stored outside the watercourse areas and their respective buffers, preferably on flat terrain and in a bunded area;

- All machinery and equipment should be inspected regularly for faults and possible leaks, these should be serviced off-site in a designated area;
- All contractors and employees should undergo induction which is to include a component of environmental awareness. The induction is to include aspects such as the need to avoid littering, the reporting and cleaning of spills and leaks and general good “housekeeping”;
- Adequate sanitary facilities and ablutions must be provided for all personnel within the project area. These facilities should be placed outside of sensitive environmental areas (wetlands and buffers included) and their use thereof must be enforced (these facilities must be kept clean so that they are a desired alternative to the surrounding vegetation);
- Have action plans on site, and training for contactors and employees in the event of spills, leaks and other impacts to the aquatic systems;
- The contractors used for the project should have spill kits available to ensure that any fuel or oil spills are clean-up and discarded correctly;
- All waste generated on-site during construction must be adequately managed. Separation and recycling of different waste materials should be supported;
- Where possible minimise the use herbicides to control alien or unwanted vegetation on the site and in proximity to the watercourse. If herbicides must be used do so well prior to any significant predicted rainfall events; and
- Materials such as sand and cement should not be stored within the wetland or buffer areas and should be safe guarded against rain-wash. Should accidental spillages of unset cement occur then this should be immediately cleaned by scraping the impacted area and removing the remnants of cement from the watercourse.

Sedimentation and Erosion

- Loose soils are particularly prone to loss due to wind or water. It is therefore preferable that construction takes place during the dry season to reduce the erosion potential of the exposed surfaces;
- Avoid the creation of concentrated flow paths wherever possible;
- Ensure soil stockpiles and concrete / building sand are sufficiently safeguarded against rain wash;
- Devise and implement a suitable stormwater management plan for the project;
- Signs of erosion must be addressed immediately to prevent further erosion of the area to prevent head cut and gully erosion from forming. This can be addressed as it occurs by bulldozing, filling, re-contouring to gentler gradients and re-vegetating;
- Temporary and permanent erosion control methods may include retention basins, detention ponds, interceptor ditches, seeding and sodding, riprap of exposed embankments, erosion mats, and mulching;
- Any exposed earth or cleared sites (includes the areas adjacent to the proposed infrastructure) should be rehabilitated promptly by relandscaping to gentler gradients and planting suitable vegetation (vigorous indigenous grasses) to protect the exposed soil. Sandbags and geotextiles should be used to assist until vegetation has established in these reworked areas;
- Compacted soils should be lightly tilled to promote vegetation reestablishment and reduce the potential for preferential flow paths and subsequent erosion and sedimentation from occurring; and
- Where required, the rehabilitation of watercourse banks must take place following closure. Key areas where erosion has occurred should be rehabilitated through reshaping and the revegetation of the wetland periphery areas.

Spread of Alien Invasive Vegetation

- Revegetate bare or denuded areas as soon as possible;
- Once and if detected, control the spread of any existing colonies;
- Avoid working in areas with alien vegetation as dispersal into unaffected areas may be aided through vehicular movement; and
- Should alien vegetation infestation be considered a contributing factor to ecosystem degradation on the site, the implementation of an alien invasive management plan should be considered.

General Mitigation Measures

- It is preferable that construction takes place during the dry season to reduce the erosion potential of the exposed surfaces;
- The wetland areas outside of the specific project site area must be avoided where possible;
- The project must be relocated to outside of the wetland buffer zones, which would significantly reduce potential impacts to the said systems;
- The construction vehicles and machinery must make use of existing access routes as much as possible, before adjacent areas are considered for access;
- Laydown yards, camps and storage areas must be beyond the wetland areas. Where possible, the construction of the road and crossings must take place from the existing paths;
- Prevent uncontrolled access of vehicles through the watercourses that can cause a significant adverse impact on the hydrology and alluvial soil structure of these areas;
- All chemicals and toxicants to be used for the construction must be stored outside the watercourse areas and their respective buffers and in a bunded area;
- All machinery and equipment should be inspected regularly for faults and possible leaks, these should be serviced off-site in a designated area;
- All contractors and employees should undergo induction which is to include a component of environmental awareness. The induction is to include aspects such as the need to avoid littering, the reporting and cleaning of spills and leaks and general good “housekeeping”;
- Adequate sanitary facilities and ablutions on the servitude must be provided for all personnel within the project area. Use of these facilities must be enforced (these facilities must be kept clean so that they are a desired alternative to the surrounding vegetation);
- Have action plans on site, and training for contactors and employees in the event of spills, leaks and other impacts to the aquatic systems;
- The contractors used for the project should have spill kits available to ensure that any fuel or oil spills are clean-up and discarded correctly;
- All removed soil and material must not be stockpiled within the system. Stockpiling should take place outside of the watercourse buffers. All stockpiles must be protected from erosion, stored on flat areas where run-off will be minimised, and be surrounded by bunds;
- Mixing of concrete must under no circumstances take place within the drainage or wetland systems. Scrape the area where mixing and storage of sand and concrete occurred to clean once finished;
- No dumping of construction material on-site may take place;
- All waste generated on-site during construction must be adequately managed. Separation and recycling of different waste materials should be supported; and
- Consideration should be given to implementing an alien invasive plant management plan post construction to control any current invaded areas and prevent the growth of alien invasive species on cleared areas.

Refer to **Appendix D5** – Wetland Impact Assessment

The following outcomes must be considered as per the Groundwater Assessment:

- ❖ Equipping of the boreholes should be carried out in accordance with the installation depths and abstraction rates for the recommended duties as specified in the groundwater management plan.
- ❖ Various water treatment options can be considered for the compounds of concern identified during the assessment.
- ❖ In some instances, affected boreholes should be chlorine shock treated and resampled to assess if micro biological counts of E. coli and total coliforms persist.

- ❖ Additional treatment options for elevated metals include reverse osmosis, ion exchange, oxidation and filtration.
- ❖ Treatment should be implemented at the reservoir distribution points to minimise treatment costs at multiple treatment points.
- ❖ Further, dilution of multiple input sources may improve the overall water quality and reduce the treatment requirements and costs.

Refer to **Appendix D5** – Groundwater Implementation Report

The following outcomes must be considered as per the Wetland Offset Strategy Report:

- Construction activities proximal (< 50 m) to the wetlands must take place during the winter period (as much as possible). In addition to this, basic stormwater structures such as berms must be designed and implemented prior to and throughout the duration of the construction activities;
- Where possible, roads and parking areas should be paved with permeable brick to allow the infiltration of water into the soil;
- Align all development areas to avoid wetlands and their buffers, unless authorised (i.e. HGM 2 and 3);
- Prior to the commencement of construction, implement sediment and erosion control measures throughout the site. This should include installing multiple rows of sandbags, silt traps, and silt fences particularly along access roads leading to drainage channels, around active construction zones, and near areas where foundations for buildings, service yards, or utility infrastructure are being established.
- To prevent erosion and protect both road margins and adjacent infrastructure within the mixed-use retail and industrial development, energy dissipation measures such as strategically placed stone berms, concrete blocks, or engineered check dams must be installed along the edges of all internal roads and access routes.
- On steeper road sections, energy dissipators should be spaced more frequently, with intervals as close as one meter apart where slopes are particularly steep or where high volumes of runoff are expected. Placement should prioritize areas near loading bays, parking lots, delivery zones, and entrances/exits to minimize erosion risks and protect both the built and natural environment;
- The areas around the development area should be hydroseeded with vigorous growing indigenous grasses that are drought tolerant to lower erosion of these key areas;
- The section of roads which will traverse the lowest lying areas/potentially wet areas or steeper slopes will be subjected to traffic from vehicles for inspections and maintenance on site with the potential for damage to habitat and erosion and thus require permeable paving.
- Avoid the creation of concentrated flow paths wherever possible;
- Devise and implement a stormwater management plan for the project footprint;
- Signs of erosion must be addressed immediately to prevent further erosion of the area to prevent headcut erosion from forming; and
- Stormwater runoff from the development area should enter the wetland system through diffuse channels fitted with flow attention / energy dissipation structures in the form of green infrastructure.

Refer to **Appendix D6** –Wetland Offset Strategy Report

The following outcomes must be considered as per the Wetland Rehabilitation Plan:

Re-vegetation/landscaping for vegetation establishment

- Stormwater runoff from the development area should enter the wetland system through diffuse channels fitted with flow attention / energy dissipation structures in the form of green infrastructure.

Ripping Compacted Areas

- All compacted areas outside the wetland delineation must be ripped using a commercial ripper with at least two rows of tines. Ripping must be undertaken within 1–3 days after seeding and following a rainfall event to promote successful vegetation establishment.

Vegetation Composition

- Attempts must be made to maximise the diversity of low hydromorphic grasses and sedges throughout.
- Re-vegetation must involve the use of both re-seeding and mechanical transplanting.
- Only locally indigenous species that are adapted to local climatic conditions must be used. Perennial species must be prioritised for transplanting. Good quality planting material or seed must be readily available
- Re-vegetation must commence immediately after landscaping and the preparation of the seedbed, preferably in early spring when conditions for germination and rootstock establishment are optimal.
- Topsoil must be stored for later use and where necessary supplemented with imported topsoil. With correct storage and replacement of topsoil species diversity must improve rapidly as species present in the seedbank also germinate;
- Attempts must be made to limit collection and disturbance to wetlands when collecting sods by sticking to the designated collection areas and utilising a single access path.

Re-vegetate Wetland Areas

- Areas characterised by a loss of soil resources must be revegetated by means of vegetation with vigorous growth, stolons or rhizomes that more or less resembles the natural vegetation in the area.
- Re-vegetation using whole plants must be undertaken just before or at the start of the wet season. Plants must be carefully harvested with roots and surrounding soil kept intact, stored in damp conditions and shaded until planting. Planting holes must be approximately 300–500 mm deep, with excavated soil stockpiled by horizon and backfilled in the original order. Following planting, the surrounding soil must be manually compacted to ensure successful establishment.

Re-vegetate Buffer Areas

- The associated buffer areas must be re-vegetated by means of indigenous grass species.
- The areas to be grassed must consist of suitable material and the areas must be scarified to a minimum depth of 100 mm with furrows spaced at 250-300 mm centres.

Alien vegetation Removal and Control

- It is recommended that all invasive species located within the water resources and buffer areas be controlled/removed. This is to improve the conditions of the wetland as well as to, most importantly, decrease competition between the revegetated and alien invasive species.

Monitoring and Mitigation

- Rehabilitated areas must be monitored seasonally during the first two years and annually thereafter to assess vegetation establishment and identify maintenance requirements. Maintenance must include the control of alien invasive plants, weeds, and encroaching vegetation, with priority given to weed management to reduce competition and support successful revegetation.
- Where feasible, rehabilitated areas should be irrigated as required, ensuring that watering does not cause erosion or soil disturbance.
- Rehabilitated areas must be protected from unnecessary disturbance and access restricted to authorised personnel undertaking monitoring and maintenance activities.

Drainage and Stormwater

- Topsoil sourced from the development area during construction can be filled into the drainage channels within the water resources and buffers. These backfilled channels must then be re-vegetated.
- These backfilled channels must then be re-vegetated.

Backfill

- To compensate for the loss of excavated material due to wind and water carrying lighter particles away, topsoil must be used to completely fill the excavated areas as well as degraded area that have experienced a loss of soil reserves.

Bank stabilisation

- Embankments must be reshaped to mimic the natural topography and slope of the surrounding catchment, avoiding excessively steep or elevated profiles. Reshaped areas must be stabilised through revegetation.
- Should the soft-engineering rehabilitation measures prove ineffective, the suitability of additional erosion-control structures, such as gabion baskets and reno mattresses, must be assessed and implemented where necessary.

Shaping

- The HGM 1 'island' will need to be shaped to the same gradient and profile as that of the current HGM 1 unchannelled valley-bottom wetland.

Solid waste removal

- All anthropogenic material must be cleared from the water resource and buffer areas to be rehabilitated. The monitoring and removal of solid waste must be continuous for the life of the development and enforced.
- All removed waste must be separated and not stored for a period of more than two weeks at a collection point. The waste must be disposed at licensed handling facilities.

Refer to **Appendix D7**- Wetland Rehabilitation Plans

The following outcomes must be considered as per the Engineering Services Report:

- Solid waste generated from the development will fall within the business and commercial and non-hazardous industrial waste categories.
- Stormwater must be managed in accordance with the approved Stormwater Management Plan to prevent erosion, sediment loss, and adverse impacts on downstream infrastructure and receiving watercourses.
- All runoff must be attenuated to ensure post-development discharge rates do not exceed pre-development conditions.
- Bulk earthworks and stormwater infrastructure, including attenuation facilities and culvert systems, must be constructed as designed to safely convey stormwater through the site.

Refer to **Appendix D7**- Engineering Services Report

6.5. Assumptions, Uncertainties and Gaps in Knowledge relating to the Assessment and Mitigation Measures Proposed as per Section 3(o)

The information in this report is based on the findings of several specialists' studies. The following assumptions and limitations relating to this assessment were identified by specialists:

Hydrological Assessment

The following aspects were considered as limitations of the assessment:

- ❖ This study was undertaken as a once-off study and relies on historical hydrological and climate data for the site, as well as recognised hydrological and water resource databases for South Africa.

- Data generated during the time of this study is not seasonally bound as average yearly data was applied where required and is scientifically acceptable;
- The topographic data available for the study area is of sufficient accuracy and coverage to enable conceptual hydraulic modelling at a suitable level of detail.
- It has been assumed that the extent of the development area provided by the responsible party is accurate.

Terrestrial Compliance Statement

The following limitations applied to the studies undertaken for this report:

- It is assumed that all information received from the client and/or landowner is accurate;
- All datasets accessed and utilised for this assessment are considered to be representative of the most recent and suitable data for the intended purposes;
- The assessment area (PAOI) was based on the footprint areas as provided by the client, and any alterations to the area and/or missing GIS information pertaining to the assessment area would have affected the area surveyed and hence the results of this assessment;
- The area was surveyed during a single site visit, therefore, this assessment does not consider temporal trends;
- Whilst every effort was made to cover as much of the PAOI as possible, representative sampling was completed, and by its nature it is possible that some plant and animal species that are present within the PAOI were not recorded during the field investigations;
- The GPS used in the assessment has an accuracy of 5 m and consequently any spatial features may be offset by up to 5 m.

Wetland Assessment

The following limitations applied to the studies undertaken for this report:

- It has been assumed that the extent of the project area provided to the specialist is accurate;
- Areas characterised by external wetland indicators have been the focus for this assessment. Areas lacking these characteristics have not been focussed on; and
- The GPS used for water resource delineations is accurate to within five meters. Therefore, the wetland delineation plotted digitally may be offset by a maximum of five meters to either side.

Wetland Offset Strategy Report

The following limitations applied to the studies undertaken for this report:

- The re-assessment of the wetlands to be impacted to inform the overall impact assessment was a desktop assessment verification. An available specialist study was utilised for the assessment;
- The screening and rapid evaluation of potential offset candidate sites was undertaken at desktop level only with no infield verification. This analysis will need to be updated in the next phase based on rapid site assessments; and
- No stakeholder engagement has taken place to date. Thus, the approach and offset targets recommended in this report are still to be approved.

Heritage Impact Assessment

It is difficult to apply pure scientific methods within a natural environment without limitations or assumptions. The following apply to this study:

- The footprint of the proposed development will remain within the site boundary provided to the specialist.
- The site falls in the general pattern of archaeological scatters noted from previous archaeological and heritage surveys.
- The heritage survey cannot locate subsurface features that do not leave visible marks observable from aerial photographs.
- The findings, results, observations, conclusions, and recommendations provided in this report are based on the authors' best scientific and professional knowledge as well as available information regarding the perceived impacts on heritage resources.

- ❖ The study results are based on a single day field investigation. Once-off assessments such as this may potentially miss certain heritage information, thus limiting accuracy, detail, and confidence.
- ❖ Any additional information used to inform the assessment was limited to data and GIS data sets which were available for the area at the time of assessment.

6.6. Period for which Authorisation is required, Proposed Monitoring and Auditing and Post Construction Requirements as per Section 3(q)

2014 NEMA EIA Regulations (As Amended), Appendix 1- 3(Q) where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required, the date on which the activity will be concluded, and the post-construction monitoring requirements finalised.

Based on the time required for the applicant to undertake all necessary planning processes governing the establishment of the proposed mixed-use development, it is recommended that the Environmental Authorisation is granted for a period of ten (10) years, which will also take into account any unexpected events.

Given the nature of this project, external environmental audits of the activity and implementation of the EMPr will be undertaken by the independent ECO. The findings and outcomes of these audits will be recorded in the ECO Reports and filed in the Environmental file. The environmental audits and associated reports must be conducted and submitted to the CA at intervals as indicated in the EA.

The EMPr (Appendix G) details the pre-planning, construction, post-construction and rehabilitation phases, which will be monitored by the ECO and compliance authorities. One post-construction audit should be conducted once construction is complete. Thereafter an annual audit should be conducted every two years in order to ensure that the post-construction and rehabilitation outcomes have been achieved.

6.7. Financial Provisions as per Section 3(s)

2014 NEMA EIA Regulations (as amended), Appendix 1- 3(S) where applicable, details of any financial provisions for the rehabilitation, closure, and ongoing post decommissioning management of negative environmental impacts.

N/A – Not Applicable

6.8. EAP's Opinion on whether or not to Authorise the Activity and Recommendations & Conditions for Authorisation as per Section 3(n) and (p)

2014 NEMA EIA Regulations (as amended), Appendix 1- 3(N) any aspects which were conditional to the findings of the assessment either by EAP or specialist which are to be included as conditions of authorisation and (P) a reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation.

It is the opinion of the EAP, that the proposed development be approved as:

- The proposed development is justified by past and future demand, strategic economic positioning, and alignment with regional planning objectives. It provides necessary land for industrial, commercial, and mixed-use activities that will generate employment opportunities and broaden economic opportunities. Whetstone Business Park Phase 3 should be recognised as a continuation of Whetstone's phased development, supporting spatial integration.
- A Wetland Offset Strategy was prepared by The Biodiversity Company (2026), to address residual impacts associated with HGM 2 and 3 respectively. The assessment considered the extent of wetland loss, ecological condition, ecosystem service provision, conservation importance and opportunities for ecological improvement within the broader wetland system.
- The assessment concluded that onsite rehabilitation represents the most appropriate offset mechanism for the project and proposed a rehabilitation-to-impact ratio of approximately 5:1. Rather than

establishing an offset site elsewhere within the catchment, the strategy focuses on improving the ecological condition and functioning of retained wetlands associated with HGM 1 and adjacent wetland habitat.

- The proposed offset measures are intended to compensate for residual impacts associated with HGM 2 and HGM 3 while generating a net ecological improvement within the broader wetland system.
- A Wetland Rehabilitation Plan was prepared by The Biodiversity Company (2026) to support implementation of the proposed offset strategy. The rehabilitation area comprises approximately 10 523m² and includes portions of HGM 1 (6 371m²), the associated wetland island (3 195m²), and adjacent wetland buffer areas (958m²).
- The rehabilitation programme focuses on improving the ecological condition and functioning of historically disturbed wetland habitat through measures including alien invasive vegetation control, revegetation with indigenous wetland species, erosion control and stabilisation, restoration of natural drainage processes, and long-term monitoring. The rehabilitation area was selected based on its ecological importance and potential for ecological recovery.
- The impact assessment conducted for this site shows that all identified impacts associated with the construction and post-construction phases can be mitigated to acceptable levels provided that the site specific EMPr and specialist recommendations are strictly adhered to. These measures have been incorporated into the EMPr, which also makes provision for the monitoring and auditing thereof, as well as environmental awareness training for all persons who will be conducting the activity.
- Once construction is complete, rehabilitation and landscaping must be undertaken with indigenous vegetation.

It is thus the EAP's opinion that the activity for which environmental authorisation is being sought, is authorised provided that it is undertaken in accordance with the Alternative A1 (Preferred Site Alternative) and the Preferred Stormwater Culvert Layout.

Properties and Infrastructure:

- Signage must be placed prior to the commencement of construction to make the community aware of the upcoming activities.
- The engineer must identify any existing infrastructure services that may be affected prior to commencement of construction.
- Any structures that are required to be removed must be replaced, and any damage incurred must be repaired.

Waste Management, Storage Areas:

- The Contractor must ensure that all litter is collected from the work and camp areas daily.
- All hazardous substances must be stored within a secured storage area, with impervious lining and bunding.
- Drip trays must be used where suitable.
- The mixing of concrete must be done on plastic sheeting, mortar boards or similar structures to prevent the risk of run-off.
- Chemical toilets must be used as ablution facilities during the construction period by all contractors.

Traffic and Construction Vehicles:

- Appropriate safety signage must be used to cordon off construction areas.
- Construction vehicles must adhere to speed limits.
- Access to the site for site establishment and construction activities must be planned from the existing access routes.

Dust and Erosion Control:

- The liberation of dust into the surrounding environment must be effectively controlled by the use of water sprays, water carts, fabric containment or curtains, where required.

- Suitable erosion control measures must be implemented in areas sensitive to erosion, i.e., stormwater discharge points, exposed areas and embankments.
- All exposed surfaces must be re-vegetated and stabilised as soon as is practically possible.

Monitoring and Auditing:

- The EMPr (Appendix G) and conditions thereto must be adhered to.
- An ECO must be appointed and all contractor staff to be trained on the EMPr and Environmental Authorisation requirements prior to commencement of activities.
- Environmental monitoring and auditing shall be undertaken by the Independent ECO on a frequency as to be determined by the competent authority.