

APPENDIX K: NEEDS AND DESIRABILITY REPORT FOR THE PROPOSED HOUT BAY CEMETERY EXTENSION ON THE REMAINDER OF ERF 1459, ALONG HUGHENDEN STREET, HOUT BAY, CAPE TOWN, WESTERN CAPE

INTRODUCTION

Need and desirability is based on the principle of sustainability, set out in the Republic of South Africa Constitution Act (Act No.108 of 1996) ("the Constitution") and the National Environmental Management Act (Act No. 107 of 1998) (NEMA), and provided for in various policies and plans, including the Environmental Management Framework (EMF), Spatial Development Framework (SDF) and National Development Plan 2030 (NDP). The consideration of 'need and desirability' of a proposal is a key part of environmental impact assessment which relates to the context, broader societal needs, and the public interest. Need and desirability, although not defined in NEMA, are generally considered to relate to

- a) the economic and/or societal benefit likely to be conferred by a proposed development, and
- b) the policy and spatial planning context in which the proposed activity takes place.

The Guidelines for Need and Desirability sets out a list of questions which should be addressed when considering need and desirability of a proposed development. The concept relates to whether the activity is being proposed at the right time and in the right place, considering the following factors: ecological sustainability (impacts on ecosystems and biological diversity; pollution; and renewable and non-renewable resources etc.) and justifiable economic and social development though ensuring alignment with the relevant spatial plans, including Municipal Integrated Development Plans (IDP), SDF and EMF. The assessment reports will need to provide information as to how the development will address the socio-economic impacts of the development, and whether any socio-economic impact resulting from the development impact on people's environmental rights. Considering the need and desirability of a development entails the balancing of these factors.

GUIDELINES CONSIDERED IN DRAFTING THIS SECTION OF THE REPORT

The table below is based on the Guidelines for Need and Desirability (DEA, 2014 & 2017 and DEA&DP, 2013) and sets out the key considerations motivating the need and desirability of the project proposal. This section should be read with Section E of the Basic Assessment Report (BAR), which sets out in more detail the legislative, policy, and planning contexts in which the project is proposed.

Table 1: Need and desirability guidelines as applied to the project

	GUIDELINE QUESTIONS	RESPONSE
1	How will this development (and its separate elements/aspects) impact on the ecological integrity of the area?	All potential ecological impacts have been assessed and described in the Basic Assessment Report (BAR). These ecologically significant impact studies include botanical, freshwater, groundwater and stormwater assessments. The proposed extension of the Hout Bay cemetery is unlikely to impact the ecological integrity of the area given the transformed nature of the development footprint which consists of highly disturbed vegetation. The site is severely degraded to transformed and of low conservation value. The following results were observed from the ecological assessment : • There are no Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) overlapping the project site; • Project area is not located in a Protected Area (PA) or National Protected Area Expansion Strategy (NPAES) focus area; • Project area is not located in an Important Bird Area (IBA); and • The project area is located broadly in a nationally threatened ecosystem, namely the Peninsula Granite Fynbos which is considered critically endangered. Despite its location within a threatened vegetation type, the site visit confirmed that the site is already highly degraded and altered, which significantly reduces its ecological value. As a result, the proposed cemetery expansion is expected to have an insignificant impact on terrestrial biodiversity. Even though there will be loss of vegetation and alteration to the regional vegetation type, the grass layer will likely re-establish itself in new ways after burials are completed. Potential ecological impacts of the proposed development are anticipated to primarily be groundwater contamination, however, mitigation measures and monitoring protocol has been established as part of the Groundwater Assessment Report (Appendix G5 of the BAR).

GUIDELINE QUESTIONS		RESPONSE
1.1	How were the following ecological integrity considerations taken into account? 1.1.1 Threatened Ecosystems,	The original vegetation of the site, prior to human disturbance, was likely Critically Endangered Peninsula Granite Fynbos. This vegetation type is classified as critically endangered because it is endemic to the City of Cape Town and faces ongoing threats from urbanisation, habitat loss, pine and wattle plantations, and invasions by alien plant species. However, site verification shows that the current site does not represent the regional vegetation type. The area has been altered, degraded, and invaded over time, particularly due to the operation of the Hout Bay cemetery on adjacent properties. Furthermore, the site is impacted by existing infrastructure and informal settlement activities. Therefore, it is unlikely that any indigenous vegetation representing the Critically Endangered Peninsula Granite Fynbos remains present on the site.
	1.1.2 Sensitive, vulnerable, highly dynamic, or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure,	The aquatic compliance statement confirmed that there are no watercourses or wetlands present on the site, and therefore no direct impacts under the NEMA or the National Water Act (Act No. 36 of 1998) (NWA). The proposed development footprint lies outside the 100-metre buffer zone of the Hout Bay River and, while it is near, but not within, the 500-metre regulated buffer zone of wetlands, site conditions and the nature of the development suggest a minimal likelihood of impact. However, two potential indirect impacts were identified: • Stormwater runoff management (due to its location within a Strategic Water Source Area, but the presence of compacted surfaces, separation from nearby watercourses, and limited hydrological change from added impervious areas help minimise potential runoff impacts) and • Groundwater contamination (due to decomposition products, although site-specific factors like low vulnerability, limited soil infiltration, and distance from surface water features help reduce this risk) The only environmental concerns relate to stormwater and groundwater, both of which are considered to pose low significance. These findings have informed the inclusion of appropriate stormwater management and pollution prevention measures in the construction phase to ensure minimal environmental impact.
	1.1.3 Critical Biodiversity Areas ("CBAs") and Ecological Support Areas ("ESAs"),	There are no CBAs or ESAs overlapping the project site.
	1.1.4 Conservation targets,	The proposed cemetery development will not impact on conservation targets for terrestrial ecosystems.
	1.1.5 Ecological drivers of the ecosystem,	The ecological study confirmed that the site is already highly degraded and altered, which significantly reduces its ecological value. As a result, the proposed cemetery expansion is expected to have an insignificant impact on terrestrial biodiversity.
	1.1.6 Environmental Management Framework,	The proposed Hout Bay Cemetery falls within the Southern District, for which an Environmental Management Framework (EMF) has been prepared by the City of Cape Town. The district



GUIDELINE QUESTIONS		RESPONSE
		development guidelines state the need to support the continued use of cemeteries and prioritise the identification of additional cemetery developments to cater for the increased urban growth in the district, while taking cognisance of the relevant health regulations. Therefore, the proposed Hout Bay Cemetery development aligns with the EMF in that it envisages the identification of burial spaces for the continued practice of traditional burials as well as continued cemetery use within the district.
	1.1.7 Spatial Development Framework, and	The Western Cape Spatial Development Framework (WCSDf) is a strategic planning document that guides spatial development in the Western Cape province of South Africa. It aligns land use, infrastructure development, and resource management with the province's development goals, focusing on sustainability, equity, and efficiency. While the WCSDf does not explicitly mention cemeteries, it provides guidance on appropriate land use planning, including the siting of social infrastructure such as cemeteries. For cemetery expansions, the WCSDf encourages decisions that consider land availability, proximity to existing urban nodes, accessibility, and environmental sensitivity. Aligning the Hout Bay Cemetery expansion with the spatial planning principles of the WCSDf ensures that the project supports broader provincial goals of efficient land use, sustainable development, and equitable service delivery. The City of Cape Town's Municipal Spatial Development Framework (MSDF) 2023 - 2028 outlines the city's priorities for sustainable development, climate resilience, and urban growth. While the plan doesn't specifically address cemetery expansions, it highlights the importance of spatial planning, equitable service distribution, and community engagement. Cemetery development should align with the city's spatial framework, ensuring accessibility and integration with existing infrastructure. The spatial strategy that a cemetery expansion meets is one of spatial justice and spatial sustainability. Expanding cemeteries in strategic locations ensures equitable access to burial sites across different communities, including underserved or rural areas. It also supports the principle of sustainability by considering future urban growth, environmental protection, and the efficient use of available land. This alignment with the city's spatial planning goals ensures that cemetery development is both beneficial to the community and consistent with long-term planning objectives.
	1.1.8 Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.).	The proposed development is not anticipated to impact on any global or international commitments.
1.2	How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity? What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	The ecological study confirmed that the site is already highly degraded and altered, which significantly reduces its ecological value. Due to the degraded and altered nature of the site, any potential impact that could arise would fall within an insignificant category (i.e. Very Low possible impact). However, the following general management actions were proposed to mitigate any potential damage: • Limit all construction and operational activities to the smallest footprint; • Implement industry best practice standards for preventing and managing potential hydrocarbon pollution from spills; • Restrict vegetation and soil removal to areas where it is strictly necessary; and



GUIDELINE QUESTIONS		RESPONSE
		Monitor disturbed soils regularly for the emergence of alien invasive plant species and apply appropriate control measures in accordance with an Alien Invasive Plant Species Management Plan. <i>The EMPr (Appendix H of the BAR) fully describes the impacts and recommended mitigation measures.</i>
1.3	How will this development pollute and/or degrade the biophysical environment? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	The findings from the groundwater impact assessment are as follows: - Several small-scale groundwater users are present, especially in residential areas north of the site; - Groundwater abstraction likely occurs from the secondary fractured aquifer, as the primary aquifer is unproductive for large-scale use; - The primary aquifer is perched and has limited connectivity with the deeper fractured aquifer; - Borehole samples down-gradient of the cemetery show ideal to good water quality, indicating no historical contamination from cemetery activities; - Groundwater quality in the area falls within the ideal range (0–70 mS/m); - The primary aquifer is highly vulnerable to surface contamination due to its sandy, permeable nature; - Any contamination would likely follow the groundwater flow direction (southeast to northwest), toward the Hout Bay River; - Grave sites were used as trial pits; all observed graves (2m deep) were dry; - Surface soils consist of dry, unconsolidated, fine- to medium-grained sand with small quartz grains and occasional roots; - Historical data shows the water table in the primary aquifer is deeper than 2m below ground level; and - The proposed cemetery extension is at a higher elevation, suggesting an even deeper water table beneath the new area. While the cemetery is a potential source of contamination, the depth of the water table (more than 1m below burial depth) breaks the source-pathway-receptor link. Therefore, the overall risk to groundwater resources is considered low. Despite the low risk, appropriate screening measures must be implemented to prevent any impact on the aquifer. The assessment concluded that the site is suited for use as a cemetery, given the lack of shallow groundwater. The only environmental concerns relate to stormwater and groundwater, both of which are considered to pose low significance post mitigation. These findings have informed the inclusion

GUIDELINE QUESTIONS		RESPONSE
		of appropriate stormwater management and pollution prevention measures in the construction phase to ensure minimal environmental impact. <i>The EMPr (Appendix H of the BAR) fully describes the impacts and recommended mitigation measures.</i>
1.4	What waste will be generated by this development? What measures were explored to firstly avoid waste, and where waste could not be avoided altogether; what measures were explored to minimise, reuse and/or recycle the waste? What measures have been explored to safely treat and/or dispose of unavoidable waste?	All waste, including building rubble and recyclables, will be removed from the site and taken to appropriately licensed facilities authorised to handle such waste and with sufficient capacity to accept it. During the operational phase, only negligible volumes of general waste are expected. Since this project is an extension of the existing cemetery, waste collection will be incorporated into the municipal collection schedule for the Hout Bay cemetery. <i>The EMPr (Appendix H of the BAR) fully describes the waste management measures.</i>
1.5	How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	The overall landscape and visual impact is expected to be minor positive and from a visual perspective it is not fatally flawed. The findings of Landscape and Visual Impact Assessment can be summarised as follows: • Similar type of infrastructure on the adjacent site (extension of the existing cemetery). The proposed infrastructure is not a dominant and significant component in the landscape and blends in well with existing urban forms, colours and textures. It therefore achieves a visual congruence to the surrounding environment; • The greatest negative landscape and visual impacts, albeit still minor – negligible will be during the construction phase which are temporary; • The small visual envelope due to the nature of the development (a cemetery with no significant height); • The dispersed dense tree stands, tree lined avenues and built infrastructure offer sufficient screening from most areas within the study area (except for residents residing directly next to the site); • The specific site is derelict, and the extension of the existing cemetery will enhance the overall visual quality within the immediate vicinity of the residential area, especially while traveling along Hughenden Street; • The proposed site is only visible to a minor group of people – residents living on the urban fringe of Constantiaberg (driving down Hughenden Street) and visitors to the existing cemetery; • The site is not visible from major roads within the sub region i.e. M63 (Hout Bay Main Road); and • Due to the urban context long expansive views towards the site is limited. The site does not constitute any national cultural heritage. Should and heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the proposed expansion, all works must be stopped immediately and Heritage Western Cape notified without delay.

GUIDELINE QUESTIONS		RESPONSE
1.6	How will this development use and/or impact on non-renewable natural resources? What measures were explored to ensure responsible and equitable use of the resources? How have the consequences of the depletion of the non-renewable natural resources been considered? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	The proposed development will entail the expansion of an existing cemetery. The existing cemetery infrastructure, including the access road and the water and sewer reticulation, will still be utilised, in order to accommodate the extended development and the additional infrastructure. This will save additional costs related to the establishment of a new site, that would require new infrastructure and resources. There are no water, cultural and heritage and socio-economic resources negatively affected by the project.
1.7	1.7.1 Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth or does it reduce resource dependency (i.e., dematerialised growth)? (note sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life)? 1.7.2 Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra-and intergenerational equity, and are there more important priorities for which the resources should be used (i.e., what are the opportunity costs of using these resources this the proposed development alternative?) 1.7.3 Do the proposed location, type and scale of development promote a reduced dependency on resources?	Given the modest scale of construction, the scope for energy-efficient design measures is relatively constrained. Nonetheless, several practical strategies have been proposed to minimise energy consumption and environmental impact: • Labour-Intensive Construction Methods: The greatest potential for energy savings lies in maximising the use of manual labour for tasks that do not require electrical machinery. This approach not only reduces energy demand but also helps limit noise and air pollution on site. • Supplementary Power Supply: During construction, generators could be used to augment the existing Eskom power supply, ensuring continuity while managing energy use efficiently. • Efficient Appliances and Lighting: Energy-efficient appliances and LED lightbulbs could potentially be installed where practicable. The use of daylight-saving lighting throughout the facility can contribute to electricity savings of up to 15%. • Material Recommendations: Although the development is simple and not expected to incorporate advanced energy strategies, the use of green building materials (where practical) is recommended to further enhance sustainability. Although the project does not allow for many energy-saving features, the proposed measures show a clear effort to limit environmental impact within the limits of what is possible.
1.8	1.8.1 What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?	The following are the assumptions, uncertainties and gaps in knowledge from the EAP and specialists: • It is assumed that the information on which this report is based (project information as well as existing information) is correct, factual and truthful. • It is assumed that all the relevant mitigation measures and agreements specified in this BAR and the accompanying Environmental Management Programme (EMPr) will be implemented in order to ensure minimal negative impacts and maximum environmental benefits. • It is assumed that Stakeholders and Interested and Affected Parties notified during the public participation process will submit all relevant comments within the designated review and comment period.

GUIDELINE QUESTIONS	RESPONSE
	- It is assumed that the recommendations provided by the specialists will mitigate any harmful effects on the environment, including groundwater, freshwater and soil contamination. This will be determined with the regular monitoring practices recommended in the EMPr (Appendix H). The following assumptions and limitations were identified from the various specialist studies: Assumptions and limitations from the Aquatic Compliance Statement: - Due to the scarcity of biotopes and water resources, the implementation of aquatic methodologies proved to be impractical. Consequently, it is assumed that the selected sample sites for the aquatic assessment effectively represent the broader aquatic conditions in the project area. It is further assumed that the environmental conditions during the study period are typical of the broader conditions in the semi-arid environment. - The absence of site-specific data posed challenges in determining the Present Ecological Status (PES) directly for the project site. Therefore, the PES of the broader catchment was considered as a proxy. During the cemetery expansion, it is recommended that appropriate measures be implemented to prevent any potential spillages that could runoff into the receiving stormwater drains and eventually drains into the Houtbay River. However, the likelihood of such an impact occurring is considered low. - The identified freshwater features within the study area are considered to have low ecological sensitivity and limited natural functionality. The Channeled Valley Bottom wetland located to the east of the cemetery is primarily sustained by artificial stormwater drainage inputs and lacks significant aquatic ecological diversity. This wetland does not exhibit the hydrological or biological characteristics of a natural wetland system, and its ecological functionality is considered minimal. - The Hout Bay River (Dias River) is the only recognised NFEPA and truly natural freshwater feature within the broader project area. However, the potential impact of the proposed project on this river is anticipated to be very low. This assessment is based on the fact that the river is already subject to substantial anthropogenic pressures, including influences from the nearby equestrian farm, runoff and disturbances associated with the M63 road infrastructure, and impacts from the adjacent Imizamo Yethu Village. - The existing degraded state of these freshwater systems, particularly those influenced by human activities, supports the assumption that the project's influence on aquatic ecological conditions will be negligible. Nevertheless, mitigation measures should still be considered to ensure that no additional negative impacts are introduced during project implementation.



GUIDELINE QUESTIONS	RESPONSE
	- The desktop component of this assessment utilized the most recent and relevant data sources available. However, it is important to note that these datasets typically cover a broader spatial scale, focusing on the entire catchment area rather than the specific project site. Based on the available information, no significant impacts on the aquatic ecosystems are anticipated, and the cemetery Assumptions and limitations from the Terrestrial Biodiversity Compliance Statement: - In order to obtain a comprehensive understanding of the dynamics of the biodiversity of the study area, surveys should ideally be replicated over several seasons and over a number of years. However, due to project time constraints such long-term studies are not feasible. This survey was conducted during February 2025 which is not the ideal flowering period. Nevertheless, adequate rainfall has occurred during the current summer period to allow for sufficient growth. - Since environmental studies deal with dynamic natural systems, additional information may come to light at a later stage. - Despite these limitations, a comprehensive desktop study was also conducted, in conjunction with the detailed results from the current survey, and as such there is a high confidence in the information provided. - Floral identifications of each species on site were documented and were confirmed with family experts located at SANBI. Assumptions and limitations from the Landscape and Visual Assessment: - During the time of writing this report a proposed detailed cemetery layout was not available, however assumptions were made on general industry standards, the existing adjacent cemetery and experience in the field of Landscape Architecture and Landscape and Visual Impact Assessment; - Determining a visual resource in absolute terms is not achievable. It is a complex procedure since it is determined through a combination of quantitative (visibility) and qualitative (aesthetic value) criteria. Therefore, a visual assessment cannot be entirely objective in this sense. Individuals will evaluate a landscape differently, based on experience, cultural, and social background; - Various factors can enhance or reduce the visual impact of the proposed project, for instance, vegetation near a receptor's view of the proposed project. Other factors include weather, climatic conditions, and seasonal change. Therefore, it is difficult to determine the visual impact of the proposed project from the viewpoint of each receptor; and - No specific national legislation for visual assessments currently exists in South Africa. However, the assessment of visual impacts is required by implication when the provisions



GUIDELINE QUESTIONS	RESPONSE
	of relevant acts governing environmental management are considered and when certain characteristics of either the receiving environment or the proposed project indicate that visibility and aesthetics are likely to be significant issues and that visual input is required (Oberholzer, 2005). Assumptions and limitations from the Groundwater Impact Assessment: • Available data was sourced from the relevant groundwater databases and sources. The aquifer vulnerability, yield and quality data is predominantly accurate, albeit mapped at a regional scale. • A further limitation was the temporal nature of the site visit. The field work was undertaken on a single day in November 2023 and does not account for the temporal variability of the water table. Since historical data has been made available by the City, this is not expected to impact the risk assessment for the site. • Based on the available data, it is assumed that the impermeable clay layer is continuous throughout the site and not lenticular (lenses) in nature, preventing the primary aquifer from interacting with the underlying fractured aquifer. • It is possible that there are a greater number of groundwater users in the area as what has been reported in this study. Not all groundwater users could be located or visited due to a large number of the dwellings, plots and farms being gated. Assumptions and limitations from the Traffic Impact Assessment: • The two portions will be connected by a walkway, making it possible for visitors to access the extended portion of the cemetery via the existing cemetery. This will allow visitors to park in the existing parking lot and walk to the extended portion of the cemetery. • No parking will be provided on the extended portion of the cemetery • Trip reduction factors are not applicable. • The existing parking lot at the cemetery does not have demarcated parking bays. The assumed bay size and the subsequent capacity of the parking lot were calculated based on the parking provisions in TMH16.
1.8.2 What is the level of risk associated with the limits of current knowledge?	The level of risk is considered low as all potential impacts on the environment have been identified and assessed by the specialist and/or EAP. The identification and assessment have been undertaken in accordance with the approved methodologies.
1.8.3 Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?	Identified potential impacts are assessed in accordance with the methodology as follows: <i>For each predicted impact, criteria are ascribed, and these include the intensity (size or degree scale), which also includes the type of impact, being either a positive or negative impact; the</i>



	GUIDELINE QUESTIONS	RESPONSE
		<i>duration (temporal scale); and the extent (spatial scale), as well as the probability (likelihood). The methodology is quantitative, whereby professional judgement is used to identify a rating for each criteria based on a seven-point scale; and the significance is auto-generated using a spreadsheet through application of the calculations. Specialists were able to comment where they disagree with the auto-calculated impact significance rating.</i> Specialist inputs based on the methodology have been obtained and incorporated into the report and EMPr. Ideally impact avoidance is the default position. However, this does not always result in an achievable, viable and sustainable alternative. As such where adverse impacts cannot reasonably be avoided, the activities should be managed through the effective implementation of the EMPr with a strong emphasis on post-construction rehabilitation where required to achieve impacts at an acceptable level. Where negative impacts cannot be mitigated to acceptable levels the implementation of offsets must be applied. The significance of negative impacts has not resulted in an unacceptable selection outcome. Refer to the Methodology and Impact Assessment in the BAR.
1.9	How will the ecological impacts be resulting from this development impact on people's environmental right in terms following: 1.9.1. Negative impacts: e.g., access to resources, opportunity costs, loss of amenity (e.g., open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts? 1.9.2 Positive impacts: e.g., improved access to resources, improved amenity, improved air, or water quality, etc. What measures were taken to enhance positive impacts?	Potential ecological impacts associated with cemetery use on the proposed site include soil and groundwater contamination. Contamination includes bacteria from the decomposition of human remains, coffin materials (e.g. metals) and harmful compounds in embalming solutions. This could result in reduced water quality and negative health impacts to those in surrounding areas who utilise the water for domestic use. To minimise the risk, groundwater specialists recommended mitigation measures and monitoring protocol which has been included in the EMPr. • There is potential for alien invasive species to spread and establish due to soil disturbances. • There is potential for stormwater runoff impacting the Hout Bay River. • There is potential for groundwater contamination If the proposed mitigation measures are not implemented. <i>The EMPr (Annexure H of the BAR) and Specialists Reports (Annexure G of the BAR) provides for recommendations and mitigation measures.</i> • There is a burial shortage across the City of Cape Town and additional burial sites are needed to accommodate the growing population. • There are limited sites available for the development of a cemeteries in Cape Town. Expanding the existing Hout Bay Cemetery was identified to be suitable it terms accessibility. • The proposed site has no significant environmental sensitives making it suitable for the development. • The applicant is committed to implementing the recommended mitigation measures.

GUIDELINE QUESTIONS		RESPONSE
		• There will be removal of the existing alien invasive species on site. • The operation of the cemetery will reduce the risk of the land invasion on RE Erf 1459. • Job creation during the construction and operational phase of the cemetery.
1.10	Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socio-economic impacts (e.g., on livelihoods, loss of heritage site, opportunity costs, etc.)?	Cultural services are included in ecosystem services, and these include the factors that contribute to human wellbeing and quality of life. The proposed expansion of the cemetery provides for the cultural and religious needs of the community which advocate for the burial of loved ones. Therefore, this development benefits "human wellbeing", and addresses the city-wide issue of limited appropriate land for cemetery use.
1.11	Based on all the above, how will this development positively or negatively impact on ecological integrity objectives/targets/considerations of the area?	Due to the degraded and altered nature of the site, any potential impact that could arise would fall within an insignificant category (i.e. Very Low possible impact). However, the following general management actions were proposed to mitigate any potential damage:
1.12	Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the "best practicable environmental option" in terms of ecological considerations?	• Limit all construction and operational activities to the smallest footprint; • Implement industry best practice standards for preventing and managing potential hydrocarbon pollution from spills; • Restrict vegetation and soil removal to areas where it is strictly necessary; and • Monitor disturbed soils regularly for the emergence of alien invasive plant species and apply appropriate control measures in accordance with an Alien Invasive Plant Species Management Plan.
1.13	Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope, and nature of the project in relation to its location and existing and other planned developments in the area?	The cemetery will not have ecological impacts that will vegetatively or positively affect people.
2.1	What is the socio-economic context of the area, based on, amongst other considerations, the following considerations? 2.1.1. The IDP (and its sector plans' vision, objectives, strategies, indicators, and targets) and any other strategic plans, frameworks of policies applicable to the area, 2.1.2 Spatial priorities and desired spatial patterns (e.g. need for integration of segregated communities, need to upgrade informal settlements, need for densification, etc.),	The cemetery is in line with the approved SDF and IDP, which aims to: • Support the continued use of cemeteries. • Identify location and support the establishment of other interment options to supplement or compliment the traditional in-ground burial. • Promote combining these with other activities, e.g. parks and gardens, to promote its safe usage. • Prioritise the identification of additional cemetery development in the short-medium term, in addition to cater for urban growth in the district. This should take cognisance of the health regulations in this regard. The identification of the vacant RE/1460 for additional cemetery development is consistent with The Southern Suburbs District IDP in that the proposed activity envisages additional cemetery development.

GUIDELINE QUESTIONS		RESPONSE
	2.1.3. Spatial characteristics (e.g., existing land uses, planned land uses, cultural landscapes, etc.), and	The property is currently zoned as Open Space II as per City of Cape Town zoning regulations. The zoning allows for cemeteries on the property; however, a consent use application will need to be applied for with the City of Cape Town relevant branch.
	2.1.4 Municipal Economic Development Strategy (“LED Strategy”).	Strategy 3 of the City of Cape Town’s SDF aims to plan for and prioritise the adequate provision of cemetery space to meet burial demand. The proposed expansion of the Hout Bay Cemetery aligns with the strategies of the SDF by ensuring sufficient burial space to accommodate the growing need across the city.
2.2	Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically, also on the socio-economic objectives of the area?	Positive socio-economic impacts are anticipated in the form of construction phase employment opportunities and longer-term operational phase jobs. The provision of burial space close to the surrounding neighbouring communities allows for people to be buried close to their loved ones and they won’t have to commute far distances to visit the graveyard. The expansion would ensure that all communities have fair access to cemetery services, as well as create the required space as the cemetery as reached capacity.
2.3	How will this development address the specific physical, psychological, developmental, cultural, and social needs and interests of the relevant communities?	Social and cultural benefits will arise from providing dignified burial access, meeting the religious and cultural needs of surrounding communities that incorporate burials into their practices. The proposed site is conveniently attached to the existing Hout Bay cemetery, ensuring easy access.
2.4	Will the development result in equitable (intra-and inter-generational) impact distribution, in the short-and long-term? Will the impact be socially and economically sustainable in the short-and long-term?	The cemetery expansion will align with the IDP’s goals for equitable service delivery by ensuring accessibility for all residents, regardless of their location or socio-economic status.
2.5	In terms of location, describe how the placement of the proposed development will:	The proposed cemetery expansion will be located on vacant land within the greater urban edge. This land is owned by the CoCT and leaving it unused could increase informal settlement in the area. The site is located adjacent to the existing Hout Bay Cemetery and is highly transformed and contains no plant or animal species of concern, nor are there any environmental sensitivities, making it suitable for the extension. The development is appropriately situated as it aligns with current land-use planning and the Western Cape Spatial Development Framework (WCSDF). The WCSDF encourages decisions that consider land availability, proximity to existing urban nodes, accessibility, and environmental sensitivity. Aligning the Hout Bay Cemetery expansion with these spatial planning principles ensures the project supports broader provincial goals of efficient land use, sustainable development, and equitable service delivery. Expanding cemeteries in strategic locations promotes equitable access to burial sites for various communities, including underserved and rural areas. It also follows sustainability principles by accounting for future urban growth. Additionally, the project will create employment opportunities for cemetery workers, including grave diggers and ground staff. Since the development is on the City’s urban edge and surrounded by residential and agricultural areas, local communities will not need to travel far for funerals or to visit graves. Vehicular access will be via Hout Bay Main Road and Hughenden Street. Due to differences in elevation across
	2.5.1 result in the creation of residential and employment opportunities near or integrated with each other,	
	2.5.2 reduce the need for transport of people and goods,	
	2.5.3 result in access to public transport or enable non-motorised and pedestrian transport (e.g., will the development result in densification and the achievement of thresholds in terms public transport),	
	2.5.4 compliment other uses in the area,	
	2.5.5 be in line with the planning for the area,	



GUIDELINE QUESTIONS		RESPONSE
		the site, there will be no vehicular link between the existing and expanded sections of the cemetery. Sidewalks along all adjacent roads ensure pedestrian access. The facility is also designed to accommodate both private vehicles and public transportation, including buses and taxis.
	2.5.6 for urban related development, make use of underutilised land available with the urban edge,	The proposed cemetery expansion will be located on vacant land within the greater urban edge. The land belongs to the CoCT and not utilising this portion of land could further increase the presence of informal settlement dwellers.
	2.5.7 optimise the use of existing resources and infrastructure,	The existing cemetery infrastructure, including the access road and the water and sewer reticulation, will still be utilised, in order to accommodate the extended development and the additional infrastructure. This will save additional costs related to the establishment of a new site, that would require new infrastructure and resources.
	2.5.8 opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g., not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement),	The proposed development does not require bulk infrastructure planning.
	2.5.9 discourage "urban sprawl" and contribute to compaction/densification,	The proposed development is within the urban edge, on a vacant site, and will enable the fullest possible use of the land parcel to be made.
	2.5.10 contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure more than current needs.	The proposed expansion will not contribute to the correction of historically distorted spatial patterns. It will, however, optimise the use of the vacant land to a land-use that aligns with the spatial planning in and round the area.
	2.5.11 encourage environmentally sustainable land development practices and processes.	There is limited available appropriate land for cemetery use city-wide, and this development would provide for the future need for burial space.
	2.5.12 take into account special locational factors that might favour the specific location (e.g., the location of a strategic mineral resource, access to the port, access to rail, etc.),	The proposed site is located amongst residential areas (Hout Bay).
	2.5.13 the investment in the settlement or area in question will generate the highest socio-economic returns (i.e., an area with high economic potential),	The proposal in itself is that of providing municipal basic service delivery in the form of dignified burial sites within proximity to the surrounding community.
	2.5.14. impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area, and	The development will not impact on any of these characteristics. The site does not constitute any national cultural heritage. Should and heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the proposed expansion, all works must be stopped immediately and Heritage Western Cape notified without delay.
	2.5.15 in terms of the nature, scale and location of the development promote or act as a catalyst to create a more integrated settlement?	The proposed development is intended to contribute to a more integrated settlement by providing an important municipal amenity.
2.6	How were a risk-averse and cautious approach applied in terms of socio- economic impacts?	None were required. The cemetery is in line with the approved SDF and IDP.
	2.6.1. What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?	Current knowledge is limited insofar as the economic outcomes of the proposed development are not quantified. The scale and nature of the development, and the fact that socioeconomic

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	2.6.2. What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability, and sustainability) associated with the limits of current knowledge?	impacts are anticipated to be positive while biophysical impacts are anticipated to be negative but not unacceptable, means that this limitation in knowledge is acceptable and does not pose a risk.
	2.6.3. Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?	
2.7	How will the socio-economic impacts resulting from this development impact on people's environmental right in terms following:	Refer to 1.9.1 and 1.9.2 above.
	2.7.1 Negative impacts: e.g., health (e.g., HIV-Aids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?	Refer 1.9.1 above.
	2.7.2 Positive impacts. What measures were taken to enhance positive impacts?	Refer 1.9.2 above.
2.8	Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socio-economic impacts will result in ecological impacts (e.g., over utilisation of natural resources, etc.)?	Human wellbeing depends on a functioning ecosystem which provides a variety of ecosystem services. The impacts of the proposed development on botanical, aquatic, traffic, socio-economic, geotechnical, stormwater and groundwater resources have been assessed and mitigation has been proposed to reduce negative impacts to an acceptable level. Existing services in the area will be used to their full potential. The application is for the development of a cemetery which is needed and is an essential service to be provided by the municipality.
2.9	What measures were taken to pursue the selection of the "best practicable environmental option" in terms of socio-economic considerations?	The 'best practicable environmental option', which relates to the Constitution's requirement to secure 'ecologically sustainable development' requires a consideration of potential negative impacts, known and unknown, against the socio-economic benefits of development. The negative impacts of the proposed development on the environment can be mitigated by the implementation of the environmental management programme. Therefore, there are no reasons to not consider the proposed development to be the best practicable option for the site, since it is intended to provide a necessary amenity for the area.
2.10	What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)? Considering the need for social equity and justice, do the alternatives identified,	There are no adverse environmental impacts that will unfairly discriminate against any person. The identified preferred alternative is sufficient to allow the best practicable environmental option to be selected and no further alternatives need be considered. If the specialists' recommendations are followed, any risks identified with the project is negligible to low.



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	allow the “best practicable environmental option” to be selected, or is there a need for other alternatives to be considered?	
2.11	What measures were taken to pursue equitable access to environmental resources, benefits, and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?	The project will not negatively affect access to environmental resources, benefits, or services needed to meet basic human needs and well-being. Therefore, no special measures are required to ensure access. However, the project promotes equitable access through the following actions: • It upholds environmental justice by preventing unfair discrimination in access to environmental resources and benefits. The cemetery will provide advantages to both the community and the City as a whole. • Inclusive public participation processes are conducted, actively involving vulnerable and disadvantaged groups to ensure they have a voice and access to relevant information. • Measures such as procurement practices and labor considerations are implemented to support historically disadvantaged communities. • The project aligns with legal frameworks like the NEMA and its regulations, which emphasize equitable access and social inclusion in environmental decision-making.
2.12	What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development’s life cycle?	An EMPr for the pre-construction, construction and operational phases of the proposed development specify responsibilities for environmental issues throughout the lifecycle of the development.
2.13	What measures were taken to:	The Public Participation Process (PPP) undertaken as part of the Basic Assessment is detailed in section F of the BAR. Various methods were employed to notify potential Interested and Affected Parties of the proposed project, including media notices, written notifications, and site notices; methods are detailed in Appendix F of the BAR. The BAR is being distributed for public comment for a 30-day period. The following public participation process, in terms of Regulation 41 of the EIA Regulations of 2014 as amended, will be implemented: • An initial database of potential I&APs has been compiled. The database includes known adjacent landowners, ward councillors, municipal officials, relevant state departments and organs of state. • A Site notice was fixed at a location where the public had the best chance of viewing the notice. • Notification was given to all relevant parties as per the requirements of the EIA Regulations. • The Basic Assessment Report (BAR) is available for download at Zutari webpage. • An advertisement was placed in a local newspaper.
	2.13.1. ensure the participation of all interested and affected parties,	
	2.13.2. provide all people with an opportunity to develop the understanding, skills, and capacity necessary for achieving equitable and effective participation,	
	2.13.3. ensure participation by vulnerable and disadvantaged persons,	
	2.13.4. promote community wellbeing and empowerment through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means,	
	2.13.5 ensure openness and transparency, and access to information in terms of the process,	
	2.13.6 ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge, and	

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	2.13.7 ensure that the vital role of women and youth in environmental management and development were recognised and their full participation therein were be promoted?	- The newspaper complied with the minimum requirements of the Regulations and informed the public of the availability of the Draft BAR 30-day review and comment period, the comment period date, to whom and how to submit comments. - Hard copies of the Draft BAR were placed strategically around the application site. - A register of Interested and Affected Parties (I&APs) is maintained. - A Comments and Responses Report is being maintained for the project and will be submitted together with the Final BAR for decision-making.
2.14	Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community (e.g., a mixture of low, middle- and high-income housing opportunities) that is consistent with the priority needs of the local area (or that is proportional to the needs of an area)?	There is a city-wide need for available appropriate land for cemetery use. The proposed development will provide for the cultural and religious needs of the surrounding communities which incorporate burials into their religious practices, therefore providing a needed amenity to the surrounding community. The public participation process will incorporate engagement with local councillors and community leaders. The local community will have an opportunity to raise any concerns they may have, and these concerns will be addressed throughout the process.
2.15	What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected?	There is a detailed environmental awareness programme in the EMP. The health and safety concerns will be addressed by the implementation of occupational health and safety legislation, and an environmental control officer will be appointed to monitor the compliance with the environmental management programme.
2.16	Describe how the development will impact on job creation in terms of, amongst other aspects:	During the construction phase, the contractor will be appointed by the municipality through its tender process. The City of Cape Town's (CoCT) tender system ensures fair and equitable opportunities for previously disadvantaged groups. This is achieved through its preferential procurement policy, which aligns with South Africa's Preferential Procurement Policy Framework Act (PPPFA). The policy aims to support and advance individuals and businesses that have been historically disadvantaged by past unfair discrimination. Furthermore, preference will be given to local labourers and service providers. Considering the nature of the activity, job opportunities will include those associated with construction (installation of fencing, access roads, removal of vegetation, construction of public toilet facilities and the new parking area), as well as operation (graveyard managers, caretakers, grave diggers).
	2.16.1 the number of temporary versus permanent jobs that will be created,	
	2.16.2. whether the labour available in the area will be able to take up the job opportunities (i.e., do the required skills match the skills available in the area),	
	2.16.3 the distance from where labourers will have to travel,	
	2.16.4 the location of jobs opportunities versus the location of impacts (i.e., equitable distribution of costs and benefits), and	
	2.16.5 the opportunity costs in terms of job creation (e.g., a mine might create 100 jobs, but impact on 1000 agricultural jobs, etc.).	
2.17	What measures were taken to ensure:	The stakeholders consultation process carried out by the EAP will assist in coordinating the policies, legislation and mandates of the various organs of state. Stakeholder engagement is essential for an effective Environmental Impact Assessment (EIA) process. Therefore, a PPP is conducted as part of the Environmental Authorisation (EA)
	2.17.1 that there were intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment, and	
	2.17.2 that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?	

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		application process for the project. Feedback from key stakeholders informs the EA decision-making process by DEA&DP.
2.18	What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people's common heritage?	The public participation process, which is an integral part of the EIA process, provides a means of managing potential impacts of environmental resources and determining whether the proposed use of resources is in the public's interest.
2.19	Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?	Mitigation measures are realistic and reasonable; therefore, the risk of a long-term negative legacy is low.
2.20	What measures were taken to ensure that the costs of remedying pollution, environmental degradation, and consequent adverse health effects and of preventing, controlling, or minimising further pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment?	Impacts and their associated recommended mitigation measures have been identified, forming a key part of the EMP, and will form part of the EA, should it be granted. Responsibility for their implementation and compliance with any authorisations would lie with the applicant.
2.21	Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations?	See section H of the BAR for a detailed description of alternatives and the selection of the best practicable environmental option.
2.22	Describe the positive and negative cumulative socio-economic impacts bearing in mind the size, scale, scope, and nature of the project in relation to its location and other planned developments in the area?	The socio-economic impact assessment found that the proposed expansion of Hout Bay Cemetery presents an opportunity to address both immediate and future burial needs. The project is expected to create several positive impacts during the construction and operational phases, i.e., local procurement, employment, household income, burial space, etc. However, there are potential negative impacts related to traffic, safety, security, noise, and visual disturbances, which could affect the quality of life for local residents. These impacts must be carefully managed to ensure minimal disruption to the community. The EMP includes mitigation measures for negative impacts.