



DRAFT BASIC ASSESSMENT REPORT

for

ARCH ROCK

on

Remainder Portion 5 of 296, Keurboomstrand

In terms of the

National Environmental Management Act (Act No. 107 of 1998, as amended) & 2014 Environmental Impact Regulations

Prepared for Applicant: Keurbooms Rock (Pty) Ltd

Date: 17 February 2022

Author of Report: Ms Melissa Mackay

Author Email: mel@cape-eaprac.co.za

Report Reference: BIT634/09

Department Reference: 16/3/3/1/D1/6/0000/22

Case Officer: Ms Jessica Christie

Cape EAPrac

Cape Environmental Assessment Practitioners

Tel: +27 44 874 0365

Fax: +27 44 874 0432

PO Box 2070, George 6530

17 Progress Street, George

www.cape-eaprac.co.za



APPOINTED ENVIRONMENTAL ASSESSMENT PRACTITIONER:

Cape EAPrac Environmental Assessment Practitioners

PO Box 2070

George

6530

Tel: 044-874 0365

Fax: 044-874 0432

Report written & compiled by: **Ms Melissa Mackay** (BTech & ND Nature Conservation), who has sixteen years' experience as an environmental practitioner. Registered Environmental Assessment Practitioner with the Environmental Assessment Practitioners of South Africa, EAPSA, Registration Number **2019/1446**.

Registration: Director **Louise-Mari van Zyl** (MA Geography & Environmental Science [US]; Registered Environmental Assessment Practitioner with the Environmental Assessment Practitioners of South Africa, EAPSA, Registration Number **2019/1444**. Ms van Zyl has over nineteen years' experience as an environmental practitioner.

PURPOSE OF THIS REPORT:

Public Review & Comment

APPLICANT:

Keurbooms Rock (Pty) Ltd

CAPE EAPRAC REFERENCE NO:

BIT634/09

SUBMISSION DATE

17 February 2022

PUBLIC PARTICIPATION


By participating in this environmental process, whether it be through written submissions, telephonic enquiries, registrations or attendance of meetings, you are automatically giving consent for your full contact details and/or any submissions/inputs to be used and published in all matters pertaining to this application i.e. reports/notifications/communication for review or decision-making.

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APPROVAL FOR RELEASE

NAME	TITLE	SIGNATURE
Ms Melissa Mackay	Snr Consultant	

DISTRIBUTION

DESIGNATION	NAME	EMAIL / FAX
DEA&DP: Case officer	Ms Jessica Christie	Jessica.Christie@westerncape.gov.za
Applicant	Keurbooms Rock (Pty) Ltd	Terry@babylonstoren.com
Registered I&APs	Multiple	

DRAFT BASIC ASSESSMENT REPORT

in terms of the
National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended &
Environmental Impact Regulations 2014

Arch Rock

Remainder Portion 5 of 296 Keurboomstrand

Submitted for:

Stakeholder Review & Comment

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Report Issued by:

Cape Environmental Assessment Practitioners

Tel: 044 874 0365
Fax: 044 874 0432
Web: www.cape-eaprac.co.za

PO Box 2070
17 Progress Street
George 6530

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1. CONTENT OF BASIC ASSESSMENT REPORTS

Appendix 1 of the 2014 EIA Regulations (as amended) contains the required contents of a Basic Assessment Report. The checklist below serves as a summary of how these requirements were incorporated into this Basic Assessment Report.

Requirement	Details
<p>(a) Details of -</p> <p>(i) The EAP who prepared the report; and</p> <p>(ii) The expertise of the EAP, including, curriculum vitae.</p> <p>(iii) Applicant Details</p>	<p>Ms Melissa Mackay BTech & ND Nature Conservation, with sixteen years' experience as an environmental practitioner. Company profile is included as Appendix L3.</p> <p>Keurbooms Rock (Pty) Ltd</p> <p>Unit 207, 2nd Floor, The Village Square, Oxford Street</p> <p>Email: Terry@babylonstoren.com</p>
<p>(b) The location of the activity, including –</p> <p>(i) The 21 digit Surveyor General code of each cadastral land parcel;</p> <p>(ii) Where available, the physical address and farm name;</p> <p>(iii) Where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties.</p>	<p>C03900000000029600005</p>
<p>(c) a plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale, or, if it is</p> <p>(i) A linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or</p> <p>(ii) On land where the property has not been defined, the coordinates within which the activity is to be undertaken.</p>	<p>Refer to Appendix A & B</p>
<p>(d) a description of the scope of the proposed activity, including -</p> <p>(i) All listed and specified activities triggered and being applied for; and</p> <p>(ii) A description of the activities to be undertaken including associated structures and infrastructure.</p>	<p>Section B</p>
<p>(e) A description of the policy and legislative context within which the development is proposed, including –</p> <p>(i) An identification of all legislation, policies, plans, guidelines, spatial tools, municipal</p>	<p>Section B</p>

Requirement	Details
<p>development planning frameworks, and instruments that are applicable to this activity and have been considered in the preparation of the report; and</p> <p>(ii) How the proposed activity complies with and responds to the legislation and policy context, plans, guidelines, tools frameworks and instruments.</p>	
<p>(f) A motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred location.</p>	Section D
<p>(g) A motivation for the preferred site, activity and technology alternative.</p>	Section E&F
<p>(h) A full description of the process followed to reach the proposed preferred alternative within the site, including -</p> <p>(i) Details of all alternatives considered;</p> <p>(ii) Details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;</p> <p>(iii) A summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;</p> <p>(iv) The environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;</p> <p>(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:</p> <p>(aa) can be reversed;</p> <p>(bb) may cause irreplaceable loss of resources; and</p> <p>(cc) can be avoided, managed or mitigated.</p> <p>(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;</p> <p>(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;</p> <p>(viii) The possible mitigation measures that could be applied and level of residual risk;</p> <p>(ix) The outcome of the site selection matrix;</p>	<p>Section E</p> <p>Section C and Appendix F</p> <p>Section F</p> <p>Section E & F and Appendix G</p> <p>Section G and Appendix G</p>

Requirement	Details
<p>(x) <i>If no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and</i></p> <p>(xi) <i>A concluding statement indicating the preferred alternatives, including preferred location of the activity.</i></p>	
<p>(i) <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, including –</i></p> <p>(ii) <i>A description of all environmental issues and risks that were identified during the environmental impact assessment process; and</i></p> <p>(iii) <i>An assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures.</i></p>	Section F & G and Appendix G
<p>(j) <i>An assessment of each identified potentially significant impact and risk, including -</i></p> <p>(i) <i>Cumulative impacts;</i></p> <p>(ii) <i>The nature, significance and consequences of the impact and risk;</i></p> <p>(iii) <i>The extent and duration of the impact and risk;</i></p> <p>(iv) <i>The probability of the impact and risk occurring;</i></p> <p>(v) <i>The degree to which the impact and risk can be reversed;</i></p> <p>(vi) <i>The degree to which the impact and risk may cause irreplaceable loss of resources; and</i></p> <p>(vii) <i>The degree to which the impact and risk can be mitigated.</i></p>	Section G
<p>(k) <i>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 assessment report.</i></p>	Section G and Appendix G
<p>(l) <i>An environmental impact statement which contains:</i></p> <p>(i) <i>A summary of the key findings of the environmental impact assessment;</i></p> <p>(ii) <i>A map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and</i></p> <p>(iii) <i>A summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.</i></p>	Section G & H and Appendix G
<p>(m) <i>Based on the assessment, and where applicable, impact management measures from specialist reports, the recording of proposed impact management objectives, and the impact management outcomes for the development for inclusion in the EMPr.</i></p>	Section G & H, Appendices G & H

Requirement	Details
(n) Any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation.	Section H
(o) A description of assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed.	Section F, G & H and Appendix G
(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.	Section H
(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.	Section H
(r) An undertaking under oath or affirmation by the EAP in relation to: <ul style="list-style-type: none"> (i) The correctness of the information provided in the reports; (ii) The inclusion of comments and inputs from stakeholders and I&APs; (iii) The inclusion of inputs and recommendations from the specialist reports where relevant; and (iv) Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties. 	Section J
(s) Where applicable, details of any financial provisions for the rehabilitation, closure and ongoing post decommissioning management of negative environmental impacts.	Not applicable to this application
(t) Any specific information that may be required by the competent authority.	
(u) Any other matters required in terms of section 24(4)(a) and (b) of the Act.	



BASIC ASSESSMENT REPORT

**THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND
THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.**

NOVEMBER 2019

(For official use only)	
Pre-application Reference Number (if applicable):	16/3/3/6/7/1/D1/6/0171/21
EIA Application Reference Number:	16/3/3/1/D1/6/0000/22
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

GENERAL PROJECT DESCRIPTION

(This must Include an overview of the project including the Farm name/Portion/Erf number)

Alternative 1 (Preferred Alternative)

Keurbooms Rock (Pty) Ltd purchased the existing Arch Rock Seaside Accommodation resort on Remainder of Portion 5 of 296, Keurboomstrand.

The property has purchased by Keurbooms Rock (Pty) Ltd. in 2019 and it is their proposal to re-furbish / alter the existing resort units on the property as the units are outdated and old. The refurbishment is expected to reduce the throughput capacity of the facility which currently accommodates 26 pax in 10 chalets, to 22 pax in 8 chalets. The new units will be placed on the same footprints of the old units, although there is some overlap due to configuration. The overlap however takes place on areas that were previously lawned or gravel.

The new units will not require any changes to building lines or heights that are currently in effect. The three sea facing units will make use of the same frontal position as the current units. The lawns in front of the old sea facing units will be rehabilitated to coastal dune vegetation.

The resort its current configuration commenced circa 1991, is located in an established township area and will remain a resort.

The redevelopment will consist of the following:

- 5 x 1 bedroom units with open pergola stoeps (average $\pm 81\text{m}^2$);
- 3 x 2 bedroom units with open pergola stoeps (average $\pm 90\text{m}^2$);
- Existing reception to be converted to a new laundry;
- New pool and store ($\pm 45\text{m}^2$) to replace the existing laundry;
- Reception and administration ($\pm 60\text{m}^2$) partially replacing the existing laundry and one of the old chalets; and
- 8 parking bays partially replacing the existing store.

	Existing		New	
	No	Area	No	Area
Chalets	10	760m ²	8	839m ²
General	4	162m ²	3	213m ²
Total	14	922m²	11	1052m²
Pax	26		22	

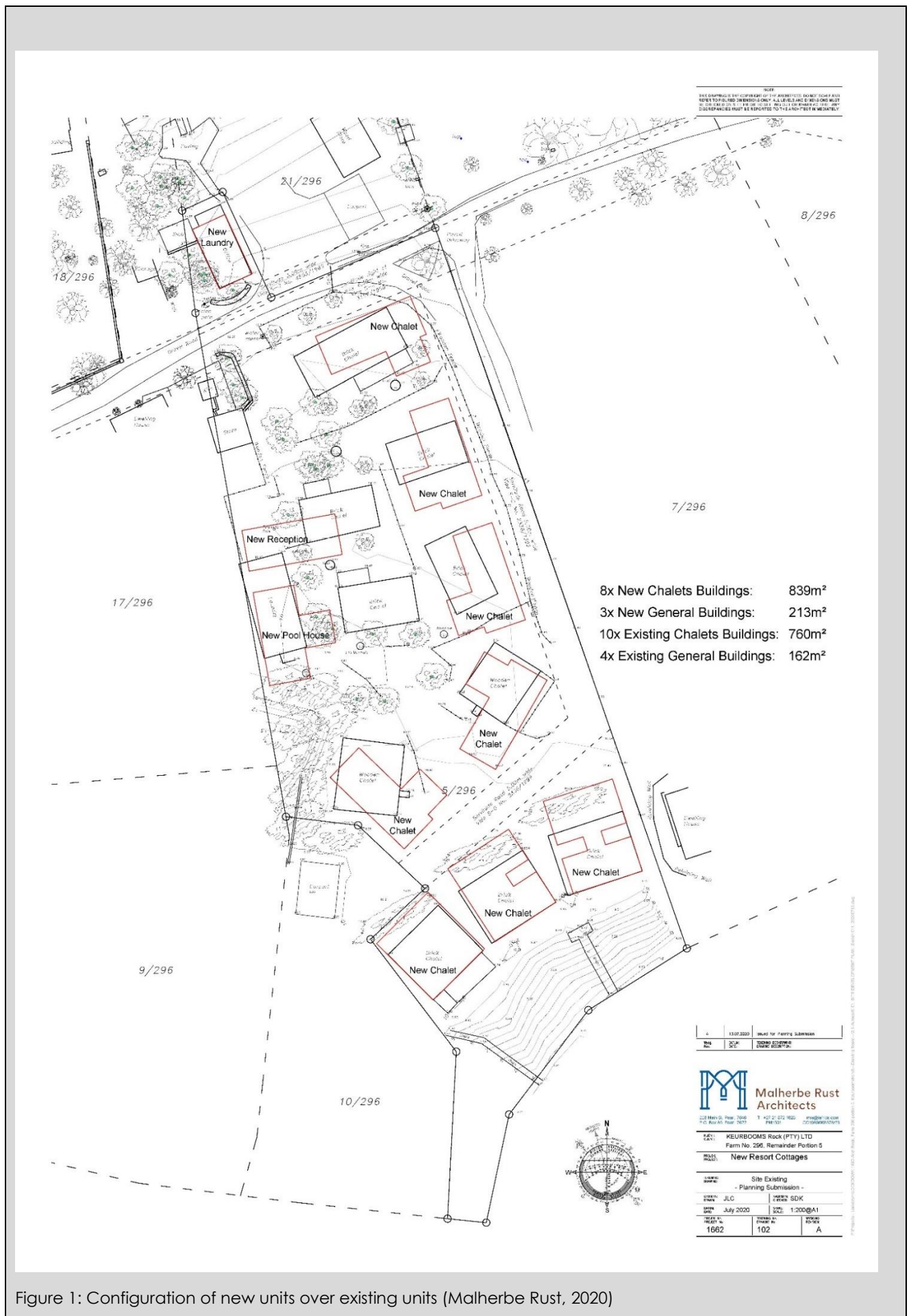


Figure 1: Configuration of new units over existing units (Malherbe Rust, 2020)



Figure 2: Site Development Plan (Malherbe Rust, 2020)

The three sea facing units must include piling to ensure long term stability and protection of the coastal interface.



Figure 3: Architects rendering (Malherbe Rust, 2020)

IMPORTANT INFORMATION TO BE READ PRIOR TO COMPLETING THIS BASIC ASSESSMENT REPORT

1. **The purpose** of this template is to provide a format for the Basic Assessment report as set out in Appendix 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in order to ultimately obtain Environmental Authorisation.
2. The Environmental Impact Assessment ("EIA") Regulations is defined in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") hereinafter referred to as the "NEMA EIA Regulations".
3. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.
4. All applicable sections of this BAR must be completed.
5. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.
6. This BAR is current as of **November 2019**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at <http://www.westerncape.gov.za/eadp> to check for the latest version of this BAR.
7. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an environmental authorisation in terms of the NEMA EIA Regulations when the Western Cape Government Department of Environmental Affairs and Development Planning ("DEA&DP") is the Competent Authority.
8. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.

9. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.
10. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.
11. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"), the "One Environmental System" is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department's Circular EADP 0028/2014: One Environmental Management System.
12. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA") is triggered, a copy of Heritage Western Cape's final comment must be attached to the BAR.
13. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link <https://screening.environment.gov.za/screeningtool> to generate the Screening Tool Report. The screening tool report must be attached to this BAR.
14. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ("NEM:QA"), the submission of the Report must also be made as follows, for-

Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

Atmospheric Emissions Licence Applications, this report must also be (i.e., another hard copy and electronic copy) submitted for the attention of the Licensing Authority or this Department's Air Quality Management Directorate (Tel: 021 483 2888 and Fax: 021 483 4368) at the same postal address as the Cape Town Office.

DEPARTMENTAL DETAILS

CAPE TOWN OFFICE: REGION 1 and REGION 2 (Region 1: City of Cape Town, West Coast District) (Region 2: Cape Winelands District & Overberg District)	GEORGE OFFICE: REGION 3 (Central Karoo District & Garden Route District)
<p>BAR must be sent to the following details:</p> <p>Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1 or 2) Private Bag X 9086 Cape Town, 8000</p> <p>Registry Office 1st Floor Utilitas Building 1 Dorp Street, Cape Town</p> <p>Queries should be directed to the Directorate: Development Management (Region 1 and 2) at: Tel: (021) 483-5829 Fax (021) 483-4372</p>	<p>BAR must be sent to the following details:</p> <p>Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530</p> <p>Registry Office 4th Floor, York Park Building 93 York Street George</p> <p>Queries should be directed to the Directorate: Development Management (Region 3) at: Tel: (044) 805-8600 Fax (044) 805 8650</p>

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	<p>The scale of the locality map must be at least 1:50 000.</p> <p>For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map.</p> <p>The map must indicate the following:</p> <ul style="list-style-type: none"> • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. <p>For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken.</p> <p>Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.</p>
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	
Site Plan:	<p>Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following:</p> <ul style="list-style-type: none"> • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. • The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. • The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development must be clearly indicated on the site plan. • Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. • Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): <ul style="list-style-type: none"> ○ Watercourses / Rivers / Wetlands ○ Flood lines (i.e., 1:100 year, 1:50 year and 1:10 year where applicable); ○ Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"); ○ Ridges; ○ Cultural and historical features/landscapes; ○ Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow <p>A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.</p>
Site photographs	<p>Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as Appendix C. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.</p>
Biodiversity Overlay Map:	<p>A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as Appendix D.</p>

Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as Appendix A3 .
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ACRONYMS

DAFF:	Department of Forestry and Fisheries
DEA:	Department of Environmental Affairs
DEA& DP:	Department of Environmental Affairs and Development Planning
DHS:	Department of Human Settlement
DoA:	Department of Agriculture
DoH:	Department of Health
DWS:	Department of Water and Sanitation
EMPr:	Environmental Management Programme
HWC:	Heritage Western Cape
NFEPA:	National Freshwater Ecosystem Protection Assessment
NSBA:	National Spatial Biodiversity Assessment
TOR:	Terms of Reference
WCBSP:	Western Cape Biodiversity Spatial Plan
WCG:	Western Cape Government

ATTACHMENTS

Note: The Appendices must be attached to the BAR as per the list below. Please use a ✓ (tick) or a x (cross) to indicate whether the Appendix is attached to the BAR.

The following checklist of attachments must be completed.

APPENDIX			✓ (Tick) or x (cross)
Appendix A:	Maps		
	Appendix A1:	Locality Map	✓
	Appendix A2:	Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning	✓
	Appendix A3:	Map with the GPS co-ordinates for linear activities	x
Appendix B:	Appendix B1:	Site development plan(s)	✓
	Appendix B2	A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;	✓
Appendix C:	Photographs		✓
Appendix D:	Biodiversity overlay map		✓
Appendix E:	Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.		
	Appendix E1:	Final comment/ROD from HWC	Pending

	Appendix E2:	Copy of comment from Cape Nature	Pending
	Appendix E3:	Final Comment from the DWS	x
	Appendix E4:	Comment from the DEA: Oceans and Coast	Pending
	Appendix E5:	Comment from the DAFF	x
	Appendix E6:	Comment from WCG: Transport and Public Works	x
	Appendix E7:	Comment from WCG: DoA	Pending
	Appendix E8:	Comment from WCG: DHS	x
	Appendix E9:	Comment from WCG: DoH	Pending
	Appendix E10:	Comment from DEA&DP: Pollution Management	x
	Appendix E11:	Comment from DEA&DP: Waste Management	x
	Appendix E12:	Comment from DEA&DP: Biodiversity	x
	Appendix E13:	Comment from DEA&DP: Air Quality	x
	Appendix E14:	Comment from DEA&DP: Coastal Management	Pending
	Appendix E15:	Comment from the local authority	✓
	Appendix E16:	Confirmation of all services (water, electricity, sewage, solid waste management)	✓
	Appendix E17:	Comment from the District Municipality	Pending
	Appendix E18:	Copy of an exemption notice	x
	Appendix E19:	Pre-approval for the reclamation of land	x
	Appendix E20:	Proof of agreement/TOR of the specialist studies conducted.	✓
	Appendix E21:	Proof of land use rights	✓

	Appendix E22:	Proof of public participation agreement for linear activities	x
Appendix F:	Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.		✓
Appendix G:	Specialist Report(s)		✓
Appendix H:	EMPr		✓
Appendix I:	Screening tool report		✓
Appendix J:	The impact and risk assessment for each alternative		In report
Appendix K:	Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline		In report
Appendix L:	Any other attachments must be included as subsequent appendices Appendix L1: Authority correspondence Appendix L2: Windeed Property Report & Title Deeds		✓

SECTION A: ADMINISTRATIVE DETAILS

	CAPE TOWN OFFICE:		GEORGE OFFICE:
Highlight the Departmental Region in which the intended application will fall	REGION 1 <small>{City of Cape Town, West Coast District}</small>	REGION 2 <small>{Cape Winelands District & Overberg District}</small>	REGION 3 (Central Karoo District & Garden Route District)
Duplicate this section where there is more than one Proponent	Keurbooms Rock (Pty) Ltd		
Name of Applicant/Proponent:			
Name of contact person for Applicant/Proponent (if other):	Mr Ignatius Terblanche (Terry) de Waal		
Company/ Trading name/State Department/Organ of State:	Keurbooms Rock (Pty) Ltd		
Company Registration Number:	2018/324347/07		
Postal address:	Unit 207, 2nd Floor, The Village Square, Oxford Street		
	Durbanville	Postal code:	7551
Telephone:	(021) 0200 444	Cell:	082 578 8977
E-mail:	Terry@babylonstoren.com	Fax:	
Company of EAP:	Cape Environmental Assessment Practitioners (Cape EAPrac)		
EAP name:	Ms Melissa Mackay		
Postal address:	PO Box 2070		
	George	Postal code:	6530
Telephone:	044 874 0365	Cell:	071 603 4132
E-mail:	mel@cape-eaprac.co.za	Fax:	044 874 0432
Qualifications:	BTech & ND Nature Conservation		
EAPASA registration no:	Melissa Mackay EAPASA Registration Number 2019/1446 Director Louise-Mari van Zyl (MA Geography & Environmental Science [US]; Registered Environmental Assessment Practitioner with the Environmental Assessment Practitioners of South Africa, EAPSA, Registration Number 2019/1444 . Ms van Zyl has over nineteen years' experience as an environmental practitioner.		
Duplicate this section where there is more than one landowner	Keurbooms Rock (Pty) Ltd		
Name of landowner:			
Name of contact person for landowner (if other):	Mr Ignatius Terblanche (Terry) de Waal		

Postal address: Telephone: E-mail:	Unit 207, 2nd Floor, The Village Square, Oxford Street		
	Durbanville	Postal code:	7551
	(021) 0200 444	Cell:	082 578 8977
	Terry@babylonstoren.com	Fax:	
Name of Person in control of the land:	Keurbooms Rock (Pty) Ltd		
Name of contact person for person in control of the land:	Mr Ignatius Terblanche (Terry) de Waal		
Postal address:	As Above		
		Postal code:	
Telephone:	()	Cell:	
E-mail:		Fax:	

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall: Contact person: Postal address: Telephone: E-mail:	Bitou Municipality		
	Mr Chris Schliemann		
	Office No. 50, Second Floor, Melville's Corner, 3 Kloof Street		
	Plettenberg Bay	Postal code:	6600
	044 501 3324	Cell:	
	cschliemann@plett.gov.za	Fax:	086 659 7954

SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS AS INCLUDED IN THE APPLICATION FORM

1.	Is the proposed development (please tick):	New	<input checked="" type="checkbox"/>	Expansion	
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				
Brownfield. The existing resort will be refurbished. The capacity of the resort will be reduced from 26 pax to 22 pax and the number of units will be reduced from 10 to 8 chalets.					
3.	For Linear activities or developments				
3.1.	Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:				
3.2.	Development footprint of the proposed development for all alternatives:			m ²	

3.3.	Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.																							
3.4.	Indicate how access to the proposed routes will be obtained for all alternatives.																							
3.5.	SG—Digit codes of the Farms/Farm Portions/Erff numbers for all alternatives																							
3.6.	Starting point co-ordinates for all alternatives																							
	Latitude (S)						°						'						''					
	Longitude (E)						°						'						''					
	Middle point co-ordinates for all alternatives																							
	Latitude (S)						°						'						''					
	Longitude (E)						°						'						''					
	End point co-ordinates for all alternatives																							
	Latitude (S)						°						'						''					
	Longitude (E)						°						'						''					
Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.																								
4.	Other developments																							
4.1.	Property size(s) of all proposed site(s):															4619m ²								
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):															±2800m ² including walkways, parking, braai areas and gardens. Buildings are ±992m ² in area.								
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:															±2745m ² including walkways, parking and gardens. Buildings are ±1052m ² in area.								
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).																							

The proposed development entails the demolition of the existing structures and the rebuilding of 8 new chalets and 3 general buildings. The new chalets will accommodate up to 22 pax.

	Existing		New	
	No	Area	No	Area
Chalets	10	760m ²	8	839m ²
General	4	162m ²	3	213m ²
Total	14	922m²	11	1052m²
Pax	26		22	

The building style will be uniform across the site and the proposed changes to the current style is reflected below.





The site layout plan below identifies how the new buildings will fit onto the existing footprints.

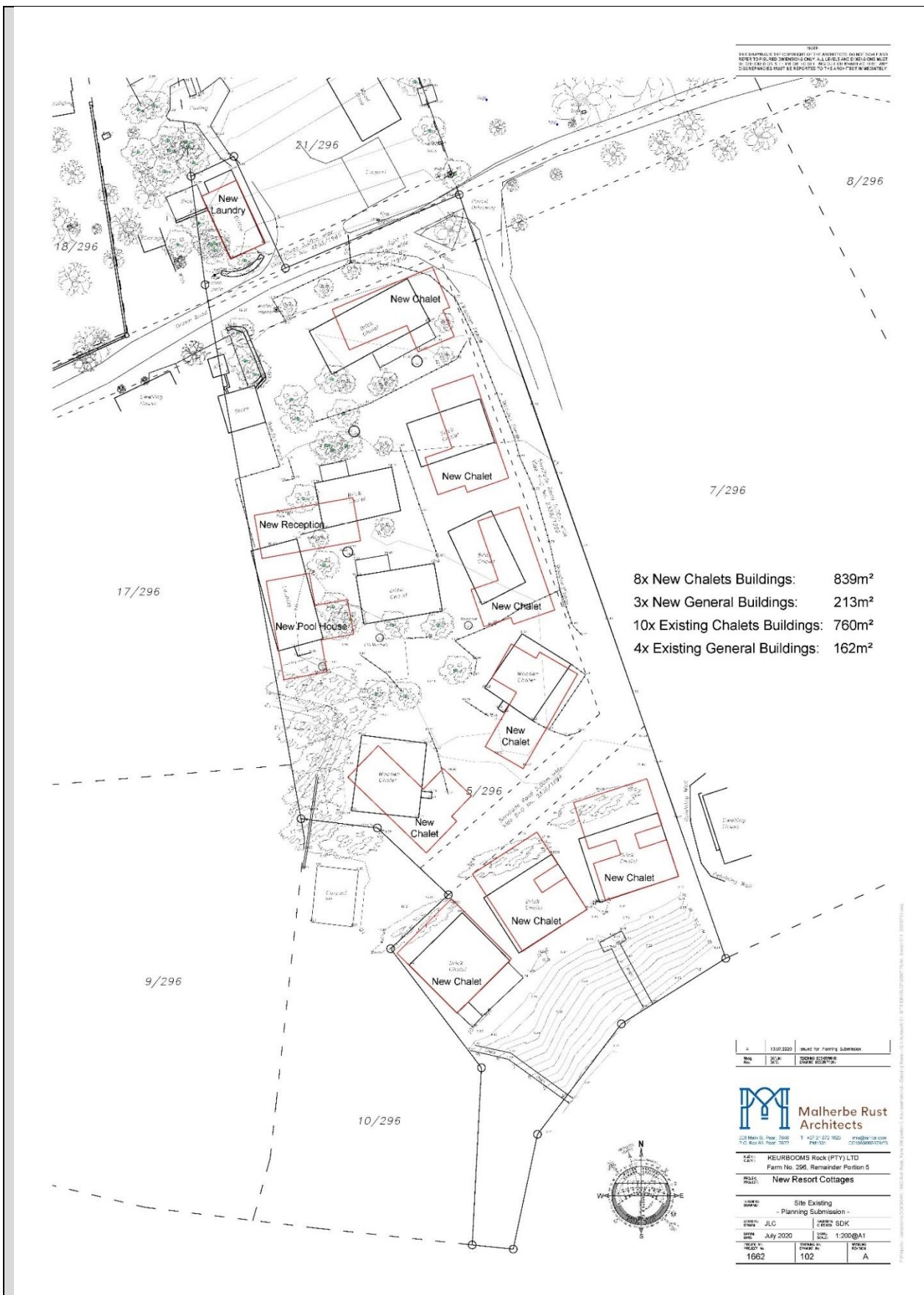


Figure 4: Site Development Plan vs Existing layout (Malherbe Rust, 2020)

Roads and Access

The property (Portion 5 of farm 296) forms part of a greater farm, subdivided in the 90' s. Formal roads have not been built traversing the historic farm, but road servitudes are in place and gravel roads services the various portions of the greater farm 296.

Portion 5 (the relevant property) has access from a gravel road cutting through the north of the property. A 5m road servitude is registered to the benefit of portion 10 of farm 296.



Figure 5: Road access and servitudes (De Villiers & Hulme Consulting Engineers, 2020)

Water supply

The site is currently serviced with municipal water. The new development has an expected maximum total water demand of 8250 ℓ/d. This demand is generated by the various cottages, along with the laundry and pool house. The existing municipal feed is assumed to be sufficient, but this will have to be confirmed during further consultation with the municipality.

Sewerage

The current resort has a soak away sewer systems and this will be redesigned to comply with latest regulations. The sewer system would gravity flow and connect to a nearby sewer manhole, if they are available. Bitou Municipality has not yet confirmed if this is available. Alternatively, sewage will collect in a central conservancy tank and pump it into the nearest suitable municipal sewer or cart it off site by means of honey sucker trucks. A design flow rate of 5500ℓ/d is expected.

Storm Water

No existing formal stormwater drainage infrastructure exists on site. There are some small stormwater pipes exiting onto the foredune from the forward chalets. These will be removed.

The roofs of the new buildings will generate some storm water run-off which will directly infiltrate the surrounding soils. The proposed new stormwater runoff will not exceed the existing.

On-site rainwater harvesting for use in the pool can be considered. The other runoff will infiltrate the surrounding soft landscaped areas.

Solid waste refuse collection

Adequate, on-site provision will be made to store refuse bins. The collection and removal of refuse will be in line with the municipal guidelines.

Earthworks

The proposed works will include the construction of 8 basements to the various units. This will generate around 1050m³ of excavated material, in addition to the grub and clearing which might add around 600m³ of topsoil and gravel to be stripped. Some of the excavated material is expected to be used for backfilling under the new units.

If favourable material is excavated, around 320m³ of excavated material could then be re-used on the site. The rest would have to be spoiled off site. Other approved engineering fill material will be imported from commercial sources.

4.5. Indicate how access to the proposed site(s) will be obtained for all alternatives.

Roads and Access

The property (Portion 5 of farm 296) forms part of a greater farm, subdivided in the 90' s. Formal roads have not been built traversing the historic farm, but road servitudes are in place and gravel roads services the various portions of the greater farm 296.

Portion 5 (the relevant property) has access from a gravel road cutting through the north of the property. A 5m road servitude is registered to the benefit of portion 10 of farm 296.



Figure 6: Road access and servitudes (De Villiers & Hulme Consulting Engineers, 2020)

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	3	9	0	0	0	4	0	0	0	0	2	9	6	0	0	0	0	0	5
4.7.	Coordinates of the proposed site(s) for all alternatives:																					
	Latitude (S)										34°		00'		11"							
	Longitude (E)										23°		27'		43"							

SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS

1. EXEMPTION APPLIED FOR IN TERMS OF THE NEMA AND THE NEMA EIA REGULATIONS

Has exemption been applied for in terms of the NEMA and the NEMA EIA Regulations. If yes, include a copy of the exemption notice in Appendix E18.	YES	NO
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2. IS THE FOLLOWING LEGISLATION APPLICABLE TO THE PROPOSED ACTIVITY OR DEVELOPMENT

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.	YES	NO
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.	YES	NO
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3.	YES	NO
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	YES	NO
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")	YES	NO
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	YES	NO
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	YES	NO
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.	YES	NO

3. OTHER LEGISLATION

List any other legislation that is applicable to the proposed activity or development.

LEGISLATION, POLICIES, PLANS, GUIDELINES, SPATIAL TOOLS, MUNICIPAL DEVELOPMENT PLANNING FRAMEWORKS, AND INSTRUMENTS	ADMINISTERING AUTHORITY and how it is relevant to this application	TYPE <i>Permit/license/authorisation/comment / relevant consideration (e.g. rezoning or consent use, building plan approval, Water Use License and/or General Authorisation, License in terms of the SAHRA and CARA, coastal discharge permit, etc.)</i>	DATE <i>(if already obtained):</i>
National Environmental Management Act (Act 107 of 1998 as amended)	DEA&DP	Environmental Authorisation	Pending
National Environmental Management Laws Amendment Act (Act 25 of 2014)	DEA&DP	Public participation as part of the Environmental Authorisation	Pending
National Environmental Management: Biodiversity Act (Act 10 of 2004)	DEA&DP	Removal of invasive vegetation / impact on threatened ecosystem type	None

National Water Act (Act 36 of 1998)	Department of Water & Sanitation	None	None
National Forest Act (Act 84 of 1998)	Department of Forestry	Possible pruning of milkwood trees	To be confirmed with final survey
Conservation of Agricultural Resources Act (Act 43 of 1983)	Department of Agriculture	Removal of invasive vegetation	None
Land Use Planning Ordinance (Act 15 of 1985)	Bitou Municipality	Rezoning & Consent Use Application Building Plan Application	Pending post EIA
Outeniqua Sensitive Coastal Areas Act (OSCA)	Bitou Municipality	OSCA Permit	Will not be applicable if EA is issued

4. POLICIES

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.	
LEGISLATION, POLICIES, PLANS, GUIDELINES, SPATIAL TOOLS, MUNICIPAL DEVELOPMENT PLANNING FRAMEWORKS, AND INSTRUMENTS	Describe how the proposed development complies with and responds:
National Environmental Management Act (Act 107 of 1998 as amended)	Environmental Impact Assessment is being undertaken in terms of Chapter 5 of NEMA using the 2017 EIA regulations.
National Environmental Management Laws Amendment Act (Act 25 of 2014)	The public participation is being undertaken in terms of this Act, specifically the 30 day comment period prescribed.
National Environmental Management: Biodiversity Act (Act 10 of 2004)	The identification of the onsite vegetation and the ecosystem status associated with the vegetation is undertaken in terms of this Act. This Act also applies to the control and management of Alien Invasive Species (AIS), which includes animals and vegetation.
National Heritage Resources Act (Act 25 of 1999)	Not required

National Water Act (Act 36 of 1998)	Since the development will be obtaining water directly from the municipality and no water resources will be affected, this Act is not applicable to this application.
National Forest Act (Act 84 of 1998)	Should the applicant need to prune the on site Milkwood trees, a permit in terms of this Act will be needed. This can only be confirmed on site post EIA.
Conservation of Agricultural Resources Act (Act 43 of 1983)	This Act applies for the removal and control of alien invasive vegetation, protection of water resources and the prevention of soil erosion.
Land Use Planning Ordinance (Act 15 of 1985)	The planning and construction of a dwelling to accommodate the land use proposed is regulated by this Ordinance. This process will only commence on the EIA process is completed.
Outeniqua Sensitive Coastal Areas Act (OSCA)	An OSCA application will not be necessary once an EA issued for this application.
National Waste Management Strategy	All waste from construction to decommissioning must be dealt with in terms of this strategy.
National Protected Area Expansion Strategy	There are no NPAES focus areas near the development properties.
Municipal Biodiversity Summary Project	The summary provides a tool with which to evaluate the impact of the development on the environment.

5. GUIDELINES

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal.

Guideline for Environmental Management Plans (2005)	An EMPr has been included with this Basic Assessment to provide practical and implementable actions to ensure that the development maintains sustainability and minimise impacts through all its phases. The document is drafted as per the Guidelines and requirements of NEMA.
Guideline for Public Participation (2013)	The PPP for this process is based on this Guideline and also includes any updated regulations.

Guideline on Alternatives (2013)	Feasible and reasonable alternatives must be considered alongside the development proposal in order to ensure the Best Practicable Environmental Option (BPEO). These Guidelines have been used in their consideration.
Guideline on Need & Desirability (2013)	Need & Desirability refers to the temporal and spatial need of an area for a specific development. This Guideline was used to define the requirements and implications of Need & Desirability.
Bitou Municipality Spatial Development Framework (2013)	The proposal is identified in line with the SDF. Demographic information was obtained from this document.
Bitou Municipality Integrated Development Plan 2017 - 2022	The proposal is identified in line with the IDP. Demographic information was obtained from this document.

6. PROTOCOLS

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form

The following protocols apply:

- SITE SENSITIVITY VERIFICATION REQUIREMENTS WHERE A SPECIALIST ASSESSMENT IS REQUIRED BUT NO SPECIFIC ASSESSMENT PROTOCOL HAS BEEN PRESCRIBED
- PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON TERRESTRIAL BIODIVERSITY
- PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON TERRESTRIAL PLANT SPECIES

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 1	Describe the portion of the proposed development to which the applicable listed activity relates.
19A(ii)	<p>The infilling or depositing of any material of more than 5m³ into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5m³ from –</p> <ul style="list-style-type: none"> (i) The seashore; (ii) The littoral active zone, an estuary or a distance of 100m inland of the high water mark of the sea; (iii) The sea; - <p>but excluding where such infilling, depositing, dredging, excavation, removal or moving –</p> <ul style="list-style-type: none"> (i) Will occur behind a development setback line; (ii) Is for maintenance purposes undertaken in accordance with a maintenance management plan; (iii) Falls within the ambit of activity 21 in this Notice, in which case that activity applies; (iv) Occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or <p>Where such development is related to the development of a port or harbour, in which case activity 26 of Listing Notice 2 of 2014 applies.</p>	<p>The majority of the property is located within 100m of the high water mark of the sea.</p> <p>The demolition and redevelopment of the buildings will exceed the 5m³ threshold as specified in this activity. The proposed works will include the construction of 8 basements to the various units. This will generate around 1050m³ of excavated material, in addition to the grub and clearing which might add around 600m³ of topsoil and gravel to be stripped. Some of the excavated material is expected to be used for backfilling under the new units.</p>
54(v)(e)	<p>The expansion of facilities—</p> <ul style="list-style-type: none"> (i) in the sea; (ii) in an estuary; (iii) within the littoral active zone; (iv) in front of a development setback; or <p>(v) if no development setback exists, within a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater;</p> <p>in respect of—</p> <ul style="list-style-type: none"> (a) fixed or floating jetties and slipways; 	<p>The majority of the property is located within 100m of the high water mark of the sea.</p> <p>The DEA&DP has maintained that this activity is applicable, and should be included in the application.</p> <p>The redevelopment of the resort will increase the overall infrastructure from ±922m² to ±1052m², an increase of ±130m².</p> <p>The municipality has confirmed and maintains that the property is located inside the urban edge of Keurboomstrand, and it is clearly part of an urban area.</p> <p>The DEA&DP is thus requested to confirm if this activity will be applicable to the remainder of this application.</p>

	(b) tidal pools; (c) embankments; (d) rock revetments or stabilising structures including stabilising walls; or (e) infrastructure or structures where the development footprint is expanded by 50 square metres or more, but excluding— (aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; or (bb) where such expansion occurs within an urban area.	
Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 3	Describe the portion of the proposed development to which the applicable listed activity relates.
Activity No(s):	Provide the relevant Scoping and EIR Activity(ies) as set out in Listing Notice 2	Describe the portion of the proposed development to which the applicable listed activity relates.
Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 3	Describe the portion of the proposed development to which the applicable listed activity relates.
Note: <ul style="list-style-type: none"> The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted. Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority. 		

List the applicable waste management listed activities in terms of the NEM:WA

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Category A	Describe the portion of the proposed development to which the applicable listed activity relates.

List the applicable listed activities in terms of the NEM:AQA

Activity No(s):	Provide the relevant Listed Activity(ies)	Describe the portion of the proposed development to which the applicable listed activity relates.

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1. Provide a description of the preferred alternative.

Alternative 1 (Preferred Alternative)

Keurbooms Rock (Pty) Ltd purchased the existing Arch Rock Seaside Accommodation resort on Remainder of Portion 5 of 296, Keurboomstrand.

The property has purchased by Keurbooms Rock (Pty) Ltd. in 2019 and it is their proposal to re-furbish / alter the existing resort units on the property as the units are outdated and old. The refurbishment is expected to reduce the throughput capacity of the facility which currently accommodates 26 pax in 10 chalets, to 22 pax in 8 chalets. The new units will be placed on the same footprints of the old units, although there is some overlap due to configuration. The overlap however takes place on areas that were previously lawned or gravel.

The new units will not require any changes to building lines or heights that are currently in effect. The three sea facing units will make use of the same frontal position as the current units. The lawns in front of the old sea facing units will be rehabilitated to coastal dune vegetation.

The resort its current configuration commenced circa 1991, is located in an established township area and will remain a resort.

The redevelopment will consist of the following:

- 5 x 1 bedroom units with open pergola stoeps (average $\pm 81\text{m}^2$);
- 3 x 2 bedroom units with open pergola stoeps (average $\pm 90\text{m}^2$);
- Existing reception to be converted to a new laundry;
- New pool and store ($\pm 45\text{m}^2$) to replace the existing laundry;
- Reception and administration ($\pm 60\text{m}^2$) partially replacing the existing laundry and one of the old chalets; and
- 8 parking bays partially replacing the existing store.

	Existing		New	
	No	Area	No	Area
Chalets	10	760m ²	8	839m ²
General	4	162m ²	3	213m ²
Total	14	922m²	11	1052m²
Pax	26		22	

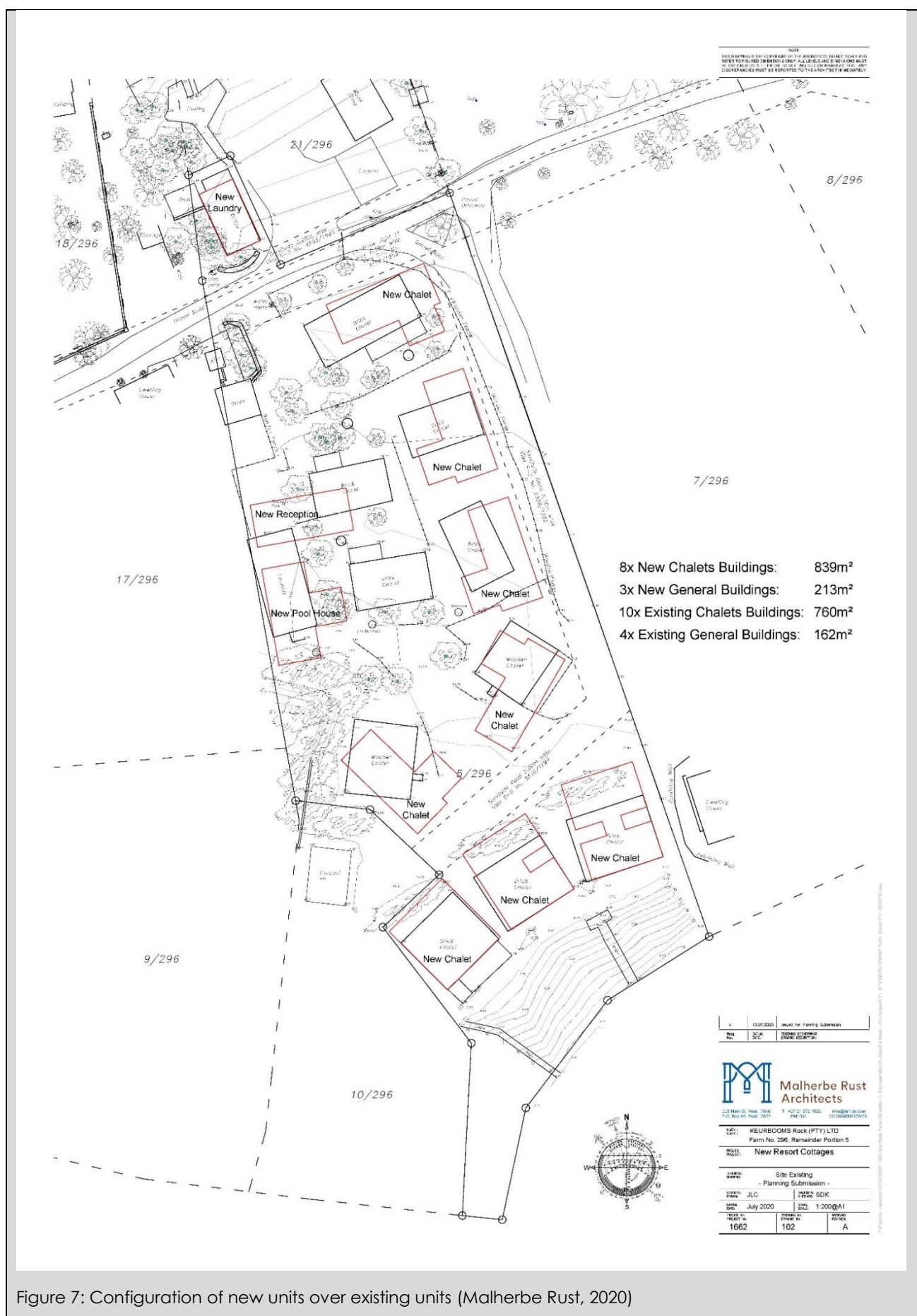
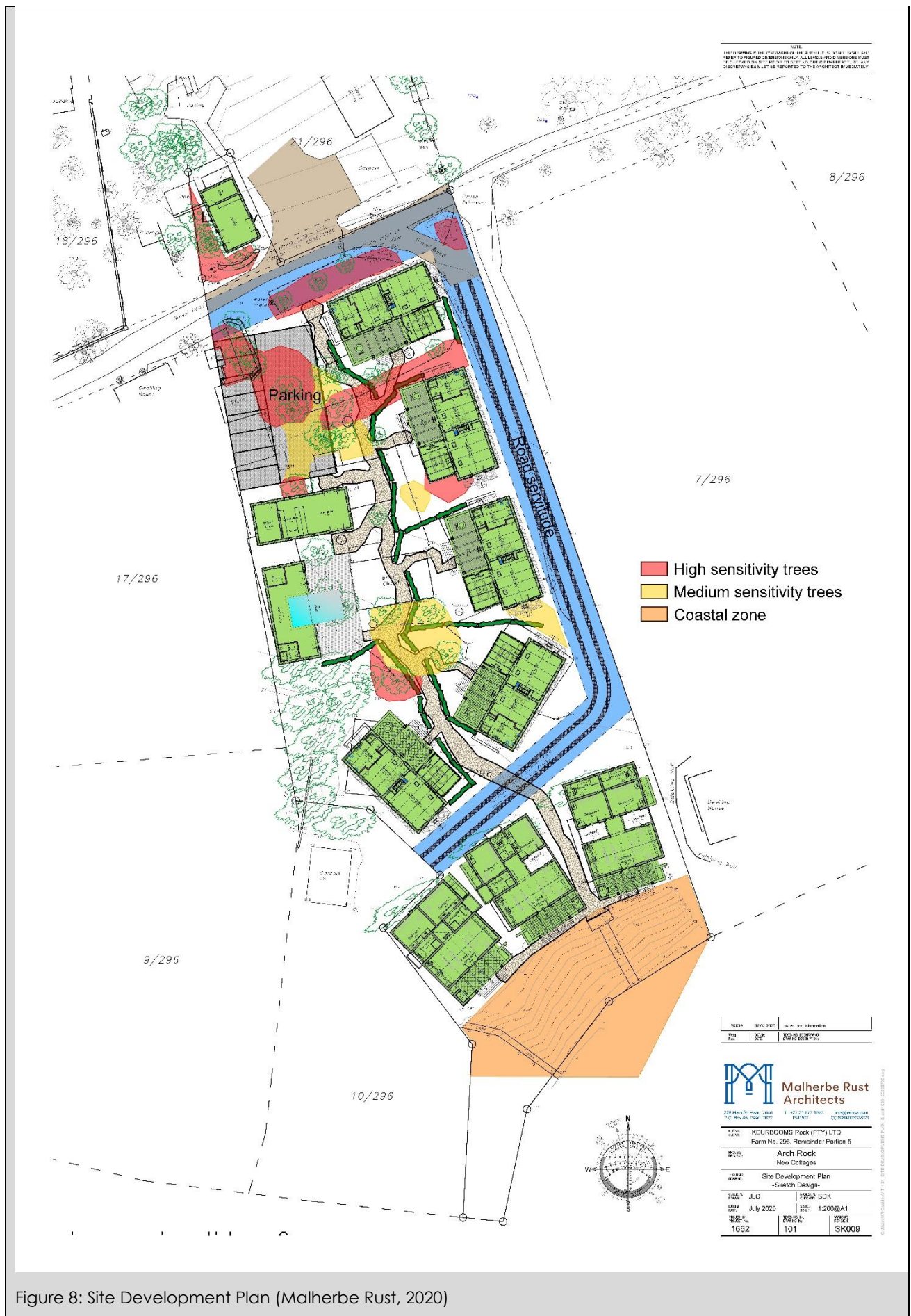


Figure 7: Configuration of new units over existing units (Malherbe Rust, 2020)



The three sea facing units must include piling to ensure long term stability and protection of the coastal interface.



Figure 9: Architects rendering (Malherbe Rust, 2020)

- | | |
|----|---|
| 2. | Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21. |
|----|---|

The project site is located on Portion 5 of Farm Arch Rock no. 296, Keurboomstrand, within the Bitou municipal area. The site is zoned Resort 1. The current activities on the site are associated with ten (10) holiday units. The proposed development will not involve any changes in the current land uses or activities on the site and will be implemented in terms of the existing resort zoning. In this regard the development will involve replacing the existing units with new units. This will involve a reduction of existing number of resort units from 10 to 8.

- | | |
|----|--|
| 3. | Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved. |
|----|--|

None

- | | |
|----|--|
| 4. | Explain how the proposed development will be in line with the following? |
|----|--|

- | | |
|-----|---|
| 4.1 | The Provincial Spatial Development Framework. |
|-----|---|

The proposed development is spatially compact and falls within the urban edge and is therefore aligned with the principles of sustainability and resilience and spatial efficiency. The proposed development also seeks to provide a quality environment for the tourists that visit the area.

- | | |
|-----|--|
| 4.2 | The Integrated Development Plan of the local municipality. |
|-----|--|

The Bitou Municipality (BM)(WC047) is a Category B municipality located within the Eden District Municipal (EDM) (DC4) in the Western Cape. Bitou is the gateway into the Western Cape from the Eastern part of South Africa. Vision 2030 for the Bitou Municipality is "To be the best together". The mission statement is "We partner with communities and stakeholders to sustainably deliver quality services so that everyone in Bitou can live and prosper together"

The IDP highlights the socio-economic challenges facing the BM. Of relevance to the proposed development these include:

- High levels of unemployment
- Limited private sector investment; and

These issues are also reflected in the SWOT analysis undertaken as part of the IDP process which lists the strengths, opportunities, weaknesses, and threats facing the BM. The following are considered relevant to the proposed development.

Strengths

- Natural environment and diverse natural heritage.
- Tourism infrastructure.
- Quality infrastructure and service delivery, stable electricity supply.
- Sound municipal administration.
- Skilled and qualified workforce.

Opportunities

- Airport upgrade.
- SMME development (hospitality).
- Tourism.
- Youth internship.
- Green city.

Weaknesses

- High unemployment and poverty.

Threats

- Unemployed youth, specifically youth unemployment.
- Poverty and high levels of indigence.

Section 2.7 provides an overview of the economy. The economy of BM is the second smallest in the Garden Route District. In 2016, the municipal area had a GDP of R3 billion, representing 7.4% of the total district GDP of the GRD. The key sectors were finance, insurance, real estate, and business service sector (25.3%), the wholesale and retail trade, catering, and accommodation sector (18.7%); and the construction sector (13%). Collectively these sectors made up 57 % of the municipal economy.

In terms of employment the sectors that reported the largest increase in jobs between 2008 and 2017 was wholesale and retail trade, catering & accommodation followed by community, social & personal services, finance, insurance, real estate & business services and general government. This highlights the importance of the tourism sector in terms of employment opportunities. The IDP identifies economic development and the creation of employment as a key objective. This includes the development of more tourism facilities and attractions. **The proposed development therefore supports the economic objectives identified in the IDP.**

4.3.	The Spatial Development Framework of the local municipality.
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The Bitou Municipality has confirmed that the property is located inside the urban edge of Keurboomstrand as per the current SDF and has been indicated as such for more than a decade.

The spatial vision for the Bitou LM is "To Become the Garden Route's Sustainable tourism hub for the benefit of all".

The SDF notes that the vision acknowledges the reality that the Bitou LM's greatest economic asset is its natural resources that make it attractive to the local and international tourism market. The quality of Bitou LM's natural environment, including its' extensive sandy beaches, is a key factor in the success of the municipality as a tourism attraction and also provides the setting for holiday homes and tourist rental accommodation with spectacular views.

The SDF indicates that Tourism Nodes mostly comprise holiday homes/accommodation which are periodically occupied (during the holiday season). As a rule, community facilities are not provided in these areas and the economic base is limited to tourism related activities.

The proposed development is therefore in keeping with the spatial concept for the Keurbooms area as a Tourism Node and is also aligned with the action points listed in the SDF. In this regard the proposed development represents an investment in tourism infrastructure and is located within the urban edge for the Keurboom area.

4.4.	The Environmental Management Framework applicable to the area.
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Not applicable.

5.	Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.
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The properties have been significantly transformed due to many years of urban development taking place. The biodiversity on the site is deemed to be negligible due to these transformations. The only items of significance are the groupings of indigenous trees that form part of the landscaping that have been identified as being sensitive. These have been incorporated into the redevelopment to retain the sense of place of the existing resort.

6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development.
----	--

The WCBSP was utilised to determine the desktop sensitivities associated with the site. The spatial plan takes into account the urban environment that makes up Keurboomstrand and has not included it in the Critical Biodiversity Areas, as shown below.



Figure 10: Critical Biodiversity Areas (CapeFarmMapper, 2020)

The area is considered to be in the category of **No Natural Remaining**

No Natural Remaining

These areas are suitable for development but may still provide limited biodiversity and ecological infrastructure functions and should be managed in a way that minimises impacts on biodiversity and ecological infrastructure.

The Handbooks lists Land Use Activity Descriptions and Biodiversity-related Conditions/Controls for Urban Areas as follows:

5. a) Existing settlements and urban expansion

Includes: Metropolitan areas, cities, larger towns, small towns, villages and hamlets.

Assumes the following conditions/controls:

- The control of urban expansion through the delineation of an urban edge to prevent urban sprawl.
- The delineation process is guided by the provincial urban edge guideline document and informed by the Western Cape Biodiversity Spatial Plan, for example: a Critical Biodiversity Area Map is used to delineate a boundary of the urban edge.
- The promotion of compact urban settlements, whilst maintaining an open space system (where possible) that is informed by a fine-scale biodiversity plan or map.

The properties are within the urban edge of Keurboomstrand it is an allowable activity as per the Land Use Zones.

7.	Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.
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According to the ICMA Coastal Zonation, the properties fall within the Coastal Protection Zone. This is the urban area located 100m inland of the high water mark of the sea. The existing resort is

located within the 100m buffer area that makes up the Coastal Protection Zone. The coastal protection zone is established to manage, regulate and restrict the use of land that is adjacent to coastal public property, or that plays a significant role in the coastal ecosystem (DEA&DP & SSI, 2009).

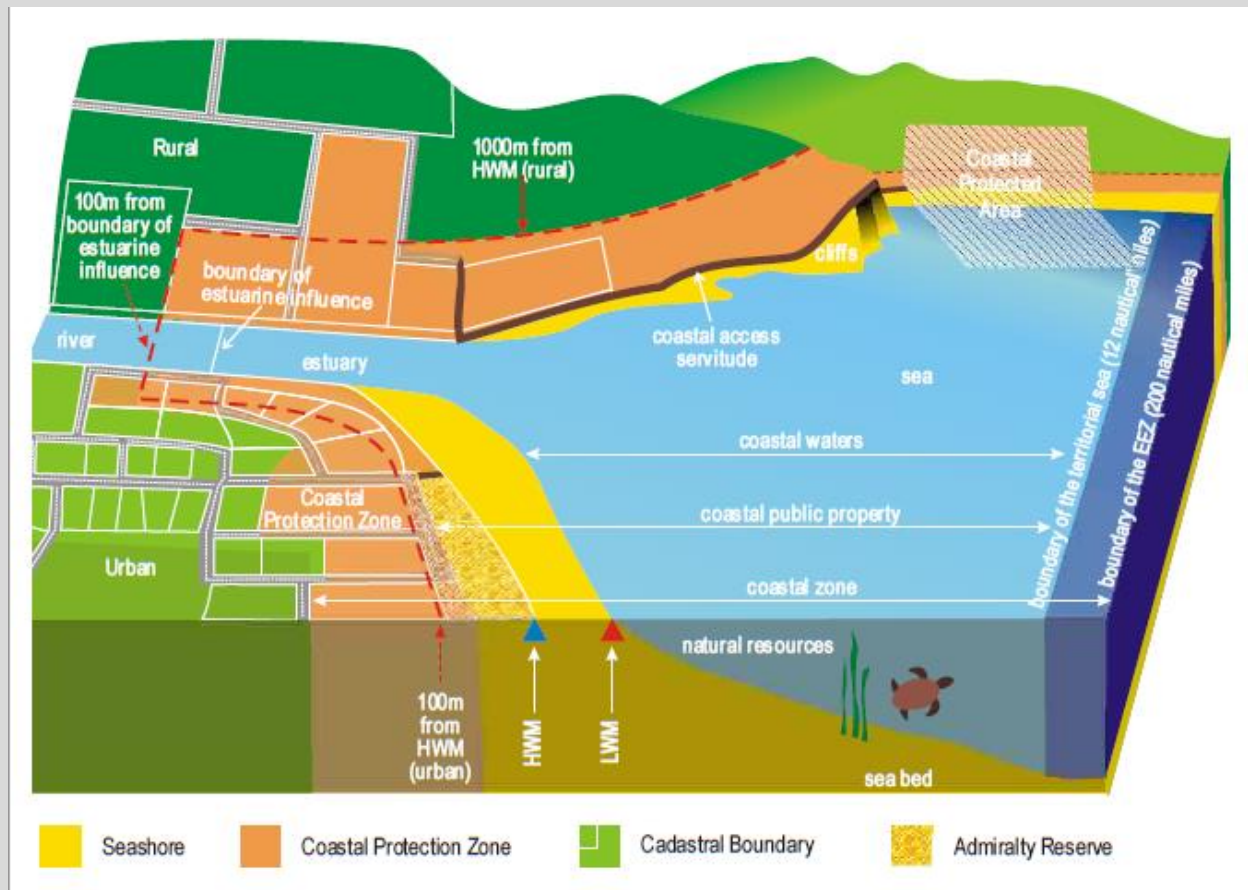
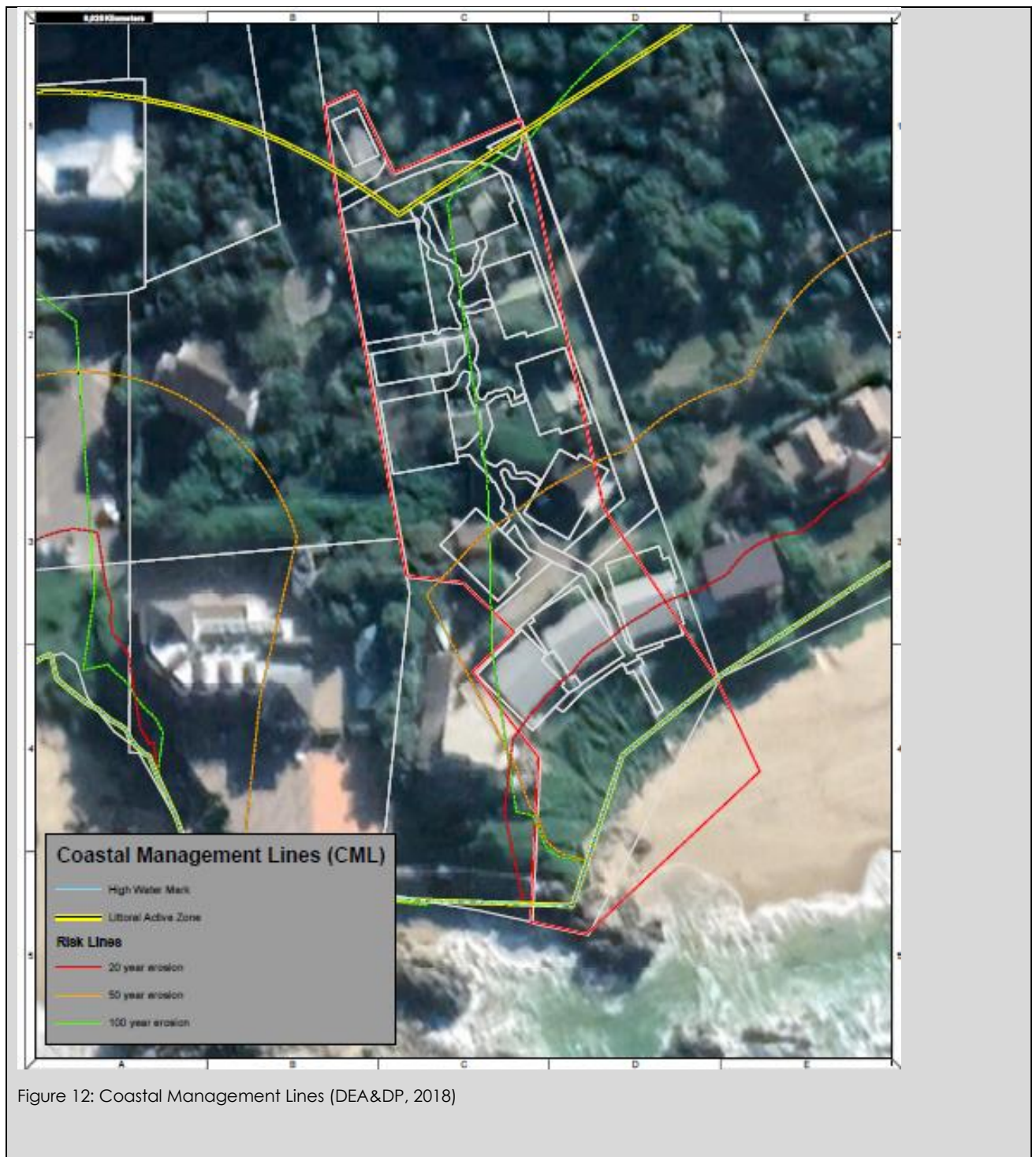


Figure 11: Coastal Zones (2009 The Department of Environmental Affairs & SSI Engineers and Environmental Consultants, South Africa)





- To protect the ecological integrity, natural character, and the economic, social and aesthetic value of the neighbouring coastal public property;
- To avoid increasing the effect or severity of natural hazards;
- To protect people, property and economic activities from the risks and threats which may arise from dynamic coastal processes such as wave and wind erosion, coastal storm surges, flooding and sea-level rise;
- - To maintain the natural functioning of the littoral active zone;
- - To maintain the productivity of the coastal zone; and
- - To allow authorities to perform rescue and clean-up operations.

The redevelopment of the existing resort will not adversely affect the aims of the Coastal Protection Zone as identified above. The following must be taken into consideration:

- The property does not form part of any current or future protected areas and is located inside the urban edge of Keurboomstrand, with urban development on either side of them;
- The land associated with the resort has been set aside for township development and forms part of the established urban area and urban edge of Keurboomstrand;
- The proposed option for refurbishing the seawards units will not cause irreversible or long lasting adverse effects on the coastal environment;
- The proposed redevelopment of the resort is not likely to affect the interests of the community as the land use and zonation will not change;
- Recent historical trends at the site, which is protected to some extent by the presence of a nearshore rocky reef, indicate **relatively low coastal erosion risk at present**, however consideration must be taken for potential climate change impacts.

8.	Explain whether the screening report has changed from the one submitted together with the application form. The screening report must be attached as Appendix I.
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No, the screening tool report has not changed from the one submitted with the Application Form.

9.	Explain how the proposed development will optimise vacant land available within an urban area.
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The proposal is for the redevelopment of the existing resort and a such no vacant land is being utilised.

10.	Explain how the proposed development will optimise the use of existing resources and infrastructure.
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The redevelopment of the existing resort will retain the existing service resources. The current units will be demolished and replaced with updated structures.

11.	Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16).
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The resort is already serviced by the Bitou Municipality and the redevelopment will retain such services. The municipality has conformed availability.

12.	In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K.
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Need (time)

Is the land use considered within the timeframe intended by the existing approved Spatial Development Framework (SDF)? (I.e. is the proposed development in line with the projects and programmes identified as priorities within the credible IDP?

Yes, the SDF dated 2017 and the Draft 2020 version clearly include the property inside the urban edge of Keurboomstrand. The proposal implies a form of economic upscaling and intensified use of land forming part of a tourism node.

The proposal is not inconsistent with spatial policies and objectives in relation to improving tourism potential pertinent within existing urban areas of Keurboomstrand (i.e. inside the urban edge).

Should the development occur here at this point in time?

Yes, the land has been utilised for resort purposes since the township was set out in 1940s. The land use i.e. resort does not change, but the proposal will provide an improvement on the current development.

Does the community / area need the activity and the associated land use concerned?

The proposal would add significant value to land used for resort purposes within a specified tourism node characterised by high demand and low supply. The redevelopment of the property is likely to attract further investment and therefore contribute to the long-term development of the area.

Are the necessary services with adequate capacity currently available?

Yes, there are existing services provided to the existing resort which will be retained.

Is this development provided for in the infrastructure planning of the municipality?

Yes, there are existing services provided to the existing resort which will be retained.

Is this project part of a national programme to address an issue of national concern or importance?

No.

Desirability (place)

Is the development the best practicable environmental option for this land / site?

Yes. The application is for the redevelopment of an existing resort to retain its function as a resort. The biodiversity impacts are low to negligible, especially as any impacts have already occurred.

Would the approval of this application compromise the integrity of the existing approved and credible municipal IDP and SDF?

No. The findings of the SIA indicate that the Bitou Municipal Integrated Development Plan (IDP) and Spatial Development Framework (SDF) highlight the key role played by tourism and support the establishment of tourism attractions and facilities. The proposed development is also in keeping with and supports the Local Area Spatial Plan (2013) for the Keurbooms River and Environs which supports low density development. The proposed development therefore complies with and is supported by the local land use policies and plans for the area. The findings of the SIA also indicate that the construction and operational phase will result in a number of positive social benefits for the local economy and community. These include the creation of employment and business opportunities and up-grading of tourism facilities. The proposed Arch Rock development is therefore supported by the findings of the SIA.

Would the approval of this application compromise the integrity of the existing approved environmental management priorities for the area?

No. The properties have been significantly transformed to accommodate resort requirements. They are located within the urban edge of Keurboomstrand. The proposed redevelopment of the existing resort retains the more sensitive tree groupings and does not extend beyond its current seawards setback.

Do location factors favour this land use at this place?

Yes. The resort is an existing facility and the redevelopment of it on the existing property is suitable. The area is also a tourism node, as identified in the municipal planning.

How will the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas?

The properties are located in the Coastal Protection Zone, however the resort has been in place for many years. The redevelopment actually reduces the number of units and number of pax that can be accommodated which will provide a small reduction of use on the environment. The site itself are not sensitivity environmentally due to the significant urban transformation that has taken place over many decades.

How will the development impact on people's health and wellbeing?

The site will not negatively impact on people's health and wellbeing. It is private property, has been providing resort accommodation for many years and the activities are consistent with the current land use.

Will the proposed activity or the land use associated with the activity applied for, result in unacceptable opportunity costs?

Unlikely. The property will be owned and managed by the applicant.

Will the proposed land use result in unacceptable cumulative impacts?

Unlikely. The application is for the redevelopment of an existing resort facility to improve and upgrade the current facility. The proposal will provide a reduction in the number of units as well as the number of pax that can be accommodated.

SECTION F: PUBLIC PARTICIPATION

The Public Participation Process ("PPP") must fulfil the requirements as outlined in the NEMA EIA Regulations and must be attached as Appendix F. Please note that If the NEM: WA and/or the NEM: AQA is applicable to the proposed development, an advertisement must be placed in at least two newspapers.

1. ~~Exclusively for linear activities: Indicate what PPP was agreed to by the competent authority. Include proof of this agreement in Appendix E22.~~

2. Confirm that the PPP as indicated in the application form has been complied with. All the PPP must be included in Appendix F.

The PPP is being undertaken and this section will be updated once the comment period is completed. The PPP will be undertaken as per the approved PP Plan.

3. Confirm which of the State Departments and Organs of State indicated in the Notice of Intent/application form were consulted with.

The following state departments have been notified of this process:

State Department	Name of person	Contact details	
DEA&DP: Coastal Management Unit	Ms leptieshaam Bekko	Tel	021 483 3370
		Fax	021 483 4527

		E-mail	ieptieshaam.bekko@westerncape.gov.za
Cape Nature	Ms Megan Simons	Tel	087 087 3058
		Fax	044 802 5313
		E-mail	msimons@capenature.co.za
Garden Route District Municipality	Dr Nina Viljoen	Tel	044 803 1318
		Fax	
		E-mail	Nina@gardenroute.gov.za / rekords@gardenroute.gov.za
Bitou Municipality	Mr Chris Schliemann	Tel	044 501 3324
		Fax	086 659 7954
		E-mail	cschliemann@plett.gov.za
Bitou Municipality	Ms Anje Taljaard	Tel	044 501 3318
		Fax	
		E-mail	ataljaard@plett.gov.za
Department of Forestry	Ms Melanie Koen	Tel	044 302 6907
		Fax	044 382 5461
		E-mail	mkoen@environment.gov.za

4. If any of the State Departments and Organs of State were not consulted, indicate which and why.

Not applicable.

5. If any of the State Departments and Organs of State did not respond, indicate which.

Pending PPP.

6. Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues were incorporated into the development proposal.

Pending PPP.

Note:

A register of all the I&AP's notified, including the Organs of State, and all the registered I&APs must be included in Appendix F. The register must be maintained and made available to any person requesting access to the register in writing.

The EAP must notify I&AP's that all information submitted by I&AP's becomes public information.

Your attention is drawn to Regulation 40 (3) of the NEMA EIA Regulations which states that "Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but **must** be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority."

All the comments received from I&APs on the pre -application BAR (if applicable and the draft BAR must be recorded, responded to and included in the Comments and Responses Report and must be included in Appendix F.

All information obtained during the PPP (the minutes of any meetings held by the EAP with I&APs and other role players wherein the views of the participants are recorded) and must be included in Appendix F.

Please note that proof of the PPP conducted must be included in Appendix F. In terms of the required "proof" the following is required:

- a site map showing where the site notice was displayed, dated photographs showing the notice displayed on site and a copy of the text displayed on the notice;
- in terms of the written notices given, a copy of the written notice sent, as well as:
 - if registered mail was sent, a list of the registered mail sent (showing the registered mail number, the name of the person the mail was sent to, the address of the person and the date the registered mail was sent);
 - if normal mail was sent, a list of the mail sent (showing the name of the person the mail was sent to, the address of the person, the date the mail was sent, and the signature of the post office worker or the post office stamp indicating that the letter was sent);
 - if a facsimile was sent, a copy of the facsimile Report;
 - if an electronic mail was sent, a copy of the electronic mail sent; and
 - if a "mail drop" was done, a signed register of "mail drops" received (showing the name of the person the notice was handed to, the address of the person, the date, and the signature of the person); and
- a copy of the newspaper advertisement ("newspaper clipping") that was placed, indicating the name of the newspaper and date of publication (of such quality that the wording in the advertisement is legible).

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. GROUNDWATER

1.1.	Was a specialist study conducted?	YES	NO
1.2.	Provide the name and or company who conducted the specialist study.		
N/A			
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
<p>According to CapeFarmMapper, the following aquifer characteristics apply:</p> <p>Aquifer Type and Yield</p> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> Classification: Fractured 0.5 - 2.0 l/s </div> <p>Depth to Groundwater</p> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> Depth (mbgl): 50.25 </div> <p>Groundwater Quality</p> <div style="border: 1px solid black; padding: 5px;"> EC (mS/m): 150 - 370 </div>			

1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.
The development will not impact on the groundwater any more than the existing residential use does.	
Depth to Groundwater	
Depth (mbgl):	50.25

2. SURFACE WATER

2.1.	Was a specialist study conducted?	YES	NO
2.2.	Provide the name and/or company who conducted the specialist study.		
Dr Jackie Dabrowski from Confluent Environmental (Pty) Ltd			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		
There are no water resources found on the property. An Aquatic Compliance Statement was undertaken in response to the sensitivity theme identified in the Screening Tool and called for by DEA&DP.			
<h3>5. AQUATIC BIODIVERSITY COMPLIANCE STATEMENT</h3> <p>Based on the results of the desktop review and the site survey, the sensitivity of aquatic biodiversity on Portion 5/296 can be regarded as Low. The main factors influencing the statement include the following:</p> <ul style="list-style-type: none">• The development is not located in an area designated as a SWSA or a FEPA ;• No freshwater features were identified within the footprint area of the site or within close proximity (i.e. at least 500 m) of the site.			

3. COASTAL ENVIRONMENT

3.1.	Was a specialist study conducted?	YES	NO
3.2.	Provide the name and/or company who conducted the specialist study.		
WML Coastal undertook a Coastal Engineering Report			
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
<p>The National Environmental Management Act (NEMA, Act 107 of 1998) makes provision for activities identified in terms of section 24(2)(a) that require an Environmental Impact Assessment to be undertaken in order to be issued with an Environmental Authorisation. "environmental authorisation", when used in Chapter 5, means the authorisation by a competent authority of a listed activity or specified activity in terms of this Act, and includes a similar authorisation contemplated in a specific environmental management Act. The National Environmental Management: Integrated Coastal Management Act (NEM:ICMA, Act 24 of 2008) is considered to be a "specific environmental management Act", or SEMA.</p> <p>The development triggers a coastal related listed activity, in that the development is located within 100m of the high water mark of the sea. A significantly large portion of Keurboomstrand falls within this area.</p>			

Thus coastal activities identified in terms of Chapter 5 of NEMA for this application are considered in terms of Section 63 of the ICMA as follows:

63. Environmental authorisations for coastal activities

(1) Where an environmental authorisation in terms of Chapter 5 of the National Environmental Management Act is required for coastal activities, the competent authority must take into account all relevant factors, including -

(a) the representations made by the applicant and by interested and affected parties;

This report will be subject to a public participation process which will generate representations by I&APs. These will be included in the final BAR submitted to the competent authority for their consideration.

(b) the extent to which the applicant has in the past complied with similar authorisations;

The applicant has not applied for any similar authorisations, thus this item is not applicable.

(c) whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and protecting those areas;

The property is located within 100m of the high water mark of the sea, thus it is considered to fall within the Coastal Protect Zone as defined by the NEM:ICMA. The property is located within the urban edge of Keurboomstrand and according to the Coastal Engineering Report *recent historical trends at the site, which is protected to some extent by the presence of a nearshore rocky reef, indicate relatively low coastal erosion risk at present.* The Coastal Engineering Report is of the opinion that the erosion risk lines identified for the property over-estimates the local erosion risk at this zone and property. Future climate impacts should not be dismissed, however and the report promotes the implementation of risk averse mitigation. The Geotechnical investigations, performed by Kantey & Templer Consulting Engineers found that recommended piling options should be implemented to address future climate impacts. Detail design of the foundation piles must take into account the corrosive marine environment.

This risk mitigation is included in the preferred Alternative design options.

(d) the estuarine management plans, coastal management programmes, coastal management lines and coastal management objectives applicable in the area;

The Eden Coastal Management Lines (DEA&DP, 2018) indicate that the many of the seaside erven within the urban area of Keurboomstrand falls within the Coastal Management Line. The applicable property is identified by the yellow star.

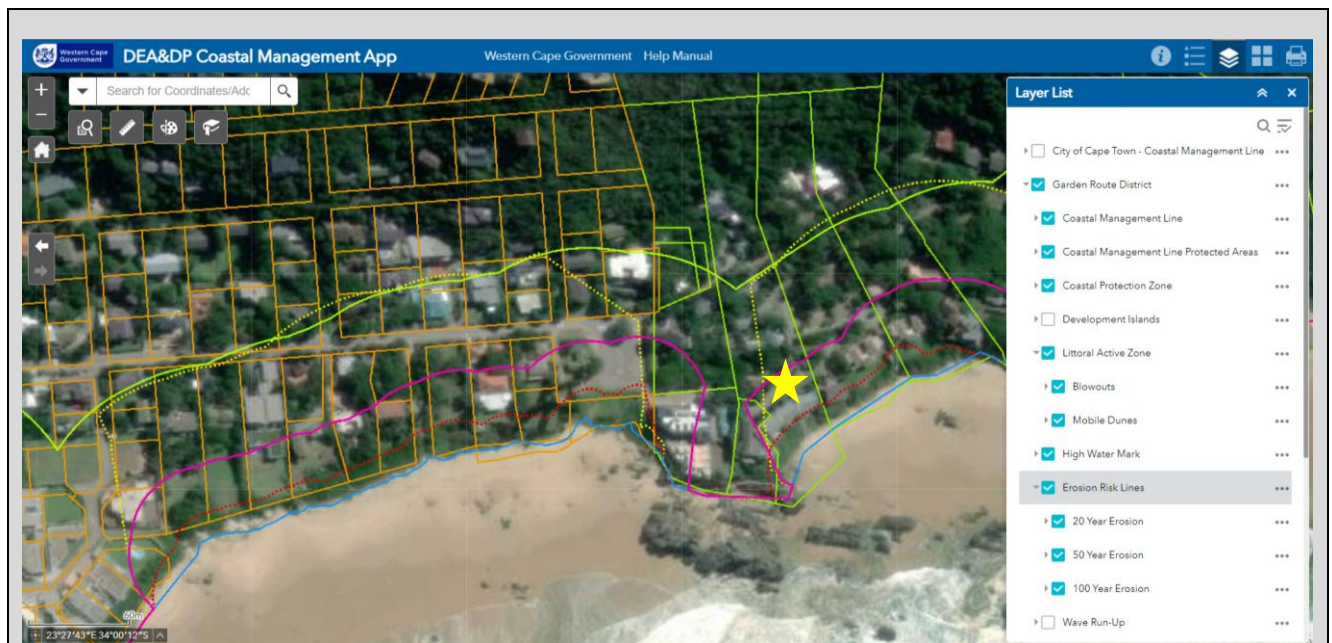


Figure 14: Central Keurboomstrand with Eden Coastal Management Lines (DEA&DP, 2018)

The coastal management lines effectively delineate different management zones proposed to facilitate improved planning and management of sensitive and often vulnerable coastal areas, and to safeguard public access points. In terms of how existing development is influenced by the implementation of this setback line, it is necessary to look closer at the projected risk lines.

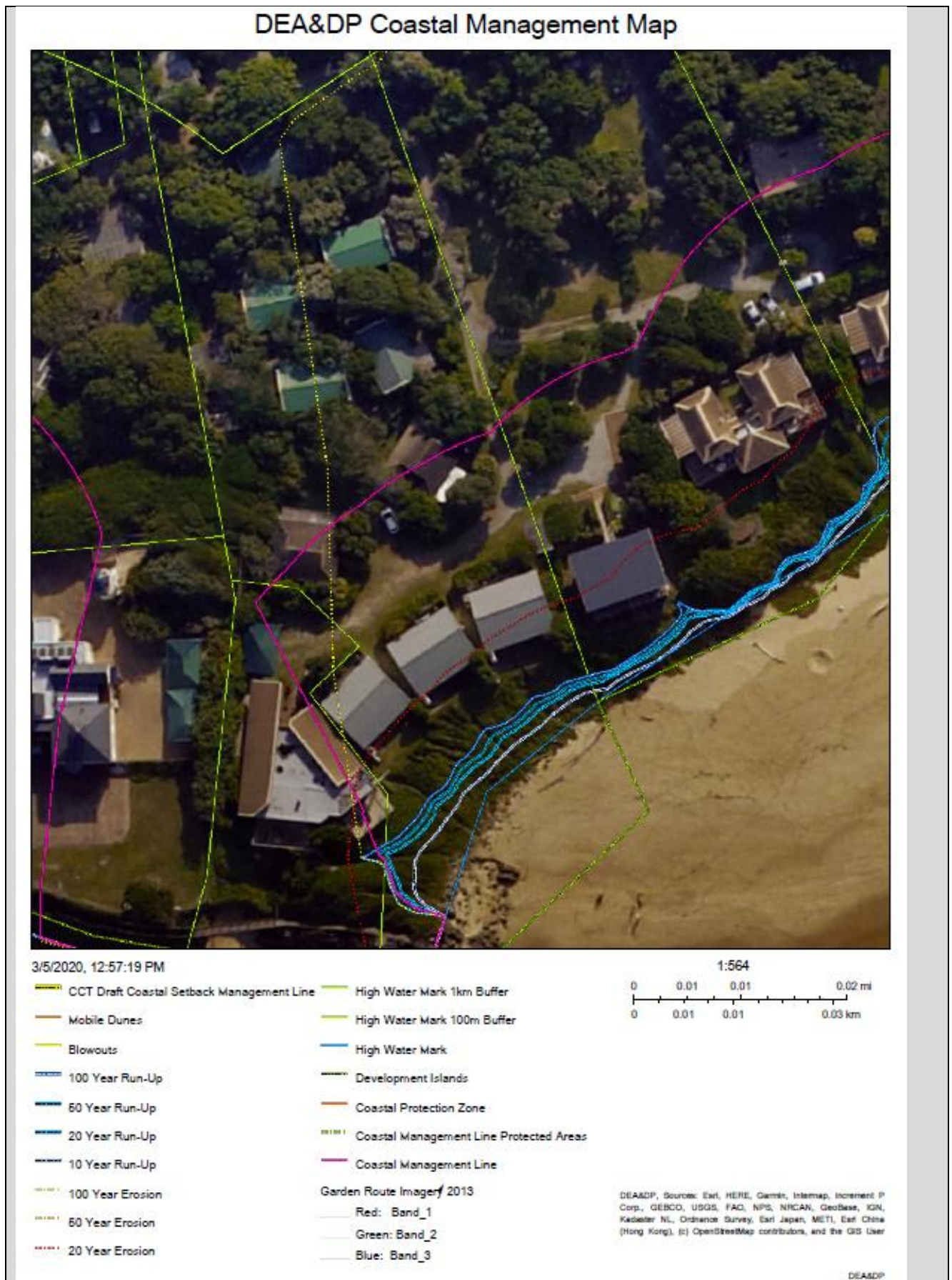


Figure 15: Erosion Risk Lines (DEA&DP, 2018)

According to the DEA&DP Coastal Management App, the property is located within the 100 year erosion risk line and the 50 year line is replicated on the Coastal Management Line. The 20 year

erosion risk line appears to have become the *de facto* setback line, as the existing dwellings have been constructed on this line. The proposal is for the redevelopment of the existing resort units and the construction will not extend beyond the edge of the current three units. The Coastal Engineering Report is of the opinion that the erosion risk lines identified for the property over-estimates the local erosion risk at this zone and property. Future climate impacts should not be dismissed, however and the report promotes the implementation of risk averse mitigation. The *Geotechnical investigations, performed by Kantey & Templer Consulting Engineers found that recommended piling options should be implemented to address future climate impacts. Detail design of the foundation piles must take into account the corrosive marine environment.*

(e) *the socio-economic impact if the activity –*

(i) *is authorised;*

(ii) *is not authorised;*

The Arch Rock Seaside Accommodation resort is an existing resort which the applicant is proposing to refurbish. The Socio Economic Assessment has confirmed that the proposal will have an overall positive impact on the surrounding environment.

The findings of the SIA indicate that the Bitou Municipal Integrated Development Plan (IDP) and Spatial Development Framework (SDF) highlight the key role played by tourism and support the establishment of tourism attractions and facilities. The proposed development is also in keeping with and supports the Local Area Spatial Plan (2013) for the Keurbooms River and Environs which supports low density development. The proposed development therefore complies with and is supported by the local land use policies and plans for the area. The findings of the SIA also indicate that the construction and operational phase will result in a number of positive social benefits for the local economy and community. These include the creation of employment and business opportunities and up-grading of tourism facilities. The proposed Arch Rock development is therefore supported by the findings of the SIA.

(g) *the likely impact of coastal environmental processes on the proposed activity;*

(Section 63(1)(g) amended by section 33(c) of Act 36 of 2014)

A Coastal Engineering study was undertaken to determine potential impacts of the coastal environmental processes of the proposed activity.

The property is located within 100m of the high water mark of the sea, thus it is considered to fall within the Coastal Protect Zone as defined by the NEM:ICMA. The property is located within the urban edge of Keurboomstrand and according to the Coastal Engineering Report *recent historical trends at the site, which is protected to some extent by the presence of a nearshore rocky reef, indicate relatively low coastal erosion risk at present.* The Coastal Engineering Report is of the opinion that the erosion risk lines identified for the property over-estimates the local erosion risk at this zone and property. Future climate impacts should not be dismissed, however and the report promotes the implementation of risk averse mitigation. The *Geotechnical investigations, performed by Kantey & Templer Consulting Engineers found that recommended piling options should be implemented to address future climate impacts. Detail design of the foundation piles must take into account the corrosive marine environment.*

This risk mitigation is included in the preferred Alternative design options.

(h) *whether the development or activity—*

(i) *is situated within coastal public property and is inconsistent with the objective of conserving and enhancing coastal public property for the benefit of current and future generations;*

No, the development is located on private property.

(ii) is situated within the coastal protection zone and is inconsistent with the purpose for which a coastal protection zone is established as set out in section 17;

The majority of the current resort and other residential dwellings of Keurboomstrand are located within the coastal protection in that they are located within 100m of the high water mark of the sea. The redevelopment of the existing resort is not inconsistent with the purpose of the CPZ. The resort does not play a significant role in a coastal ecosystem, nor is it considered to be a sensitive areas in terms of ecosystem type and status, indigenous vegetation or aquatic features.

The resort has been developed and transformed for many decades and as such the impact on the littoral zone will not be increased from the status quo.

(iii) is situated within coastal access land and is inconsistent with the purpose for which coastal access land is designated as set out in section 18;

The property is not located within coastal access land.

(iv) is likely to cause irreversible or long-lasting adverse effects to any aspect of the coastal environment that cannot satisfactorily be mitigated;

No. The property is located inside the urban edge and urban area of Keurboomstrand and this township area has been in place since as early as 1946. The refurbishing as proposed will not cause any irreversible or long-lasting adverse effects.

(v) is likely to be significantly damaged or prejudiced by dynamic coastal processes;

No. The property is located inside the urban edge and urban area of Keurboomstrand and this township area has been in place since as early as 1946. The refurbishing as proposed will not cause any irreversible or long-lasting adverse effects. It must be noted that the Coastal Engineering Report is of the opinion that the erosion risk lines identified for the property over-estimates the local erosion risk at this zone and property. Future climate impacts should not be dismissed, however and the report promotes the implementation of risk averse mitigation. The *Geotechnical investigations, performed by Kantey & Templer Consulting Engineers found that recommended piling options should be implemented to address future climate impacts. Detail design of the foundation piles must take into account the corrosive marine environment.*

(vi) would substantially prejudice the achievement of any coastal management objective; or

No. The property is located inside the urban edge and urban area of Keurboomstrand and this township area has been in place since as early as 1946. The refurbishing as proposed will not prejudice any coastal management objective.

(vii) would be contrary to the interests of the whole community;

No. The findings of the SIA indicate that the Bitou Municipal Integrated Development Plan (IDP) and Spatial Development Framework (SDF) highlight the key role played by tourism and support the establishment of tourism attractions and facilities. The proposed development is also in keeping with and supports the Local Area Spatial Plan (2013) for the Keurbooms River and Environs which supports low density development. The proposed development therefore complies with and is supported by the local land use policies and plans for the area. The findings of the SIA also indicate that the construction and operational phase will result in a number of positive social benefits for the local economy and community. These include the creation of employment and business opportunities and up-grading of tourism facilities. The proposed Arch Rock development is therefore supported by the findings of the SIA.

(Section 63(1)(h) substituted by section 33(d) of Act 36 of 2014)

(i) whether the very nature of the proposed activity or development requires it to be located within coastal public property, the coastal protection zone or coastal access land;

The property is located within the coastal protection zone (it is within 100m of the high water mark of the sea). It is an existing resort and will remain so, as its nature is for tourism use and the coastal environment of Keurboomstrand is the resource.

(j) whether the proposed activity or development will provide important services to the public when using coastal public property, the coastal protection zone, coastal access land or a coastal protected area; and

The resort is a public facility by its nature and provides a tourism service to visitors.

(5) The competent authority must ensure that the terms and conditions of any environmental authorisation are consistent with any applicable coastal management programmes and promote the attainment of coastal management objectives in the area concerned.

The competent authority for this application is obliged to comply with this requirement. This Basic Assessment Report and the specialist studies will also aid in their consideration of the application.

(6) Where an environmental authorisation is not required for coastal activities, the Minister may, by notice in the Gazette list such activities requiring a permit or licence.

Not applicable.

3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.
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Not applicable.

3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.
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The applicant is proposing the refurbishment of the existing resort development. The existing resort has been in situ from as early as 1946 in varying forms. The modelled coastal risk zones have been considered and have influenced the development in that the three front sea facing units will be redeveloped without extending further towards the sea.

4. BIODIVERSITY

4.1.	Were specialist studies conducted?	YES	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		
	Messrs Benjamin Walton & Peet Joubert (Terrestrial Biodiversity) Mr Willem Mathee & Prof Jan Venter (Terrestrial Animals)		
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		
	<p>The following systemic conservation planning and biodiversity tools were utilised:</p> <ul style="list-style-type: none"> • SANBI Vegetation Maps 2018; • Terrestrial ecosystem threat status assessment 2018; • Terrestrial Ecosystem Threat Status 2011; • National Freshwater Ecosystem Priority Areas (NFEPA); • Western Cape Biodiversity Spatial Plan (WCBSP, 2017); • Eden Coastal Management Lines (DEA&DP, 2018). <p>The site has been significantly transformed, has no aquatic resources, animal nor any sensitive vegetation types on it.</p>		
4.4.	Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.		

The site has been significantly transformed and is located inside the urban edge of Keurboomstrand. In terms of biodiversity objectives, the site does not add nor detract further from them.

4.5. Explain what impact the proposed development will have on the site specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development.

Terrestrial Biodiversity:

The existing resort and the proposed redevelopment does not impact on any areas identified as CBA or ESA. Redevelopment of the resort accommodation units, will not impact on the conservation status of Goukamma Dune Thicket; with vegetation of Low Terrestrial Biodiversity Sensitivity and of Medium Plant Species Sensitivity. The redevelopment at the property should retain most of the locally indigenous tree species as they afford shade and shelter for avifauna and sense of place of the area.

Animal Species:

Based on the results of the desktop study and site survey, the sensitivity of the study site (Portion 5 of Farm 296 Arch Rock, Keurboomstrand) in terms of the terrestrial animals can be regarded as **LOW**. This is based on the following:

- The absence of georeferenced records of *Aneuryphymus montanus* at or near the study site;
- The absence of recent observations of *Sarophorus punctatus* at or near the study site, with the only specimens from the area collected in 1976;
- The general absence of suitable food for *Sarophorus punctatus* at the study site, and unsuitability of the vegetation for *Aneuryphymus montanus* at the site;
- The lack of these two species of conservation concern, or other SCC, observations during the site visit; and
- The high level of disturbance at the site, which has been present for the past few decades, making it unlikely that either of the highlighted species of conservation concern are present at the site.

4.6. If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.

No.

4.7. Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.

Animal Species:

Based on the results of the desktop study and site survey, the sensitivity of the study site (Portion 5 of Farm 296 Arch Rock, Keurboomstrand) in terms of the terrestrial animals can be regarded as **LOW**. This is based on the following:

- The absence of georeferenced records of *Aneuryphymus montanus* at or near the study site;
- The absence of recent observations of *Sarophorus punctatus* at or near the study site, with the only specimens from the area collected in 1976;
- The general absence of suitable food for *Sarophorus punctatus* at the study site, and unsuitability of the vegetation for *Aneuryphymus montanus* at the site;
- The lack of these two species of conservation concern, or other SCC, observations during the site visit; and
- The high level of disturbance at the site, which has been present for the past few decades, making it unlikely that either of the highlighted species of conservation concern are present at the site.

The fauna observed on site are included in the table below. The proposal to retain the tree clumps will not affect the species that are utilising them. The redevelopment of the existing dwellings will not cause permanent displacement of these species.

Common Name	Scientific name
Birds	
Bulbul, Cape	<i>Pycnonotus capensis</i>
Canary, Forest	<i>Crithagra scotops</i>
Dove, Cape Turtle	<i>Streptopelia capicola</i>
Drongo, Fork-tailed	<i>Dicrurus adsimilis</i>
Flycatcher, African Paradise	<i>Terpsiphone viridis</i>
Greenbul, Sombre	<i>Andropadus importunus</i>
Mousebird, Speckled	<i>Colius striatus</i>
Robin-chat, Cape	<i>Cossypha caffra</i>
Saw-wing, Black	<i>Psalidoprocne pristoptera</i>
Seedeater, Streaky-headed	<i>Crithagra gularis</i>
Sparrow, Southern Grey-headed	<i>Passer diffusus</i>
Starling, Red-winged	<i>Onychognathus morio</i>
Sunbird, Greater Double-collared	<i>Cinnyris afer</i>
Sunbird, Southern Double-collared	<i>Cinnyris chalybeus</i>
Swift, White-rumped	<i>Apus caffer</i>
Turaco, Knysna	<i>Tauraco corythaix</i>
Wagtail, Cape	<i>Motacilla capensis</i>
Waxbill, Sweet	<i>Coccyzygia melanotis</i>
Weaver, Cape	<i>Ploceus capensis</i>
White-eye, Cape	<i>Zosterops capensis</i>
Insects: Hymenoptera	
Bee, Cape honey	<i>Apis mellifera capensis</i>
Bee, Giant Carpenter	<i>Xylocopa flavorufa</i>
Wasp, Small Brown Paper	<i>Ropalidia distigma</i>
Insects: Lepidoptera	

Blue, Common Geranium	<i>Cacyreus marshalli</i>
Blue, Tiny Grass	<i>Zizula hylax</i>
Brown, Common Bush	<i>Bicyclus safitza</i>
Border, Eastern Dotted	<i>Mylothris agathina</i>
Pansy, Yellow	<i>Junonia hierta</i>
Swallowtail, Citrus	<i>Papilio demodocus</i>
White, African Veined	<i>Belenois gidica</i>

5. GEOGRAPHICAL ASPECTS

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.

The findings of the geotechnical report have led to the inclusion of piling foundations for the three sea front units being included in the preferred Alternative.

Geotechnical:

- The Arch Rock subsoil profile comprises, for the most part, transported fine to medium grained windblown and colluvial sands, generally of medium dense consistency. The sand is underlain at 6-8m depth by bedrock presenting as medium hard to hard rock quartzitic sandstone and shale.
- The upper profile contains up to 800mm of organic rich compressible soils.
- Hard rock quartzitic sandstone boulders, cobbles and gravel occur within the sandy profile down to depths of about 2,0m.
- Founding conditions for the bulk of the site are such that spread footings dimensioned not to exceed a maximum permissible bearing pressure of 175 kPa may be used for the new structures. Founding is possible within the upper 1,0m of the subsoil profile.
- The buildings along the embankment facing the sea will, due to the presence of low strength soils and the risk of slope instability, have to be piled.
- Piling options should be finalised in consultation with a specialist geotechnical contractor and his design engineers.

6. HERITAGE RESOURCES

6.1.	Was a specialist study conducted?	YES	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
	Mr Stefan de Kock of Perception Planning		
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
	There are no sensitive heritage resources on the site.		

7. HISTORICAL AND CULTURAL ASPECTS

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.

Vastly different from the undeveloped, natural landscape within which is found the Matjesrivier PHS, ±900m to the east, the subject property forms part of an urbanised area (albeit with low density character) which had been physically transformed through establishment of the Keurboomstrand village during the 1920's. Works associated with this transformation would have included, inter alia, earthworks, construction of roads, installation of services. Furthermore, more recent works on the property included construction of ten cottages, outbuilding and office, access road and associated circulation space. The proposal would mostly make use of existing built footprints to retain mature trees and cause as little disturbance as possible. From an archaeological perspective, therefore the likelihood of the property presenting opportunities for significant archaeological occurrences is therefore considered very low.

Given the long-standing transformed nature of the property as well as the intention to rebuild new units on existing built platforms, it is suggested that no further palaeontological studies be required in this instance but that a protocol for fossil finds be put in place during the construction phase.

Unfortunately available historic aerial imagery series (1936, 1966, 1974, 1980, 1991) are of insufficient resolution to provide insight into former land use on and within the proximity of the property. The property does not contain any structures older than 60 years/ structures considered of cultural significance. The proposal would essentially be focussed on existing built footprints, be for less units (albeit an 130m² increase in the overall building footprint). Taken in conjunction with the above assessment we are therefore of the view that the proposal would not materially impact on heritage resources of cultural significance and that the development may proceed.

Heritage Western Cape has confirmed that no further heritage studies are required (see Appendix E1).

8. SOCIO/ECONOMIC ASPECTS

8.1. Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.

The site is situated within a coastal hamlet characterised predominantly by single residential land use and tourism facilities. The Arch Rock Resort is located in the eastern most part of Keurboomstrand. The site is located at the end of Lower Hill Street, which terminates at the public parking area for Singing Kettle Beach. The land uses along Lower Hill Street, which provides access to the site, consists of residential houses made up of permanent and holiday houses. Enrico's restaurant and accommodation facility is located next to the parking area for Singing Kettle Beach, immediately adjacent and to the west of the site. A caravan park is located immediately to the west of the site. There are also a number of additional holiday units located to the east of the site. These units are not affected by the redevelopment.

The land uses and activities in the area and other part of the Keurboomstrand are therefore associated with tourism, including the up-market Keursands development. This is confirmed by the sign at the intersection with Lower and Upper Hill Street.

The area is mostly seasonal, although the Covid-19 pandemic has led to more residents staying on and working remotely.

8.2. Explain the socio-economic value/contribution of the proposed development.

Construction phase - Creation of local business and employment and opportunities

The developer will be responsible for the construction of the units and installation of the bulk services. Based on the information provided by the developer and information from similar developments the construction phase will extend over a period of approximately 14 months and create approximately 60-80 temporary employment opportunities. Based on similar projects 50% (30-40) of the employment opportunities will be available for low skilled workers, 40% (24-32) semi-skilled workers and 10% (6-8) for

skilled workers. The total wage bill will be in the region of Based on information provided by the developer the total wage bill for the construction phase will be in the region of R 11 million (2022 Rand values). This is based on 60 employees and assumes a monthly wage of R 8 000 for low skilled workers, R 15 000 for semi-skilled workers and R 30 000 for skilled workers over a 14-month period.

Most of the employment opportunities associated with low and semi-skilled workers will benefit local Historically Disadvantaged (HD) members of the community. This would represent an opportunity for the local building sector and members of the local community who are employed in the building sector. While the employment opportunities associated with the construction phase are frequently regarded as temporary employment, it is worth noting that the people employed in the construction industry by its very nature rely on "temporary" jobs for their survival. In this regard "permanent" employment in the construction sector is linked to the ability of construction companies to secure a series of temporary projects over a period of time. Each development, such as the proposed development, therefore, contributes to creating "permanent" employment in the construction sector. The BLM IDP also highlights unemployment as a key challenge.

The capital expenditure associated with the proposed development will be in the region of R50 million (2022 Rand value). The work during the construction phase will be undertaken by local contractors and builders. The building materials associated with the construction phase will also be sourced from locally based suppliers. The proposed development will therefore also represent a positive benefit for the local construction and building sector in the BLM. The wage spend will also benefit the local economy.

Operation phase - Creation of employment and business opportunities

The 8-unit facility will employ 27 permanent staff, made up of 2 management staff and 25 service staff (cleaning, maintenance etc.) Most of the employment opportunities will benefit Historically Disadvantaged Individuals (HDIs) from the local community. The BLM IDP highlights unemployment as a key challenge. The operational budget, including wages, will be in the region of R 10 million per annum (2022 Rand values). The operational phase will therefore also create opportunities for local businesses, such as plumbers, electricians, security, landscaping, house maintenance, etc. Local spend by visitors will also support and benefit business in the area.

Support for tourism and economic development

The Arch Rock Resort provides holiday accommodation for visitors to Plettenberg Bay. The location of the facility and access to the beach make it a sought-after facility. The establishment of 8 new units is aimed at upgrading the current accommodation which represents an investment in tourism infrastructure in the BLM.

As indicated in the letter from Lesley Jacobs, Manager Economic Development and Tourism, Bitou Municipality(17/09/2021), the proposed development supports the Bitou Municipalities Local Economic Development Strategy which identifies tourism as a key sector. The letter also highlights the downstream economic linkages associated with the tourism industry. In this regard tourism has been identified by National Government as one of the key industries for future economic growth and the creation of large-scale employment opportunities. The National Development Plan 2030 highlights the potential role of tourism, including both domestic and international tourism. In 2018 the tourism sector contributed R273 billion to South Africa's GDP, of which domestic tourism accounted for 56% of total spend and international inbound travel 44%. In terms of employment, one in every 22 working South Africans were employed in the tourism sector(StatsSA2018).

8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.
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The following social initiatives are recommended:

Construction phase:

- The developer should establish a database of local construction companies in the area, specifically SMME's owned and run by HDI's. These companies should be notified of the tender process and invited to bid for project related work.
- The developer in consultation with the appointed contractor/s should look to employ a percentage of the labour required for the construction phase from local area in order to maximize opportunities for members from the local HD communities.

Operation phase:

- The developer should establish a database of local service companies in the area, specifically SMME's owned and run by HDI's. These companies should be notified of the tender process and invited to bid for project related work.
- The developer in consultation with the appointed contractor/s should look to employ a percentage of the labour required for the operation phase from local area in order to maximize opportunities for members from the local HD communities.
- The nature of low skilled employment opportunities allows for upskilling opportunities for committed staff;
- On the job training in the tourism industry is a standard feature of the industry.

- | | |
|------|--|
| 8.4. | Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development. |
|------|--|

The demolition and construction phases of the development are likely to be a potential nuisance factor for traffic, noise and dust impacts. These can be managed to minimise the impacts and are temporary.

There are no likely impacts to people's health and well being during the operational phase of the development, given that the existing resort is an accepted component of the Keurboomstrand area.

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. DETAILS OF THE ALTERNATIVES IDENTIFIED AND CONSIDERED

- | | |
|------|--|
| 1.1. | Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts. |
|------|--|

Alternative 1 (Preferred Alternative)

Keurbooms Rock (Pty) Ltd purchased the existing Arch Rock Seaside Accommodation resort on Remainder of Portion 5 of 296, Keurboomstrand.

The property has purchased by Keurbooms Rock (Pty) Ltd. in 2019 and it is their proposal to re-furbish / alter the existing resort units on the property as the units are outdated and old. The refurbishment is expected to reduce the throughput capacity of the facility which currently accommodates 26 pax in 10 chalets, to 22 pax in 8 chalets. The new units will be placed on the same footprints of the old units, although there is some overlap due to configuration. The overlap however takes place on areas that were previously lawned or gravel.

The new units will not require any changes to building lines or heights that are currently in effect. The three sea facing units will make use of the same frontal position as the current units. The lawns in front of the old sea facing units will be rehabilitated to coastal dune vegetation.

The resort its current configuration commenced circa 1991, is located in an established township area and will remain a resort.

The redevelopment will consist of the following:

- 5 x 1 bedroom units with open pergola stoeps (average $\pm 81\text{m}^2$);
- 3 x 2 bedroom units with open pergola stoeps (average $\pm 90\text{m}^2$);
- Existing reception to be converted to a new laundry;
- New pool and store ($\pm 45\text{m}^2$) to replace the existing laundry;
- Reception and administration ($\pm 60\text{m}^2$) partially replacing the existing laundry and one of the old chalets; and
- 8 parking bays partially replacing the existing store.

	Existing		New	
	No	Area	No	Area
Chalets	10	760m ²	8	839m ²
General	4	162m ²	3	213m ²
Total	14	922m²	11	1052m²
Pax	26		22	

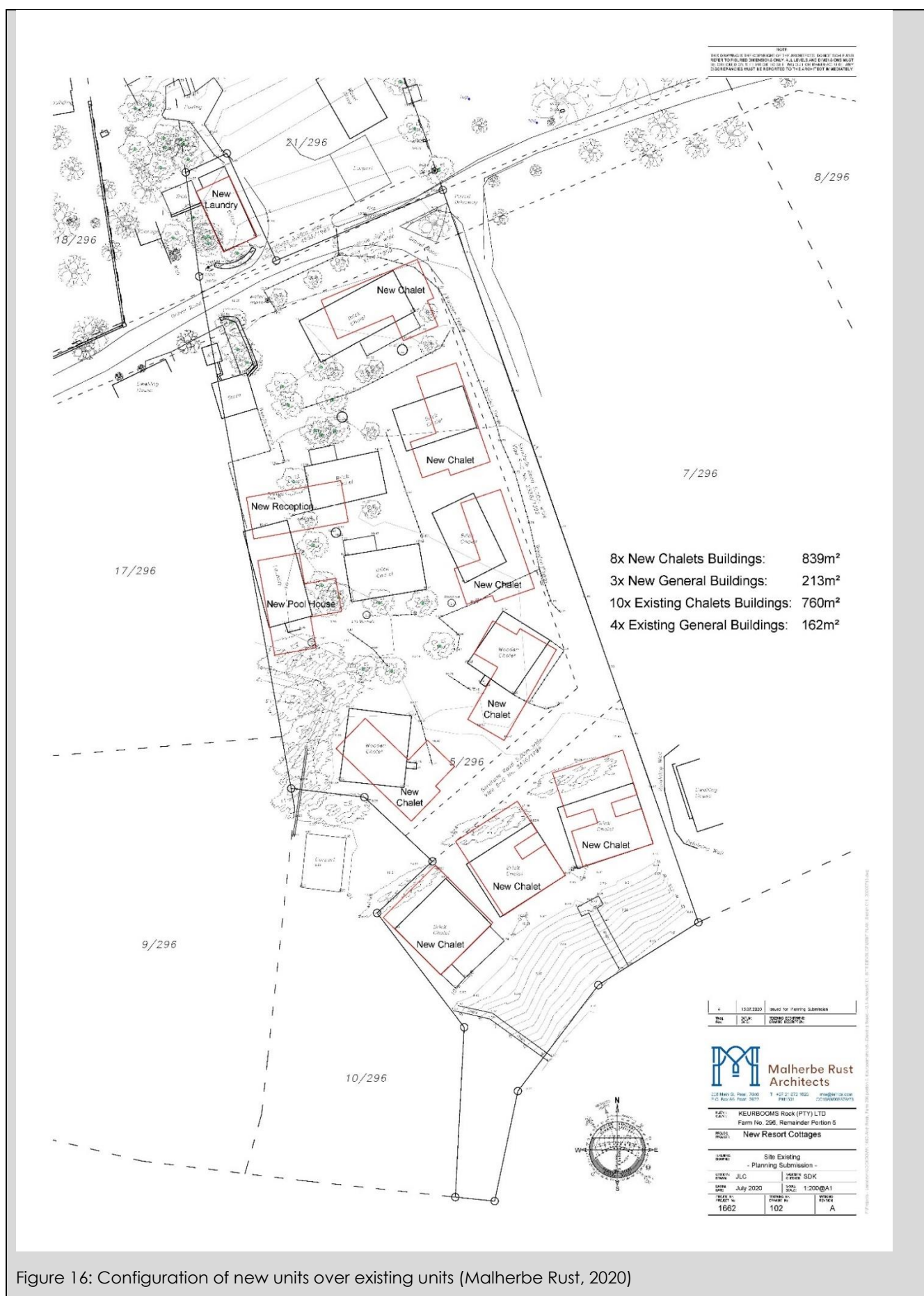


Figure 16: Configuration of new units over existing units (Malherbe Rust, 2020)

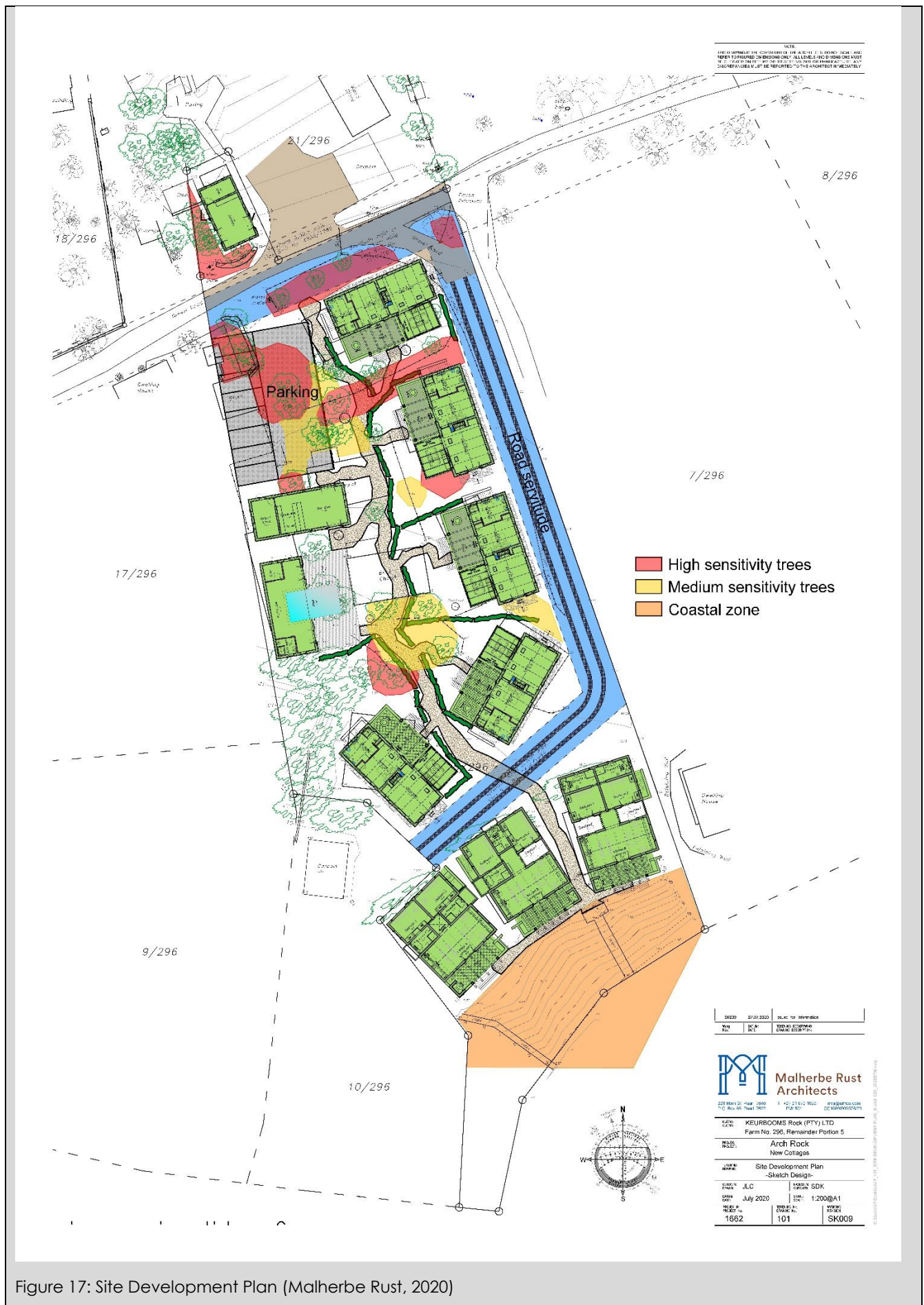


Figure 17: Site Development Plan (Malherbe Rust, 2020)

The three sea facing units must include piling to ensure long term stability and protection of the coastal interface.



Figure 18: Architects rendering (Malherbe Rust, 2020)

Provide a description of any other property and site alternatives investigated.

No other property or site alternatives are being considered as the proposal is for the refurbishment of the existing Arch Rock Seaside Accommodation resort. The property is owned by the applicant.

Provide a motivation for the preferred property and site alternative including the outcome of the site selection matrix.

Following were the criteria provided by the applicant for the site selection:

- The applicant owns the property.
- Municipal services are already provided to the property.
- The resort is an existing tourism facility and this application is for its redevelopment. There will be no change in land use.
- The municipal planning for the area supports the development.
- The property is located inside the urban edge and urban area of Keurboomstrand.

The following were criteria provided by the EAP & specialist:

- The redevelopment of the existing tourism facility will not have any significant negative impact on the terrestrial biodiverse, botany or animal species.
- The redevelopment of the site will not have any impact on heritage or cultural aspects. The site has been significantly altered since at least 1920.
- The preferred alternatives has taken into consideration the existing landscaped tree groupings and they will be retained.

The matrix value is determined by multiplying the weighting by the individual score assigned.

The maximum score that can be achieved by this site selection matrix is 105. Achieving a 105 score confirms the suitability of the site for the proposed activity.

Site Selection Matrix

Criteria		Site 1	Site 2	Site 3	1 = Not Acceptable 2 = Poor 3 = Acceptable 4 = Very Good 5 = Excellent
Property					
Size	3	15	0	0	
Applicant owned	1	5	0	0	
Zonation	3	15	0	0	
Landuse	2	10	0	0	
Services					
Access	3	15	0	0	
Water	3	15	0	0	
Electricity	3	15	0	0	
Environmental considerations	2	10	0	0	
Waste Management	1	5	0	0	
		92	0	0	
Multiply weighting for criteria by the individual score assigned i.e. weighting for Size is 3, score given is 5 therefore matrix value is 15					
Provide a full description of the process followed to reach the preferred alternative within the site.					
<p>The property is the location of the Arch Rock Seaside Accommodation resort. It previously formed part of the larger tourism facility that included the Arch Rock Resort to the east. According to the heritage practitioner, the area was used for tourism and holiday use from as early as 1920.</p> <p>The current owner bought the property with the intention to retain it as a tourism facility. They have a background in upmarket tourism facilities and the redevelopment of this facility will benefit the area of Keurboomstrand.</p> <p>The architectural and planning team surveyed the existing dwellings and put forward the proposal to modernise and upgrade the resort. The existing units are made up of multiple different styles and the intention is to consolidate the style, whilst making the best use of the environment to ensure that each unit has a connection to nature and the scenic beauty of the area. The units will be placed mostly on the existing footprint areas but slightly better orientated.</p> <p>Excerpt from the planning report states the following:</p>					

As mentioned above, the develop proposal will be more or less positioned on the same footprint of the existing chalets.

Environmental mapping and screening formed an integral part of the design process and critical areas on site have played an important role in determining the current proposed layout, hence current disturbed areas form the basis of new buildings. The immense scenic beauty of the context allows for modest small buildings which fully utilize the views and connection between natural and built landscape. Although only the front three units will have direct sea view the other units are placed within landscaped canopies that embody a unique charm important to retain within new development. The placement of these units, with specific reference to the three units facing the sea, sits on the same front line as per existing units and follows the same orientation as currently on site. All new units have been placed over the current unit footprints.

The design and architectural framework for re-layout and improvement draws inspiration from modest traditional single storeyed cottages arranged around the landscape to create a landscaped courtyard between buildings. The proposed buildings will have 45 degree non reflective corrugated roofs, white rolled roof ridges, white lime washed walls and gables, timber pergolas with vines on and stone chipped flat roofs as linking elements.

Simplistic rectangular in layout and placed within the current arrangement of trees ultimately creating a closely linked experience between outside and inside living. The overall unit's proportion of roof to wall is 1:1. This allows for a simplistic gable end articulation traditional to vernacular typologies.. Timber screening walls, which will naturally weather into a soft greyish tone will be utilized as boundary condition between this and neighboring properties as well as between units where privacy is required. Currently there are well established trees on the site and by utilizing the existing placement the new units integrate with the current landscaping's sense of place.

A Pedestrian orientated user experience is encouraged and cars will be parked at a central parking area at the entrance to the development. This will ensure that spaces between units can be enjoyed and shared by all users without a visual clutter of cars.

Provide a detailed motivation if no property and site alternatives were considered.

- The applicant owns the property.
- Municipal services are already provided to the property.
- The resort is an existing tourism facility and this application is for its redevelopment. There will be no change in land use.
- The municipal planning for the area supports the development.
- The property is located inside the urban edge and urban area of Keurboomstrand.

List the positive and negative impacts that the property and site alternatives will have on the environment.

Positive Impacts:

- Construction
 - Creation of business and employment opportunities
- Operation
 - Creation of business and employment opportunities
 - Support tourism and economic development. Also same as the status quo impacts.

Negative Impacts:

- Construction
 - Creation of business and employment opportunities
 - Noise, dust, and safety impacts associated with construction related activities and the movement of heavy vehicles.
 - Very low impacts on terrestrial biodiversity, animal species and botanical functions of the site.

No Impact:

- No impact on heritage resources.
- No impact on visual status quo.

1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
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Provide a description of the preferred activity alternative.

The potential negative impacts associated with the proposal range between Low to non-existent, with the most significant being temporary impacts associated with construction activities. The preferred Alternative has taken into account the sensitivity of the on-site tree groupings and is implementing best practise stabilising mechanisms (piling) on the seawards units to ensure long term stability and protection of the coastal interface.

Alternative 1 (Preferred Alternative)

Keurbooms Rock (Pty) Ltd purchased the existing Arch Rock Seaside Accommodation resort on Remainder of Portion 5 of 296, Keurboomstrand.

The property has purchased by Keurbooms Rock (Pty) Ltd. in 2019 and it is their proposal to re-furbish / alter the existing resort units on the property as the units are outdated and old. The refurbishment is expected to reduce the throughput capacity of the facility which currently accommodates 26 pax in 10 chalets, to 22 pax in 8 chalets. The new units will be placed on the same footprints of the old units, although there is some overlap due to configuration. The overlap however takes place on areas that were previously lawned or gravel.

The new units will not require any changes to building lines or heights that are currently in effect. The three sea facing units will make use of the same frontal position as the current units. The lawns in front of the old sea facing units will be rehabilitated to coastal dune vegetation.

The resort its current configuration commenced circa 1991, is located in an established township area and will remain a resort.

The redevelopment will consist of the following:

- 5 x 1 bedroom units with open pergola stoeps (average $\pm 81\text{m}^2$);
- 3 x 2 bedroom units with open pergola stoeps (average $\pm 90\text{m}^2$);
- Existing reception to be converted to a new laundry;
- New pool and store ($\pm 45\text{m}^2$) to replace the existing laundry;

- Reception and administration ($\pm 60\text{m}^2$) partially replacing the existing laundry and one of the old chalets; and
- 8 parking bays partially replacing the existing store.

	Existing		New	
	No	Area	No	Area
Chalets	10	760m ²	8	839m ²
General	4	162m ²	3	213m ²
Total	14	922m²	11	1052m²
Pax	26		22	

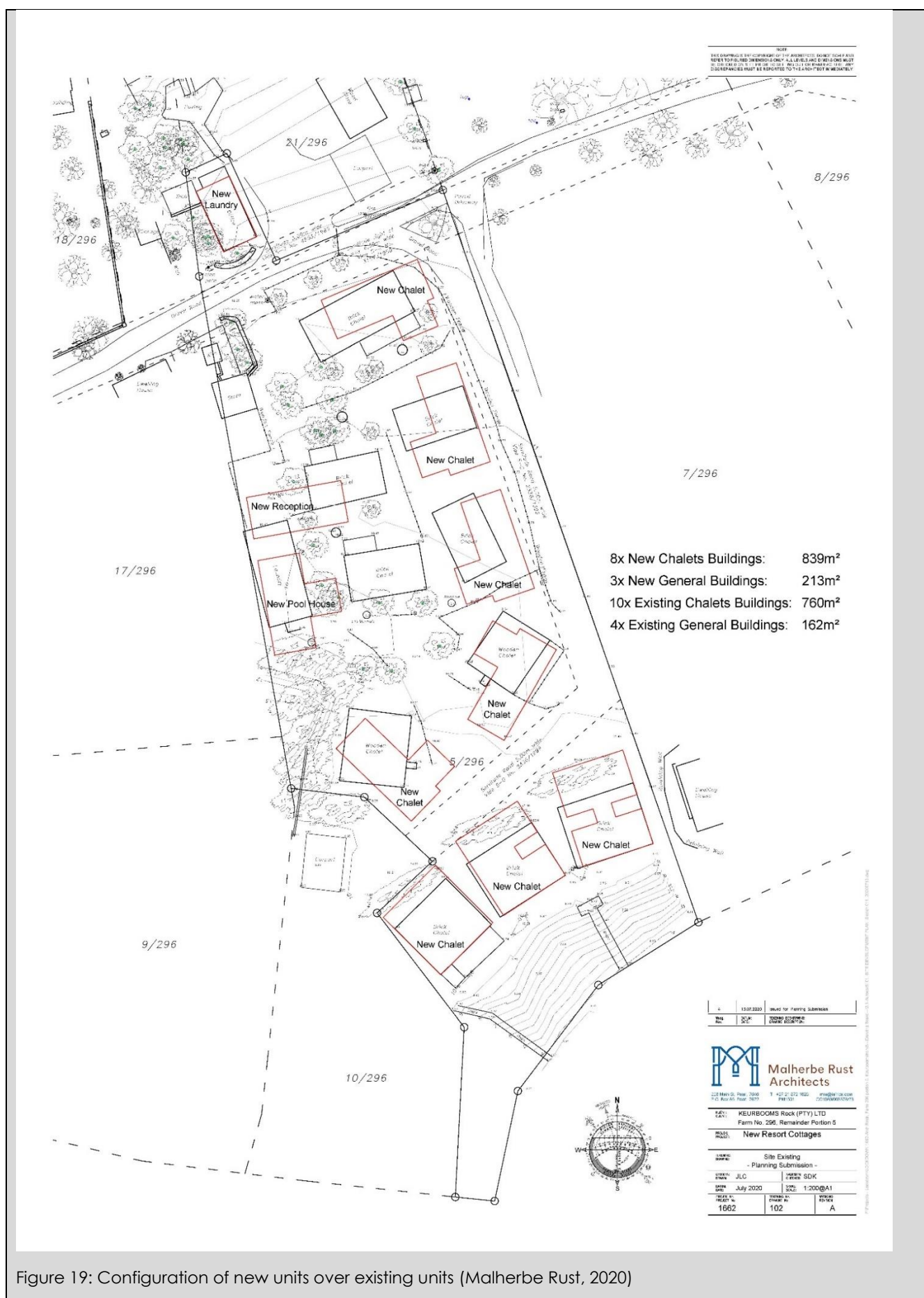


Figure 19: Configuration of new units over existing units (Malherbe Rust, 2020)

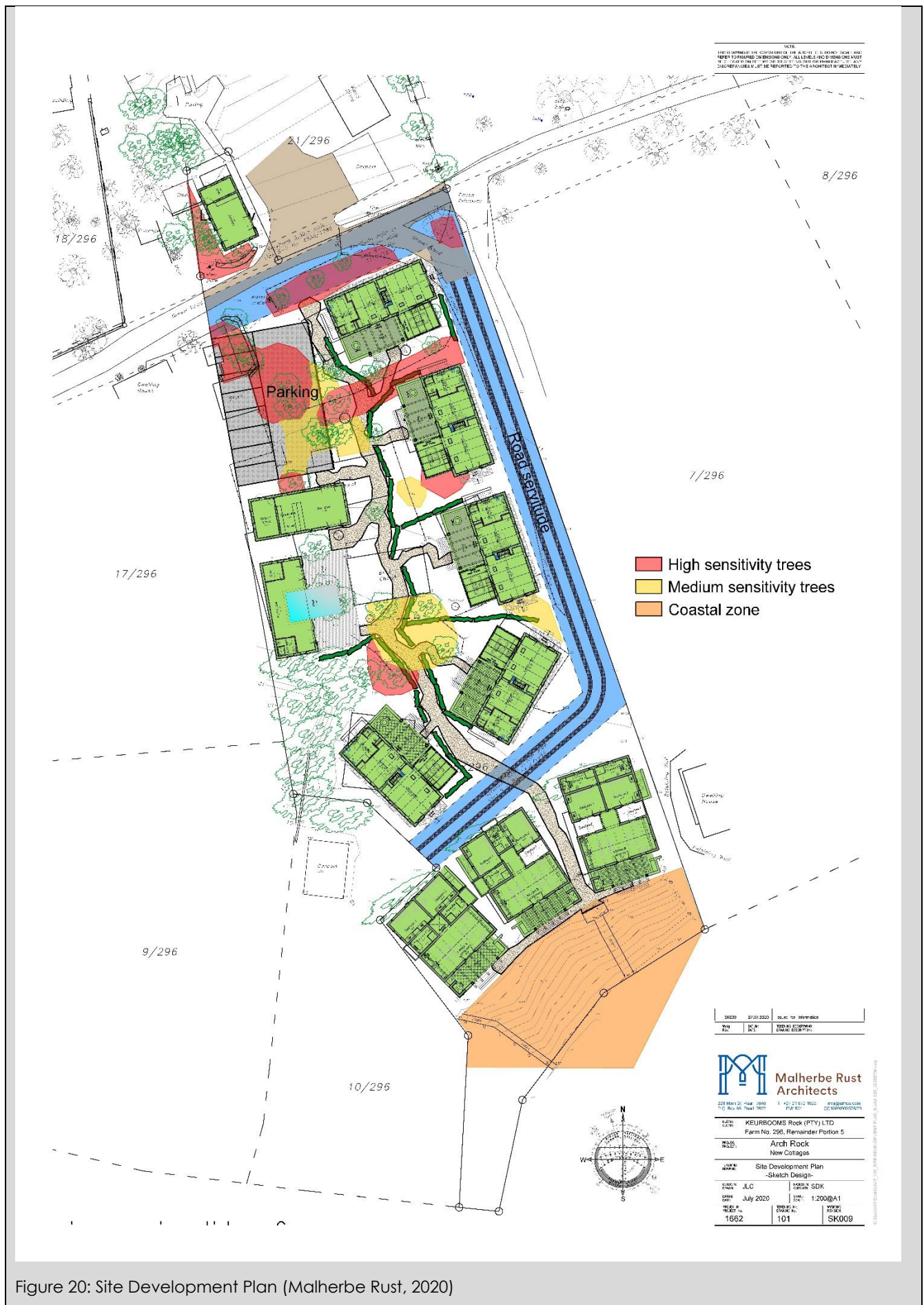


Figure 20: Site Development Plan (Malherbe Rust, 2020)

The three sea facing units must include piling to ensure long term stability and protection of the coastal interface..



Figure 21: Architects rendering (Malherbe Rust, 2020)

Provide a description of any other activity alternatives investigated.

None. The existing facility is a seaside resort and it will remain as such with this application.

Provide a motivation for the preferred activity alternative.

The applicant is proposing the refurbishment of the existing resort to provide a more modernised and upmarket facility inside the urban edge and urban area of Keurboomstrand. The proposal reduces the current number of 10 unit to 8 and from 26 pax to 22. The preferred alternative has taken into account the existing tree groupings which will be retained and included in the new layout.

The impacts of the refurbishment of the facility range from Low to None and the positive impacts are related to the socio economic benefit for the area.

Provide a detailed motivation if no activity alternatives exist.

The Arch Rock Seaside Accommodation resort is an existing approved facility that is located on an area that has been utilised since at least 1920 for tourism and holiday activities. The property is located inside the urban edge and urban area of Keurboomstrand, which is known as a holiday destination. The applicant is not proposing a change in land use and is not increasing the throughput of the facility, and will also be within the current municipal building thresholds for the site.

There is therefore no other alternative under consideration, other than the status quo or No Go Alternative that can realistically be considered for this site.

List the positive and negative impacts that the activity alternatives will have on the environment.

Positive Impacts:

- Construction
 - Creation of business and employment opportunities
- Operation
 - Creation of business and employment opportunities
 - Support tourism and economic development. Also same as the status quo impacts.

Negative Impacts:

- Construction
 - Creation of business and employment opportunities
 - Noise, dust, and safety impacts associated with construction related activities and the movement of heavy vehicles.
 - Very low impacts on terrestrial biodiversity, animal species and botanical functions of the site.

No Impact:

- No impact on heritage resources.
- No impact on visual status quo.

1.3.	Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts
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Provide a description of the preferred design or layout alternative.

Alternative 1 (Preferred Alternative)

Keurbooms Rock (Pty) Ltd purchased the existing Arch Rock Seaside Accommodation resort on Remainder of Portion 5 of 296, Keurboomstrand.

The property has purchased by Keurbooms Rock (Pty) Ltd. in 2019 and it is their proposal to re-furbish / alter the existing resort units on the property as the units are outdated and old. The refurbishment is expected to reduce the throughput capacity of the facility which currently accommodates 26 pax in 10 chalets, to 22 pax in 8 chalets. The new units will be placed on the same footprints of the old units, although there is some overlap due to configuration. The overlap however takes place on areas that were previously lawned or gravel.

The new units will not require any changes to building lines or heights that are currently in effect. The three sea facing units will make use of the same frontal position as the current units. The lawns in front of the old sea facing units will be rehabilitated to coastal dune vegetation.

The resort its current configuration commenced circa 1991, is located in an established township area and will remain a resort.

The redevelopment will consist of the following:

- 5 x 1 bedroom units with open pergola stoeps (average $\pm 81\text{m}^2$);
- 3 x 2 bedroom units with open pergola stoeps (average $\pm 90\text{m}^2$);
- Existing reception to be converted to a new laundry;
- New pool and store ($\pm 45\text{m}^2$) to replace the existing laundry;
- Reception and administration ($\pm 60\text{m}^2$) partially replacing the existing laundry and one of the old chalets; and
- 8 parking bays partially replacing the existing store.

	Existing		New	
	No	Area	No	Area
Chalets	10	760m ²	8	839m ²
General	4	162m ²	3	213m ²
Total	14	922m²	11	1052m²

Pax	26		22		
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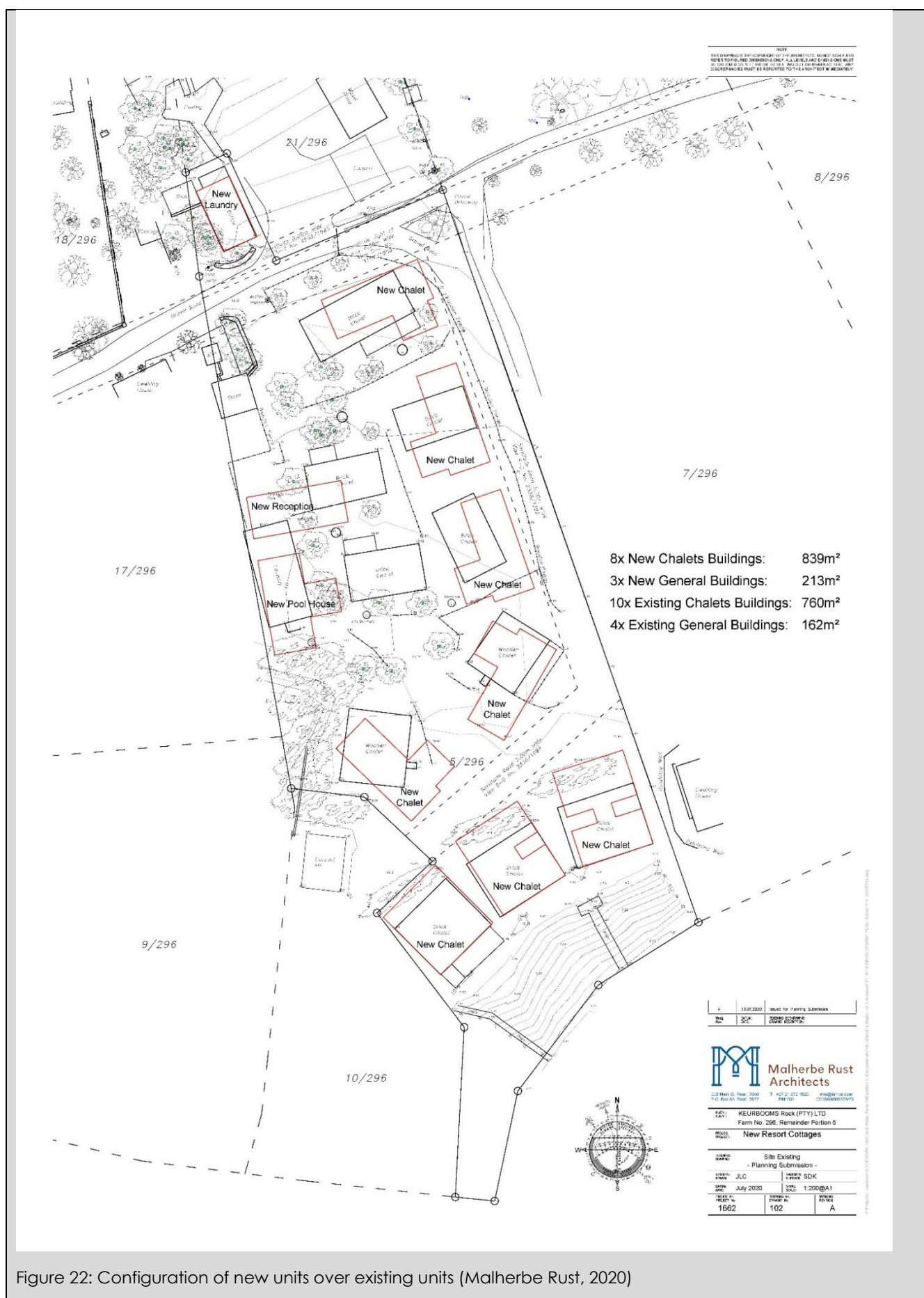


Figure 22: Configuration of new units over existing units (Malherbe Rust, 2020)

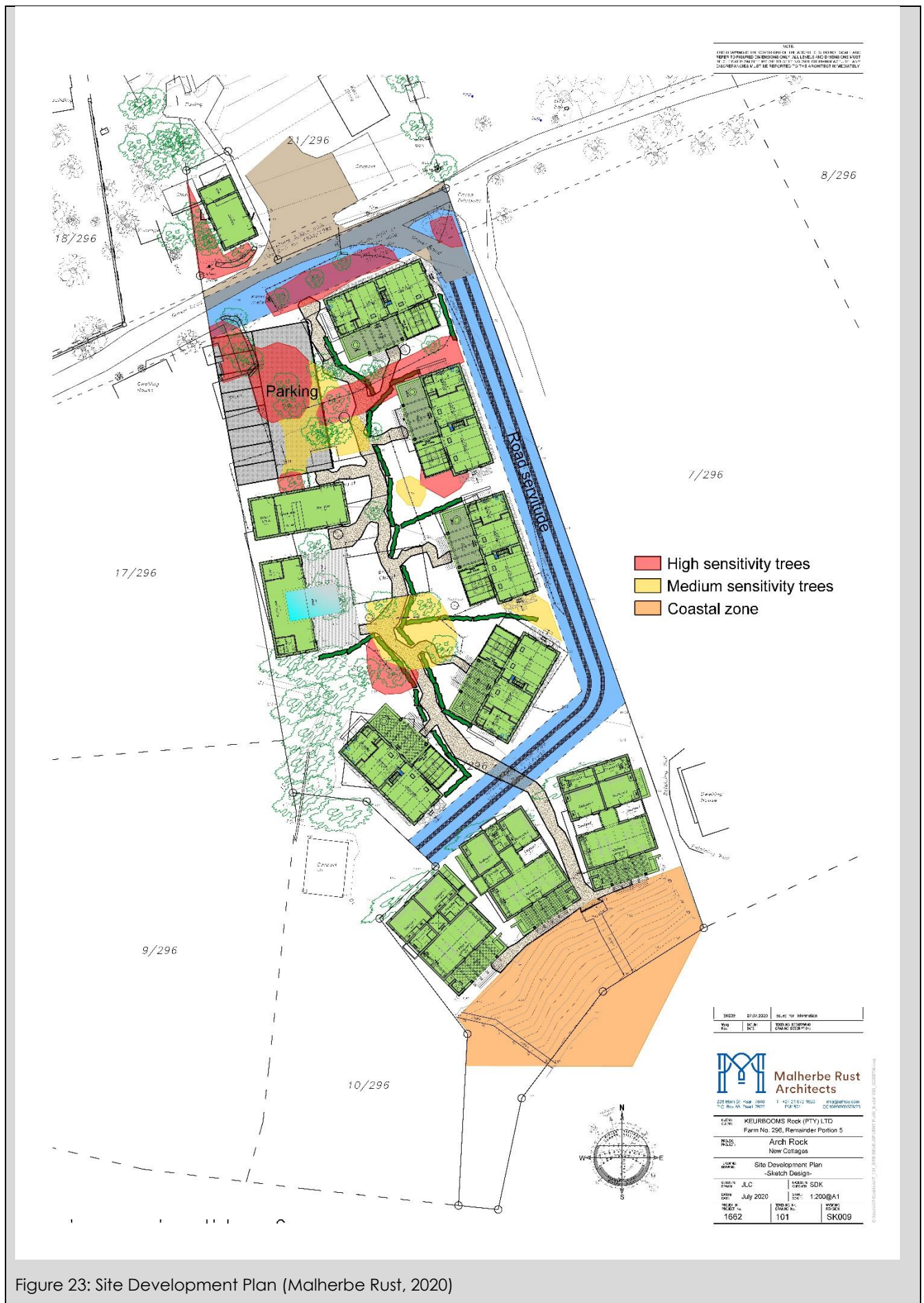


Figure 23: Site Development Plan (Malherbe Rust, 2020)

The three sea facing units must include piling to ensure long term stability and protection of the coastal interface.



Figure 24: Architects rendering (Malherbe Rust, 2020)

Provide a description of any other design or layout alternatives investigated.

The only other layout alternative will be the approved status quo or No Go Alternative.

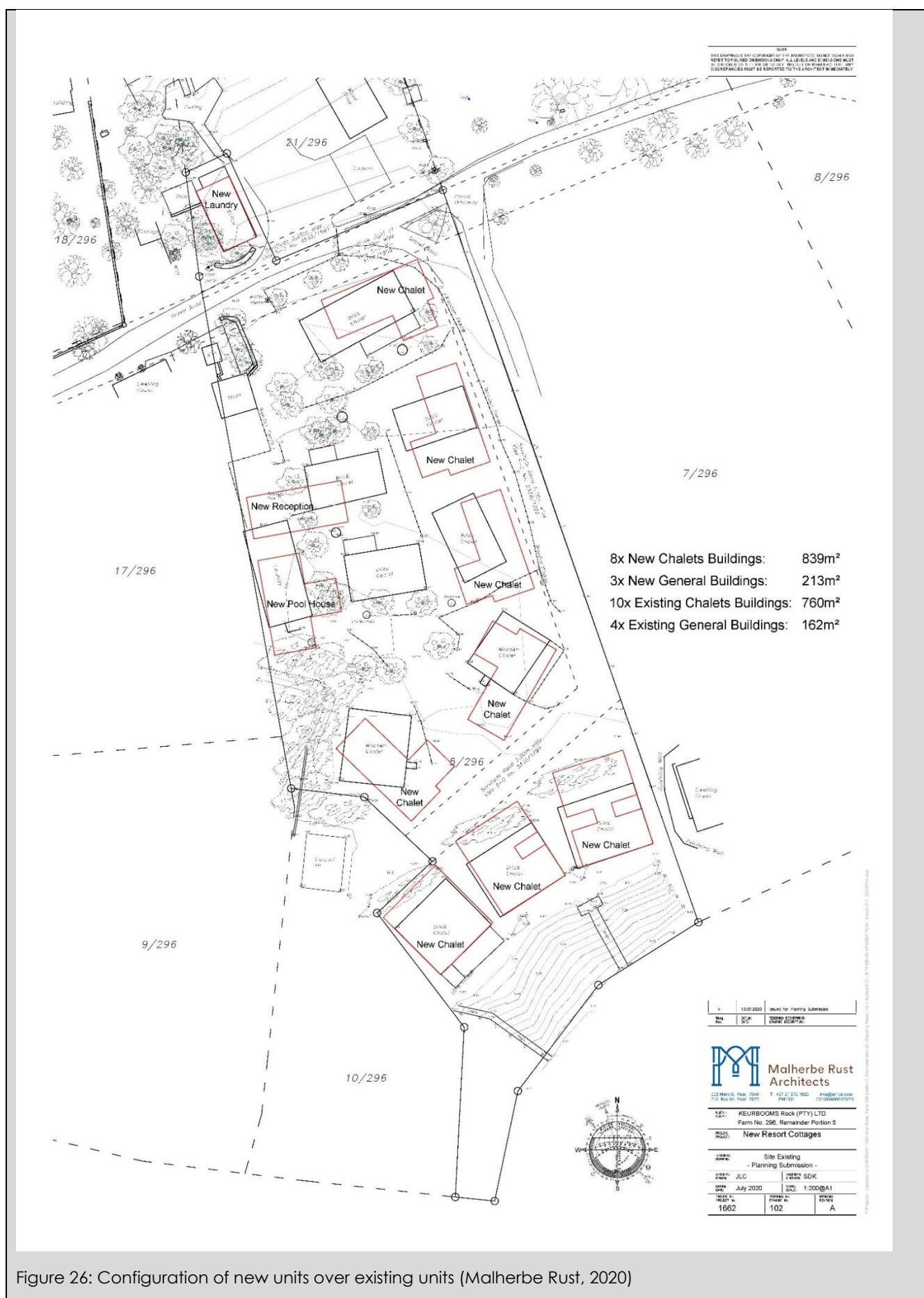
No Go Alternative:

This alternative retains the current approved layout and design that is on the site. There are 10 chalets on the site that accommodate 26 pax. The chalets are of mixed design and materials and are somewhat outdated.

The applicant is proposing implementing the preferred Alternative 1 to replace this layout. It will add considerable value to the existing facility and improve the surrounding property values. The No Go Alternative is thus considered an unreasonable option, but will be assessed as a baseline to the Preferred Alternative.

<ul style="list-style-type: none"> ○ Very low impacts on terrestrial biodiversity, animal species and botanical functions of the site. 	
<p>No Impact:</p> <ul style="list-style-type: none"> • No impact on heritage resources. • No impact on visual status quo. 	
1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred technology alternative:	
No technology alternatives are being proposed.	
Provide a description of any other technology alternatives investigated.	
Not applicable.	
Provide a motivation for the preferred technology alternative.	
Not applicable.	
Provide a detailed motivation if no alternatives exist.	
Not applicable.	
List the positive and negative impacts that the technology alternatives will have on the environment.	
Not applicable.	
1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred operational alternative.	
<p>Alternative 1 (Preferred Alternative)</p> <p>Keurbooms Rock (Pty) Ltd purchased the existing Arch Rock Seaside Accommodation resort on Remainder of Portion 5 of 296, Keurboomstrand.</p> <p>The property has purchased by Keurbooms Rock (Pty) Ltd. in 2019 and it is their proposal to re-furbish / alter the existing resort units on the property as the units are outdated and old. The refurbishment is expected to reduce the throughput capacity of the facility which currently accommodates 26 pax in 10 chalets, to 22 pax in 8 chalets. The new units will be placed on the same footprints of the old units, although there is some overlap due to configuration. The overlap however takes place on areas that were previously lawned or gravel.</p> <p>The new units will not require any changes to building lines or heights that are currently in effect. The three sea facing units will make use of the same frontal position as the current units. The lawns in front of the old sea facing units will be rehabilitated to coastal dune vegetation.</p> <p>The resort its current configuration commenced circa 1991, is located in an established township area and will remain a resort.</p> <p>The redevelopment will consist of the following:</p> <ul style="list-style-type: none"> • 5 x 1 bedroom units with open pergola stoeps (average $\pm 81\text{m}^2$); • 3 x 2 bedroom units with open pergola stoeps (average $\pm 90\text{m}^2$); • Existing reception to be converted to a new laundry; • New pool and store ($\pm 45\text{m}^2$) to replace the existing laundry; • Reception and administration ($\pm 60\text{m}^2$) partially replacing the existing laundry and one of the old chalets; and • 8 parking bays partially replacing the existing store. 	

	Existing		New	
	No	Area	No	Area
Chalets	10	760m ²	8	839m ²
General	4	162m ²	3	213m ²
Total	14	922m²	11	1052m²
Pax	26		22	



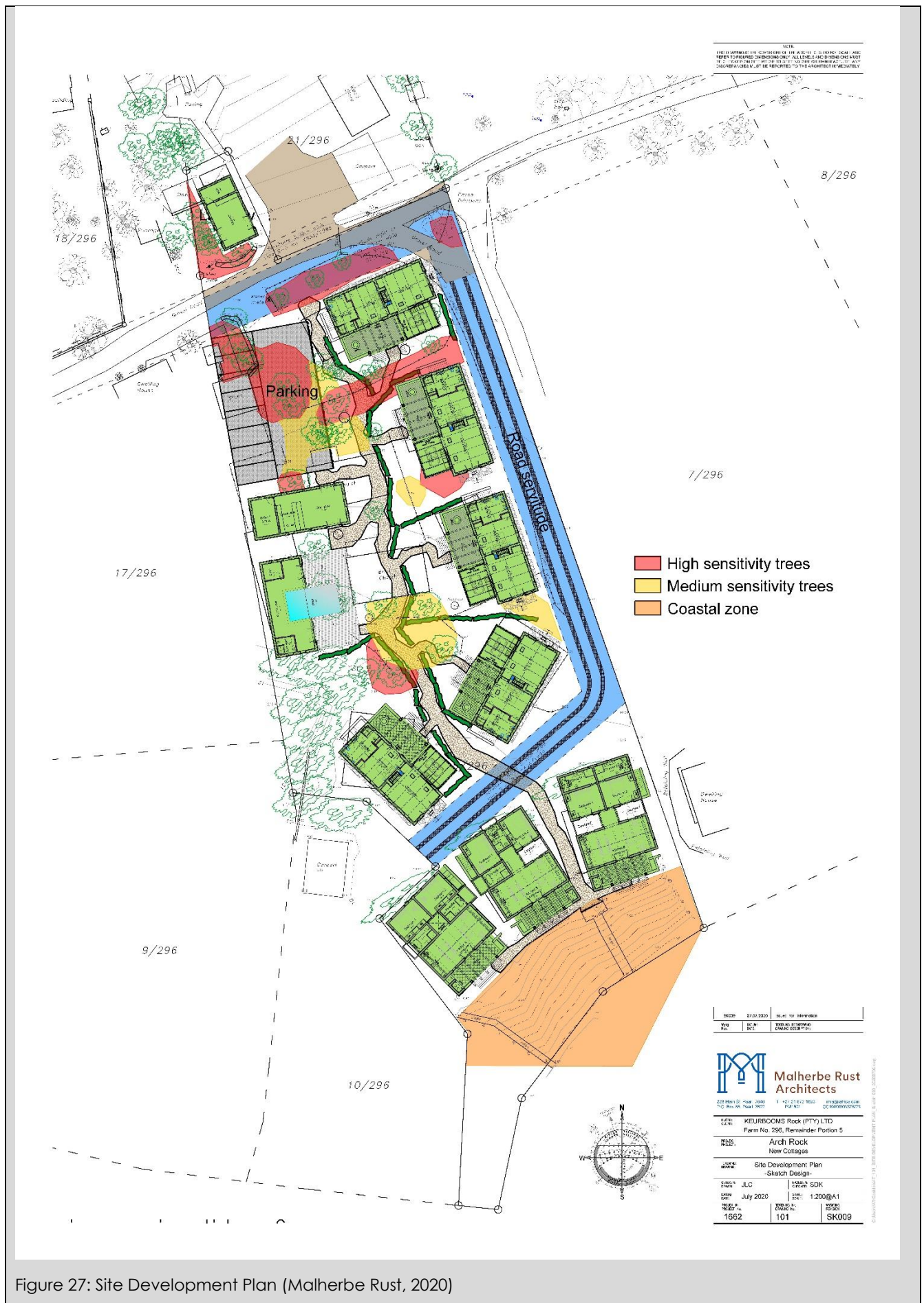


Figure 27: Site Development Plan (Malherbe Rust, 2020)

The three sea facing units must include piling to ensure long term stability and protection of the coastal interface.



Figure 28: Architects rendering (Malherbe Rust, 2020)

Provide a description of any other operational alternatives investigated.

None

Provide a motivation for the preferred operational alternative.

Not applicable.

Provide a detailed motivation if no alternatives exist.

Not applicable.

List the positive and negative impacts that the operational alternatives will have on the environment.

Positive Impacts:

- Construction
 - Creation of business and employment opportunities
- Operation
 - Creation of business and employment opportunities
 - Support tourism and economic development. Also same as the status quo impacts.

Negative Impacts:

- Construction
 - Creation of business and employment opportunities
 - Noise, dust, and safety impacts associated with construction related activities and the movement of heavy vehicles.
 - Very low impacts on terrestrial biodiversity, animal species and botanical functions of the site.

No Impact:

- No impact on heritage resources.
- No impact on visual status quo.

1.6.	The option of not implementing the activity (the 'No-Go' Option).	
	Provide an explanation as to why the 'No-Go' Option is not preferred.	
	<p>The No Go Alternative is the status quo, which is the existing facility. This alternative retains the current approved layout and design that is on the site. There are 10 chalets on the site that accommodate 26 pax. The chalets are of mixed design and materials and are somewhat outdated.</p> <p>The applicant is proposing implementing the preferred Alternative 1 to replace this layout. It will add considerable value to the existing facility and improve the surrounding property values. The No Go Alternative is thus considered an unreasonable option, but will be assessed as a baseline to the Preferred Alternative.</p>	
1.7.	Provide an explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.	
	<p>The preferred alternative (Alternative 1) has taken into account the areas that are considered sensitive, most notably the tree groupings on the site that also formed part of the 2003 layout plan. In addition, the three sea facing units will be redeveloped using pilings to ensure long term stability and protection of the coastal interface.</p>	
1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.	
	<p>The applicant is proposing the refurbishment of the existing Arch Rock Seaside Accommodation resort. Alternative 1 is the Preferred Alternative for the development. This option has been assessed by the various specialists and the potential impacts range from Medium Positive to Very Low Negative.</p>	
	<p>Alternative 1 (Preferred Alternative)</p> <p>Keurbooms Rock (Pty) Ltd purchased the existing Arch Rock Seaside Accommodation resort on Remainder of Portion 5 of 296, Keurboomstrand.</p> <p>The property has purchased by Keurbooms Rock (Pty) Ltd. in 2019 and it is their proposal to re-furbish / alter the existing resort units on the property as the units are outdated and old. The refurbishment is expected to reduce the throughput capacity of the facility which currently accommodates 26 pax in 10 chalets, to 22 pax in 8 chalets. The new units will be placed on the same footprints of the old units, although there is some overlap due to configuration. The overlap however takes place on areas that were previously lawned or gravel.</p> <p>The new units will not require any changes to building lines or heights that are currently in effect. The three sea facing units will make use of the same frontal position as the current units. The lawns in front of the old sea facing units will be rehabilitated to coastal dune vegetation.</p> <p>The resort its current configuration commenced circa 1991, is located in an established township area and will remain a resort.</p> <p>The redevelopment will consist of the following:</p> <ul style="list-style-type: none"> • 5 x 1 bedroom units with open pergola stoeps (average $\pm 81\text{m}^2$); • 3 x 2 bedroom units with open pergola stoeps (average $\pm 90\text{m}^2$); • Existing reception to be converted to a new laundry; • New pool and store ($\pm 45\text{m}^2$) to replace the existing laundry; • Reception and administration ($\pm 60\text{m}^2$) partially replacing the existing laundry and one of the old chalets; and • 8 parking bays partially replacing the existing store. 	
	Existing	New

	No	Area	No	Area
Chalets	10	760m ²	8	839m ²
General	4	162m ²	3	213m ²
Total	14	922m²	11	1052m²
Pax	26		22	

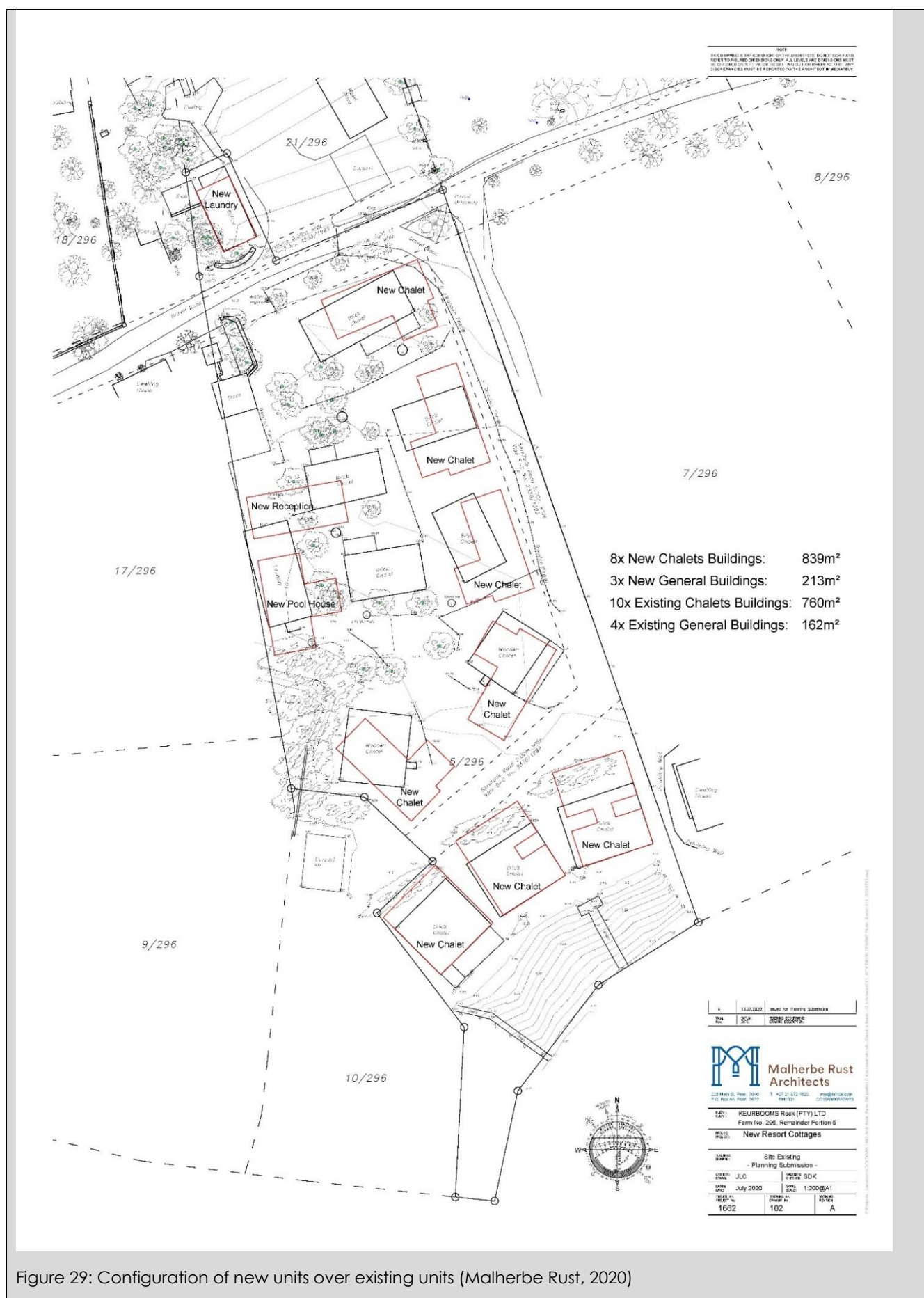


Figure 29: Configuration of new units over existing units (Malherbe Rust, 2020)



The three sea facing units must include piling to ensure long term stability and protection of the coastal interface..



Figure 31: Architects rendering (Malherbe Rust, 2020)

2. “NO-GO” AREAS

Explain what “no-go” area(s) have been identified during identification of the alternatives and provide the co-ordinates of the “no-go” area(s).

The no-go areas that have been identified are as follows:

- Areas seawards of the current development edge; and
- Tree groupings that have been identified as High Sensitivity by the EAP.

3. METHODOLOGY TO DETERMINE THE SIGNIFICANCE RATINGS OF THE POTENTIAL ENVIRONMENTAL IMPACTS AND RISKS ASSOCIATED WITH THE ALTERNATIVES.

Describe the methodology to be used in determining and ranking the nature, significance, consequences, extent, duration of the potential environmental impacts and risks associated with the proposed activity or development and alternatives, the degree to which the impact or risk can be reversed and the degree to which the impact and risk may cause irreplaceable loss of resources.

Criteria for Assessment

These criteria are drawn from the EIA Regulations, published by the Department of Environmental Affairs and Tourism (April 1998) in terms of the Environmental Conservation Act No. 73 of 1989.

These criteria include:

- **Nature of the impact**

This is the appraisal of the type of effect the construction, operation and maintenance of a development would have on the affected environment. This description should include what is to be affected and how.

- **Extent of the impact**

Describe whether the impact will be: local extending only as far as the development site area; or limited to the site and its immediate surroundings; or will have an impact on the region, or will have an impact on a national scale or across international borders.

- **Duration of the impact**

The specialist / EAP should indicate whether the lifespan of the impact would be short term (0-5 years), medium term (5-15 years), long term (16-30 years) or permanent.

- **Intensity**

The specialist / EAP should establish whether the impact is destructive or benign and should be qualified as low, medium or high. The study must attempt to quantify the magnitude of the impacts and outline the rationale used.

- **Probability of occurrence**

The specialist / EAP should describe the probability of the impact actually occurring and should be described as improbable (low likelihood), probable (distinct possibility), highly probable (most likely) or definite (impact will occur regardless of any prevention measures).

The impacts should also be assessed in terms of the following aspects:

- **Legal requirements**

The specialist / EAP should identify and list the relevant South African legislation and permit requirements pertaining to the development proposals. He / she should provide reference to the procedures required to obtain permits and describe whether the development proposals contravene the applicable legislation.

- **Status of the impact**

The specialist / EAP should determine whether the impacts are negative, positive or neutral ("cost – benefit" analysis). The impacts are to be assessed in terms of their effect on the project and the environment. For example, an impact that is positive for the proposed development may be negative for the environment. It is important that this distinction is made in the analysis.

- **Accumulative impact**

Consideration must be given to the extent of any accumulative impact that may occur due to the proposed development. Such impacts must be evaluated with an assessment of similar developments already in the environment. Such impacts will be either positive or negative, and will be graded as being of negligible, low, medium or high impact.

- **Degree of confidence in predictions**

The specialist / EAP should state what degree of confidence (low, medium or high) is there in the predictions based on the available information and level of knowledge and expertise.

Based on a synthesis of the information contained in the above-described procedure, you are required to assess the potential impacts in terms of the following significance criteria:

No significance: the impacts do not influence the proposed development and/or environment in any way.

Low significance: the impacts will have a minor influence on the proposed development and/or environment. These impacts require some attention to modification of the project design where possible, or alternative mitigation.

Moderate significance: the impacts will have a moderate influence on the proposed development and/or environment. The impact can be ameliorated by a modification in the project design or implementation of effective mitigation measures.

High significance: the impacts will have a major influence on the proposed development and/or environment and will result in the “no-go” option on the development or portions of the development regardless of any mitigation measures that could be implemented. This level of significance must be well motivated.

4. ASSESSMENT OF EACH IMPACT AND RISK IDENTIFIED FOR EACH ALTERNATIVE

Note: The following table serves as a guide for summarising each alternative. The table should be repeated for each alternative to ensure a comparative assessment. The EAP may decide to include this section as Appendix J to this BAR.

<div> <div>◀ State Impact e.g Odour, Noise, clearanc</div> <div>Terrestrial Biodiversity</div> <div>State Impact e.g Odour, Noise, clearanc ▶</div> </div>		
Alternative:	Alternative 1	No Go Option
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:	Loss of vegetation	Loss of vegetation
Nature of impact:	Clearance of vegetation within the Goukamma Dune Thicket or Shale Fynbos ecosystem type affecting pattern and process	No clearance of vegetation, status quo retained
Extent and duration of impact:	Site specific, permanent	Site specific, permanent
Consequence of impact or risk:	Loss of pattern and process	None
Probability of occurrence:	Highly Improbable as healthy or representative Shale Fynbos or Dune Thicket vegetation occurring there, as the property is transformed, fragmented and situated adjacent to a built environment.	Highly Improbable as healthy or representative Shale Fynbos or Dune Thicket vegetation occurring there, as the property is transformed, fragmented and situated adjacent to a built environment.
Degree to which the impact may cause irreplaceable loss of resources:	None	None
Degree to which the impact can be reversed:	None	None
Indirect impacts:	None	None
Cumulative impact prior to mitigation:	Low as site is already significantly transformed	None

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low	Very Low
Degree to which the impact can be avoided:	None	None
Degree to which the impact can be managed:	None	None
Degree to which the impact can be mitigated:	None	None
Proposed mitigation:	Best Practise: - Remove alien invasive species - Use indigenous landscaping - Retain tree groupings and protected species. If any require pruning or removal, a Forestry License must be obtained.	Best Practise: - Remove alien invasive species - Use indigenous landscaping - Retain tree groupings and protected species. If any require pruning or removal, a Forestry License must be obtained.
Residual impacts:	None	None
Cumulative impact post mitigation:	None	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very Low	None
OPERATIONAL PHASE		
Potential impact and risk:	None	None
Nature of impact:	None	None
Extent and duration of impact:	None	None
Consequence of impact or risk:	None	None
Probability of occurrence:	None	None

Degree to which the impact may cause irreplaceable loss of resources:	None	None
Degree to which the impact can be reversed:	None	None
Indirect impacts:	None	None
Cumulative impact prior to mitigation:	None	None
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	None	None
Degree to which the impact can be avoided:	None	None
Degree to which the impact can be managed:	None	None
Degree to which the impact can be mitigated:	None	None
Proposed mitigation:	None	None
Residual impacts:	None	None
Cumulative impact post mitigation:	None	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	None	None
DECOMMISSIONING AND CLOSURE PHASE		
<i>Since this application is for the redevelopment of the existing resort, which has been in operation for many decades, within an urban area, it is unlikely that it will be decommissioned in the near future. As such there are no impacts associated with decommissioning currently identified, however, any legislative requirements valid at the time that decommissioning may occur, should be followed.</i>		
Potential impact and risk:		

Nature of impact:		
Extent and duration of impact:		
Consequence of impact or risk:		
Probability of occurrence:		
Degree to which the impact may cause irreplaceable loss of resources:		
Degree to which the impact can be reversed:		
Indirect impacts:		
Cumulative impact prior to mitigation:		
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		
Degree to which the impact can be avoided:		
Degree to which the impact can be managed:		
Degree to which the impact can be mitigated:		
Proposed mitigation:		
Residual impacts:		
Cumulative impact post mitigation:		
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		

<div> <div>« State Impact e.g Odour, Noise, clearanc</div> <div>Terrestrial Animals</div> <div>State Impact e.g Odour, Noise, clearanc»</div> </div>		
Alternative:	Alternative 1	No Go Option
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:	Loss of vegetation that supports faunal habitat	Loss of vegetation that supports faunal habitat
Nature of impact:	Disruption to habitat for Species of Conservation Concern (SCC)	No clearance of vegetation, status quo retained
Extent and duration of impact:	Site specific, permanent	Site specific, permanent
Consequence of impact or risk:	Loss of pattern and process	None
Probability of occurrence:	Highly Improbable as the vegetation on site does not support that required by the SCC	Highly Improbable as the vegetation on site does not support that required by the SCC
Degree to which the impact may cause irreplaceable loss of resources:	None	None
Degree to which the impact can be reversed:	None	None
Indirect impacts:	None	None
Cumulative impact prior to mitigation:	Low as site is already significantly transformed	Low as site is already significantly transformed
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low	Very Low
Degree to which the impact can be avoided:	None	None
Degree to which the impact can be managed:	None	None
Degree to which the impact can be mitigated:	None	None

Proposed mitigation:	<p>Best Practise:</p> <ul style="list-style-type: none"> - Dense clumps of indigenous trees should remain intact, to serve as a continuous source of food for these species, and increase the rate of recolonisation by the pollinator species after the redevelopment has occurred. 	<p>Best Practise:</p> <ul style="list-style-type: none"> - Dense clumps of indigenous trees should remain intact, to serve as a continuous source of food for these species, and increase the rate of recolonisation by the pollinator species after the redevelopment has occurred.
Residual impacts:	None	None
Cumulative impact post mitigation:	None	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very Low	No change to status quo
OPERATIONAL PHASE		
Potential impact and risk:	None	None
Nature of impact:	None	None
Extent and duration of impact:	None	None
Consequence of impact or risk:	None	None
Probability of occurrence:	None	None
Degree to which the impact may cause irreplaceable loss of resources:	None	None
Degree to which the impact can be reversed:	None	None
Indirect impacts:	None	None
Cumulative impact prior to mitigation:	None	None
Significance rating of impact prior to mitigation	None	None

(e.g. Low, Medium, Medium-High, High, or Very-High)		
Degree to which the impact can be avoided:	None	None
Degree to which the impact can be managed:	None	None
Degree to which the impact can be mitigated:	None	None
Proposed mitigation:	None	None
Residual impacts:	None	None
Cumulative impact post mitigation:	None	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	None	None

DECOMMISSIONING AND CLOSURE PHASE

Since this application is for the redevelopment of the existing resort, which has been in operation for many decades, within an urban area, it is unlikely that it will be decommissioned in the near future. As such there are no impacts associated with decommissioning currently identified, however, any legislative requirements valid at the time that decommissioning may occur, should be followed.

Potential impact and risk:		
Nature of impact:		
Extent and duration of impact:		
Consequence of impact or risk:		
Probability of occurrence:		
Degree to which the impact may cause irreplaceable loss of resources:		

Degree to which the impact can be reversed:		
Indirect impacts:		
Cumulative impact prior to mitigation:		
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		
Degree to which the impact can be avoided:		
Degree to which the impact can be managed:		
Degree to which the impact can be mitigated:		
Proposed mitigation:		
Residual impacts:		
Cumulative impact post mitigation:		
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		

<div> <div>« State Impact e.g Odour, Noise, clearanc</div> <div>Coastal Erosion</div> <div>State Impact e.g Odour, Noise, clearanc »</div> </div>		
Alternative:	Alternative 1	No Go Option
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:	Coastal erosion on the seawards boundary of the property	Status quo retained
Nature of impact:	Demolition and reconstruction of the three sea facing units.	Status quo retained

Extent and duration of impact:	Site specific, Permanent	Site specific, Permanent
Consequence of impact or risk:	Improved risk mitigation for coastal protection zone	Is currently sufficient but although the risk of erosion is deemed to be low, future climate impacts may cause erosion to the coastal interface.
Probability of occurrence:	Definite	Very probable
Degree to which the impact may cause irreplaceable loss of resources:	None	Medium
Degree to which the impact can be reversed:	None	None
Indirect impacts:	Improved coastal protection for the resort.	Could lead to coastal erosion on this and adjacent properties
Cumulative impact prior to mitigation:	Medium	Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (positive)	Medium
Degree to which the impact can be avoided:	Low	Low
Degree to which the impact can be managed:	High	Low
Degree to which the impact can be mitigated:	Medium	Low
Proposed mitigation:	<ul style="list-style-type: none"> Construction of pilings for the foundation of the three sea facing units; Design of the foundation piles must take into account the corrosive marine environment. Retain existing indigenous vegetation on the beach facing slopes and avoid damage to these during construction; 	<ul style="list-style-type: none"> Retain existing indigenous vegetation on the beach facing slopes and avoid damage to these during construction; Retain the elevated wooden stairway to avoid trampling of vegetation on the slopes; No other beach access is allowed.

	<ul style="list-style-type: none"> Retain the elevated wooden stairway to avoid trampling of vegetation on the slopes; No other beach access is allowed. 	
Residual impacts:	None	None
Cumulative impact post mitigation:	Improved coastal protection for the property and adjacent even	Stabilised property but requires ongoing monitoring of beach facing slope
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low	Low
OPERATIONAL PHASE		
Potential impact and risk:	Costal erosion associated with stormwater	Costal erosion associated with stormwater
Nature of impact:	Stormwater management	Stormwater management
Extent and duration of impact:	Site specific, permanent	Site specific, permanent
Consequence of impact or risk:	Incorrect stormwater management impacting on the integrity of the foredune	Status quo
Probability of occurrence:	Probable	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Low	Low
Degree to which the impact can be reversed:	High	High
Indirect impacts:	Coastal erosion affecting other properties and the remainder of the resort.	Coastal erosion affecting other properties and the remainder of the resort.
Cumulative impact prior to mitigation:	Low	Low
Significance rating of impact prior to mitigation	Low	Low

(e.g. Low, Medium, Medium-High, High, or Very-High)		
Degree to which the impact can be avoided:	High	High
Degree to which the impact can be managed:	High	High
Degree to which the impact can be mitigated:	High	High
Proposed mitigation:	<ul style="list-style-type: none"> No stormwater or any other water (such as swimming pool backwash) may be directed to the seawards slope; Stormwater must be directed landwards to the existing municipal stormwater system; Rainwater harvesting should be implemented; Retain indigenous vegetation on the seawards slope to absorb stormwater; No additional beach access is allowed. 	<ul style="list-style-type: none"> Rainwater harvesting should be implemented; Retain indigenous vegetation on the seawards slope to absorb stormwater; No additional beach access is allowed.
Residual impacts:	None	None
Cumulative impact post mitigation:	Low	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very Low	Very Low
DECOMMISSIONING AND CLOSURE PHASE		
<p><i>Since this application is for the redevelopment of the existing resort, which has been in operation for many decades, within an urban area, it is unlikely that it will be decommissioned in the near future. As such there are no impacts associated with decommissioning currently identified, however, any legislative requirements valid at the time that decommissioning may occur, should be followed.</i></p>		
Potential impact and risk:		
Nature of impact:		

Extent and duration of impact:		
Consequence of impact or risk:		
Probability of occurrence:		
Degree to which the impact may cause irreplaceable loss of resources:		
Degree to which the impact can be reversed:		
Indirect impacts:		
Cumulative impact prior to mitigation:		
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		
Degree to which the impact can be avoided:		
Degree to which the impact can be managed:		
Degree to which the impact can be mitigated:		
Proposed mitigation:		
Residual impacts:		
Cumulative impact post mitigation:		
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		

◀ State Impact e.g Odour, Noise, clearanc **Socio Economic** State Impact e.g Odour, Noise, clearanc ▶

Alternative:	Alternative 1	No Go Option
PLANNING, DESIGN AND DEVELOPMENT PHASE		
Potential impact and risk:	Impact assessment of employment and business creation opportunities during the construction phase	None
Nature of impact:	Creation of employment and business opportunities.	None
Extent and duration of impact:	Local, short term	None
Consequence of impact or risk:	Contribution to local economy	None
Probability of occurrence:	Probable	None
Degree to which the impact may cause irreplaceable loss of resources:	None	None
Degree to which the impact can be reversed:	Medium	None
Indirect impacts:	While the employment opportunities associated with the construction phase are frequently regarded as temporary employment, it is worth noting that the people employed in the construction industry by its very nature rely on "temporary" jobs for their survival. In this regard "permanent" employment in the construction sector is linked to the ability of construction companies to secure a series of temporary projects over a period of time. Each development, such as the proposed development, therefore, contributes to creating "permanent" employment in the construction sector.	None
Cumulative impact prior to mitigation:	Low	None
Significance rating of impact prior to mitigation	Medium	None

(e.g. Low, Medium, Medium-High, High, or Very-High)		
Degree to which the impact can be avoided:	N/A	None
Degree to which the impact can be managed:	Medium	None
Degree to which the impact can be mitigated:	Medium	None
Proposed mitigation:	<p>The developer should establish a database of local construction companies in the area, specifically SMME's owned and run by HDI's. These companies should be notified of the tender process and invited to bid for project related work.</p> <p>The developer in consultation with the appointed contractor/s should look to employ a percentage of the labour required for the construction phase from local area in order to maximize opportunities for members from the local HD communities.</p>	None
Residual impacts:	None	None
Cumulative impact post mitigation:	Medium	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (positive)	None

Nature of impact:	Potential safety and security risks posed by presence of construction workers on site.	None
Extent and duration of impact:	Local, short term	None

Consequence of impact or risk:	The presence of construction workers in the area has the potential to impact on the safety and security of local residents.	None
Probability of occurrence:	Probable	None
Degree to which the impact may cause irreplaceable loss of resources:	None	None
Degree to which the impact can be reversed:	Medium	None
Indirect impacts:	This may increase the potential risk of break-ins. However, given the relatively small size of the development (8 units) the potential risks are likely to be limited and can be effectively mitigated.	None
Cumulative impact prior to mitigation:	Low	None
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (negative)	None
Degree to which the impact can be avoided:	N/A	None
Degree to which the impact can be managed:	Medium	None
Degree to which the impact can be mitigated:	Medium	None
Proposed mitigation:	<ul style="list-style-type: none"> Construction related activities should be timed where possible to avoid peak holiday periods. No construction workers, with the exception of security personnel, should be allowed to stay on site overnight. Building contractors appointed by the developer must ensure that workers are transported to and from the site on a daily basis. 	None

	<ul style="list-style-type: none"> Construction related activities should comply with all relevant building regulations. In this regard activities on site should be restricted to between 07h00 and 18h00 during weekdays and 08h00 and 13h00 on Saturdays. No work should be permitted after 13h00 on Saturdays and on Sundays. 	
Residual impacts:	None	None
Cumulative impact post mitigation:	Medium	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (negative)	None

Nature of impact:	Potential noise, dust and safety impacts associated with construction related activities and traffic.	None
Extent and duration of impact:	Local, short term	None
Consequence of impact or risk:	Construction related activities can impact negatively on adjacent landowners and communities. The typical impacts include dust and noise. The movement of heavy construction vehicles may also pose potential safety risks to other road users and pedestrians.	None
Probability of occurrence:	Probable	None
Degree to which the impact may cause irreplaceable loss of resources:	None	None
Degree to which the impact can be reversed:	Medium	None
Indirect impacts:	Given the relatively small size of the development (8 units) the potential impacts associated with construction related	None

	activities are likely to be limited and can be effectively mitigated. This includes timing construction related activities to avoid peak holiday times.	
Cumulative impact prior to mitigation:	Increased delays during construction phase	None
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (negative)	None
Degree to which the impact can be avoided:	N/A	None
Degree to which the impact can be managed:	Medium	None
Degree to which the impact can be mitigated:	Medium	None
Proposed mitigation:	<ul style="list-style-type: none"> • Construction related activities should be timed where possible to avoid peak holiday periods. • • Construction related activities should comply with all relevant building regulations. In this regard activities on site should be restricted to between 07h00 and 18h00 during weekdays and 08h00 and 13h00 on Saturdays. No work should be permitted after 13h00 on Saturdays and on Sundays. • • Drivers should be made aware of the potential risk posed to pedestrians. All drivers must ensure that speed limit of 60 km per hour is enforced. • • The footprint area cleared for development should be minimised and dust suppression measures, such as spreading mulch over exposed areas, should be implemented. • • Dust suppression measures must be implemented for heavy vehicles such as ensuring that vehicles used to transport sand and building materials are fitted with tarpaulins or covers. 	None

Residual impacts:	None	None
Cumulative impact post mitigation:	Low	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low (negative)	None

OPERATIONAL PHASE		
Potential impact and risk:	Creation of employment and business opportunities	None
Nature of impact:	Creation of employment and business opportunities during the operational phase	None
Extent and duration of impact:	Local, Long Term	None
Consequence of impact or risk:	The 8-unit facility will employ 27 permanent staff, made up of 2 management staff and 25 service staff (cleaning, maintenance etc.) Most of the employment opportunities will benefit Historically Disadvantaged Individuals (HDIs) from the local community. The BLM IDP highlights unemployment as a key challenge. The operational budget, including wages, will be in the region of R 10 million per annum (2022 Rand values). The operational phase will therefore also create opportunities for local businesses, such as plumbers, electricians, security, landscaping, house maintenance, etc.	None
Probability of occurrence:	Highly probable	None
Degree to which the impact may cause irreplaceable loss of resources:	None	None

Degree to which the impact can be reversed:	N/A	None
Indirect impacts:	None	None
Cumulative impact prior to mitigation:	None	None
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (positive)	None
Degree to which the impact can be avoided:	Low	None
Degree to which the impact can be managed:	Medium	None
Degree to which the impact can be mitigated:	Low	None
Proposed mitigation:	<p>The developer should establish a database of local companies in the area, specifically SMME's owned and run by HDI's. These companies should be notified of the tender process and invited to bid for project related work.</p> <p>The developer in consultation with the appointed contractor/s should look to employ a percentage of the labour required for the operation phase from local area in order to maximize opportunities for members from the local HD communities.</p>	None
Residual impacts:	None	None
Cumulative impact post mitigation:	Local spend by visitors will also support and benefit business in the area.	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (positive)	None

Nature of impact:	Support for tourism sector and economic development	None
Extent and duration of impact:	Local, Long Term	None
Consequence of impact or risk:	The Arch Rock Resort provides holiday accommodation for visitors to Plettenberg Bay . The location of the facility and access to the beach make it a sought after facility . The establishment of 8 new units is aimed at upgrading the current accommodation which represents an investment in tourism infrastructure in the BL M.	None
Probability of occurrence:	Highly probable	None
Degree to which the impact may cause irreplaceable loss of resources:	N/A	None
Degree to which the impact can be reversed:	N/A	None
Indirect impacts:	None	None
Cumulative impact prior to mitigation:	None	None
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (negative)	None
Degree to which the impact can be avoided:	Medium	None
Degree to which the impact can be managed:	Medium	None
Degree to which the impact can be mitigated:	High	None
Proposed mitigation:	The proposed up-grade of the Arch Rock facility should proceed as planned.	None
Residual impacts:	None	None

Cumulative impact post mitigation:	Promotion of social and economic development and improvement in the overall well-being of the community	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (positive)	None

DECOMMISSIONING AND CLOSURE PHASE

Since this application is for the redevelopment of the existing resort, which has been in operation for many decades, within an urban area, it is unlikely that it will be decommissioned in the near future. As such there are no impacts associated with decommissioning currently identified, however, any legislative requirements valid at the time that decommissioning may occur, should be followed.

Potential impact and risk:		
Nature of impact:		
Extent and duration of impact:		
Consequence of impact or risk:		
Probability of occurrence:		
Degree to which the impact may cause irreplaceable loss of resources:		
Degree to which the impact can be reversed:		
Indirect impacts:		
Cumulative impact prior to mitigation:		
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		

Degree to which the impact can be avoided:		
Degree to which the impact can be managed:		
Degree to which the impact can be mitigated:		
Proposed mitigation:		
Residual impacts:		
Cumulative impact post mitigation:		
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		

◀ State Impact e.g Odour, Noise, clearancAquaticState Impact e.g Odour, Noise, clearanc▶			
Alternative:	Alternative 1	No Go Option	
PLANNING, DESIGN AND DEVELOPMENT PHASE			
Potential impact and risk:	None	None	
Nature of impact:	None	None	
Extent and duration of impact:	None	None	
Consequence of impact or risk:	None	None	
Probability of occurrence:	None	None	
Degree to which the impact may cause irreplaceable loss of resources:	None	None	

Degree to which the impact can be reversed:	None	None
Indirect impacts:	None	None
Cumulative impact prior to mitigation:	None	None
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	None	None
Degree to which the impact can be avoided:	None	None
Degree to which the impact can be managed:	None	None
Degree to which the impact can be mitigated:	None	None
Proposed mitigation:	None	None
Residual impacts:	None	None
Cumulative impact post mitigation:	None	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	None	None
OPERATIONAL PHASE		
Potential impact and risk:	None	None
Nature of impact:	None	None
Extent and duration of impact:	None	None
Consequence of impact or risk:	None	None
Probability of occurrence:	None	None

Degree to which the impact may cause irreplaceable loss of resources:	None	None
Degree to which the impact can be reversed:	None	None
Indirect impacts:	None	None
Cumulative impact prior to mitigation:	None	None
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	None	None
Degree to which the impact can be avoided:	None	None
Degree to which the impact can be managed:	None	None
Degree to which the impact can be mitigated:	None	None
Proposed mitigation:	None	None
Residual impacts:	None	None
Cumulative impact post mitigation:	None	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	None	None
DECOMMISSIONING AND CLOSURE PHASE		
<p><i>Since this application is for the redevelopment of the existing resort, which has been in operation for many decades, within an urban area, it is unlikely that it will be decommissioned in the near future. As such there are no impacts associated with decommissioning currently identified, however, any legislative requirements valid at the time that decommissioning may occur, should be followed.</i></p>		
Potential impact and risk:		

Nature of impact:		
Extent and duration of impact:		
Consequence of impact or risk:		
Probability of occurrence:		
Degree to which the impact may cause irreplaceable loss of resources:		
Degree to which the impact can be reversed:		
Indirect impacts:		
Cumulative impact prior to mitigation:		
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		
Degree to which the impact can be avoided:		
Degree to which the impact can be managed:		
Degree to which the impact can be mitigated:		
Proposed mitigation:		
Residual impacts:		
Cumulative impact post mitigation:		
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)		

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

1.	Provide a summary of the findings and impact management measures identified by all Specialist and an indication of how these findings and recommendations have influenced the proposed development.
<p>Terrestrial Biodiversity & Botanical:</p> <p>The vegetation unit at the receiving environment is mapped as Goukamma Dune Thicket, with a conservation status as Least Threatened. Ground-truthing of the study area has refuted the presence of healthy or representative Shale Fynbos or Dune Thicket vegetation occurring there, as the property is transformed, fragmented and situated adjacent to a built environment.</p> <p>Redevelopment of the resort accommodation units will not impact on the conservation status of Goukamma Dune Thicket; with vegetation of Low Terrestrial Biodiversity Sensitivity and of Medium Plant Species Sensitivity. The redevelopment at the property should retain most of the locally indigenous tree species as they afford shade and shelter for avifauna and sense of place of the area.</p> <p>The tree groupings that have been highlighted as high sensitivity have been retained in the preferred Alternative.</p>	
<p>Terrestrial Animals:</p> <p>Based on the results of the desktop study and site survey, the sensitivity of the study site (Portion 5 of Farm 296 Arch Rock, Keurboomstrand) in terms of the terrestrial animals can be regarded as LOW. This is based on the following:</p> <ul style="list-style-type: none"> • The absence of georeferenced records of <i>Aneuryphymus montanus</i> at or near the study site; • The absence of recent observations of <i>Sarophorus punctatus</i> at or near the study site, with the only specimens from the area collected in 1976; • The general absence of suitable food for <i>Sarophorus punctatus</i> at the study site, and unsuitability of the vegetation for <i>Aneuryphymus montanus</i> at the site; • The lack of these two species of conservation concern, or other SCC, observations during the site visit; and • The high level of disturbance at the site, which has been present for the past few decades, making it unlikely that either of the highlighted species of conservation concern are present at the site. <p>Recommendations</p> <p>The abundance of pollinator species (insects and bird species) is mainly due to the presence of large tree clumps at the study site, especially the northern section furthest from the coastline. It is advised that the dense clumps of indigenous trees remain intact, to serve as a continuous source of food for these species, and increase the rate of recolonisation by the pollinator species after the redevelopment has occurred.</p> <p>The tree groupings that have been highlighted as high sensitivity have been retained in the preferred Alternative.</p>	
<p>Aquatic:</p> <p>Based on the results of the desktop review and the site survey, the sensitivity of aquatic biodiversity on Portion 5/296 can be regarded as Low. The main factors influencing the statement include the following:</p> <ul style="list-style-type: none"> • The development is not located in an area designated as a SWSA or a FEPA ; 	

- No freshwater features were identified within the footprint area of the site or within close proximity (i.e. at least 500 m) of the site.

Coastal Engineering:

The proposed elevations of the new beachfront cottages are clear of the 1:100 year extreme run-up level of approximately 8.1 m MSL (Royal Haskoning DHV, 2018) and are therefore deemed at **very low risk of coastal flooding**.

The DEA&DP erosion risk lines indicate that significant parts of the property may be at high risk of coastal erosion in the near future. However recent historical trends at the site, which is protected to some extent by the presence of a nearshore rocky reef, indicate **relatively low coastal erosion risk at present**. We therefore believe that the erosion risk lines over-estimate the local erosion risk at this property (Farm Portion 5 of 296, Keurboomstrand). **Nonetheless, the effects of climate change will pose increasing risk in the future and coastal erosion is a concern for this property**. The beachfront units are considered to be possibly at risk of damage due to coastal erosion.

Geotechnical investigations were performed by Kantey & Templer Consulting Engineers (report issued November 2021). These indicate bedrock at a depth of 6-8 m and low strength soils with potential slope instability along the beachfront embankment.

The vegetation covering the steep beachfront slope offers considerable erosion protection. Care should be taken to limit damage to this vegetation during construction activities and future use. A specialist dune vegetation assessment and management plan is recommended to ensure that suitable indigenous species are present to provide optimum bank stabilisation. Beach access pathways should not allow vegetation trampling / disturbance as these create vulnerable zones which can compromise the stability of larger sections of slope during a large storm event. As noted above, replacement of the older access paths with an elevated wooden stairway several years back appears to have already gone a long way to improving the natural erosion protection.

No stormwater runoff (or other runoff, e.g. swimming pool backwash water) must be allowed to concentrate onto the steep seaward slope.

A revetment (e.g. gabions or large geotextile sandbags) along the toe of the beachfront slope is an effective structural option to protect the property. A drawback of such hard structures in a beach environment is the potential exacerbation of erosion seawards of and neighbouring the structure as a result of reflection of wave energy. Where possible they should therefore be buried in a revegetated dune. A revetment is **not a preferred solution for this property in the current situation** but could be considered in the future should increasing erosion problems become evident.

The Preferred Alternative (Alternative 1) includes the recommended pilings on the three sea facing units. Stormwater and indigenous vegetation recommendations are included as management actions for the facility in this report and in the EMPr.

Heritage:

Vastly different from the undeveloped, natural landscape within which is found the Matjesrivier PHS, ±900m to the east, the subject property forms part of an urbanised area (albeit with low density character) which had been physically transformed through establishment of the Keurboomstrand village during the 1920's. Works associated with this transformation would have included, inter alia, earthworks, construction of roads, installation of services. Furthermore, more recent works on the property included construction of ten cottages, outbuilding and office, access road and associated circulation space. The proposal would mostly make use of existing built footprints to retain mature trees and cause as little disturbance as possible. From an archaeological perspective, therefore the

likelihood of the property presenting opportunities for significant archaeological occurrences is therefore considered very low.

Given the long-standing transformed nature of the property as well as the intention to rebuild new units on existing built platforms, it is suggested that no further palaeontological studies be required in this instance but that a protocol for fossil finds be put in place during the construction phase.

Unfortunately available historic aerial imagery series (1936, 1966, 1974, 1980, 1991) are of insufficient resolution to provide insight into former land use on and within the proximity of the property. The property does not contain any structures older than 60 years/ structures considered of cultural significance. The proposal would essentially be focussed on existing built footprints, be for less units (albeit an 130m² increase in the overall building footprint). Taken in conjunction with the above assessment we are therefore of the view that the proposal would not materially impact on heritage resources of cultural significance and that the development may proceed.

There are no sensitive heritage resources on the site. Heritage Western Cape has confirmed that no further heritage studies are required (see Appendix E1).

Socio-Economic:

SUMMARY OF KEY FINDINGS

The key findings of the study are summarised under the following sections:

- Fit with policy and planning.
- Construction phase impacts.
- Operational phase impacts.
- Cumulative impacts.
- No-development option.

POLICY AND PLANNING ISSUES

The findings of the review indicate the proposed development is consistent with the zoning for the site, namely Resort 1. The Bitou Municipal Integrated Development Plan (IDP) and Spatial Development Framework (SDF) highlight the key role played by tourism and support the establishment of tourism attractions and facilities. The proposed development is also in keeping with and supports the Local Area Spatial Plan (2013) for the Keurbooms River and Environs which supports low density development.

CONSTRUCTION PHASE IMPACTS

The key social issues associated with the construction phase include:

Potential positive impacts

- Creation of business and employment opportunities

The construction phase will extend over a period of approximately 14 month and create in the region of 60-80 employment opportunities. Based on figures from similar projects, 50% (30-40) of the employment opportunities will be available for low skilled workers, 40% (24-32) semi-skilled workers and 10% (6-8) for skilled workers. The total wage bill for the construction phase will be in the region of R11 million (2022 Rand values). Most of the employment opportunities will benefit local Historically Disadvantaged (HD) members of the community.

The capital expenditure associated with the proposed development is in the region of R50 million (2022 Rand value). The construction work will be undertaken by local contractors and builders and building materials will be sourced from locally based suppliers. The proposed development will therefore

represent a positive benefit for the local construction and building sector in the BLM. The wage spend will also benefit the local economy.

Potential negative impacts

- Security and safety impacts associated with the presence of construction workers.
- Noise, dust, and safety impacts associated with construction related activities and the movement of heavy vehicles.

Due to the nature of the development and the limited number of units (8) the significance of the negative impacts will be **Low Negative**. Table 1 summarises the significance of the impacts associated with the construction phase.

Table 1: Summary of social impacts during construction phase

Impact	Significance No Mitigation	Significance With Enhancement / Mitigation
Creation of business and employment opportunities	Medium (+)	Medium (+)
Threat to safety and security	Low (-)	Low (-)
Impact of construction related activities (dust, noise, safety etc.)	Low (-)	Low (-)

OPERATIONAL PHASE IMPACTS

The key social issues affecting the operational phase include:

Potential positive impacts

The positive impacts associated with the current operations also apply to the revised, lower density development, namely:

- Creation of employment and business opportunities.
- Support tourism and economic development.

Employment and business opportunities

The development will employ 27 permanent staff, the majority of whom will be local HDIs. The operational budget, including wages, will be in the region of R 10 million per annum (2022 Rand values). The operational phase will therefore create opportunities for local businesses, such as plumbers, electricians, security, landscaping, house maintenance, etc.

Tourism and economic development

The establishment of 8 new units is aimed up-grading the current accommodation which represents an investment in tourism infrastructure in the BLM. The letter from Lesley Jacobs, Manager Economic Development and Tourism, Bitou Municipality (17/09/2021) confirms that the proposed development supports the Bitou Municipalities Local Economic Development Strategy which identifies tourism as a key sector.

Potential negative impacts

The proposed development will not result in any changes in the current activities on the site or an increase in the number of units. The proposed development will therefore not result in any material changes to and or impacts on the social environment.

Table 2 summarises the significance of the impacts associated with the operational phase.

Table 2: Summary of social impacts during operational phase

Impact	Significance No Mitigation	With Enhancement /Mitigation
Employment and business opportunities	Medium (+)	Medium (+)
Support for tourism and economic development	Medium (+)	Medium (+)

CUMULATIVE IMPACTS

The proposed development will not result in a change in the current activities on the site or an increase in the number of units. The proposed development will therefore not result in any additional cumulative impacts on local services or traffic in the area.

NO DEVELOPMENT OPTION

The No-Development option would represent a lost opportunity to up-grade and improve the existing tourism accommodation facilities on the site and the associated investment in tourism infrastructure in the BLM. The No-Development option is therefore not supported by the findings of the SIA.

CONCLUSION

The findings of the SIA indicate that the Bitou Municipal Integrated Development Plan (IDP) and Spatial Development Framework (SDF) highlight the key role played by tourism and support the establishment of tourism attractions and facilities. The proposed development is also in keeping with and supports the Local Area Spatial Plan (2013) for the Keurbooms River and Environs which supports low density development. The proposed development therefore complies with and is supported by the local land use policies and plans for the area. The findings of the SIA also indicate that the construction and operational phase will result in a number of positive social benefits for the local economy and community. These include the creation of employment and business opportunities and up-grading of tourism facilities. The proposed Arch Rock development is therefore supported by the findings of the SIA.

2. List the impact management measures that were identified by all Specialist that will be included in the EMPr

The following impact management measures have been included in the EMPr:

- Retain the locally indigenous tree groupings in the development;
- Indigenous vegetation on the beach facing slope must be maintained and encouraged. Any areas that are exposed due to construction must be rehabilitated as soon as the disturbance is completed;
- No stormwater run off may be allowed to concentrate on the seaward slope;
- Standard Heritage requirements for findings must be executed;
- Noise, dust and traffic recommendations must be executed;
- Local employment requirements must be followed.

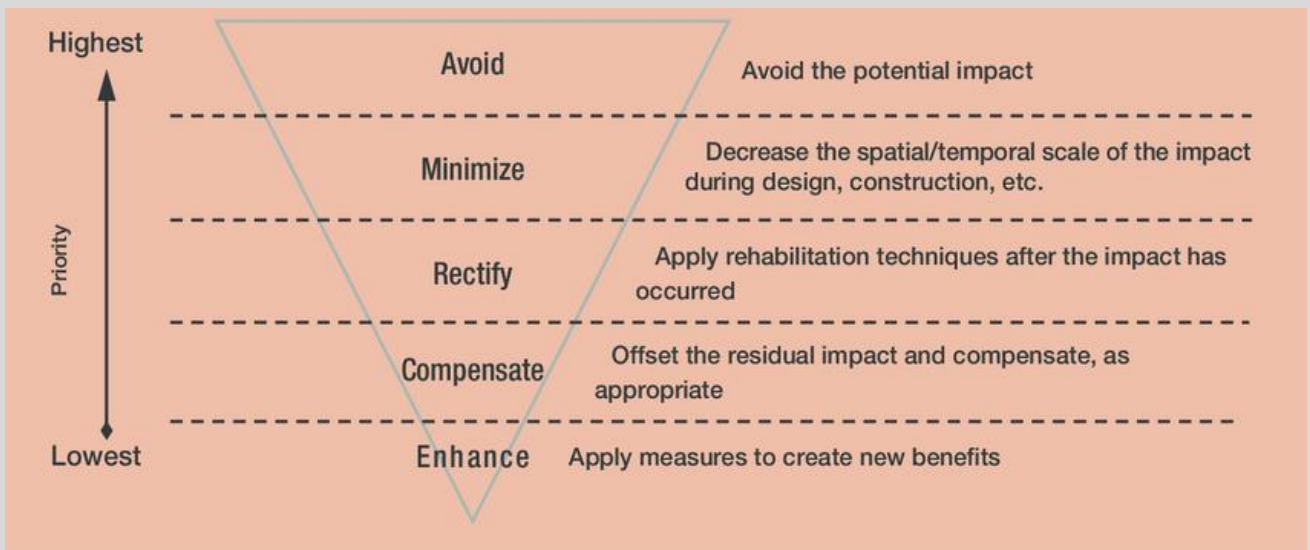
3. List the specialist investigations and the impact management measures that will **not** be implemented and provide an explanation as to why these measures will not be implemented.

Not applicable.

4. Explain how the proposed development will impact the surrounding communities.

The proposed development is in keeping with the existing impacts and surrounding community of Keurboomstrand.

The proposed development is expected to have an overall positive impact on the surrounding communities with regard to employment and tourism opportunities. Some temporary negative impacts are expected during construction but can be adequately managed.

5.	Explain how the risk of climate change may influence the proposed activity or development and how has the potential impacts of climate change been considered and addressed.
<p>The proposed elevations of the new beachfront cottages are clear of the 1:100 year extreme run-up level of approximately 8.1 m MSL (Royal Haskoning DHV, 2018) and are therefore deemed at very low risk of coastal flooding.</p> <p>The DEA&DP erosion risk lines indicate that significant parts of the property may be at high risk of coastal erosion in the near future. However recent historical trends at the site, which is protected to some extent by the presence of a nearshore rocky reef, indicate relatively low coastal erosion risk at present. We therefore believe that the erosion risk lines over-estimate the local erosion risk at this property (Farm Portion 5 of 296, Keurboomstrand). Nonetheless, the effects of climate change will pose increasing risk in the future and coastal erosion is a concern for this property. The beachfront units are considered to be possibly at risk of damage due to coastal erosion.</p> <p>It is also recommended that sustainable resource mechanisms for water and energy use are included in the design.</p>	
6.	Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.
There are no conflicting recommendations between specialists.	
7.	Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.
All findings and recommendations by the specialists have been incorporated into the proposal.	
8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.
<p>The property has been significantly transformed over many decades and has been utilised as a resort and will remain a resort. The impacts on the environment associated with the proposed activity (Alternative 1 (Preferred)) have been deemed to be Low, Very Low and Negligible by the specialists.</p> <p>The tree groupings that were identified as having the highest sensitivity on the site are being retained i.e. the impact of removing them is avoided, thus following the mitigation hierarchy.</p> <p>The throughput of the resort is being reduced thus the overall impact on the areas resources is reduced.</p>	
 <p>The diagram illustrates the Mitigation Hierarchy, a funnel-shaped model with five levels. On the left, a vertical arrow labeled 'Priority' points upwards from 'Lowest' to 'Highest'. The levels, from top to bottom, are:</p> <ul style="list-style-type: none"> Avoid: Avoid the potential impact Minimize: Decrease the spatial/temporal scale of the impact during design, construction, etc. Rectify: Apply rehabilitation techniques after the impact has occurred Compensate: Offset the residual impact and compensate, as appropriate Enhance: Apply measures to create new benefits 	

SECTION J: GENERAL

1. ENVIRONMENTAL IMPACT STATEMENT

1.1. Provide a summary of the key findings of the EIA.

Terrestrial Biodiversity & Botanical:

The vegetation unit at the receiving environment is mapped as Goukamma Dune Thicket, with a conservation status as Least Threatened. Ground-truthing of the study area has refuted the presence of healthy or representative Shale Fynbos or Dune Thicket vegetation occurring there, as the property is transformed, fragmented and situated adjacent to a built environment.

Redevelopment of the resort accommodation units will not impact on the conservation status of Goukamma Dune Thicket; with vegetation of Low Terrestrial Biodiversity Sensitivity and of Medium Plant Species Sensitivity. The redevelopment at the property should retain most of the locally indigenous tree species as they afford shade and shelter for avifauna and sense of place of the area.

Terrestrial Animals:

Based on the results of the desktop study and site survey, the sensitivity of the study site (Portion 5 of Farm 296 Arch Rock, Keurboomstrand) in terms of the terrestrial animals can be regarded as **LOW**. This is based on the following:

- The absence of georeferenced records of *Aneuryphymus montanus* at or near the study site;
- The absence of recent observations of *Sarophorus punctatus* at or near the study site, with the only specimens from the area collected in 1976;
- The general absence of suitable food for *Sarophorus punctatus* at the study site, and unsuitability of the vegetation for *Aneuryphymus montanus* at the site;
- The lack of these two species of conservation concern, or other SCC, observations during the site visit; and
- The high level of disturbance at the site, which has been present for the past few decades, making it unlikely that either of the highlighted species of conservation concern are present at the site.

Recommendations

The abundance of pollinator species (insects and bird species) is mainly due to the presence of large tree clumps at the study site, especially the northern section furthest from the coastline. It is advised that the dense clumps of indigenous trees remain intact, to serve as a continuous source of food for these species, and increase the rate of recolonisation by the pollinator species after the redevelopment has occurred.

Aquatic:

Based on the results of the desktop review and the site survey, the sensitivity of aquatic biodiversity on Portion 5/296 can be regarded as **Low**. The main factors influencing the statement include the following:

- The development is not located in an area designated as a SWSA or a FEPA ;
- No freshwater features were identified within the footprint area of the site or within close proximity (i.e. at least 500 m) of the site.

Coastal Engineering:

The proposed elevations of the new beachfront cottages are clear of the 1:100 year extreme run-up level of approximately 8.1 m MSL (Royal Haskoning DHV, 2018) and are therefore deemed at **very low risk of coastal flooding**.

The DEA&DP erosion risk lines indicate that significant parts of the property may be at high risk of coastal erosion in the near future. However recent historical trends at the site, which is protected to some extent by the presence of a nearshore rocky reef, indicate **relatively low coastal erosion risk at present**. We therefore believe that the erosion risk lines over-estimate the local erosion risk at this property (Farm Portion 5 of 296, Keurboomstrand). **Nonetheless, the effects of climate change will pose increasing risk in the future and coastal erosion is a concern for this property**. The beachfront units are considered to be possibly at risk of damage due to coastal erosion.

Geotechnical investigations were performed by Kantey & Templer Consulting Engineers (report issued November 2021). These indicate bedrock at a depth of 6-8 m and low strength soils with potential slope instability along the beachfront embankment.

The vegetation covering the steep beachfront slope offers considerable erosion protection. Care should be taken to limit damage to this vegetation during construction activities and future use. A specialist dune vegetation assessment and management plan is recommended to ensure that suitable indigenous species are present to provide optimum bank stabilisation. Beach access pathways should not allow vegetation trampling / disturbance as these create vulnerable zones which can compromise the stability of larger sections of slope during a large storm event. As noted above, replacement of the older access paths with an elevated wooden stairway several years back appears to have already gone a long way to improving the natural erosion protection.

No stormwater runoff (or other runoff, e.g. swimming pool backwash water) must be allowed to concentrate onto the steep seaward slope.

A revetment (e.g. gabions or large geotextile sandbags) along the toe of the beachfront slope is an effective structural option to protect the property. A drawback of such hard structures in a beach environment is the potential exacerbation of erosion seawards of and neighbouring the structure as a result of reflection of wave energy. Where possible they should therefore be buried in a revegetated dune. A revetment is **not a preferred solution for this property in the current situation** but could be considered in the future should increasing erosion problems become evident.

Heritage:

Vastly different from the undeveloped, natural landscape within which is found the Matjesrivier PHS, ±900m to the east, the subject property forms part of an urbanised area (albeit with low density character) which had been physically transformed through establishment of the Keurboomstrand village during the 1920's. Works associated with this transformation would have included, inter alia, earthworks, construction of roads, installation of services. Furthermore, more recent works on the property included construction of ten cottages, outbuilding and office, access road and associated circulation space. The proposal would mostly make use of existing built footprints to retain mature trees and cause as little disturbance as possible. From an archaeological perspective, therefore the likelihood of the property presenting opportunities for significant archaeological occurrences is therefore considered very low.

Given the long-standing transformed nature of the property as well as the intention to rebuild new units on existing built platforms, it is suggested that no further palaeontological studies be required in this instance but that a protocol for fossil finds be put in place during the construction phase.

Unfortunately available historic aerial imagery series (1936, 1966, 1974, 1980, 1991) are of insufficient resolution to provide insight into former land use on and within the proximity of the property. The property does not contain any structures older than 60 years/ structures considered of cultural significance. The proposal would essentially be focussed on existing built footprints, be for less units

(albeit an 130m² increase in the overall building footprint). Taken in conjunction with the above assessment we are therefore of the view that the proposal would not materially impact on heritage resources of cultural significance and that the development may proceed.

There are no sensitive heritage resources on the site. Heritage Western Cape has confirmed that no further heritage studies are required (see Appendix E1).

Socio-Economic:

The findings of the SIA indicate that the Bitou Municipal Integrated Development Plan (IDP) and Spatial Development Framework (SDF) highlight the key role played by tourism and support the establishment of tourism attractions and facilities. The proposed development is also in keeping with and supports the Local Area Spatial Plan (2013) for the Keurbooms River and Environs which supports low density development. The proposed development therefore complies with and is supported by the local land use policies and plans for the area. The findings of the SIA also indicate that the construction and operational phase will result in a number of positive social benefits for the local economy and community. These include the creation of employment and business opportunities and up-grading of tourism facilities. The proposed Arch Rock development is therefore supported by the findings of the SIA.

1.2.	Provide a map that that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2)
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The map is attached as Appendix B2.

1.3.	Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.
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Positive Impacts:

- Construction
 - Creation of business and employment opportunities
- Operation
 - Creation of business and employment opportunities
 - Support tourism and economic development. Also same as the status quo impacts.

Negative Impacts:

- Construction
 - Creation of business and employment opportunities
 - Noise, dust, and safety impacts associated with construction related activities and the movement of heavy vehicles.
 - Very low impacts on terrestrial biodiversity, animal species and botanical functions of the site.

No Impact:

- No impact on heritage resources.
- No impact on visual status quo.

2. RECOMMENDATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

2.1.	Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMP
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The following impact management measures have been included in the EMP:

	<ul style="list-style-type: none"> • Retain the locally indigenous tree groupings in the development; • Indigenous vegetation on the beach facing slope must be maintained and encouraged. Any areas that are exposed due to construction must be rehabilitated as soon as the disturbance is completed; • No stormwater run off may be allowed to concentrate on the seaward slope; • Standard Heritage requirements for findings must be executed; • Noise, dust and traffic recommendations must be executed; • Local employment requirements must be followed.
2.2.	Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.
	<p>The following should be included as conditional:</p> <ul style="list-style-type: none"> • The detailed design of the foundation piles must take into account the corrosive marine environment.
2.3.	Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.
	<p>The property is currently utilised for resort purposes and will continue to be utilised for resort purposes. It is located inside the urban edge and urban area of Keurboomstrand and is serviced by the municipality. The proposed redevelopment will reduce the current throughput of the facility from 10 units to 8 and from 26 pax to 22.</p> <p>The site has been significantly transformed and has formed part of the urban environment since at least 1920.</p> <p>None of the specialists have found any aspects of concern related to this redevelopment.</p> <p>This office is confident that the application may be authorised. The following items should be included as conditions of approval:</p> <ul style="list-style-type: none"> • Appointment of a suitably qualified Environmental Control Officer (ECO) for the duration of construction; • Compliance with the Environmental Management Programme (EMPr).
2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.
	<p>Aquatic:</p> <p>Much of the present site has been transformed as a tourist resort and it is therefore not possible to determine whether any small watercourses were present on the site and subsequently transformed.</p>
	<p>Socio-Economic:</p> <p>Assumptions</p> <p><i>Fit with planning and policy requirements</i></p> <p>Legislation and policies reflect societal norms and values. The legislative and policy context therefore plays an important role in identifying and assessing the potential social impacts associated with a proposed development. In this regard a key component of the SIA process is to assess the proposed development in terms of its fit with key planning and policy documents. Should the findings of the study therefore indicate that the proposed development in its current format does not conform to the spatial principles and guidelines contained in the relevant legislation and planning documents, and there are no significant or unique opportunities created by the development, the development cannot be supported.</p>

Based on a review of relevant policy and planning document the proposed development is consistent with the zoning for the site, namely Resort 1. The proposed development is also in keeping with and supports the Local Area Spatial Plan (2013) for the Keurbooms River and Environs which supports low density development.

Interviews

The proposed development will not involve any changes in the current land uses or activities on the site and will be implemented in terms of the existing resort zoning. The adjacent land uses also include a number of accommodation facilities. As such interviews with local stakeholders were not undertaken during the site visit.

Limitations

There are no limitations that have a potential bearing on the findings of the SIA.

Coastal Engineering:

Limitations

The findings are based on a purely desktop study of information obtained from the client, published literature and engineering assumptions made which are deemed representative of the local site conditions. They are intended to provide a high level assessment of the coastal risks and potential solutions. All solutions proposed require expert detailed design prior to implementation.

This section provides a brief overview of *specific assumptions and limitations* having an impact on this environmental application process:

- It is assumed that the information on which this report is based (project information as well as existing information) is **correct, factual and truthful**.
- The proposed development is **in line** with the statutory planning vision for the area and thus it is assumed that issues such as the cumulative impact of development in terms of character of the area and its resources, have been taken into account during the strategic planning for the area.
- It is assumed that all the relevant **mitigation measures** and agreements specified in this report 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 initial public participation process will submit all relevant **comments within the designated** review and comment period.

2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.
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- Construction should commence within five (05) years from date of authorisation;
- Construction should be concluded at least three (03) years from commencement;
- Monitoring should include the following:
 - Construction Completion Statement on handover of the site back to the applicant;
 - Six (06) months post construction audit
 - Final audit two (2) years post construction.

3. WATER

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.

The property is serviced by the Bitou Municipality. It is advised that rainwater harvesting take place on the site for use outside. This will also reduce the amount of stormwater egressing to the stormwater system. The swimming pool may not be filled with potable water.

The following water saving mechanisms must be implemented in the design of the units:

- Dual flush toilets
- Low flow shower heads
- Low flow taps
- Water conservative washing machines
- Geyser and pipe insulation
- Swimming pools:
 - Pool covers must be used to prevent water evaporation, loss of chemicals, loss of water heat and as security against drowning of people or animals.
 - Well maintained pool equipment is more efficient and lasts longer.
 - Create a windbreak around the pool using indigenous plants. This prevents the wind from increasing evaporation on the surface of the water.
 - Chemical pools are discouraged and consideration should rather be given to salt water or natural pools.
 - Backwash water (applicable to both chemical and salt water pools) may not be discharged onto the ground, but must be collected in a tank and removed from site. It is possible to discharge the backwash water into a grey water system if one is in place.

4. WASTE

Explain what measures have been taken to reduce, reuse or recycle waste.

Effective management of household waste contributes to a more sustainable implementation of landfill sites and their management. Sorting of recyclable materials at the source, i.e. in each household, causes less backlog at the landfill site and decreases the availability of material so required by scavengers to the dump site. Using biodegradable waste in a garden compost heap or an earthworm farm is far more supportive of the environment than disposing of it in the general waste.

Normal household waste will be generated during the operation phase of the development. According to the National Waste Information Baseline Report (2012) Fiehn and Ball (2005) estimated per capita waste generation in the Western Cape as 675kg per year or 1.85kg per day. Based on this figure and a minimum estimate of 22 pax being on site, with an estimated 70% occupancy rate (this is based on 2019 figures for peak holidays), there will be a generation of ± 40.7 kg per day. Recycling should be strongly encouraged by the development to minimise the amount of domestic waste generated. General municipal waste will be collected as per the municipal requirements.

The following actions should be implemented:

- Recycling;
- Composting;
- Collection of garden refuse.

5. ENERGY EFFICIENCY

8.1. Explain what design measures have been taken to ensure that the development proposal will be energy efficient.

The provision of energy has become a controversial topic, and has led to the reconsideration for many people of how they use energy in their homes. It is important for people to create a habit of conserving energy on a daily basis. The property is serviced by the Bitou Municipality.

The following energy saving should be implemented:

- Solar heated water system;
- Energy efficient lighting;
- Energy efficient appliances;
- Solar cooling systems;
- Evaporative cooling systems;
- Geyser and pipe insulation.

SECTION K: DECLARATIONS

1. DECLARATION OF THE APPLICANT

Note: Duplicate this section where there is more than one Applicant.

I **Mr Terry de Waal**, ID number **CONFIDENTIAL** in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
 - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
 - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
 - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
 - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
 - Legitimate costs in respect of specialist(s) reviews; and
 - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.

 2022/02/17
 Signature of the Applicant: Date:


 Name of company (if applicable):

2. DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (“EAP”)

I **Ms Melissa Mackay**, EAPASA Registration number **2019/1446**, as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this BAR and any other documents/reports submitted in support of this BAR;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;

2022/02/17

Signature of the EAP:

Date:

Cape Environmental Assessment Practitioners (Cape EAPrac)

Name of company (if applicable):

~~3. DECLARATION OF THE REVIEW EAP~~

I, _____, EAPASA Registration number _____ as the appointed Review EAP hereby declare/affirm that:

- ~~• I have reviewed all the work produced by the EAP;~~
- ~~• I have reviewed the correctness of the information provided as part of this Report;~~
- ~~• I meet all of the general requirements of EAPs as set out in Regulation 13 of the NEMA EIA Regulations;~~
- ~~• I have disclosed to the applicant, the EAP, the specialist (if any), the review specialist (if any), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; and~~
- ~~• I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.~~

Click or tap to enter a date.

Signature of the EAP: _____ Date: _____

~~Name of company (if applicable):~~

4. DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I **Mr Benjamin Walton (Cape Vegetation Surveys)**, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

Click or tap to enter a date.

Signature of the Specialist:

Date:

Cape Vegetation Surveys

Name of company (if applicable):

STATEMENT OF INDEPENDENCE

I, Benjamin Alan Walton, trading as "Cape Vegetation Surveys", in terms of section 33 of the NEMA, 1998 (Act No. 107 of 1998), as amended, hereby declare that I provide services as an independent botanical specialist and receive remuneration for services rendered for expressing a factual account of the baseline environment. I have no financial or other vested interest in the project. Botanical information contained in the report may not be copied without the authors consent.

An abridged Curriculum Vitae:

Benjamin Alan Walton

Experience: Cape Vegetation Surveys: Consulting Botanist 2017-2020

Western Cape Nature Conservation Board (CapeNature), Scientist: Land Use Advisor 2010-2017;

Department of Environmental Affairs and Development Planning, Principal Environmental Officer (George) 2008-2010;

Cape Vegetation Surveys: Consulting Botanist (Cape Town) 2006-2008;

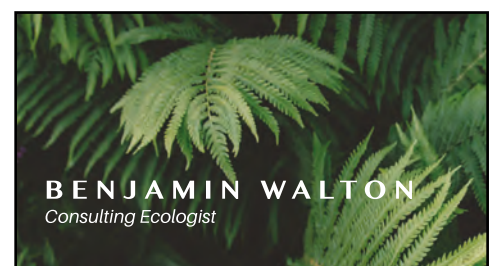
Qualification: M.Sc. Forestry (Conservation Ecology), Stellenbosch University, 2001- 2006;

B.Sc. Botany, University of Cape Town, 1986-1989.

BENJAMIN WALTON

*Consulting Ecologist for Eden & Central Karoo Districts
B.Sc. (Bot.), M.Sc. Forestry (Cons. Ecol.)*

*phytofundi@gmail.com
081 499 1678
Wilderness*



DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I **Mr Willem Mathee**, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.



2022/02/16

Signature of the Specialist:

Date:

N/A

Name of company (if applicable):

DECLARATION OF CONSULTANTS INDEPENDANCE

I consider myself bound to the rules and ethics of the South African Council for Natural Scientific Professions (SACNASP);

- At the time of conducting the study and compiling this report I did not have any interest, hidden or otherwise, in the proposed development that this study has reference to, except for financial compensation for work done in a professional capacity;
- Work performed for this study was done in an objective manner. Even if this study results in views and findings that are not favourable to the client/applicant, I will not be affected in any manner by the outcome of any environmental process of which this report may form a part, other than being members of the general public;
- I declare that there are no circumstances that may compromise my objectivity in performing this specialist investigation. I do not necessarily object to or endorse any proposed developments, but aim to present facts, findings and recommendations based on relevant professional experience and scientific data;
- I do not have any influence over decisions made by the governing authorities;
- I undertake to disclose all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by a competent authority to such a relevant authority and the applicant;
- I have the necessary qualifications and guidance from professional experts in conducting specialist reports relevant to this application, including knowledge of the relevant Act, regulations and any guidelines that have relevance to the proposed activity;
- This document and all information contained herein is and will remain the intellectual property of Confluent Environmental. This document, in its entirety or any portion thereof, may not be altered in any manner or form, for any purpose without the specific and written consent of the specialist investigators.
- All the particulars furnished by me in this document are true and correct.



Jackie Dabrowski (Ph.D., Pr.Sci.Nat. *Aquatic Science*)
SACNASP Registration Number 115166
Co-director: Confluent Environmental (Pty) Ltd

Qualifications: BSc, BSc Honours (Entomology), MSc & PhD (Veterinary Science)

Expertise: > 10 years' experience working on aquatic ecosystems across South Africa, with a focus on the Southern Cape in the last 3 years. Includes research and consulting expertise, having published > 10 water-related research articles and compiled > 80 aquatic specialist reports. Research and consulting have been in a range of sectors including agriculture, urban developments, linear structures, renewable energy, conservation, and mining.

DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I **Ms Robyn Owens (WML Coast)**, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.



16/02/2022

Click or tap to enter a date.

Signature of the Specialist:

Date:

WML Coast


Name of company (if applicable):

DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I **Mr Stefan de Kock (Perception Planning)**, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

	2022/02/16
Signature of the Specialist:	Date:

Perception Planning

Name of company (if applicable):

ANNEXURE D

The specialist declaration of independence in terms of the Regulations_

I, Tony Barbour _____, declare that -- General

declaration:

I act as the independent specialist in this application;

I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;

I declare that there are no circumstances that may compromise my objectivity in performing such work;

I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;

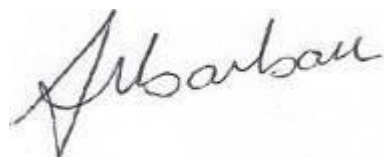
I will comply with the Act, Regulations and all other applicable legislation;

I have no, and will not engage in, conflicting interests in the undertaking of the activity;

I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;

all the particulars furnished by me in this form are true and correct; and

I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.



Signature of the specialist:

Tony Barbour Environmental Consulting and Research

Name of company (if applicable):

3 February 2022

Date:

~~5. DECLARATION OF THE REVIEW SPECIALIST~~

I, _____, as the appointed Review Specialist hereby
declare/affirm that:

- ~~• I have reviewed all the work produced by the Specialist(s);~~
- ~~• I have reviewed the correctness of the specialist information provided as part of this Report;~~
- ~~• I meet all of the general requirements of specialists as set out in Regulation 13 of the NEMA EIA Regulations;~~
- ~~• I have disclosed to the applicant, the EAP, the review EAP (if applicable), the Specialist(s), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; and~~
- ~~• I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.~~

Click or tap to enter a date.

Signature of the EAP: _____ Date: _____

Name of company (if applicable):