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email msimons@capenature.co.za
reference LE14/2/6/1/6/1/RE296-5_Hosuing_Keurboomstrand
date 07 April 2022

Cape EAPrac,
P.O Box 2070,
George,
6530

Attention: Ms Melissa Mackay
By email: (mel@cape-eaprac.co.za)

Dear Ms Melissa Mackay

**DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ARCH ROCK ON THE
REMAINDER PORTION 5 OF 296, KEURBOOMSTRAND, BITOU LOCAL MUNICIPALITY,
WESTERN CAPE.**

DEA&DP Reference: 16/3/3/1/D1/6/0000/22

CapeNature would like to thank you for the opportunity to review the above report. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.

According to the Western Cape Biodiversity Spatial Plan (Pool-Stanvliet *et.al.* 2017)¹ property is outside the extent of Critical Biodiversity Areas but has natural (Ecological Support Areas (ESA 1: Terrestrial). The WCBSP mapped the following features:

- Indigenous Forest Type
- Coastal Habitat Type
- Foredune
- Garden Route Shale Fynbos (EN)
- South Outeniqua Sanstone Fynbos (VU)
- Eastern Fynbos Renosterveld Shale Fynbos Floodplain Wetland
- Coastal resource protection-Eden
- Watercourse protection- South Eastern Coastal Belt

¹ Pool-Stanvliet, R., Duffell-Canham, A., Pence, G. & Smart, R. 2017. The Western Cape Biodiversity Spatial Plan Handbook. Stellenbosch: CapeNature.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Associate Prof Denver Hendricks (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Ms Marguerite Loubser, Mr Mervyn Burton, Dr Colin Johnson, Prof Aubrey Redlinghuis, Mr Paul Slack

According to Mucina and Rutherford 2006² and the WCBSP (Pool-Stanvliet *et al.* 2017) the mapped vegetation unit for the property is **Vulnerable** Garden Route Shale Fynbos as listed in the 2011 NEM:BA threatened ecosystems gazette³. In the updated National Biodiversity Assessment, the vegetation will be listed as Least Concerned Goukamma Dune Thicket and Garden Route Shale Fynbos is mapped to the south (Skowno *et al.* 2018)⁴.

Coastal ecosystems are ecological infrastructures that provides a range of regulatory services to coastal communities⁵. The foredunes play an essential role in providing physical buffering against sea storm surges and other potential climate change related impacts. Therefore, they should be in a functional near-natural state. Furthermore, the property forms part of a coastal corridor, which is an important ecological infrastructure. This coastal corridor has been disturbed overtime. As these areas are important corridors to maintain landscape connectivity it is crucial that no further disturbances occur, and that the area must be restored to improve connectivity and reduce landscape fragmentation.

CapeNature reminds the applicant to obtain comments from the Department of Forestry, Fisheries and Environment (DFFE) if any listed protected tree⁶ species or indigenous forest will be disturbed. CapeNature will not object to the findings\recommendations as DFFE is a custodian of forestry resources in South Africa.

CapeNature recommends that all topsoil stockpiles be less than 1.5m in height and have adequate signage to illustrate which are topsoil and subsoil for rehabilitation purpose. Furthermore, caution must be applied to ensure that the topsoil is not contaminated. Areas susceptible to erosion or bare soil should be protected by installing the necessary temporary structures.

The proposed site within the erosion risk zones of the draft Eden Coastal Management Line (see fig.1 and table 1)⁷. These zones are areas within the flood risk zones of estuaries and littoral active zones. This zone demarcates the area in which development will either be prohibited or controlled. This is done in order to achieve the objectives as set in section 25 of ICM Act, as amended, or coastal management objectives⁸.

² Mucina, L. & Rutherford, M.C. (Eds.) 2006. *The Vegetation of South Africa, Lesotho and Swaziland*. South African National Biodiversity Institute, Pretoria

³ National Environmental Management: Biodiversity Act (10/2004): National list of ecosystems that are threatened and in need of protection. 2011.

⁴ Skowno, A. L., Poole, C. J., Raimondo, D. C., Sink, K. J., Van Deventer, H., Van Niekerk, L., Harris, L. R., Smith-Adao, L. B., Tolley, K. A., Zengeya, T. A., Foden, W. B., Midgley, G. F. and Driver, A. 2019. National Biodiversity Assessment 2018: The status of South Africa's ecosystems and biodiversity. Synthesis Report. Pretoria, South Africa. 214 pp.

⁵ Cadman, M. (ed.). 2016. Fynbos Forum Ecosystem Guidelines for Environmental Assessment in the Western Cape, Edition 2. Fynbos Forum, Cape Town.

⁶ Notice of the List of Protected Tree Species under the National Forest Act, 1998 (Act No. 84 of 1998)

⁷ Western Cape Government, Department of Environmental Affairs and Development Planning. 2018. The Technical Delineation of both the coastal management line; the EIA development setback line as well as an audit of coastal access in the Eden District Municipality

⁸ National Environmental Management: Integrated Coastal Management Amendment Act, 2014 Act (No. 36 of 2014).

Table 1: The Coastal Management Zones and the appropriate development regulations in each zone

Zone	Description	Development controls to apply
CPZ	Area seaward of the CPZ	No additional controls
CML	Area seaward of the CML and around development islands	- Prevent new development expansion areas below the CML - General development parameters to avoid insensitive new development and positively inform execution of existing rights
DSL	Area seaward of the DSL and around development islands	As per EIA listing notices
Risk zones	- Medium term (50 year) erosion risk zone (built-up areas) - Long term (100 year) erosion risk zone (rural areas) - Area within 1:100yr floodline or below the 10m amsl contour around estuaries - Littoral active zones	Specific development parameters to avoid insensitive new development and positively inform execution of existing rights with specific reference to: - Encroachment - Erosion risk - Mobile sand - Flooding - Storm damage - Public access - Vegetation control - Public amenities and infrastructure

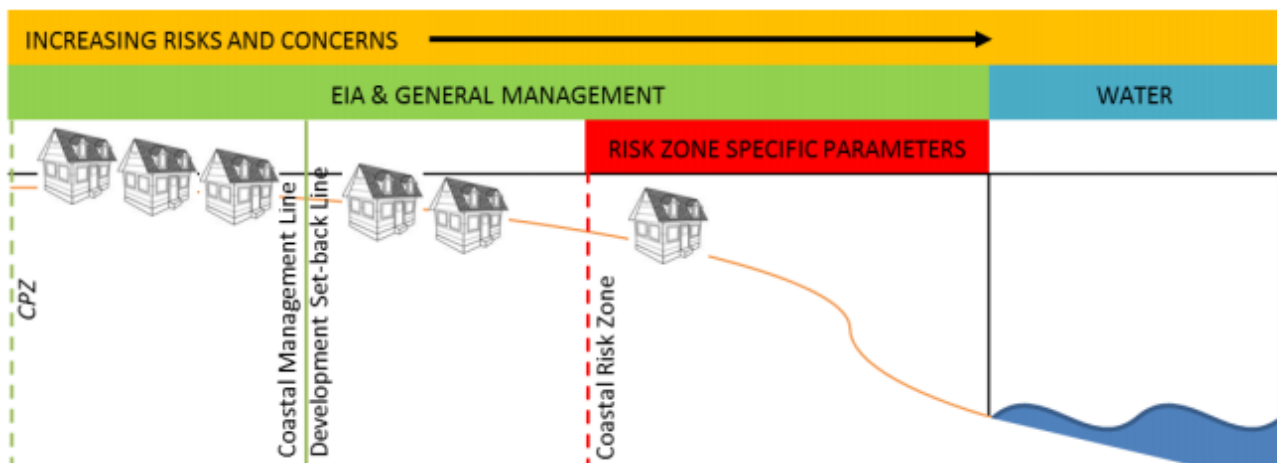


Figure 1: Illustration of the different Coastal Management Zones, including the applicable risks, of the Eden District that must be considered for development management.

In terms of the Sea Shore Act, 1935 (Act No. 21 of 1935) a lease agreement is required from CapeNature for any structure's seawards or on the High-Water Mark of the Sea on state-owned land. Please note that in terms of section 3(5) of the Sea-Shore Act, 1935 (Act No 21 of 1935)

“Before any lease is entered into under subsection (1) or any permit is granted under subsection (2), the Minister shall, at the expense of the person with or to whom it is proposed to enter into such lease or to issue such permit, cause a notice to be published

in the Gazette and in not less than one newspaper circulating in the neighbourhood wherein the portion of the sea-shore or the sea concerned is situated, wherein-
(a) the proposal to enter into the lease or to issue the permit is made known;
(b) the place where and the times at which full particulars of the proposed lease or permit will be open for inspection are specified; and
(c) it is specified that objection to the proposed lease or permit may be lodged with a person specified in the notice, before a date so specified, which shall be not less than 30 days after the date on which the notice is published.

Prior to construction the waste, by the areas used for dumping, should be removed from the entire site and not only the development footprint. Removal of waste, generated during the activity, must be disposed at a registered disposal facility. Implement the integrated waste management approach that addresses waste avoidance, reduction, re-use, recycling, recovery, treatment, and safe disposal as a last resort.⁹

An Environmental Control Officer (ECO) should be appointed to oversee the process and should be present, if possible, during the construction and to identify any harmful activities.

Any remaining vegetation should be rehabilitated, where possible, and conserved. It is important to protect coastal biodiversity in order to maintain the coastal corridor movement. Thus, the development footprint should be within the disturbed areas and should not result in any further loss to biodiversity.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely,



Megan Simons
For: Manager (Landscape Conservation Intelligence)

⁹ National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008). Consultation on the draft revised and updated national waste management strategy. 2019.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Associate Prof Denver Hendricks (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Ms Marguerite Loubser, Mr Mervyn Burton, Dr Colin Johnson, Prof Aubrey Redlinghuis, Mr Paul Slack



BREDE-GOURITZ
CATCHMENT MANAGEMENT AGENCY

101 York Street 3rd Floor Rm 302 George 6530, P.O. Box 1205 George 6530

Enquiries: R Mphahlele Tel: 023 346 8000 Fax: 044 873 2199 E-mail: rmphahlele@bgcma.co.za

REFERENCE: 4/10/2/ K70A /KEURBOOMSTRAND 296/5, BITOU

Date: 29/03/2022

Cape Environmental Assessment Practitioners (Pty) Ltd
PO Box 2070
GEORGE
6530

Dear Sir/Madam

RE: DBAR PROPOSED REDEVELOPMENT OF THE EXISTING ARCH ROCK SEASIDE ACCOMMODATION ON PORTION 5 OF FARM 296 KEURBOOMSTRAND, BITOU

Reference is made to the above mentioned subject matter submitted to this office for comments.

The following are BGCMA comments which should be adhered to:

1. The activities associated with the proposed development which encroaches on the regulated area of a watercourse are regarded as water uses in terms of section 21 (c) & (i) of the National Water Act, 1998 (Act 36 of 1998) (NWA); and require a water use authorization prior commencement in terms of section 22 of NWA.

"Regulated area of a watercourse" refers to:

(a) The outer edge of the 1 in 100-year flood line and /or delineated riparian habitat, whichever is the greatest distance, measured from the middle of the watercourse of a river, spring, natural channel, lake or dam;

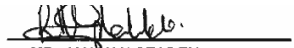
(b) In the absence of a determined 1 in 100-year flood line or riparian area the area within 100m from the edge of a watercourse where the edge of the watercourse is the first identifiable annual bank fill flood bench (subject to compliance to section 144 of the Act); or(c) A 500 m radius from the delineated boundary (extent) of any wetland or pan.

2. Please note that commencement with water uses contemplated in section 21 of NWA without an authorisation as required in terms of section 22 of NWA, constitute an offense in terms of section 151(1) (a) of NWA. Further, in terms of section 151 (2) of NWA, any person who contravenes is guilty of an offense and liable on first conviction to a fine or imprisonment of a period not exceeding five years or both such a fine and imprisonment.
3. The onus remains with the property owner to adhere to the above provision of NWA prior commencement with any water use activities contemplated in section 21 of NWA.
4. This office can be contacted for further information relating to requirement for, and/or application for a water use authorization.

**RE: DBAR PROPOSED REDEVELOPMENT OF THE EXISTING ARCH ROCK SEASIDE
ACCOMMODATION ON PORTION 5 OF FARM 296 KEURBOOMSTRAND, BITOU**

This office reserves the right to amend and revise its comments as well as to request any further information,

Yours faithfully,


pp MR. JAN VAN STADEN
CHIEF EXECUTIVE OFFICER (ACTING)



Melissa Mackay

From: Rabokale Mphahlele <rmphahlele@bgcma.co.za>
Sent: Wednesday, 06 April 2022 12:18
To: jackie@confluent.co.za; Melissa Mackay
Subject: Re: DBAR PROPOSED REDEVELOPMENT OF THE EXISTING ARCH ROCK SEASIDE ACCOMMODATION ON PORTION 5 OF FARM 296 KEURBOOMSTRAND, BITOU

Good day

Thank you, Jackie

I apologize for the confusion caused by my comments. Please note that the comments do not suggest that an application should be lodged for this development in particular but are generally inform that authorization should be secured before the commencement of any activities within the regulated area of a watercourse, and the consequences thereof if this legal requirement is not complied with.

In respect of Jackie's email below, sections 21 (c) & (i) will not be required for this development hence there is no need to apply for a water use authorization.

From: jackie@confluent.co.za <jackie@confluent.co.za>
Sent: Tuesday, April 5, 2022 9:13 AM
To: 'Melissa Mackay' <melissa@cape-eaprac.co.za>; Rabokale Mphahlele <rmphahlele@bgcma.co.za>
Subject: RE: DBAR PROPOSED REDEVELOPMENT OF THE EXISTING ARCH ROCK SEASIDE ACCOMMODATION ON PORTION 5 OF FARM 296 KEURBOOMSTRAND, BITOU

Good morning Mel and Rabokale,

Please see attached again the freshwater compliance statement compiled in response to the DFFE screening tool. It confirms that the development site is already highly modified, and most importantly has no freshwater features on it, or within 500 m from it.
I inspected the full site, as well as the surrounding area.
There should therefore be no Section 21 c and i water uses as it is not within the regulated area of a watercourse as defined in GN509.

Thanks and regards,
Jackie

From: Melissa Mackay <melissa@cape-eaprac.co.za>
Sent: 05 April 2022 08:22 AM
To: rmphahlele@bgcma.co.za; jackie@confluent.co.za
Subject: FW: DBAR PROPOSED REDEVELOPMENT OF THE EXISTING ARCH ROCK SEASIDE ACCOMMODATION ON PORTION 5 OF FARM 296 KEURBOOMSTRAND, BITOU

Good morning

Many thanks for your comment. I am a little confused by the content of the letter, as Confluent confirmed that there were no regulated watercourses in or near the site. Your correspondence is not clear on whether you agree that there is no WUL required. Your comments were requested as the Screening Tool called for an aquatic specialist report and DEA&DP insisted that BGCMA must be a registered stakeholder.

I look forward to your response.

Please Note: When registering as an Interested and Affected Party (I&AP), you consent to the lawful processing of personal information for the intended purposes, as described by the Protection of Personal Information Act, 2013 (Act no. 4 of 2013). Your information will be used for this project, including the initial application as well as subsequent related appeals, amendments or audits, or any future project where you are identified as an I&AP. You also agree that by submitting comment to inform this process, your contact details will, where required by a public body, be reflected in our regulated reports that must be compiled and submitted to the general public, registered stakeholders, organs of state as well as the competent authority for consideration and decision-making.

Kindly view our [Privacy Statement](#) for more information.

Regards

Melissa Mackay | 084 584 7419

SENIOR CONSULTANT | ECO | GIS

BTech Nat. Con. (NMMU)

Reg. EAP (EAPASA)



Cape *EAP*rac



T: 044 874 0365

F: 044 874 0432

17 Progress Street, George

PO Box 2070, George 6530

From: Rabokale Mphahlele <rmphahlele@bgcma.co.za>

Sent: Wednesday, 30 March 2022 09:20

To: Melissa Mackay <melissa@cape-eaprac.co.za>

Subject: RE: DBAR PROPOSED REDEVELOPMENT OF THE EXISTING ARCH ROCK SEASIDE ACCOMMODATION ON PORTION 5 OF FARM 296 KEURBOOMSTRAND, BITOU

Good day

Please see attached BGCMA comments on the above-referenced subject matter.

Kind regards,



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Enquiries: T Mbambo

Tel: 074 083 6174

Ref: **EDMS - 216054**

Cape EAPrac Environmental Assessment Practitioners

Att: Ms. Melissa Mackay

P.O Box 2070

George

6530

Tel: 044 874 0365

Email: mel@cape-eaprac.co.za

Dear Ms. Mackay

SUBJECT: COMMENTS ON THE COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR ARCH ROCK ON REMAINDER PORTION 5 OF ERF 296, KEURBOOMSTRAND

The Department of Forestry, Fisheries, and the Environment (DFFE) Oceans & Coasts (O&C) Branch appreciates the opportunity granted to comment on the Draft Basic Assessment Report for Arch Rock on Remainder Portion 5 of Erf 296, Keurboomstrand. This Branch has provided recommendations in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), ("NEMA") and the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("**ICM Act**").

1. The Branch O&C has the mandate to ensure the holistic management of the coast and estuarine areas as an integrated system and promote coordinated coastal management. It ensures that the ecological integrity, natural character, and the economic, social, and aesthetic value of coastal zones are maintained to ensure that people, properties, and economic activities are protected against the impacts of dynamic coastal processes.

2. Guided by the principles of integrated coastal management, this Branch continues to strive for environmental sustainability and socially justified sharing of benefits derived from a resource-rich coastal area without compromising the ability of future generations to access those benefits.
3. Based on practical knowledge and experience in the application of environmental legislation, the assessment of associated impacts, this Branch concludes that it **is in support** of the competent authority to grant environmental authorisation for the proposed redevelopment of Arch Rock resort on Portion 5 of 296 Keurboomstrand.

4. **Conditions and Recommendations for the Attention of the EAP and CA:**

- 4.1 This Branch notes that the proposed redevelopment comprises the construction of three new cottages on approximately the same footprints as the existing units. From a coastal erosion perspective, setting back the new units from the seafront represents a risk-averse approach that is recommendable. There is, however, no setback limit within the property that can be guaranteed safe. The recommendation is therefore to construct as far back as reasonably possible within the framework of the wider redevelopment goals.
- 4.2 It is recommended that the foundations of the new beachfront cottages are designed to remain stable in the event of failure of the beach-facing slope due to coastal erosion. As an approach to address this, the applicant can review the recommendation of piled foundation supports which are integrated into the structural design of the building to ensure long-term stability and protection from the coastal interface.
- 4.3 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.
- 4.4 Further to this, protection measures to increase public safety need to be considered for steep seaward facing Unit 1. Unlike units 2 and 3, the dune cordon/bank is steep, slopes downwards, and is currently at different elevations. This



would present a safety risk of injuries for older visitors and/or children, it is recommended that the applicant explores the option of designing wooden/timber poles around the boardwalk or near the toe of the dune as a safety measure and to limit the trampling on the vegetation.

- 4.5 A specialist dune vegetation assessment and management plan are recommended to ensure that suitable indigenous species are present to provide optimum bank stabilisation.
- 4.6 This Branch notes and concurs with the recommendations by the coastal engineer that although a revetment is not a preferred solution for this property in the current situation, could be considered in the future should increasing erosion problems become evident. Provision for this should be made in the maintenance management plan for inclusion and consideration by the competent authority.
- 4.7 The Coastal Vulnerability Index and DEA&DP erosion risk lines indicate that significant parts of the property may be at high risk of coastal erosion. 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. While this might be the case, adequate measures need to be undertaken to ensure that this property is protected from dynamic coastal processes.
- 4.8 The applicant is made aware of the increasing risk of property damage due to extreme coastal events. Adequate mitigation measures need to be exercised to mitigate the long-term, cumulative, and unintended impacts.
- 4.9 This Branch notes that no geotechnical reports for the site have been provided. It is recommended that a formal geotechnical investigation be conducted before the commencement of detail design and tendering. This will confirm the existence of near-surface bedrock, the suitability of excavated material as fill material, and the depth of the groundwater table and shed further light on the extent of the erosion risk measures that need to be undertaken.
- 4.10 This Branch reiterates the need for understanding the depth of bedrock below the site, specifically as it relates to the units that are 100m from the highwater mark as this significantly affects the coastal erosion risks and will influence the design of the foundations of the new beachfront cottages to ensure stability in the event of shoreline erosion.

- 4.11 While there is little evidence that suggests that this area is at risk from coastal erosion, it is crucial to note that the effects of climate change (including sea-level rise and increased storm intensity) potentially increase the coastal risk to beachfront properties in this area.
- 4.12 The Coastal Vulnerability Risk Index and the DEA&DP erosion risk lines indicate that significant parts of the property may be at high risk of coastal erosion. The Keurboomstrand Beach sand erodes and accretes intermittently over time and appears to be currently “dynamically stable.” The Coastal Viewer further confirms that the remainder of Portion 5 Erf 296 is situated beyond the moderate risk zone and is within the low-risk zone for coastal erosion.
- 4.13 To further reduce the potential risks to the public property associated with failure of the existing wall, all excavations, and construction-related activities should be setback landwards, away from the seaward facing of Remainder of Portion 5 of Erf 296. No excavation, digging, or removal of sand should be undertaken within 3m of the toe of the bank to prevent structural failure.
- 4.14 No stormwater runoff (or other runoff, e.g., swimming pool backwash water) must be allowed to concentrate onto the steep seaward slope where it can contribute to erosion problems. Runoff from the roof of the new proposed buildings should be planned around the existing formal stormwater drainage system (if present) or directly infiltrate into soft landscaped areas surrounding the building (in such a way that it is not likely to form an erosion channel).
- 4.15 The Terrestrial and Biodiversity Compliance Statement outlines that various protected and indigenous trees occur at the property with gardens beds and lawns surrounding the chalets. The applicant should note that a permit from Forestry Western Cape should be acquired to relocate, remove or prune Protected trees within the development footprint. This Branch strongly maintains that all protected trees that are found on site should be built into the architectural design for the site and, as far as possible be retained.
- 4.16 Construction and operational management of the development must ensure that the Milkwood Trees are not impacted by proposed construction activities at all development stages.
- 4.17 Only indigenous plant species should be used in the landscaped areas of the redevelopment.

- 4.18 In line with the Bitou Municipality Spatial Development Framework (Keurbooms River Draft SDF), this development should be subject to strict urban design, architecture and adhere to relevant land-use guidelines.
- 4.19 The potential security and safety impacts associated with the presence of construction workers and other impacts associated with noise, dust, and safety impacts associated with construction-related activities and the movement of heavy vehicles were identified as key socioeconomic issues associated with this development proposal. While most of these impacts are unavoidable, the onus lies with the applicant to ensure that the construction activities result in a minimal disturbance to neighboring.
- 4.20 The construction and operational plan should not clash with the residential land use of this neighborhood. The construction schedule/operational plan/ times be communicated and, if possible, avoid holiday periods. As far as possible, the construction schedule should be available to neighbor properties to ensure that they are aware of the proposed activities and that they can make adequate means to mitigate noise and impacts.
- 4.21 Construction work should be restricted to weekday working hours between 08h00- 17h00. This Branch further stresses that the responsibility to keep noise levels within reasonable limits and hours lies with the applicant and appointed building contractor.

5. Specific Considerations for Inclusion in the Environmental Management Plan (EMP)

- 5.1 Should there be any archaeological evidence on-site, work should cease immediately, and the case reported to Heritage Western Cape for a professional investigation.
- 5.2 Clearing must be preceded by a plant search-and-rescue operation by a botanist, to remove any scarce, significant, or useful indigenous species that can be transplanted on the property post-construction.
- 5.3 No wastewater containing harmful chemicals should be released on-site, to avoid contamination of the sand/soil.
- 5.4 Ensure drainage and runoff are controlled to prevent erosion and soil loss. Install contour berms where erosion has occurred to ensure that no new erosion pathways are formed.

5.5 Best practice Rainwater harvesting should be implemented to mitigate impacts.

5.6 Access to sensitive areas outside the developmental footprint must be controlled using signage during construction. The appointed Environmental Control Officer should ensure that all No-Go areas are demarcated.

Kindly note that the Department reserves the right to revise its comments and request further information based on any additional information received. All correspondence, documentation, and/or requests (hard copy and an electronic copy) should be submitted to our office via OCEIA@dfpe.gov.za / or **Physical Address: Department of Forestry, Fisheries & the Environment (DFPE), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.**

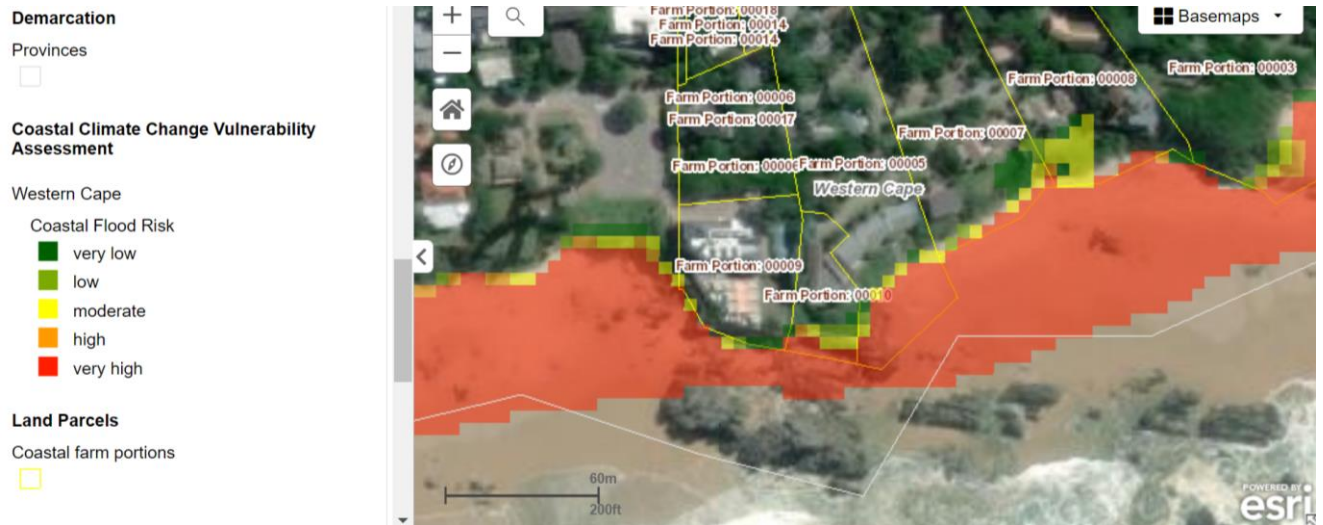
Yours Sincerely

A handwritten signature in black ink, appearing to be 'P. Peters', written over a horizontal line.

ACTING DIRECTOR: COASTAL CONSERVATION STRATEGIES

DATE: 28/03/2022

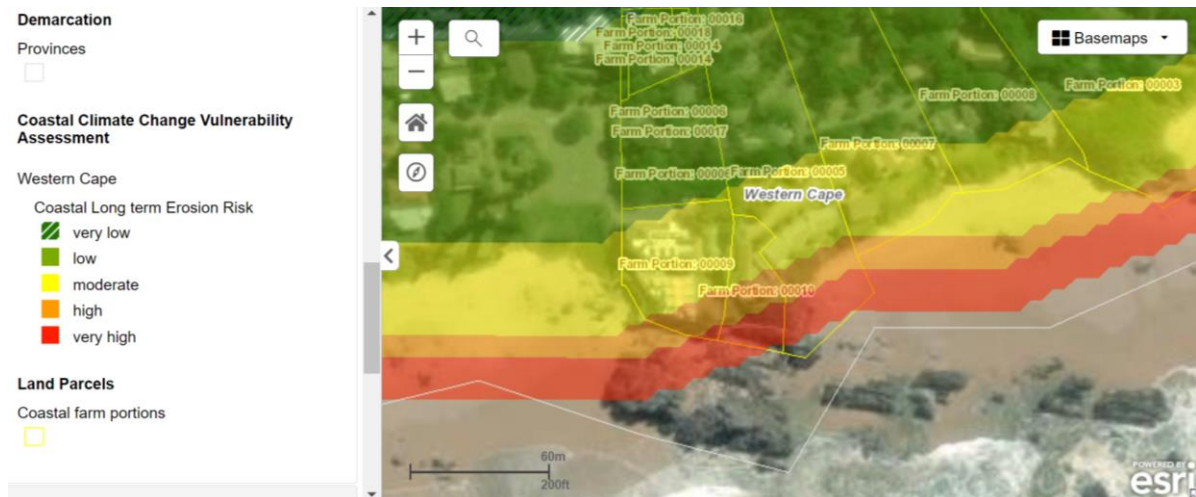
Appendix A: Coastal Vulnerability Assessment of Portion 5 of farm 296



The beach area of the property is at a very high risk of flooding, while the foot of the slope has moderate to low flooding risk of flooding.



The property is located in an area that has short-term erosion risk ranging from very high to low. The slope has a high risk of eroding in the short term while the structures are located in an area that has moderate risk of short-term erosion.



The whole of portion 5 is within an area that is at risk of long-term erosion, ranging from very high to very low risk. The beach area has a very high to high risk of eroding, the slope has high to moderate risk of eroding and the structures located in an area that has moderate risk of eroding.



OUR REFERENCE : 20/9/2/4/6/677
YOUR REFERENCE : BIT634/10
DEA&DP REFERENCE : 16/3/3/1/D1/6/0000/22
ENQUIRIES : Cor van der Walt/David Lakey

Cape Environmental Assessment Practitioners
PO Box 2070
George
6530

Att: Melissa Mackay

DRAFT BASIC ASSESSMENT REPORT
RE-DEVELOPMENT OF THE EXISTING ARCH ROCK SEASIDE ACCOMMODATION:
DIVISION KNYSNA
PORTION 5 OF THE FARM 296, KEURBOOMSTRAND

The Draft Assessment Report dated 15 February 2022 has reference.

The existing Arch Rock Seaside Accommodation has been purchased by Keurbooms Rock (Pty) Ltd in 2019 and it is their proposal to refurbish/alter the existing resort units as they are outdated. The refurbishment will result in a lower throughput capacity, from 26 pax in 10 chalets to 22 pax in 8 chalets. The majority of the property is located within 100m of the high water mark of the sea.

The Western Cape Department of Agriculture: Land Use Management has no objection towards the above application.

Please note:

- Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.

- The Department reserves the right to revise initial comments and request further information based on the information received.

Yours sincerely



Mr. CJ van der Walt

LANDUSE MANAGER: LANDUSE MANAGEMENT

2022-03-23

Copies:

Department of Environmental Affairs & Development Planning

Private Bag X 6509

George

6530

Bitou Municipality

Private Bag X1002

PLETTENBERG BAY

6600

Melissa Mackay

From: Anje Taljaard <ataljaard@plett.gov.za>
Sent: Wednesday, 23 March 2022 16:25
To: Melissa Mackay
Cc: Chris Schliemann; Records
Subject: RE: 16/3/3/1/D1/6/0000/22 Redevelopment of the Arch Rock Seaside Accommodation on Portion 5 of Farm 296 Keurboomstrand

Dear Melissa,

I hope this email finds you well. The EIA for the redevelopment of Arch Rock Seaside Accommodation on Portion 5 of Farm 296, Keurboomstrand has reference. Please accept the following as comment.

1. The redevelopment of existing accommodation units are not objected to in principle.
2. The applicant is to take cognisance of the proximity to the coastal area and potential risk that can result due to climate change and coastal erosion. The Municipality absolve themselves of all future liability in this regards and any construction is undertaken at the applicant's own risk.
3. The set back of the frontal units as far from the high water mark is supported.
4. Please include myself from the Bitou Municipality in all future ECO reporting as detailed in the EMP.
5. It is recommended that a suitable indigenous and endemic plant species list be compiled for use in landscaping and any rehabilitation that might be required.
6. No new access paths to the beach is supported and should be monitored for the lifespan of the proposed redevelopment.

Please let me know should you require any additional information.

Kindest regards,

Anjé Taljaard
Environmental Management Officer
Bitou Local Municipality
Directorate: Economic Development & Planning
Division: Land Use Management
Office No. 50, Second Floor, Melville's Corner, 3 Kloof Street, Plettenberg Bay 6600
Tel: (044) 501 3318 Email: ataljaard@plett.gov.za



The Environment belongs to all - past, present and future generations.

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From: Melissa Mackay <melissa@cape-eaprac.co.za>

Sent: Tuesday, 15 February 2022 15:14

To: Melissa Mackay <melissa@cape-eaprac.co.za>

Subject: 16/3/3/1/D1/6/0000/22 Redevelopment of the Arch Rock Seaside Accommodation on Portion 5 of Farm 296 Keurboomstrand

Good afternoon

RE: 16/3/3/1/D1/6/0000/22 REDEVELOPMENT OF THE ARCH ROCK SEASIDE ACCOMMODATION ON PORTION 5 OF FARM 296 KEURBOOMSTRAND

Please find attached notification for the availability of the Draft Basic Assessment Report (DBAR) for the proposed redevelopment of the existing Arch Rock Seaside Accommodation on Portion 5 of Farm 296 Keurboomstrand. The reports will be made available for a 30 day comment period from **Monday 21 February to Wednesday 23 March 2022**. Documents can be accessed via the Cape EAPrac website or any other digital platform requested. An email will be circulated towards the end of the week providing links to the website and on the WeTransfer site.

You have been identified as a stakeholder or have registered as an Interested & Affected Party (I&AP) for the process. Should you no longer wish to receive correspondence, please advise in writing.

Please Note: When registering as an Interested and Affected Party (I&AP), you consent to the lawful processing of personal information for the intended purposes, as described by the Protection of Personal Information Act, 2013 (Act no. 4 of 2013). Your information will be used for this project, including the initial application as well as subsequent related appeals, amendments or audits, or any future project where you are identified as an I&AP. You also agree that by submitting comment to inform this process, your contact details will, where required by a public body, be reflected in our regulated reports that must be compiled and submitted to the general public, registered stakeholders, organs of state as well as the competent authority for consideration and decision-making.

Kindly view our [Privacy Statement](#) for more information.

Regards

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