



BETTER TOGETHER

Development Management  
(Region 3)

**REFERENCE:** 16/3/3/6/4/11/D4/16/0045/19  
**ENQUIRIES:** Shireen Pullen  
**DATE OF ISSUE:** 09 APR 2019

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**Attention: Ms. J. Ebersohn**

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Dear Madam

**CONSULTATION BASIC ASSESSMENT REPORT: THE PROPOSED CONSTRUCTION OF A MIXED USE, SPORT, ADVENTURE AND TOURISM DEVELOPMENT ON ERF 12403, GEORGE REX, KNYSNA**

1. The above-mentioned document received by this Department on 27 February 2019 refers.
2. This Department has reviewed the document and comment as follows:

2.1. It is noted that the proposed development entails the establishment of a high-performance aquatic centre, a sport's village (for accommodation for athletes and supporters), sports-orientated retail and professional services (e.g. physio-therapists, biokineticists, gym, massage, sport psychology) and will include the following mixed uses:

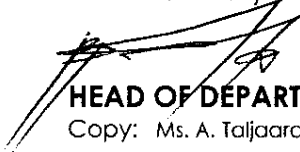
- 2 "General Residential Zone" portions;
- 5 "Business Zone" portions
- 1 "Business Zone" with consent use for a "Place of Entertainment" portion;
- 4 "Private Open Space" portions
- 2 x "Special Zone" portions.

2.2. The proposal also includes the rehabilitation of George Rex wetland, which is an existing wetland on site. It is also noted from your submission that the proposal requires a Water Use Licence (WULA) in terms of the National Water Act, 1996 (Act No 38 of 1998). In light of the one environmental system, it is now a requirement to synchronise the EIA and WULA processes in order to ensure that both processes are duly informed by one another. It is therefore the duty of the Environmental Assessment Practitioner ("EAP") to take note of the timeframes and synchronise the two processes. Failure to give effect to the one environmental system may prejudice the success of the application.

- 2.3. It is evident from the submission that most parts (71%) of the property forms part of a functional freshwater wetland system. As such, the potential impacts on both the receiving ecological environment and the development itself cannot be ignored. These site specific attributes or constraints will necessitate the consideration of site layout alternatives to protect and sustain the integrity of the site to meet the Target Ecological Condition for the site, but also to ensure that the development is also not negatively impacted upon.
- 2.4. The findings of the George Rex Wetland Reserve should inform the proximity of the proposed development from the ecological functional wetland area and also what development setbacks or buffers should be considered or established to guide and inform decision-making.
- 2.5. Despite the proposal to clean and rehabilitate the existing stormwater channels, the suggested planning measures to convey stormwater from the proposed development is not very clear. It is therefore critical that a storm water management plan be developed as part of the BAR to deal specifically with stormwater and flood attenuation, in addition to the rehabilitation of existing overgrown areas and new areas that will be disturbed, should the development be authorised. The said plan should take into consideration appropriate culvert outlets and invert levels and what other municipal stormwater infrastructure upgrades will be required to accommodate the development proposal.
- 2.6. It is also noted that the specialist's reports attached to the consultation Basic Assessment Report do not fully comply with Appendix 6 of the EIA Regulations, relating to the details of expertise of the specialists. Please ensure that the specialist reports contained in the final BAR give effect to this requirement.
- 2.7. The final BAR must also include written confirmation from the Bitou Municipality that they have adequate unallocated capacity to secure sustainable supply and infra-structure capacity (water, sewage, stormwater and solid waste removal) to support the proposed development.
- 2.8. The Pre-Consultation Basic Assessment Report does not include an Environmental Management Programme ("EMPr"). In accordance with Section 24N of NEMA and regulation 19(1)(a) the BAR must contain an EMPr that must meet the requirements outlined in Section 24N (2) & (3) of the NEMA (as amended) and Appendix 4 of the EIA Regulations 2014. The EMPr must address the potential environmental impacts of the activity throughout the project life cycle including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing). Please ensure that the BAR includes an EMPr when submitted for commenting and decision-making purposes.
- 2.9. Furthermore, the impacts for all reasonable and feasible alternatives must be comparatively assessed in order to determine the best environmentally practicable alternative.
- 2.10. It is also important that you determine whether the development proposal will be influenced by any floodlines.
3. Please note that the activity may not commence prior to an environmental authorisation being granted by the Department.

4. Kindly quote the abovementioned reference number in any future correspondence in respect of this application.
5. This Department reserves the right to revise initial comments and request further information from you based on any new or revised information received.

Yours faithfully



**HEAD OF DEPARTMENT**  
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Bitou Municipality

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