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Proposed development of outside deck within 100 meters from the HWM OF THE Sea and a beach access boardwalk plus viewing deck.

DEA&DP REF: 16/3/3/6/7/1/D1/15/0299/25
BASIC ASSESSMENT DRAFT REPORT

Date: 30 January 2026

Compiled by: Samatha Teeluckdhari (2023/6443)
Reference: January 2026 – DRAFT BAR/9706
Assisted by: Lizelle Genade (Candidate 2023/7793)

S. Teeluckdhari

EAP Signature: Candidate Signature:

ISSUED BY:
Eco Route

Submitted to:
DEA&DP

Document Reference:
January 2026 – DRAFT BAR/9706

Document Summary:
Application for environmental authorisation for the proposed development of outside deck within 100 meters from the HWM OF THE Sea and a beach access boardwalk plus viewing deck.

CONDITIONS OF USE OF THE REPORT

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STATEMENT OF INDEPENDENCE

I, Samatha Teeluckdhari of Eco Route Environmental Consultancy, 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 Candidate Environmental Assessment Practitioner (EAPASA Reg: 2023/6443) and receive remuneration for services rendered for undertaking tasks required in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), and the Environmental Impact Assessment Regulations, 2014 (as amended). I have no financial or other vested.

Western Cape Government

Department of Environmental Affairs and Development Planning

BASIC ASSESSMENT REPORT

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

30 January 2026

BASIC ASSESSMENT REPORT

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

30 January 2026

(For official use only)	
Pre-application Reference Number (if applicable):	
EIA Application Reference Number:	
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)

Erf 9706, Portion 57 of 443, Plettenberg Bay, Western Cape Province.

Erf Nr: 9706 (34.091161°S 23.370694°E)
Area (Sqm): 23228.3
SG Code: C03900080000970600000
SG Region: KNYSNA
Minor Region: PLETTENBERG BAY

The property is zoned Residential. Andrew Beveridge, the owner is applying for the development of a deck and a beach access boardwalk plus viewing deck within 100m of the HWM

Preferred alternative would be to apply for the development of proposed development of deck within 100 meters from the HWM and a beach access boardwalk plus viewing deck.

Or for the **alternative 1,** the development of a deck within 100 meters from the HWM and a beach access boardwalk plus viewing deck, which would include an additional 28m^2 shallow dog wash and shower.

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, 19998 (Act No. 107 of 1998) ("NEMA") hereinafter referred to as the "NEMA EIA Regulations".

3. *Submission of documentation, reports and other correspondence:*

   The Department has adopted a digital format for corresponding with proponents/applicants or the general public. If there is a conflict between this approach and any provision in the legislation, then the provisions in the legislation prevail. If there is any uncertainty about the requirements or arrangements, the relevant Competent Authority must be consulted.

   The Directorate: Development Management has created generic e-mail addresses for the respective Regions, to centralise their administration. Please make use of the relevant general administration e-mail address below when submitting documents:

   DEADPEIAAdmin@westerncape.gov.za
   Directorate: Development Management (Region 1):
   City of Cape Town; West Coast District Municipal area;
   Cape Winelands District Municipal area and Overberg District Municipal area.

   DEADPEIAAdmin.George@westerncape.gov.za
   Directorate: Development Management (Region 3):
   Garden Route District Municipal area and Central Karoo District Municipal area

   General queries must be submitted via the general administration e-mail for EIA related queries. Where a case-officer of DEA&DP has been assigned, correspondence may be directed to such official and copied to the relevant general administration e-mail for record purposes.

   All correspondence, comments, requests and decisions in terms of applications, will be issued to either the applicant/requester in a digital format via email, with digital signatures, and copied to the Environmental Assessment Practitioner ("EAP") (where applicable).

4. 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.

5. All applicable sections of this BAR must be completed.

6. 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.

7. This BAR is current as of **April 2024**. 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 to check for the latest version of this BAR.

8. 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.

9. 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.

10. 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.

11. 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.

12. 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.

13. 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.

14. 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.

15. 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:AQA"), 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: **DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1)** (City of Cape Town, West Coast District, Cape Winelands District & Overberg District)	**GEORGE REGIONAL OFFICE:** **DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 3)** (Central Karoo District & Garden Route District)
The completed Form must be sent via electronic mail to: DEADPEIAAdmin@westerncape.gov.za Queries should be directed to the Directorate: Development Management (Region 1) at: E-mail: DEADPEIAAdmin@westerncape.gov.za Tel: (021) 483-5829 Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1) Private Bag X 9086 Cape Town, 8000	The completed Form must be sent via electronic mail to: DEADPEIAAdmin.George@westerncape.gov.za Queries should be directed to the Directorate: Development Management (Region 3) at: E-mail: DEADPEIAAdmin.George@westerncape.gov.za Tel: (044) 814-2006 Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530

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:	The scale of the locality map must be at least 1:50 000. 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. The map must indicate the following: • 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. 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. 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.
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:	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: • 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): o Watercourses / Rivers / Wetlands o Flood lines (*i.e.,* 1:100 year, 1:50 year and 1:10 year where applicable); o Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): o Ridges; o Cultural and historical features/landscapes; o 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 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.
Site photographs	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.
Biodiversity Overlay Map:	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**.
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**.

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**	✓
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** **Please note that the boardwalk does not overlap any CBA or ESA**		✓
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**	✓
	Appendix E2:	**Copy of comment from Cape Nature**	
	Appendix E3:	**Final Comment from the DWS(From BOCMA)**	✓
	Appendix E4:	**Comment from the DEA: Oceans and Coast**	
	Appendix E5:	**Comment from the DAFF**	

	Appendix E6:	**Comment from WCG: Transport and Public Works**	
	Appendix E7:	**Comment from WCG: DoA**	
	Appendix E8:	**Comment from WCG: DHS**	
	Appendix E9:	**Comment from WCG: DoH**	
	Appendix E10:	**Comment from DEA&DP: Pollution Management**	
	Appendix E11:	**Comment from DEA&DP: Waste Management**	
	Appendix E12:	**Comment from DEA&DP: Biodiversity**	
	Appendix E13:	**Comment from DEA&DP: Air Quality**	
	Appendix E14:	**Comment from DEA&DP: Coastal Management**	
	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**	
	Appendix E18:	**Copy of an exemption notice**	
	Appendix E19	**Pre-approval for the reclamation of land**	
	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**	
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.**		**To be included in the FBAR**
Appendix G:	**Specialist Report(s)**		✓

Appendix H:	**EMPr**	✓
Appendix I:	**Screening tool report**	✓
Appendix J:	**The impact and risk assessment for each alternative**	**In document**
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**	✓
Appendix L:	**OSCAE permit from Bitou Municipality**	✓

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE: REGION 1		GEORGE OFFICE: BEGION 3
	(City of Cape Town, West Coast District	(Cape Winelands District & Overberg District)	(Central Karoo District & Garden Route District)

Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	**Andrew James Beveridge and Katharine Josephine Beveridge**	
Name of contact person for Applicant/Proponent (if other):	**N/A**	
Company/ Trading name/State Department/Organ of State:	**N/A**	
Company Registration Number:	**N/A**	
Postal address:	**4 Whale Rock Beach, Plettenberg Bay**	
		Postal code: 6600
Telephone:	( )	**Cell: +27(0) 83 300 8665/+27(0) 83 293 7143**
E-mail:	**andrew@beveridge.co.za/ jo@beveridge.co.za**	
Company of EAP:	**Eco Route Environmental Consultancy**	
EAP name:	**Samantha Teeluckdhari**	
Postal address:	**P.O Box 1252 Sedgefield**	
		Postal code: 6573
Telephone:	( )	**Cell: +27(0) 72 773 5397**
E-mail:	**samantha@ecoroute.co.za**	Fax: ( )
Qualifications:	**BSS Geography and Environmental Management**	
EAP registration no:	**2023/6443**	
Duplicate this section where there is more than one landowner Name of landowner:	**As above**	
Name of contact person for landowner (if other):		
Postal address:		
		Postal code:
Telephone:	( )	Cell:
E-mail:		Fax: ( )
Name of Person in control of the land:		
Name of contact person for person in control of the land:		
Postal address:		
		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:	**Bitou Municipality**	
Contact person:	**Anje Minne/Chris Schlieman**	
Postal address:	**Private Bag X1002, Plettenberg Bay,**	
		Postal code: 6600
Telephone	**+27(0) 44 501 3318**	**Cell: +27(0) 72 229 6640**
E-mail:	**aminne@plett.gov.za/ cschliemann@plett.gov.za**	Fax: ( )

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

1.	Is the proposed development (please tick):	New		**Expansion**	
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				
Brownfield **An OSCAE permit has been obtained for the construction of a new dwelling on the same footprint as a previous structure that was destroyed during the 2017 fires. Subsequently, the proposed development of a deck within 100 meters of the High-Water Mark (HWM), as well as a beach access boardwalk and viewing deck, is being included as part of the Basic Assessment Report (BAR) process.**					
3.	**For Linear activities or developments**				
3.1.	Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:				
Erf 9706, Brakkloof, Plettenberg bay, Western Cape via a gravel road off Whale rock road on the eastern side of the property					
3.2.	Development footprint of the proposed development for all alternatives.			**Preferred (Total):** **379.3m2** **Boardwalk: 98.3m2** **New decking: 281m2** **Alternative 1 (Total):** **407.3m²** **Boardwalk: 98.3m2** **New decking: 309m2**	

Development footprint of the proposed development and associated infrastructure size(s) for preferred alternatives:

DECKING AREAS OVER 100m MARK

	Existing	Demolish	New	Total
Boardwalks	72,7m²	5,7m²	31,3m²	98,3m²
Decking & firepit	49 m²	0m²	232m²	281m²
				379,3m²

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.

Preferred Alternative:

The proposed development consists of the construction of an outside deck (281 m² with firepit) and a beach access boardwalk with viewing deck (98.3 m²), with a combined footprint of 379.3 m² located within 100 m of the High-Water Mark (HWM). The intervention is intended to replace a previously existing structure lost to fire damage and has been designed to minimise environmental impacts while promoting sustainable coastal access and use.

The development of a deck within 100 meters from the HWM and a beach access boardwalk plus viewing deck. The dimension of this alternative is:
Boardwalk: 98.3m2
New decking and firepit: 281m2

No ablution facilities will be in this area so no sewage effluent applicable

Alternative 1:

The development of a deck within 100 meters from the HWM and a beach access boardwalk plus viewing deck.
The dimension of this alternative is:
Boardwalk: 98.3m2
New decking and firepit: 309m2 (an additional 28m2 for a shallow dog wash and shower)

3.4.	Indicate how access to the proposed routes will be obtained for all alternatives.

Development forms part of a dwelling under construction, which is accessed from Whale Rock via a dirt road on the western side of the property.

3.5.	SG Digit codes of the Farms/Farm Portions/Erf numbers	**C**	**0**	**3**	**9**	**0**	**0**	**0**	**8**	**0**	**0**	**0**	**0**	**9**	**7**	**0**	**6**	**0**	**0**	**0**	**0**	**0**

	for all alternatives			
3.6.	**Starting point co-ordinates for all alternatives**			
	Latitude (S)	**34º**	**5‘**	**27.2688 “**
	Longitude (E)	**23º**	**22‘**	**17.4468“**
	Middle point co-ordinates for all alternatives			
	Latitude (S)	**34º**	**5‘**	**27.1284“**
	Longitude (E)	**23º**	**22‘**	**18.8364“**
	End point co-ordinates for all alternatives			
	Latitude (S)	**34º**	**5‘**	**27.6144“**
	Longitude (E)	**23º**	**22‘**	**19.9632“**
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):			
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):			
4.3.				
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).			
4.5.	Indicate how access to the proposed site(s) will be obtained for all alternatives.			
4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:			
4.7.	Coordinates of the proposed site(s) for all alternatives:			
	Latitude (S)			
	Longitude (E)			

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**

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.
None

4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.
National Policy Development Framework 2020
The National Environmental Management Act, 1998 (107 Of 1998)
The National Environmental Management Act, 1998 (107 Of 1998)
Bitou Municipal Land Use Planning Bylaw, 2015
Spatial Planning and Land Use Management Act (16 Of 2013)
Western Cape Land Use Planning Act, 2014 (3 Of 2014)
Subdivision Of Agricultural Land Act, 1970 (Act 70 Of 1970)
National Heritage Resources Act, 1999 (Act 25 Of 1999)
National Health Act, 2003 (Act 61 Of 2003)

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.
DEA&DP Biodiversity Guideline (June 2005)
DEA&DP EIA Guideline (March 2013)
DEA&DP Guideline on Need and Desirability (March 2013)
National Development Plan (2011)
Provincial Spatial Development Framework (2014)
Bitou Municipality IDP 2017-2022
Garden Route Biodiversity Sector Plan

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
Please see attached Screening Tool Reports and Site Sensitivity Verification Report (Appendix I)

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.
N/A		
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 12:	The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. a. Western Cape i.Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has	The proposed development of a deck within 100 meters of the High-Water Mark (HWM), as well as a beach access boardwalk and viewing deck.

	been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii.Within critical biodiversity areas identified in bioregional plans; **iii.Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas;** iv.On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or v.On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.	
Activity 17:	Development— (i) in the sea; (ii) in an estuary; (iii) **within the littoral active zone;** (iv) in front of a development setback; or (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; in respect of— (a) fixed or floating jetties and slipways; (b) tidal pools; (c) embankments; (d)rock revetments or stabilising structures including stabilising walls; or (e)infrastructure or structures with a development footprint of 50 square metres or more — but excluding— (aa) the development of infrastructure and structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;	The proposed development of a deck within 100 meters of the High-Water Mark (HWM), as well as a beach access boardwalk and viewing deck.
Activity 19A:	The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from— If less than 5 cubes of soil will be removed this listed activity is not applicable (i) the seashore; **(ii)the littoral active zone, an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever distance is the greater; or** (iii) the sea; — but excluding where such infilling, depositing, dredging, excavation, removal or moving— (f) will occur behind a development setback; (g)is for maintenance purposes undertaken in accordance with a maintenance management plan; (h)falls within the ambit of activity 21 in this Notice, in which case that activity applies; (i)occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.	The proposed development of a deck within 100 meters of the High-Water Mark (HWM), as well as a beach access boardwalk and viewing deck.

Note: • 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.
N/A		

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.
N/A		

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

The proposed development consists of the construction of a deck (281 m² with firepit) and a beach access boardwalk with viewing deck (98.3 m²), with a combined footprint of 379.3 m² located within 100 m of the High-Water Mark (HWM). The intervention is intended to replace a previously existing structure lost to fire damage and has been designed to minimise environmental impacts while promoting sustainable coastal access and use.

The development of a deck within 100 meters from the HWM and a beach access boardwalk plus viewing deck. The dimension of this alternative is:
Boardwalk: 98.3m2
New decking and firepit: 281m2

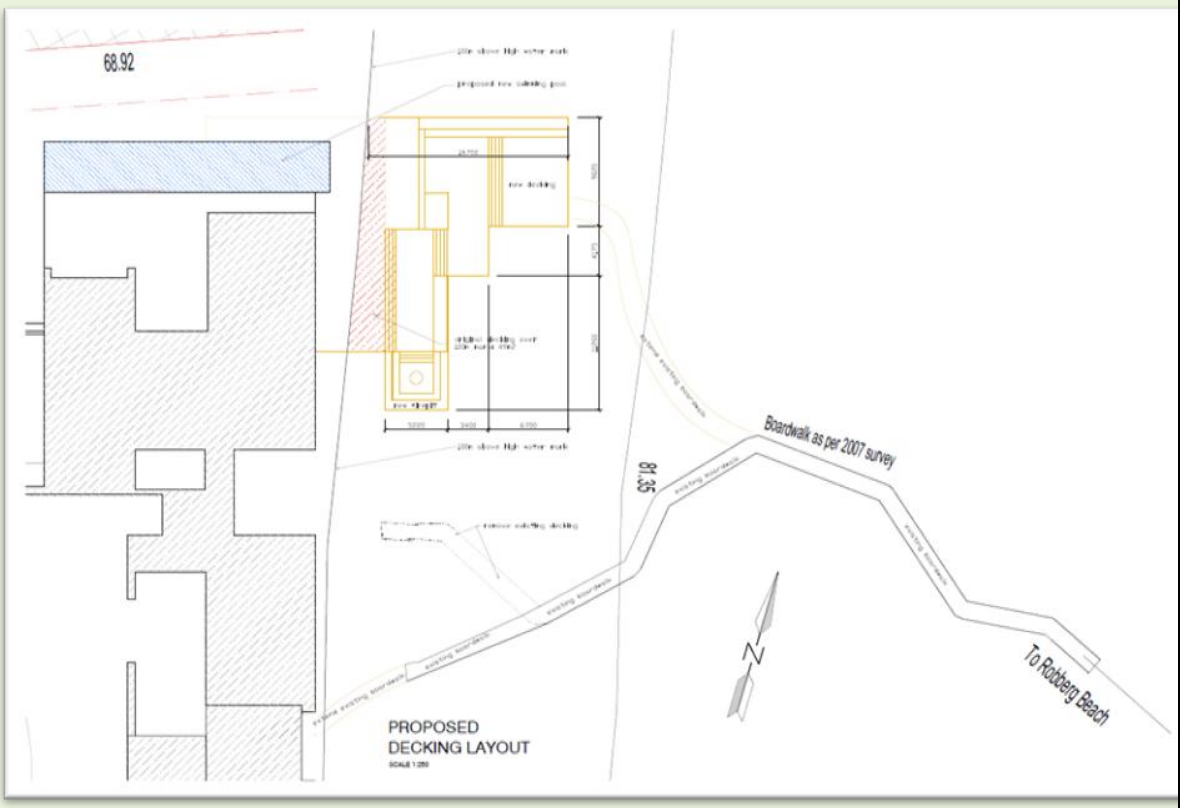

Figure 1: Proposed deck and boardwalk – preferred alternative

Figure 2: Proposed deck and boardwalk – preferred alternative

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.

Erf 9706 is situated within the jurisdiction of Bitou municipality and is zoned residential.

Primary land use rights include the erection of a dwelling house and associated structures such as decks, balconies, and walkways, provided they are ancillary to the main residential use.

The construction of a private deck and access boardwalk associated with a residential dwelling is therefore generally considered a consent-use or primary right.

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.

No conflict

4.	Explain how the proposed development will be in line with the following?
4.1	The Provincial Spatial Development Framework.

Alignment with the Provincial Spatial Development Framework (PSDF, 2014)

The Provincial Spatial Development Framework (PSDF, 2014) emphasises that development along the coast, lakes, rivers, and dams must not compromise ecological integrity, tourism potential, or landscape character, and should be contained within a limited footprint, preferably located within or adjacent to existing settlements (p. 45).

The proposed development is situated within an existing residential property footprint that was previously affected by fire, where a deck and boardwalk had historically existed. The applicant now proposes to reconstruct these structures in a manner that minimises environmental impacts while maintaining the landscape character of the area. The total footprint of 379.3 m² ensures that the intervention remains limited in scale and appropriate to the sensitive coastal setting.

The deck and boardwalk are designed to be small-scale, non-intrusive, and reversible, using lightweight timber materials that integrate into the surrounding built environment. By formalising access through a structured and

elevated boardwalk, the proposal will reduce dune trampling and habitat disturbance, thereby supporting the PSDF's intent to safeguard ecological integrity and coastal landscape values while enabling responsible access.

Accordingly, the proposed development is consistent with the PSDF's objectives of containing coastal development, protecting natural assets, and ensuring environmentally sustainable land use.

4.2	The Integrated Development Plan of the local municipality.

Alignment with the Bitou Integrated Development Plan (IDP, 2022–2027)

The proposed development consists of the construction of an outside deck (281 m² with firepit) and a beach access boardwalk with viewing deck (98.3 m²), with a combined footprint of 379.3 m² located within 100 m of the High-Water Mark (HWM) of the sea. The intervention is intended to replace a previously existing structure lost to fire damage and has been designed to minimise environmental impacts while promoting sustainable coastal access and use.

The development supports the following strategic objectives of the Bitou IDP (2022–2027):

Strategic Objective 5: Facilitate Growth, Jobs, and Empowerment (p. 65)
The construction phase will generate short-term employment opportunities, contributing to local economic activity.

Strategic Objective 3: Ensure Efficiency, Control, and Excellence (p. 64)
The proposal is confined to a limited footprint (379.3 m²) and will be undertaken in compliance with the Environmental Management Programme (EMPr) and the coastal management line requirements.

This approach ensures efficient and responsible land use while adhering to municipal planning and control measures.

Strategic Objective 6: Ensure Safety of Residents (p. 65)
By formalising beach access through a structured boardwalk and viewing deck, the development will improve public safety by preventing uncontrolled dune trampling, stabilising designated access points, and reducing risks associated with informal coastal paths.

Strategic Objective 6: Environmental Management and Climate Change (p. 65)
The IDP underscores the importance of sustainable coastal development. The proposed development aligns with this priority as it:

- Replaces a previously existing structure.
- Utilises lightweight, reversible materials and construction methods that minimise ecological disturbance.
- Contributes to the maintenance of ecological integrity and landscape character in line with municipal climate resilience goals.

Accordingly, the development is consistent with the Bitou IDP's vision of promoting sustainable, safe, and environmentally responsible coastal development, while providing socio-economic and recreational benefits.

4.3.	The Spatial Development Framework of the local municipality.

Alignment with the Bitou Spatial Development Framework (BSDF, 2022)

The Bitou Spatial Development Framework (BSDF, 2022) emphasises the protection and sustainable management of natural environmental resources (p. 8). The proposed development supports this objective through the use of timber, reversible, and elevated structures that minimise disturbance to dune vegetation and natural processes.

The BSDF defines an urban edge to contain lateral urban sprawl within the municipality (p. 97). It discourages isolated or ribbon development along the coastline, instead promoting infrastructure that consolidates within existing settlement nodes. The proposal is situated within an existing residential property footprint and reinstates a previously existing deck and boardwalk lost to fire damage. By limiting the scale of new structures to 379.3 m², the development avoids dispersal and aligns with the SDF's intent to consolidate rather than fragment development.

The BSDF further prioritises climate change adaptation and resilient communities (p. 15). The proposal incorporates elevated, lightweight timber structures that are reversible and adaptable to changing coastal conditions, including storms, erosion, and sea level rise. This design approach directly supports the SDF's emphasis on resilient coastal infrastructure.

Accordingly, the proposed boardwalk and deck are consistent with the BSDF's strategic objectives of protecting sensitive natural resources, preventing unmanaged coastal sprawl, and promoting resilient, adaptable development within the defined urban edge.

4.4.	The Environmental Management Framework applicable to the area.

Alignment with the Garden Route Environmental Management Framework (GREMF, 2010)

The proposed development aligns with the objectives of the Garden Route Environmental Management Framework (GREMF, 2010), which emphasises the need for development to support conservation priorities, protect cultural and heritage landscapes, and promote the sustainable use of natural resources (p. 20).

The proposed boardwalk and viewing deck provide controlled and managed access to the beach, thereby preventing the creation of informal pathways and reducing trampling of dune vegetation. The deck and firepit will be constructed with natural materials (e.g., timber decking) to integrate with the surrounding landscape, maintaining scenic quality and cultural values. Consolidating access into a single designated pathway will further reduce erosion and dune degradation.

The GREMF introduces Environmental Constraint and Control Zones (p. 21), classifying areas according to environmental sensitivity. The proposed development is located within a high control zone, and therefore mitigation measures will be applied, including:

Minimising vegetation clearance;

Replanting and rehabilitating disturbed edges with locally indigenous vegetation; and

Using raised and permeable structures to avoid interference with dune dynamics and hydrological processes.

The GREMF is underpinned by the National Environmental Management Act (NEMA, Act 107 of 1998), which requires that disturbance of ecosystems, biodiversity loss, and coastal degradation be avoided, minimised, or remedied (p. 32). The design avoids large-scale excavation and hard surfacing, relying instead on lightweight, permeable decking that accommodates natural water movement and dune dynamics.

The development therefore follows a risk-averse approach, ensuring that sensitive coastal ecosystems are preserved while enabling responsible access. In doing so, it is consistent with the GREMF's objectives of facilitating environmentally responsible coastal development while protecting the sensitive ecological and cultural landscapes of the Garden Route.

5.	Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.

No PPP done yet. Refer to appendix G.

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

The WC BSP (2023) influenced the proposal by requiring that the development remain low-impact, reversible, and biodiversity-sensitive, particularly in dune and foredune ESA zones. The boardwalk is consistent with WC BSP guidelines for regulated coastal access, while the deck/firepit must be designed to avoid dune destabilisation, habitat loss, and climate vulnerability.

The WCBSP map shows that part of the property, as well as the coastal shore to the west of the property, is mapped as an ecological Support Area 1 (see below).
However The location of the deck and boardwalk does not fall within a CBA or an ESA.

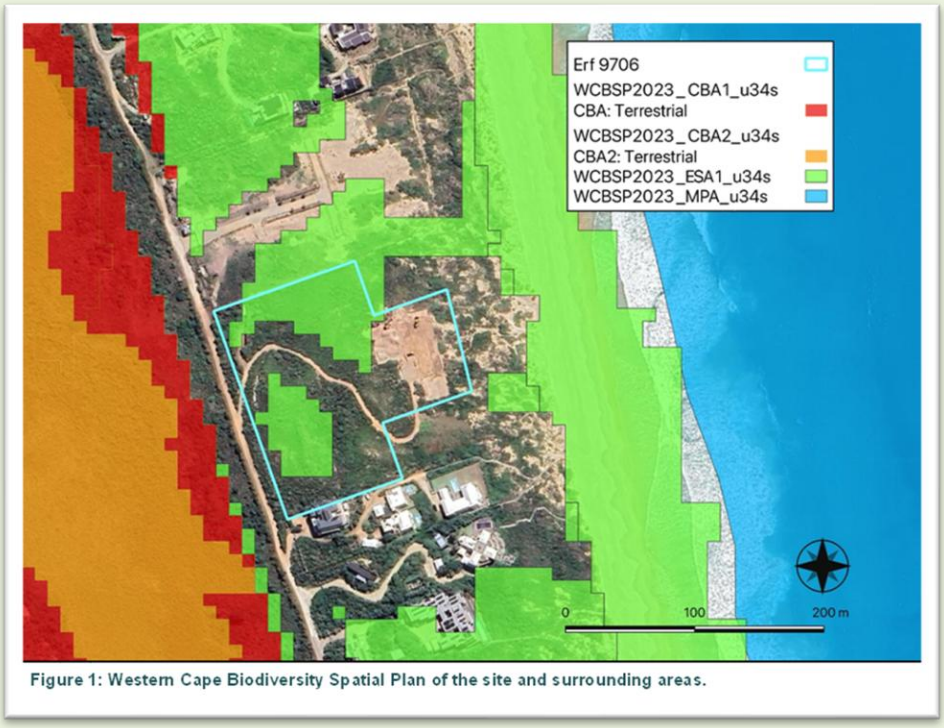

Figure 1: Western Cape Biodiversity Spatial Plan of the site and surrounding areas.

7.	Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.

Alignment with the Purpose and Intention of the ICMA Environmental Protection and Rehabilitation The proposed structures are confined to previously disturbed and modified areas where a deck and boardwalk historically existed. The development does not introduce new disturbance into natural coastal vegetation or dune systems and therefore aligns with the ICMA's purpose to protect the ecological integrity and natural character of the coastal environment. Sustainable and Managed Access The proposed boardwalk and viewing deck provide a clearly defined, formalised access route to the beach, thereby preventing uncontrolled pedestrian movement, erosion, and damage to sensitive dune vegetation. This is consistent with the ICMA's intention under Section 18 to facilitate managed public access while preventing degradation of the coastal environment. Risk Avoidance and Adaptation to Dynamic Coastal Processes The elevation and materials of the structures are compatible with the dynamic nature of the coastal zone, ensuring resilience against sea-level rise and storm events, in line with Section 17(1)(a), which requires that development within the coastal protection zone be compatible with the natural functioning of the coast. Promotion of Sustainable Coastal Use The proposed deck and boardwalk are low-impact structures intended for recreational enjoyment and appreciation of the natural coastal landscape. The design and scale maintain visual harmony with the surrounding environment and contribute to responsible, sustainable use of coastal resources, as promoted by the preamble and Section 3 of the ICMA.	
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.
No	
9.	Explain how the proposed development will optimise vacant land available within an urban area.
This is not vacant land	
10.	Explain how the proposed development will optimise the use of existing resources and infrastructure.
The proposal optimises existing resources and infrastructure by reusing an already disturbed footprint, integrating with existing access and services of dwelling under construction.	
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).
No services (electricity, sewer or water) required for this development	
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.
See Appendix K	

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.

To be included in FINAL BAR

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

To be included in FINAL BAR

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

To be included in FINAL BAR

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

To be included in FINAL BAR

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

To be included in FINAL BAR

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.

To be included in FINAL BAR

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.		
N/A			
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.		

N/A

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.		
N/A			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		
N/A			

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.		
Dr David Hoare (Pr.Sci.Nat.)(SACNASP Reg. no. 400221/05 (Ecology, Botany), BioCensus (Pty) Ltd			
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.		

Alignment with the Purpose and Intention of the ICMA

Environmental Protection and Rehabilitation
The proposed structures are confined to previously disturbed and modified areas where a deck and boardwalk historically existed. The development does not introduce new disturbance into natural coastal vegetation or dune systems and therefore aligns with the ICMA's purpose to protect the ecological integrity and natural character of the coastal environment.

Sustainable and Managed Access
The proposed boardwalk and viewing deck provide a clearly defined, formalised access route to the beach, thereby preventing uncontrolled pedestrian movement, erosion, and damage to sensitive dune vegetation. This is consistent with the ICMA's intention under Section 18 to facilitate managed public access while preventing degradation of the coastal environment.

Risk Avoidance and Adaptation to Dynamic Coastal Processes
The elevation and materials of the structures are compatible with the dynamic nature of the coastal zone, ensuring resilience against sea-level rise and storm events, in line with Section 17(1)(a), which requires that development within the coastal protection zone be compatible with the natural functioning of the coast.

Promotion of Sustainable Coastal Use
The proposed deck and boardwalk are low-impact structures intended for recreational enjoyment and appreciation of the natural coastal landscape. The design and scale maintain visual harmony with the surrounding environment and contribute to responsible, sustainable use of coastal resources, as promoted by the preamble and Section 3 of the ICMA.

3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.
N/A	
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.

Integrated Coastal Management Act (ICMA) and Coastal Management Programmes (CMPs)
The activity is within the coastal protection zone (CPZ) and triggers the need for alignment with coastal management objectives.

Provincial and municipal Coastal Management Programmes (CMPs) advocate:
- Avoidance of hard infrastructure in dynamic zones,
- Use of nature-based solutions,
- Maintenance of public access without degrading the coastal environment.

The proposed boardwalk and deck are consistent with CMP objectives if built using elevated, reversible, and low-impact construction techniques

The development will be subject to appropriate environmental controls, permits, and specialist input to ensure compliance with environmental thresholds and policy intent.

4. Biodiversity

4.1.	Were specialist studies conducted?	**YES**	NO

4.2.	Provide the name and/or company who conducted the specialist studies.
Dr David Hoare (Pr.Sci.Nat.)(SACNASP Reg. no. 400221/05 (Ecology, Botany), BioCensus (Pty) Ltd	
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.
The site falls within the Fynbos Biome, and vegetation corresponds primarily to Goukamma Strandveld and Cape Seashore Vegetation types. None of the vegetation types on site are listed as Critically Endangered or Endangered, but they contribute to local ecological functioning of the dune system. The site is near the coastal zone but does not intersect any NFEPA wetlands or estuaries. The nearest significant aquatic feature is the Keurbooms Estuary to the Northeast. National ecosystem threat status and biodiversity pattern information used to assess irreplaceability and sensitivity of habitats, rates biodiversity sensitivity assigned to the proposed footprint as low–medium. According to Western Cape Biodiversity Spatial Plan (WCBSP 2023, CapeNature), the property falls within an ESA 1 zone, indicating high ecological importance but allowing low-impact development provided that natural vegetation and ecological processes are maintained. Based on information obtained using the maps etc. mentioned above: - The boardwalk alignment follows an existing historical pathway, thereby avoiding undisturbed dune vegetation and limiting new impacts. - The footprint was kept within already modified or previously disturbed zones, consistent with ESA 1 management objectives under the WCBSP. - The design incorporates elevated structures to maintain natural sand movement and vegetation regeneration, in line with best-practice dune management principles. (Plants, Animals and Terrestrial Biodiversity Assessment: Hoare, July, 2025)	
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.
According to Western Cape Biodiversity Spatial Plan (WCBSP 2023, CapeNature), the property falls within an ESA 1 zone, indicating high ecological importance but allowing low-impact development provided that natural vegetation and ecological processes are maintained.	
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.
Minimal as development will be in previous disturbed areas and design will allow for natural function of ecological processes	
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.
N/A	
4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.
Raised structures to allow for natural growth of vegetation on site.	

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.
The boardwalk alignment follows the path of the original pre-2017 boardwalk, located on an already disturbed strip where vegetation is sparse, thereby avoiding unnecessary alteration of dune form and slope. The structure will be elevated above the dune surface on wooden posts, allowing uninterrupted sand movement and natural regeneration of dune vegetation beneath it. Foundations are minimal and placed manually, avoiding large-scale excavation or reshaping of the dune profile.

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.		
N/A			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
N/A			

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.
The Screening Report identifies the receiving environment as having Low Archaeological and Cultural Heritage Sensitivity. This was confirmed by Heritage Western Cape (HWC) via email, stating that there does not appear to be a Section 38(1) trigger for the proposed development—unless the boardwalk exceeds 300 m in length. HWC further indicated that they have no particular concerns regarding archaeological sensitivities, as the redevelopment is proposed within the existing footprint, and the construction of the deck and boardwalk is unlikely to involve significant earthworks.

8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.
Residential urban area in Plettenberg Bay	
8.2.	Explain the socio-economic value/contribution of the proposed development.
Short time employment during construction.	
8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.
Short term employment will be created during the construction phase of this proposed development.	
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.
No The proposed structures are confined to previously disturbed and modified areas where a deck and boardwalk historically existed. The development does not introduce new disturbance into natural coastal vegetation or dune systems and therefore will protect the ecological integrity and natural character of the coastal environment. The design and scale maintain visual harmony with the surrounding environment and contribute to responsible, sustainable use of coastal resources	

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.
Provide a description of the preferred property and site alternative.	
Only one site and property as preference. Replacing decks and boardwalk which burnt down in 2017 fires.	
Provide a description of any other property and site alternatives investigated.	
N/A	
Provide a motivation for the preferred property and site alternative including the outcome of the site selectin matrix.	
The proposed structures are confined to previously disturbed and modified areas where a deck and boardwalk historically existed. It will provide controlled and managed access to the beach, thereby preventing the creation of informal pathways and reducing trampling of dune vegetation. The deck and firepit will be constructed with natural materials (e.g., timber decking) to integrate with the surrounding landscape, maintaining scenic quality and cultural values. Consolidating access into a single designated pathway will further reduce erosion and dune degradation.	
Provide a full description of the process followed to reach the preferred alternative within the site.	
The proposed structures are confined to previously disturbed and modified areas where a deck and boardwalk historically existed.	
Provide a detailed motivation if no property and site alternatives were considered.	
The proposed structures are confined to previously disturbed and modified areas where a deck and boardwalk historically existed. It will provide controlled and managed access to the beach, thereby preventing the creation of informal pathways and reducing trampling of dune vegetation. The deck and firepit will be constructed with natural materials (e.g., timber decking) to integrate with the surrounding landscape, maintaining scenic quality and cultural values. Consolidating access into a single designated pathway will further reduce erosion and dune degradation.	
List the positive and negative impacts that the property and site alternatives will have on the environment.	
Positive It will provide controlled and managed access to the beach, thereby preventing the creation of informal pathways and reducing trampling of dune vegetation. The deck and firepit will be constructed with natural materials (e.g., timber decking)	

to integrate with the surrounding landscape, maintaining scenic quality and cultural values. Consolidating access into a single designated pathway will further reduce erosion and dune degradation Negative Negative impacts will be mitigated by measurement recommended by specialist.	
1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred activity alternative.	
Applicant replacing a boardwalk which was destroyed in the 2017 fires. Utilises lightweight, reversible materials and construction methods that minimise ecological disturbance.	
Provide a description of any other activity alternatives investigated.	
N/A	
Provide a motivation for the preferred activity alternative.	
N/A.	
Provide a detailed motivation if no activity alternatives exist.	
Applicant replacing a boardwalk which was destroyed in the 2017 fires.	
List the positive and negative impacts that the activity alternatives will have on the environment.	
Positive It will provide controlled and managed access to the beach, thereby preventing the creation of informal pathways and reducing trampling of dune vegetation. The deck and firepit will be constructed with natural materials (e.g., timber decking) to integrate with the surrounding landscape, maintaining scenic quality and cultural values. Consolidating access into a single designated pathway will further reduce erosion and dune degradation Negative Negative impacts will be mitigated by measurement recommended by specialist.	
1.3.	Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts
Provide a description of the preferred design or layout alternative.	
The development of a deck within 100 meters from the HWM and a beach access boardwalk plus viewing deck. The dimension of this alternative is: Boardwalk: 98.3m2 New decking and firepit: 281m2	

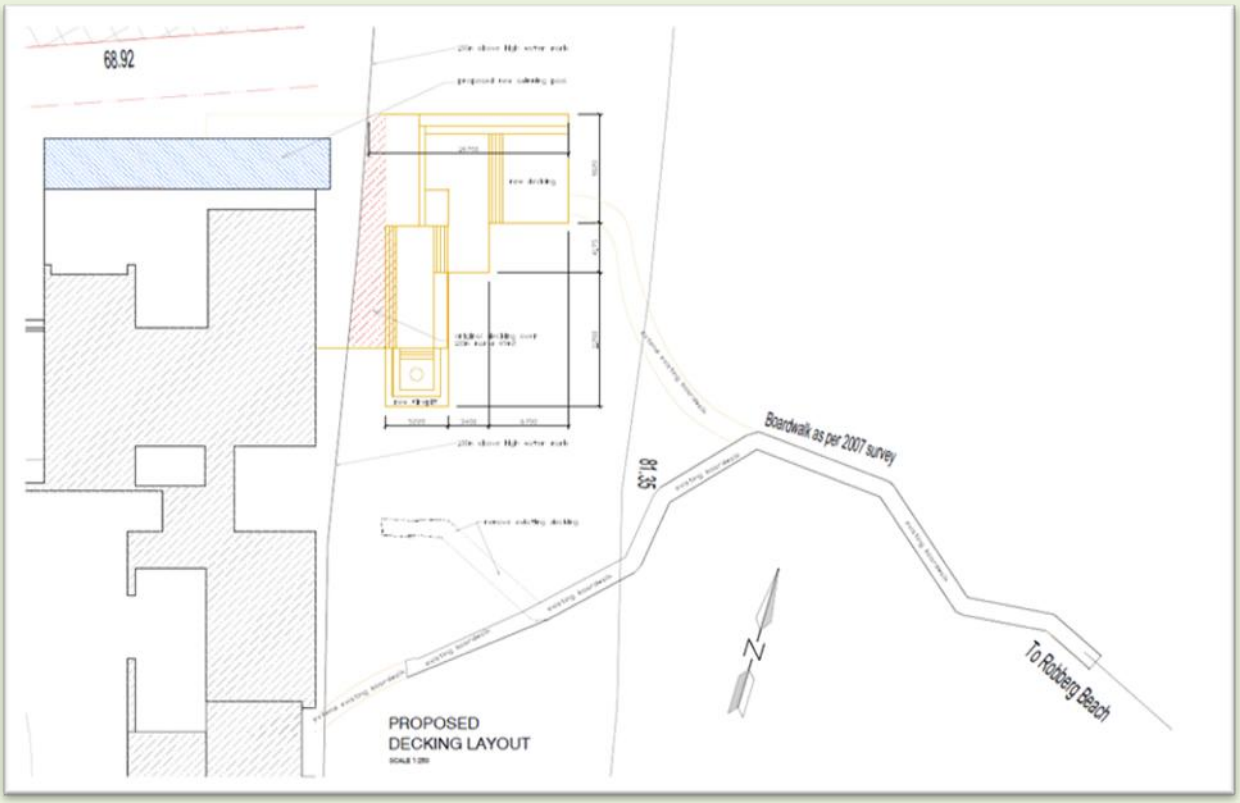

Figure 3: Proposed deck and boardwalk – preferred alternative

Figure 4: Proposed deck and boardwalk – preferred alternative

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

The development of a deck within 100 meters from the HWM and a beach access boardwalk plus viewing deck.
The dimension of this alternative is:
Boardwalk: 98.3m2
New decking and firepit: 309m2 (an additional 28m2 for a shallow dog wash and shower)

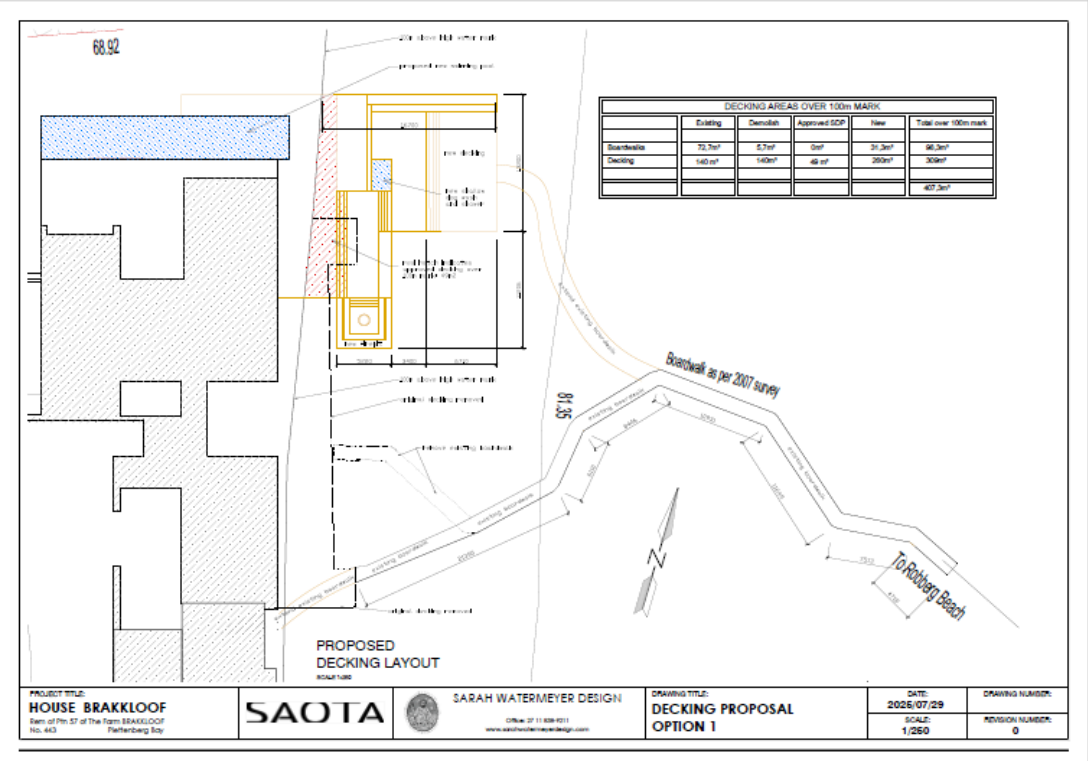

Figure 4: Proposed deck and boardwalk – Alternative 1

Provide a motivation for the preferred design or layout alternative.
Smaller deck with less disturbance. 28m² difference.
Provide a detailed motivation if no design or layout alternatives exist.
N/A
List the positive and negative impacts that the design alternatives will have on the environment.
Positive impacts: - The proposed structures are confined to previously disturbed and modified areas where a deck and boardwalk historically existed. - It will provide controlled and managed access to the beach, thereby preventing the creation of informal pathways and reducing trampling of dune vegetation. - The deck and firepit will be constructed with natural materials (e.g., timber decking) to integrate with the surrounding landscape, maintaining scenic quality and cultural values. - Consolidating access into a single designated pathway will further reduce erosion and dune degradation. Negative impacts: - Destabilisation of dunes due to construction and/or operation of boardwalk without mitigation and monitoring. - Possible loss of protected milkwood trees. NFA license will be applied for if necessary. - Invasion by alien invasive plant species.

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:
N/A
Provide a description of any other technology alternatives investigated.
N/A
Provide a motivation for the preferred technology alternative.
N/A
Provide a detailed motivation if no alternatives exist.
N/A
List the positive and negative impacts that the technology alternatives will have on the environment.

N/A	
1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred operational alternative.	
N/A	
Provide a description of any other operational alternatives investigated.	
N/A	
Provide a motivation for the preferred operational alternative.	
N/A	
Provide a detailed motivation if no alternatives exist.	
N/A	
List the positive and negative impacts that the operational alternatives will have on the environment.	
N/A	
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.	
If no boardwalk is constructed, informal pathways will be created, trampling of dune vegetation, leading to erosion and runoff.	
1.7.	Provide and 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.
N/A	
1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.
The proposed development is confined to a single location where the previous deck and boardwalk structures were historically situated. The design incorporates minor extensions to the existing footprint to establish functional connectivity between the dwelling, main deck, and boardwalk. These extensions have been planned to minimise additional disturbance, ensuring that the overall development remains largely within the previously transformed area and does not encroach into adjacent natural or undisturbed vegetation zones.	

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).
All areas beyond the approved footprint of the proposed boardwalk and decks will be designated as no-go zones. These areas must remain undisturbed to prevent soil erosion, protect existing vegetation, and maintain the natural ecological integrity of the site. Strict access control and clearly demarcated boundaries will be implemented to ensure that no construction-related activities, material storage, or movement of personnel occur within these sensitive areas. 34.090716°S 23.371779°E 34.091146°S 23.371873°E

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.
Assessment methodology as followed by Dr. Hoare (Plant Species, Animal Species, and Terrestrial Biodiversity Assessment Report for Erf 9706 at Robberg, Plettenberg Bay in the Western Cape Province, 30 July 2025) **Impact assessment methodology** The impact assessment methodology assists in evaluating the overall effect of a proposed activity on the environment. The impact assessment must take account of the nature, scale and duration of effects on the environment and whether such effects are positive (beneficial) or negative (detrimental). The rating system is applied to the potential impact on the receptor. The impact assessment methodology provided below explicitly takes into account the value and condition of the biodiversity resources affected. In assessing the significance of each issue the following criteria (including an allocated point system) is used:

CRITERIA	SCORE 1	SCORE 2	SCORE 3	SCORE 4	SCORE 5
BIODIVERSITY VALUE / SENSITIVITY CRITERIA					

Irreplaceability (I) The biodiversity value of the affected resource	Resource is widespread and common and /or regenerates itself (LC)	Resource is uncommon, endemic to a restricted area, moderately rare, or is already noticeably affected but still relatively widespread (e.g., NT, ESA)	Resource is naturally rare, restricted to limited localities, ephemeral, or is approaching a threshold of persistence (VU, CBA2)	Resource is highly localised / loss has already exceeded persistence thresholds (EN, CBA1)	Resource is critically rare / loss has already well exceeded persistence thresholds (CR, Protected)
Threshold (T) The scale of the impact relative to the overall distribution of a resource, therefore the degree to which the impact contributes towards exceeding an ecological threshold	Impact affects a negligible proportion of the overall biodiversity resource	Impact affects a proportion of the biodiversity resource that is within 6 orders of magnitude of the total extent / number of the resource (0.001-0.1%)	Impact affects a proportion of the biodiversity resource that is within 4 orders of magnitude of the total extent / number of the resource (0.1-1%)	Impact affects a proportion of the biodiversity resource that is within 2 orders of magnitude of the total extent / number of the resource (1-10%)	Impact affects a proportion of the biodiversity resource that is within 1 order of magnitude or more of the total extent / number of the resource (≧10%)
Condition (C) The integrity of the resource in terms of its intactness and functionality, the coherence of its ecological structure and function	Resource in very poor condition, displaying advanced degradation		Moderately affected resource, functional but displaying obvious signs of minor degradation		Fully functional and in a state expected in a completely natural state, unaffected by human influence.
Reversibility (R) The ability of the environmental receptor to rehabilitate or restore after the activity has caused environmental change	Reversible: Recovery without rehabilitation	Mostly reversible: requires minor mitigation	Partly reversible: Recoverable with more intense mitigation	Barely reversible: unlikely to be reversed, even with intense mitigation	Irreversible: Not possible despite action
IMPACT MAGNITUDE CRITERIA					
Extent (E) The geographical extent of the impact on a given environmental receptor	Site: Within site boundary only	Site & surroundings: Extends for a limited distance beyond site boundaries	Landscape: Outside activity area	Regional: Affects patterns at a regional or provincial scale	Global: Across borders or boundaries
Duration (D) The length of permanence of the impact on the environmental receptor	Immediate: On impact, 0-1 years	Short term: 1-5 years	Medium term: 5-10 years	Long term: Project life, 10-25 years	Permanent: Indefinite

Magnitude (M) The degree of alteration of the affected environmental receptor	Very low: No impact on processes	Low: Slight impact on processes	Medium: Processes continue but in a modified way	High: Processes temporarily cease or continue in a highly modified way	Very High: Permanent cessation of processes
Probability of Occurrence (P) The likelihood of an impact occurring in the absence of pertinent environmental management measures or mitigation	Improbable	Low Probability	Probable	Highly Probability	Definite
Significance (S) is determined by combining the above criteria in the following formula:	$\boldsymbol{S = [(E + D + M)/3 \times (R + I + T + C)/4]/5}$ $\boldsymbol{Significance = (Extent + Duration + Magnitude)/3 \times (Reversibility + Irreplaceability + Threshold + Condition)/4}$				
IMPACT SIGNIFICANCE RATING					
Total Score	**0 - 1**	**1 - 2**	**2 - 3**	**3 - 4**	**4 - 5**
Environmental Significance Rating (Negative (-))	**Very low**	**Low**	**Moderate**	**High**	**Very High**
Environmental Significance Rating (Positive (+))	**Very low**	**Low**	**Moderate**	**High**	**Very High**

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.

Alternative:	Preferred Option 1
PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Destabilisation of dunes due to construction and/or operation of boardwalk.
Nature of impact:	Impact affects a negligible proportion of the overall biodiversity resource
Extent and duration of impact:	Extends for a limited distance beyond site boundaries. Long term: Project life, 10-25 years
Consequence of impact or risk:	Vegetation would be impacted. Possible erosion.
Probability of occurrence:	Based on the proposed development plan and the known location of the habitats found on site, the impact will be POSSIBLE
Degree to which the impact may cause irreplaceable loss of resources:	Resource is critically rare / loss has already well exceeded persistence thresholds (CR, Protected). The dunes and dune vegetation are sensitive ecosystems that, for several well-described reasons, should be protected. They are irreplaceable in the sense that the original habitat is unlikely to recover in the case of high levels of damage.
Degree to which the impact can be reversed:	Partly reversible: Recoverable with more intense mitigation
Indirect impacts:	Erosion of dune
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High

Proposed mitigation:	• Temporary stabilisers can be used to provide a surface cover until more permanent vegetation becomes established. They protect the sand surface and can encourage sand trapping. These include temporary stabilisers such as brushes and mulches, liquid sprays, and cover crops, and the installation of erosion control structures like sand fences and coir logs. • Encourage revegetation of bare areas through natural dune successional processes. This can be formalised in a Rehabilitation Plan, which should include details of erosion control methods, a detailed revegetation plan, a monitoring schedule, and performance indicators.
Residual impacts:	N/A
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Loss of individuals of protected tree species
Nature of impact:	Impact affects a negligible proportion of the overall biodiversity resource
Extent and duration of impact:	Within site boundary only. Loss of trees on site is assessed as being long-term on the basis that trees removed can be replaced through planting - the timeframe is to allow planted individuals to achieve a reasonable size, which could take 10 years or more.
Consequence of impact or risk:	At a local scale, the impact is of LOW intensity, since it would result in the permanent loss of the trees on site, although this is unlikely.
Probability of occurrence:	Low Probability
Degree to which the impact may cause irreplaceable loss of resources:	Resource is uncommon, endemic to a restricted area, moderately rare, or is already noticeably affected but still relatively widespread.
Degree to which the impact can be reversed:	Mostly reversible: requires minor mitigation
Indirect impacts:	Loss of sensitive habitat and fauna
Cumulative impact prior to mitigation:	Low
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	• Retain existing trees within proposed development. • If any trees need to be removed or pruned then a permit is required, according to the National Forests Act. • If appropriate, plant additional milkwoods in the development as part of the final landscaping. The proportions and composition should reflect habitat that would have occurred naturally at this site.
Residual impacts:	After mitigation not applicable
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Invasion by alien invasive plants
Nature of impact:	The potential impact affects a negligible proportion of the vegetation type, but can spread easily and become more problematic over wider areas.
Extent and duration of impact:	Site & surroundings: Extends for a limited distance beyond site boundaries. Long term: Project life, 10-25 years.
Consequence of impact or risk:	At a local scale, the impact could be of MODERATE to HIGH intensity, since it would result in processes temporarily ceasing or continuing in a highly modified way
Probability of occurrence:	High Probability
Degree to which the impact may cause irreplaceable loss of resources:	Resource is critically rare / loss has already well exceeded persistence thresholds (CR, Protected) without mitigation.
Degree to which the impact can be reversed:	Partly reversible: Recoverable with more intense mitigation . Reversal of alien invasion is partly REVERSIBLE - vegetation can be restored to its current state through active rehabilitation in combination with natural succession, but requires high input
Indirect impacts:	Spread of AIS
Cumulative impact prior to mitigation:	At a local scale, the impact could be of MODERATE to HIGH intensity, since it would result in processes temporarily ceasing or continuing in a highly modified way.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	• Compile and implement an alien management plan, which highlights control priorities and areas and provides a programme for long-term control. • Undertake regular monitoring to detect alien invasions early so that they can be controlled, as per the Alien Management Plan.
Residual impacts:	After mitigation not applicable
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Clearance of vegetation for the construction of the deck and boardwalk
Nature of impact:	Loss of sensitive dune vegetation.
Extent and duration of impact:	Very Limited, to immediate surroundings only.
Consequence of impact or risk:	Loss of sensitive dune vegetation
Probability of occurrence:	Moderate. Has occurred here or elsewhere and could therefore occur.
Degree to which the impact may cause irreplaceable loss of resources:	Low. The resource will not be damaged irreparably
Degree to which the impact can be reversed:	High. The affected environment will recover from the impact with intervention.
Indirect impacts:	Loss of sensitive dune vegetation.
Cumulative impact prior to mitigation:	Loss of sensitive dune vegetation.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low. Natural functions and processes are somewhat altered
Degree to which the impact can be avoided:	Moderate, as there is only one site, but small development
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High

Proposed mitigation:	• The removal and translocation of protected plants if found should be undertaken prior to construction clearing activities. A permit is required prior to removal. • Protected plants must either be moved to a safer, no -go area on the property or taken to a nursery for temporary storage until rehabilitation takes place. • No heavy machinery allowed on site. • Only areas necessary for the development footprint should be cleared and the remainder of the property should be left natural. • During the construction phase of the proposed development, disturbance to the primary dune system must be avoided. • Laydown areas for construction materials must be contained within the clearing footprint of the proposed development.
Residual impacts:	After mitigation possible loss of some rescued and replanted vegetation.
Cumulative impact post mitigation:	The impact would result in insignificant cumulative effects
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Disturbance / removal of topsoil
Nature of impact:	Disturbance of topsoil, potential soil erosion and the loss of topsoil
Extent and duration of impact:	Very limited. Brief
Consequence of impact or risk:	Possible loss of topsoil.
Probability of occurrence:	Probable, but impact can be mitigated.
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	High
Indirect impacts:	Loss of topsoil without mitigation
Cumulative impact prior to mitigation:	Loss of topsoil without mitigation
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	The stockpiling of topsoil for use in rehabilitation is required. Stockpiles must not exceed 1.5m in height, must be covered with shade cloth or similar, to prevent erosion.
Residual impacts:	None
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Waste Pollution
Nature of impact:	Pollution caused by waste generated by the construction process.
Extent and duration of impact:	Very limited. Brief
Consequence of impact or risk:	Pollution of dune area.
Probability of occurrence:	Low probability with mitigation

Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	High
Indirect impacts:	Pollution of dune area.
Cumulative impact prior to mitigation:	Pollution of dune area.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	• All construction waste generated on-site during construction must be adequately managed. Separation and recycling of different waste materials should be supported. • All construction waste materials must be collected and disposed of at a suitable waste facility. • No dumping of construction material in any unlicensed facility or sensitive areas may take place. • A buffer must be established and monitored on a weekly basis to clean-up any waste that may have been blown from the construction site; and • Adequate sanitary facilities and ablutions must be provided for all personnel throughout the project area. Use of these facilities must be enforced (these facilities must be kept clean so that they are a desired alternative to the surrounding environment.
Residual impacts:	None
Cumulative impact post mitigation:	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Noise pollution
Nature of impact:	Noise caused by machinery and staff
Extent and duration of impact:	Limited. Brief
Consequence of impact or risk:	Nuisance to neighbours.
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	High
Indirect impacts:	Nuisance to neighbours.
Cumulative impact prior to mitigation:	None
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Low
Degree to which the impact can be managed:	Low
Degree to which the impact can be mitigated:	High
Proposed mitigation:	• Construction activities must only take place during normal working times between 07:00-17:00 on weekdays. • Machinery may be fitted with silences to dampen noise. • Staff must be reminded that noise levels must be kept low.

Residual impacts:	None
Cumulative impact post mitigation:	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low Some extent of noise pollution during construction is expected; however, with mitigation the impact will be reduced.

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Visual impact
Nature of impact:	Visual & aesthetic consequences of the proposed project
Extent and duration of impact:	Limited. Short term.
Consequence of impact or risk:	Temporary visual impact
Probability of occurrence:	High probability but mitigable.
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	High
Indirect impacts:	None
Cumulative impact prior to mitigation:	None
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	• Due to the proposed construction of deck and boardwalk, temporary construction would be inevitable. • Shade cloth around construction site. • Ensure site is neat and tidy at all times.
Residual impacts:	**None**
Cumulative impact post mitigation:	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low As construction is temporary it will reduce visual impact.

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Employment, no risk
Nature of impact:	Empowerment of the local community members living in the area relating to temporary employment opportunities
Extent and duration of impact:	Local. Short term.
Consequence of impact or risk:	Temporary employment
Probability of occurrence:	Definite
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	N/A
Indirect impacts:	Temporary income generation for local community
Cumulative impact prior to mitigation:	N/A
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	• Due to the proposed construction of deck and boardwalk, temporary construction would be inevitable. • Shade cloth around construction site. • Ensure site is neat and tidy at all times

Residual impacts:	N/A
Cumulative impact post mitigation:	Minor upliftment for the local community.
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Due to the proposed development being on a small-scale, there is a low difference in impacts between without mitigation and with mitigation. However, as the impact would be positive for the local community to be employed during construction, mitigation is recommended to ensure this occurs.

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Stormwater runoff and erosion.
Nature of impact:	Erosion from exposed surfaces / minor earthworks for installation of deck and boardwalk.
Extent and duration of impact:	Limited. Limited to the site and its immediate surroundings Short term. Impact will last between 1 and 5 years
Consequence of impact or risk:	Erosion from exposed surfaces / minor earthworks for installation of deck and boardwalk.
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources:	Resource is uncommon, endemic to a restricted area, moderately rare, or is already noticeably affected but still relatively widespread.
Degree to which the impact can be reversed:	Partly reversible: Recoverable with more intense mitigation
Indirect impacts:	Erosion. Loss of topsoil.
Cumulative impact prior to mitigation:	Erosion. Loss of topsoil.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-High
Degree to which the impact can be avoided:	Medium
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	• Adequate drainage and erosion protection must be provided around the site and where necessary. • Erosion prevention and control measures must be implemented. This may be by the use of mulch bags or silt fences. • Wind erosion should be limited by using mesh netting set up around any cleared footprints as soon as clearing has taken place. • Revegetate all bare areas of soil post-construction with indigenous vegetation.
Residual impacts:	With mitigation no runoff and erosion should occur.
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low

PLANNING, DESIGN AND DEVELOPMENT PHASE	
Potential impact and risk:	Geotechnical restraints due to sandy soils
Nature of impact:	Settlement issues
Extent and duration of impact:	Very limited. Short term.
Consequence of impact or risk:	Settlement issues, slope stability problems, potential erosion.
Probability of occurrence:	Low Probability
Degree to which the impact may cause irreplaceable loss of resources:	Resource is uncommon, endemic to a restricted area, moderately rare, or is already noticeably affected but still relatively widespread (e.g., NT, ESA)
Degree to which the impact can be reversed:	Mostly reversible: requires minor mitigation
Indirect impacts:	Settlement issues, slope stability problems, potential erosion.
Cumulative impact prior to mitigation:	Settlement issues, slope stability problems, potential erosion.

Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	• Areas that are disturbed through building activities (such as the excavations for pole foundations) should be suitably rehabilitated without delay. Failure to do so will have a knock-on effect on biodiversity in the form of an increase in wind erosion, soil exposure and a loss of the soil micro -organisms that are essential for plant growth. • Use of complete cover of locally chipped woody material (for example Acacia cyclops stems and branches but not the seed pods).
Residual impacts:	With mitigation impact would be minimal.
Cumulative impact post mitigation:	None
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low

OPERATIONAL PHASE	
Potential impact and risk:	Invasion by alien invasive plants
Nature of impact:	The potential impact affects a negligible proportion of the vegetation type, but can spread easily and become more problematic over wider areas.
Extent and duration of impact:	Site & surroundings: Extends for a limited distance beyond site boundaries. Long term: Project life, 10-25 years.
Consequence of impact or risk:	At a local scale, the impact could be of MODERATE to HIGH intensity, since it would result in processes temporarily ceasing or continuing in a highly modified way
Probability of occurrence:	High Probability
Degree to which the impact may cause irreplaceable loss of resources:	Resource is critically rare / loss has already well exceeded persistence thresholds (CR, Protected) without mitigation.
Degree to which the impact can be reversed:	Partly reversible: Recoverable with more intense mitigation . Reversal of alien invasion is partly REVERSIBLE - vegetation can be restored to its current state through active rehabilitation in combination with natural succession, but requires high input
Indirect impacts:	Spread of AIS
Cumulative impact prior to mitigation:	At a local scale, the impact could be of MODERATE to HIGH intensity, since it would result in processes temporarily ceasing or continuing in a highly modified way.
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium
Degree to which the impact can be avoided:	High
Degree to which the impact can be managed:	High
Degree to which the impact can be mitigated:	High
Proposed mitigation:	• Compile and implement an alien management plan, which highlights control priorities and areas and provides a programme for long-term control. • Undertake regular monitoring to detect alien invasions early so that they can be controlled, as per the Alien Management Plan.
Residual impacts:	After mitigation not applicable
Cumulative impact post mitigation:	Low
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low

DECOMMISSIONING AND CLOSURE PHASE	
Potential impact and risk:	**N/A**
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.

Dr Hoare's Terrestrial Biodiversity, Plant, and Animal Species Assessment concluded that the proposed deck and boardwalk will have low overall biodiversity sensitivity and low to medium significance impacts if constructed and managed responsibly.
Key findings include:

Vegetation and Habitat

The site falls within the Goukamma Strandveld vegetation type, which is not threatened.
The area includes natural dune shrubland that is stable and should be maintained in this condition.
The foredunes are ecologically sensitive and play an important role in protecting coastal infrastructure and biodiversity.

Species Sensitivity

Two protected Milkwood trees (Sideroxylon inerme) occur on site; neither needs to be removed.
Brunsvigia orientalis bulbs must be rescued before construction (as required by Bitou Municipality).
No Species of Conservation Concern (SCC) for plants or animals will be significantly affected.

Impact Assessment Results

Destabilisation of dunes: Low significance — the boardwalk itself helps prevent dune disturbance by channelling pedestrian movement.
Loss or damage to protected trees: Low significance — existing trees can be retained.
Invasion by alien plants: Medium significance — to be mitigated through active management.

Influence on the Development Design

The design of the deck and boardwalk has been guided by the findings to:
Avoid disturbance to dune vegetation and stabilised sand areas.
Retain existing trees and vegetation wherever possible.
Include management plans for alien control and dune rehabilitation.
Use construction techniques that minimise surface disturbance and erosion.

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

Impact Management Measures to be Included in the EMPr

The following measures identified by Dr Hoare should be incorporated into the Environmental Management Programme (EMPr):

Dune Stabilisation and Rehabilitation

- Use temporary stabilisers (brushes, mulch, coir logs, sand fences, etc.) until vegetation re-establishes.

- Implement a Rehabilitation Plan with:
• Erosion control methods.
• Revegetation strategy using indigenous dune species.
• Monitoring schedule and performance indicators.

Alien Invasive Species Management

- Compile and implement an Alien Management Plan identifying:
• Priority areas for control.
• Long-term control and monitoring programme.

- Regular monitoring to detect and remove alien invasions early.

Protection of Milkwood Trees (Sideroxylon inerme)

- Retain existing trees within the development footprint.
- Obtain a permit under the National Forests Act if removal or pruning becomes necessary.
- Plant additional milkwoods during landscaping to enhance habitat restoration.

Rescue of Brunsvigia orientalis Bulbs

- Rescue and relocate bulbs prior to construction as required by Bitou Municipality.

Construction Phase Controls

- Limit access to demarcated work areas.
- Store materials on already disturbed ground only.
- Prevent wind erosion and soil disturbance.
- Implement stormwater and erosion management.

Overall Conclusion

Dr Hoare confirmed that the site has low biodiversity sensitivity, and with the above measures integrated into the EMPr, the proposed boardwalk and deck are environmentally acceptable and will contribute positively to dune protection and habitat management if properly maintained.

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.

None

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

The proposed development will have a net positive impact on surrounding communities by improving managed access to the coast, supporting local economic activity temporarily, and contributing to the sustainable use and appreciation of the coastal environment, while short-term construction impacts will be temporary and effectively mitigated through the EMPr.

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.

The deck and boardwalk are elevated, allowing natural coastal processes and stormwater movement beneath the structures without interference.

The use of open, non-permanent structures (timber decking on posts rather than solid foundations) ensures that the development remains adaptable and reversible if future coastal retreat or extreme weather events necessitate relocation or modification, and incorporates flexibility to adapt to future changes associated with climate variability.

The Environmental Management Programme (EMPr) will include provisions for ongoing monitoring of erosion and vegetation stability, allowing adaptive management should coastal conditions change over time.

Should sea-level rise or erosion intensify, removal or relocation of structures can be implemented with minimal environmental disturbance due to the lightweight and reversible nature of the proposed design.

6.	Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.

While the biodiversity and geotechnical specialists approached the site from different technical perspectives, their recommendations were complementary rather than conflicting. The final design integrates both sets of findings by:

- Minimising disturbance and excavation,
- Using elevated, lightweight foundations,
- Implementing erosion, stormwater, and alien control measures, and
- Rehabilitating disturbed areas with indigenous vegetation.

As a result, all specialist recommendations are now aligned, and their combined input has strengthened the environmental and structural integrity of the proposed boardwalk and deck development.

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.

While the biodiversity and geotechnical specialists approached the site from different technical perspectives, their recommendations were complementary rather than conflicting. The final design integrates both sets of findings by:

- Minimising disturbance and excavation,
- Using elevated, lightweight foundations,
- Implementing erosion, stormwater, and alien control measures, and
- Rehabilitating disturbed areas with indigenous vegetation.

As a result, all specialist recommendations are now aligned, and their combined input has strengthened the environmental and structural integrity of the proposed boardwalk and deck development.

8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.

Best practicable environmental option

The selected design:

- Will attempt to avoid key ecological sensitivities (protected trees).
- Minimises soil instability and erosion through appropriate foundation and stormwater design.
- Rehabilitates any disturbed areas with indigenous vegetation.
- Enhances long-term dune protection by providing formalised, low-impact access to the beach.

In summary, by rigorously applying the mitigation hierarchy at each stage — from site selection and layout planning to construction and rehabilitation — the proposed deck and boardwalk achieve the best balance between environmental protection, public access, and sustainable coastal management.

SECTION J: GENERAL

1. Environmental Impact Statement

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

The Environmental Impact Assessment (EIA) for the proposed deck, viewing platform, and beach access boardwalk on Erf 9706, Robberg, identified that the development can proceed without significant adverse environmental impacts, provided that the recommended mitigation and management measures are implemented.

Environmental Context:

The site is located within 100 m of the high-water mark on a stabilised coastal dune system dominated by Goukamma Dune Strandveld vegetation, which is not threatened.

The area is already subject to limited human activity, including existing pedestrian access paths to the beach.

Key Specialist Findings:

Biodiversity (Dr D. Hoare):

- The site has low biodiversity sensitivity, with no critical habitats or threatened species affected.
- Two protected Milkwood trees (Sideroxylon inerme) occur on site but can be retained.
- Brunsvigia orientalis bulbs must be rescued prior to construction.
- The proposed development, by formalising beach access, will reduce cumulative trampling and erosion impacts on the surrounding dunes.

Geotechnical (I. Paton, Outeniqua Geotechnical Services):

- The site is underlain by loose to medium-dense aeolian sands with some uncontrolled fill, requiring lightweight or piled foundations to ensure stability.
- The soils are highly erodible, necessitating effective stormwater management and erosion control measures.

Impact Assessment Summary:

- Potential impacts identified include:
- Vegetation disturbance and habitat loss (low significance with mitigation).
- Soil erosion and dune instability (low to medium significance, mitigated by elevated design and stormwater control).
- Visual and aesthetic impact (low, as materials and design are consistent with natural coastal character).
- Construction-related disturbances such as dust, noise, and temporary access impacts (short-term and manageable).
- No significant impacts on surface water, heritage, or neighbouring properties were identified.

Mitigation and Management:

The mitigation hierarchy was applied to avoid, minimise, and rehabilitate potential impacts.

Key measures include:

- Demarcation of the construction area to avoid unnecessary disturbance.
- Erosion and stormwater control infrastructure.
- Rehabilitation with indigenous dune vegetation post-construction.
- Alien invasive species control and ongoing monitoring.
- Protection of existing Milkwoods and rescue of Brunsvigia bulbs.

Cumulative and Climate Change Considerations:

- The development contributes to better long-term dune management by channelling pedestrian movement, thereby reducing cumulative degradation.
- The design accommodates future climate risks, such as increased storm intensity and sea-level rise, through elevated, non-permanent structures that can withstand coastal processes without causing dune destabilisation.

Overall Conclusion

The EIA concludes that the proposed development represents the best practicable environmental option.
With the recommended mitigation measures incorporated into the Environmental Management Programme (EMPr), the project is environmentally acceptable, will enhance coastal management, and supports sustainable access.

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)
	See Appendix B
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.

Positive Impacts:

Improved Environmental Management:

- The formalisation of beach access via a raised boardwalk will reduce uncontrolled pedestrian movement, thereby minimising trampling and erosion of sensitive dune vegetation.
- The structure will help protect and stabilise dune systems by guiding visitors along a designated route.
- The boardwalk and viewing deck will enhance safe access to the beach.

Employment and Local Economic Benefits:

- The construction phase will create temporary local employment opportunities and support small contractors and local suppliers.
- Contribution to Sustainable Coastal Development

Negative Impacts and Risks:

Disturbance of Vegetation and Soil:

- Localised clearing of dune vegetation within the footprint may cause temporary habitat disturbance.
- Potential loss of topsoil and erosion risk during construction if activities are not carefully managed.

Visual and Aesthetic Impacts:

- The structure introduces a man-made element into a natural coastal landscape, though this impact is low due to the use of natural-toned, non-reflective materials and an elevated, lightweight design.

Construction-Phase Disturbances:
- Short-term impacts such as noise, dust, and restricted access for nearby residents and visitors may occur.
- These are temporary and reversible with appropriate site management and scheduling.

Soil Instability and Erosion Risk:
- The loose aeolian sands identified by the geotechnical specialist pose a risk of instability and erosion if not properly managed.
- The use of piled foundations, stormwater control, and rehabilitation measures reduces this risk to low significance.

Potential Climate-Related Risks:
- Future sea-level rise and storm surges could increase erosion pressure on the foredunes.
- The design mitigates this by using elevated, demountable structures that can be adapted or removed if coastal retreat occurs.

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 EMPr

1. Vegetation and Habitat Disturbance

Objective:
Protect and conserve indigenous dune vegetation and prevent unnecessary loss of natural habitat.

Outcomes:
- All vegetation clearance limited strictly to the approved construction footprint.
- No removal of protected Milkwood trees (Sideroxylon inerme).
- Brunsvigia orientalis bulbs successfully rescued and relocated prior to construction.
- Disturbed areas rehabilitated with locally indigenous dune species to achieve >80% vegetation cover within 12 months post-construction.
- No introduction or spread of alien invasive plants within the site.

2. Soil Stability and Erosion Control

Objective:
Prevent erosion and ensure dune stability during and after construction.

Outcomes:
- No visible erosion or destabilisation of dunes resulting from construction activities.
- All stormwater from hard surfaces and deck structures directed through controlled, energy-dissipating outlets away from dune slopes.
- Temporary stabilisation (brush-packing, coir logs, or mulch) implemented immediately after construction until vegetation re-establishes.
- Maintenance and monitoring of rehabilitated areas for at least 12 months to ensure effective dune stabilisation.

3. Protection of Fauna and Flora

Objective:
Minimise disturbance to coastal fauna and ensure compliance with conservation requirements.

Outcomes:
- No injury or mortality of fauna as a result of construction activities.
- ECO confirmation that all protected species rescue and relocation have been completed prior to construction commencement.

4. Stormwater and Drainage Management

Objective:
Prevent erosion, sedimentation, and waterlogging resulting from altered drainage patterns.

Outcomes:

- Functional and well-maintained stormwater management system in place that prevents concentrated discharge onto dune surfaces.
- No visible signs of erosion or sedimentation at discharge points.
- Regular inspection and maintenance of stormwater structures during and after construction.

5. Construction Phase Management

Objective:
Minimise the environmental footprint of construction activities.

Outcomes:

- All construction confined to the demarcated site footprint with no off-path access into vegetated areas.
- All construction waste removed and disposed of at licensed waste facilities.
- No fuel, oil, or chemical spills occur; if accidental spills occur, they are contained and remediated immediately.
- All contractors briefed on EMPr requirements and sign environmental compliance declarations.

6. Visual and Aesthetic Integrity

Objective:
Ensure that the development blends with the natural coastal environment.

Outcomes:

- Structures constructed with non-reflective, natural-toned materials consistent with the surrounding environment.
- No visual scarring or degradation of the natural landscape evident post-construction.
- Landscaping complements natural dune vegetation and assists with visual screening where required.

7. Long-Term Maintenance and Rehabilitation

Objective:
Ensure ongoing environmental performance and rehabilitation success post-construction.

Outcomes:

- A Maintenance Plan implemented for regular inspection of the boardwalk, erosion control, and vegetation condition.
- Vegetation cover maintained at a minimum of 80% to prevent re-erosion.
- Alien plant control programme implemented for at least two years post-construction.
- ECO or environmental manager conducts quarterly monitoring during the first year and biannual inspections thereafter.

8. Climate Change and Coastal Risk Adaptation

Objective:
Ensure resilience of the structure and ecosystem to coastal processes and climate change.

Outcomes:
The boardwalk and deck remain stable and functional under extreme weather conditions (high rainfall, coastal storms).
No negative interference with natural dune migration or coastal dynamics.
Infrastructure is demountable or adaptable should future coastal retreat occur.

Summary of Desired Outcomes

- A stable, rehabilitated dune system with well-established indigenous vegetation.
- Controlled pedestrian access that protects sensitive dune habitats.
- No long-term negative impacts on biodiversity, soil stability, or visual character.
- Sustainable access.

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.

The findings of the EIA and specialist assessments by Dr David Hoare (Biodiversity Specialist) and Iain Paton (Geotechnical Specialist) include several conditions and requirements that must be implemented to ensure that the proposed development remains environmentally acceptable.

The following conditions are therefore recommended for inclusion in the Environmental Authorisation:

1. Limitation of Development Footprint

- The construction footprint must be strictly limited to the approved layout as assessed in the EIA.
- No works or access may extend into undisturbed dune vegetation or beyond the demarcated construction area.
- The boardwalk alignment and deck location must remain consistent with that assessed and approved in terms of the EIA and OSCAE permit

2. Protection of Vegetation and Protected Trees

- No removal or pruning of protected Milkwood trees (Sideroxylon inerme) may occur without a valid permit issued in terms of the National Forests Act, 1998 (Act No. 84 of 1998).
- Brunsvigia orientalis bulbs identified within the construction footprint must be rescued and relocated prior to commencement of site works, under supervision of the appointed Environmental Control Officer (ECO).
- Vegetation clearing may only occur after the ECO has verified the demarcation of the site boundaries and confirmed compliance with vegetation protection measures.

3. Dune Stability and Erosion Control

- Construction activities must not destabilise the existing dune system.
- No deep excavation or reshaping of dune profiles is permitted.
- The foundation system must consist of lightweight or elevated structures (e.g. timber or composite piles) as recommended by the geotechnical specialist.
- A dune rehabilitation and erosion control plan (using brush-packing, coir logs, or other natural stabilisers) must be implemented immediately after construction.

4. Stormwater and Drainage Management

- A site-specific stormwater management plan must be implemented to prevent erosion and concentrated runoff onto dune slopes.
- All drainage structures must be designed to disperse flow energy and direct runoff away from sensitive areas, in accordance with geotechnical recommendations.

5. Alien Invasive Plant Control

- An Alien Invasive Species Management Plan must be implemented as part of the EMPr.
- The proponent is responsible for long-term monitoring and removal of alien plant species within the development footprint and immediate surrounding area.

6. Construction Environmental Management

- All construction activities must be conducted under the supervision of an independent Environmental Control Officer (ECO), appointed prior to commencement.
- The ECO must:
- Verify that all mitigation measures are implemented and maintained.
- Conduct regular site inspections and maintain compliance records.
- Submit compliance reports to the competent authority as required by the EA conditions.
- All contractors must be briefed on environmental obligations and sign a declaration of understanding prior to work commencing.

7. Rehabilitation and Monitoring

- All areas disturbed during construction must be revegetated with indigenous dune plant species as approved by the ECO.
- The rehabilitated areas must achieve a minimum of 80% vegetation cover within 12 months of construction completion.
- Post-construction monitoring must be conducted for at least one year to ensure rehabilitation success and dune stability.

8. Climate and Coastal Process Resilience

- The structure must remain elevated and demountable, allowing for future adjustment or removal should coastal retreat or storm damage occur.
- No hard engineering measures (e.g. gabions, sea walls) may be used to protect the structure against erosion or sea-level rise.

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.

Given the site context, the specialist findings, and the capacity for mitigation through design and an enforceable EMPr, the proposed development should be authorised subject to the strict implementation of the conditions above (Point 2.2). With

these conditions the project will deliver the intended access and dune-protection benefits while keeping residual environmental risks to an acceptable, manageable level.	
2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.
The assessment is based on available information and the assumption that the project will be constructed exactly as assessed and that all mitigation measures in the EMPr will be fully implemented. It also assumes adherence to specialist recommendations, including the use of lightweight/piled foundations, protection of Milkwood trees, correct stormwater management, and proper rehabilitation. Some uncertainties remain, particularly regarding long-term coastal dynamics, climate change effects, and the exact behaviour of dune sands and historical fill during construction. Ecological rehabilitation success may vary depending on rainfall, wind, and other natural factors. Future cumulative impacts from increased visitor use also hold some uncertainty. Gaps in knowledge relate mainly to limited subsurface information (common for dune systems), the absence of long-term site-specific monitoring data, and incomplete historical records of past disturbances. Despite these uncertainties, the remaining risks can be effectively managed through adaptive management, ECO oversight, and ongoing monitoring. No gaps or uncertainties are considered significant enough to change the conclusion that the proposed development is environmentally acceptable with mitigation.	
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.
Period for which the EA is required: The Environmental Authorisation is required for the full duration of the construction phase and subsequent rehabilitation and monitoring period, estimated at approximately 5 years from the date of issue. This period allows for construction, rehabilitation, compliance monitoring and the completion of all post-construction obligations. Date the activity will be concluded: Construction of the deck and boardwalk is expected to take approximately 3–6 months from the date of commencement, depending on weather and coastal conditions. All construction activities are anticipated to be concluded within one year of the EA's effective date. Post-construction monitoring finalisation: Post-construction environmental monitoring, including dune stabilisation, vegetation establishment, erosion control, and alien invasive species management, must continue for a minimum of 12 months after construction completion. Monitoring should therefore be fully finalised within 24 months of the start of construction, unless the ECO advises that extended monitoring is required to achieve acceptable rehabilitation and stability outcomes.	

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.
N/A

4. Waste

Explain what measures have been taken to reduce, reuse or recycle waste.
Normal construction waste will be generated during the works. All waste will be sorted in accordance with the waste hierarchy and disposed of at the appropriate licensed landfill site. This procedure is already being implemented on the property during the construction of the dwelling and will continue for the boardwalk and deck installation.

5. Energy Efficiency

8.1.	Explain what design measures have been taken to ensure that the development proposal will be energy efficient.
N/A The boardwalk and deck do not require electricity for day-to-day functioning.	

SECTION K: DECLARATIONS

DECLARATION OF THE APPLICANT

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

I, Andrew James Beveridge, ID number 6508205134089 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.

30 January 2026

Signature of the Applicant: Date:

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I, **Samantha Teeluckdhari**, EAP Registration number **2023/6443** 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;

30 January 2026

Signature of the EAP: Date:

Eco Route

Name of company (if applicable):

DECLARATION OF THE REVIEW EAP

I ……, EAP 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.

Signature of the EAP: Date:

Name of company (if applicable):

DECLARATION OF THE SPECIALIST

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

I ……, 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.

Signature of the EAP: Date:

Name of company (if applicable):

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.

Signature of the EAP: Date:

Name of company (if applicable):