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FINAL BASIC ASSESSMENT REPORT

Proposed Development of a Deck and Boardwalk Within 100 Meters Inland of the High-Water Mark of the Sea, Erf 9706, Plettenberg Bay, Western Cape

DEA&DP REF: 16/3/3/1/D1/15/0005/26

20 MAY 2026

Compiled by: Samatha Teeluckdhari (2023/6443)
Assisted by: Lizelle Genade (Candidate 2023/7793)

S. Teeluckdhari

EAP Signature:

Lgenade

Candidate Signature:

ISSUED BY:
Eco Route

Submitted to:
DEA&DP

Document Reference:
MAY 2026 – FINAL BAR/9706

Document Summary:
Application for Environmental Authorisation for Proposed Development of a Deck and Boardwalk Within 100 Meters Inland of the High-Water Mark/HWM of the Sea, Erf 9706, Plettenberg Bay, Western Cape

CONDITIONS OF USE OF THE REPORT

The report is the property of **Eco Route Environmental Consultancy**, who may publish it, in whole, provided that:

1. Eco Route Environmental Consultancy are indemnified against any claim for damages that may result from publication.
2. Eco Route Environmental Consultancy accepts no responsibility by the Applicant/Client for failure to follow or comply with the recommended programme, specifications or recommendations contained in this report.
3. Eco Route Environmental Consultancy accepts no responsibility for deviation or non-compliance of any specifications or guidelines provided in the report.
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5. This document is prepared exclusively for **Andrew Beveridge** and is subject to all confidentiality, copyright and trade secrets, rules, intellectual property law and practices of South Africa.

STATEMENT OF INDEPENDENCE

I, **Samantha 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.

APRIL 2026

SUMMARY OF AMENDMENTS MADE TO THE BAR AND EMPr

The Draft Basic Assessment Report has been revised in response to comments received from the competent authority and stakeholders. Key updates and improvements are summarised as follows:

Policy and Legislative Alignment:

- Updated and strengthened alignment with current national, provincial, and local policy frameworks.
- Expanded discussion on compliance with the Integrated Coastal Management Act (ICMA), including specific reference to relevant sections (e.g. Section 15 and Section 63).
- Improved alignment with the Bitou Local Municipality Integrated Development Plan (IDP) and municipal planning context.

Municipal and Coastal Management Considerations:

- Clarified that the development does not result in the privatisation or restriction of public beach access.
- Addressed municipal concerns regarding beach management and confirmed consistency with applicable by-laws.
- Emphasised that the proposal formalises an existing access route rather than creating a new exclusive access.

Design and Layout Clarifications:

- Amended the Preferred and Alternative design and layout in response to comment from authorities.
- Provided greater detail on the boardwalk alignment, including confirmation that it largely follows a historical route with a minor new section.
- Further justified the design approach, including the use of elevated, permeable, and reversible structures.
- Clarified the use of soft engineering methods within State-owned land – Alternative 2.
- The fire pit area has been removed from the SDP and will be replaced by a seating area instead due to possible fire risk.

Environmental Impact Assessment:

- Expanded assessment of positive and negative impacts, including those associated with property, activity, site, and design alternatives.
- Strengthened motivation for the preferred alternatives (activity, site, and design).

Specialist Input Integration:

- Improved alignment with fauna specialist findings, including confirmation of low sensitivity and limited impacts.
- Strengthened ecological justification for the selected layout and construction approach.

Coastal Risk and Climate Change:

- Significantly expanded assessment of coastal flood risk, including storm surge, sea-level rise, and extreme weather events.
- Demonstrated how climate risks have influenced the design, siting, and materials of the development.
- Confirmed that the structures are designed to be adaptable, low-risk, and non-defensive.

Impact Management and Mitigation Measures:

- Refined and expanded impact management outcomes for inclusion in the EMPr.
- Included additional measures relating to erosion and sediment control, vegetation rehabilitation, and access management.
- Strengthened the application of the precautionary approach.

Technology and Design Alternatives:

- Included consideration of technology alternatives to improve resource efficiency and reduce environmental impact.
- Motivated the selection of low-impact construction methods and materials.

Overall Reporting Improvements:

- Improved clarity, structure, and consistency across the BAR.
- Strengthened justification and defensibility of conclusions.
- Ensured alignment with DEA&DP expectations and review requirements.

The appropriate changes have been made to the EMPr in order to align the BAR and EMPr.

BASIC ASSESSMENT REPORT

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

20 MAY 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, 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 boardwalk within 100 meters inland of the High-Water Mark of the sea, Erf 9706, Plettenberg Bay, Western Cape.

Preferred Alternative/ Alternative 1:

This alternative will now consist of the construction of a timber deck and boardwalk that will terminate within the applicant's property boundary. The boardwalk was previously existing and originally extended beyond the property boundary into State-Owned land (see below figure 1). This was assessed in the previous Draft Basic Assessment Report/ BAR but has since been revised to align with the recommendations of various organs of state, hence this revised report. The biodiversity assessment was commissioned to assess the entire existing boardwalk area within the boundary of

Erf 9706 and within the State-Owned land. There is only a minor portion – 20.5m² of the proposed boardwalk that will follow a new route before terminating at the property boundary.

NB: The fire pit has been removed from the Preferred Layout and will be replaced with a seating area.

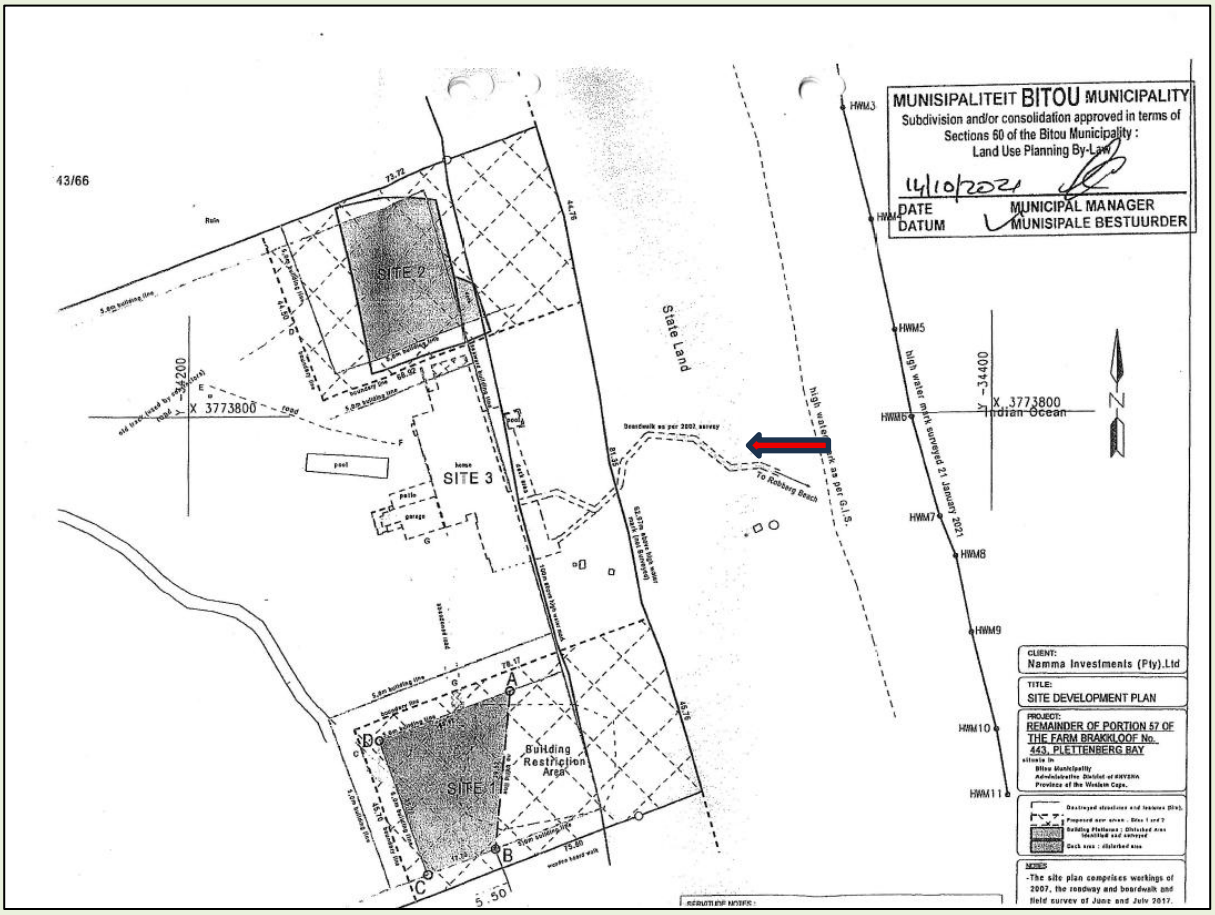


Figure 1: Bitou Municipality Subdivision Approval 2021 – showing existence and approval of boardwalk

Alternative 2:

The development of a timber deck and boardwalk within Erf 9706 and extending into State-Owned land. The boardwalk within the State Land will make use of soft engineering methods i.e. demarcated pathways using timber stakes and logs.

Figure 2: Example of soft engineering method

*This alternative is only possible if landowner consent is obtained.

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

BAR:	Basic Assessment Report
CBA:	Critical Biodiversity Area
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
ESA:	Ecological Support Area
HWC:	Heritage Western Cape
HWM:	High-Water Mark
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** **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)**	N/A
	Appendix E17:	**Comment from the District Municipality**	✓
	Appendix E18:	**Copy of an exemption notice**	N/A
	Appendix E19	**Pre-approval for the reclamation of land**	N/A
	Appendix E20:	**Proof of agreement/TOR of the specialist studies conducted.**	
	Appendix E21:	**Proof of land use rights** **Title Deed**	✓
	Appendix E22:	**Proof of public participation agreement for linear activities**	N/A
Appendix F:	**Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.**		✓
Appendix G:	**Specialist Report(s)**		✓
Appendix H:	**EMPr**		✓
Appendix I:	**Screening tool report**		✓

Appendix J:	**The impact and risk assessment for each alternative**	In 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**	✓

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)

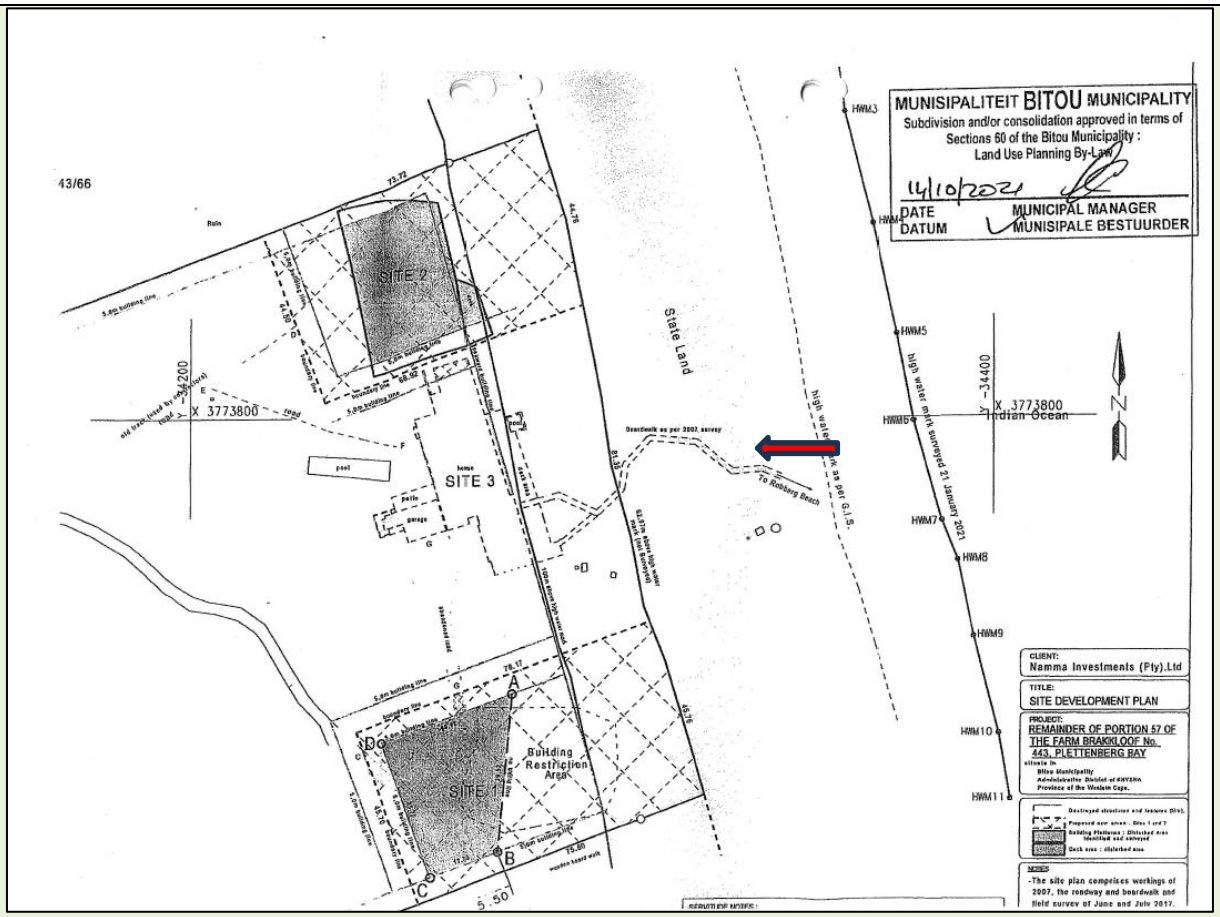
Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	Andrew James Beveridge and Katharine Josephine Beveridge	
Name of contact person for Applicant/Proponent (if other):	N/A	
Company/ Trading name/State Department/Organ of State:	N/A	
Company Registration Number:	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 – the boardwalk was previously existing until a fire destroyed it in 2017.					
3.	**For Linear activities or developments**				
3.1.	Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:				
Erf 9706, 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/ Alternative 1:** Boardwalk: 42.5 m^2 New decking: 281m^2 TOTAL = 323.5 m^2 **Alternative 2:** Boardwalk: 98.3 m^2 New decking: 281 m^2 TOTAL = 379.3 m^2	
3.3.	Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.				
Preferred Alternative/ Alternative 1: This alternative will consist of the construction of a timber deck (281m^2) and boardwalk (42.5m^2) within 100m inland of the High-Water Mark of the sea that will terminate within the applicant's property boundary. The boardwalk was previously existing and originally extended beyond the property boundary into State-Owned land until a fire destroyed it in 2017. There is only a minor portion – 20.5m^2 of the proposed boardwalk that will follow a new route before terminating at the property boundary.					



Bitou Municipality Subdivision Approval 2021 – showing existence and approval of boardwalk

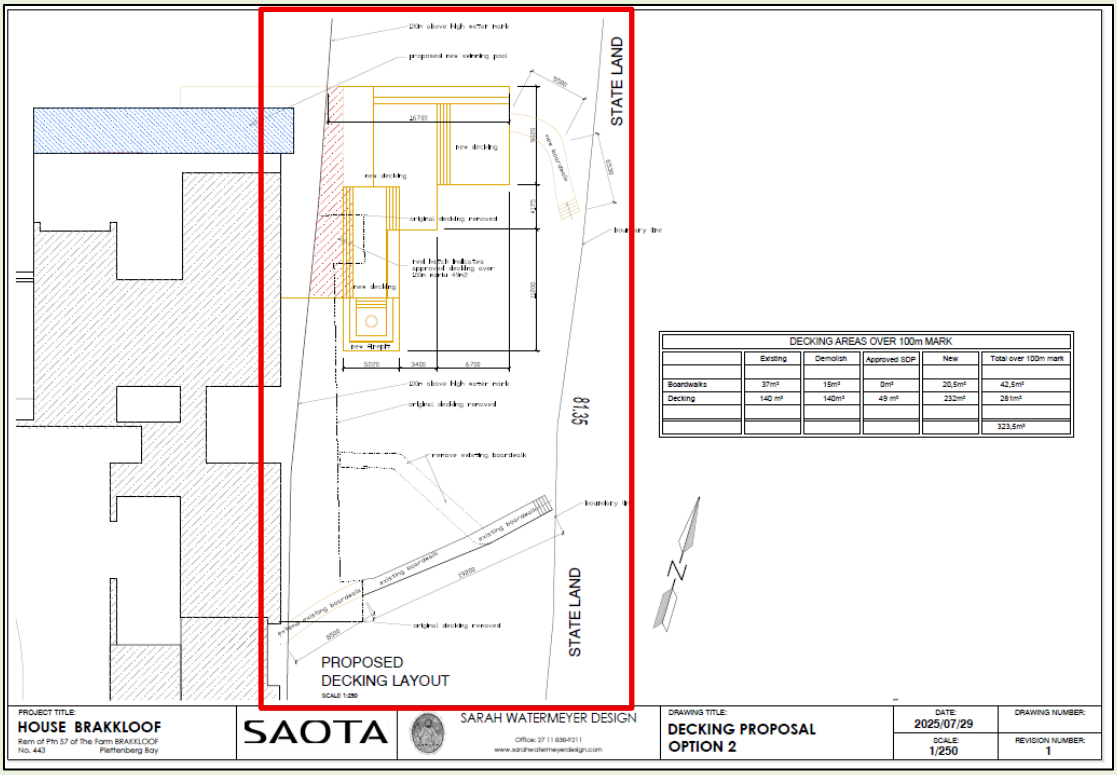


Figure 3: Proposed Site Development Plan (*Deck and Boardwalk Only – outlined red area) see Appendix B1 for clearer image

Alternative 2:

The development of a timber deck and boardwalk (total 379.3m^2) within Erf 9706 and extending into State-Owned land. The boardwalk within the State Land will make use of soft engineering methods i.e. demarcated pathways using timber stakes and logs.

Example of soft engineering method

*This alternative is only possible if landowner consent is obtained.

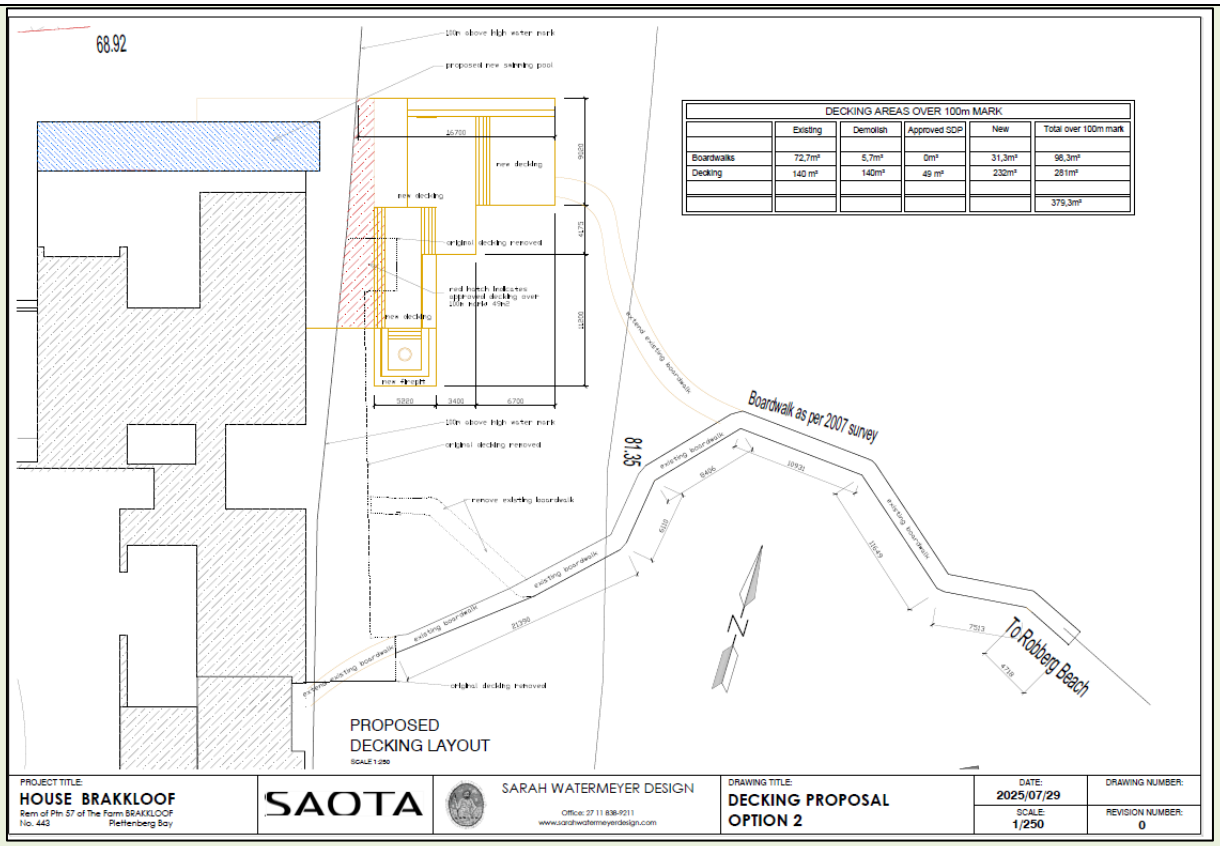


Figure 4: Alternative 2 SDP

3.4.	Indicate how access to the proposed routes will be obtained for all alternatives.
The proposed forms part of a dwelling currently 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 for all alternatives	**C**	**0**	**3**	**9**	**0**	**0**	**0**	**8**	**0**	**0**	**0**	**0**	**9**	**7**	**0**	**6**	**0**	**0**	**0**	**0**	**0**

3.6.	**Starting point co-ordinates (Boardwalk to the North - NEW)**			
	Latitude (S)	**34°**	**5'**	**26.60"S**
	Longitude (E)	**23°**	**22'**	**17.73"E**
	Middle point co-ordinates			
	Latitude (S)	**34°**	**5'**	**26.62"S**
	Longitude (E)	**23°**	**22'**	**17.92"E**
	End point co-ordinates			
	Latitude (S)	**34°**	**5'**	**26.82"S**
	Longitude (E)	**23°**	**22'**	**18.03"E**
	Starting point co-ordinates (Boardwalk to the South - Existing)			
	Latitude (S)	**34°**	**5'**	**28.25"S**
	Longitude (E)	**23°**	**22'**	**17.50"E**
	Middle point co-ordinates for all alternatives			
	Latitude (S)	**34°**	**5'**	**27.82"S**
	Longitude (E)	**23°**	**22'**	**18.03"S**
	End point co-ordinates for all alternatives			
	Latitude (S)	**34°**	**5'**	**27.66"S**

	Longitude (E)	**23°**	**22'**	**18.26"E**
Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.				
4.	**Other developments**			
4.1.	Property size(s) of all proposed site(s):			
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 Environmental Management Act (NEMA, Act 107 of 1998)	The proposed activity was assessed through a Basic Assessment Process under NEMA. Sustainable development principles (e.g. protection of biodiversity, efficient use of resources) have been integrated into the site design and mitigation measures.
National Biodiversity Framework & Biodiversity Act (NEMBA)	The development avoids Ecological Support Areas (ESAs).
Western Cape Provincial Spatial Development Framework (PSDF 2023)	Emphasises protection of coastal environments, climate resilience, and consolidation of development within existing settlements. The development is contained within an existing residential property and maintains a limited footprint, aligning with these principles.
Western Cape Provincial Strategic Plan 2025-2030	Promotes environmental sustainability and climate resilience. The use of lightweight, elevated, and reversible structures supports adaptation to dynamic coastal processes such as erosion and sea-level rise.
Bitou Spatial Development Framework (2022)	Supports controlled and low-impact development within sensitive coastal environments. The proposal is contained within the property boundary and does not contribute to coastal sprawl or ribbon development. The development minimises impacts on natural systems and aligns with spatial planning objectives.
Bitou Integrated Development Plan (IDP) (2022–2027)	Encourages sustainable development, environmental protection, and efficient land use. The proposal supports these objectives through: • Environmentally responsible design; • Limited, small-scale development; • Short-term employment during construction.
Coastal Management Policies (aligned with ICMA and Coastal Management Programmes)	Promote protection of coastal processes and environmentally sensitive development within the coastal protection zone.

	The proposal utilises elevated, permeable structures that minimise dune disturbance and support natural coastal functioning. While the development is for private use, it formalises access within the property, thereby preventing ad hoc movement and reducing potential environmental degradation.

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 EIA Guideline (March 2013)	Provides direction on the Basic Assessment process and impact identification. Influenced the assessment of alternatives, impact mitigation measures, and the adoption of a precautionary, risk-averse approach. Ensured that the preferred alternative avoids sensitive areas and minimises environmental disturbance.
DEA&DP Guideline on Need and Desirability (March 2013)	Guides evaluation of whether the development is appropriate within its context. Influenced the justification for the development by confirming that it is located within an existing residential property and replaces a previously existing structure. Supported the selection of a reduced footprint and environmentally sensitive design.
DEA&DP Biodiversity Guideline (June 2005)	Provides guidance on avoiding and minimising impacts on biodiversity. Informed the placement of the deck and boardwalk within already disturbed areas. Ensured that sensitive vegetation and ecological processes are avoided and maintained.

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 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.	The proposed entails the development of a deck and with a total footprint of 325m^2 within 100 meters inland of the High-Water Mark/HWM of the sea. **NB: The updated development footprint will result in a loss of approximately 231m^2 of indigenous vegetation. Therefore, this listed activity is not applicable to the Preferred Layout.**
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;	The proposed entails the development of a deck and boardwalk with a development footprint of approximately 323.5m^2 within 100 meters inland of the High-Water Mark/HWM of the sea.

	(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;	
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 the development of a deck and boardwalk will require the excavation of more than 5 cubic metres of soil within 100 meters inland of the High-Water Mark/HWM of the sea.

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

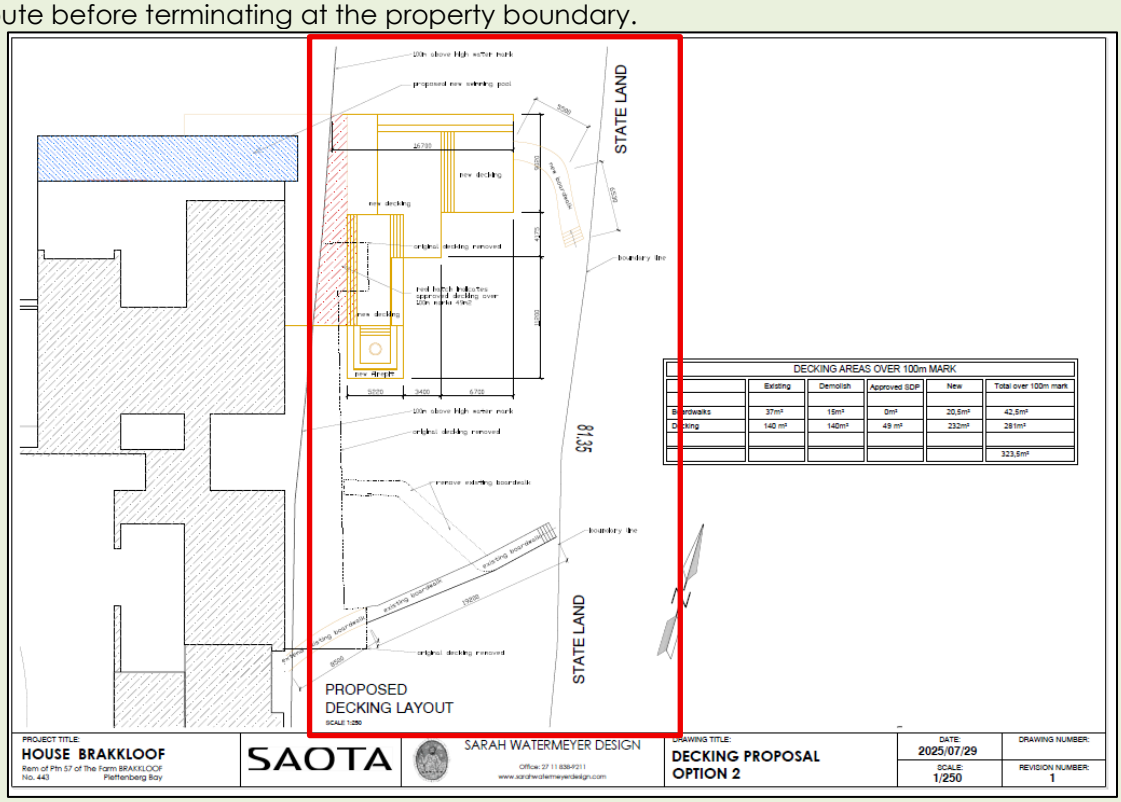
Activity No(s):	Provide the relevant **Listed Activity(ies)**	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A		

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

Preferred Alternative/ Alternative 1:

This alternative will consist of the construction of a timber deck (281m^2) and boardwalk (42.5m^2) within 100m inland of the High-Water Mark of the sea that will terminate within the applicant's property boundary. The boardwalk was previously existing and originally extended beyond the property boundary into State-Owned land until a fire destroyed it in 2017. There is only a minor portion – 20.5m^2 of the proposed boardwalk that will follow a new route before terminating at the property boundary.



Proposed Site Development Plan (*Deck and Boardwalk Only – outlined red area) see Appendix B1 for clearer image

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 applicant is applying for the construction of a deck and boardwalk on Erf 9706, Plettenberg Bay.

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 323.5 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.

The proposed development has been assessed against the objectives of the Bitou Local Municipality's Integrated Development Plan (IDP), and is considered to be aligned with its key priorities relating to sustainable development, environmental management, and responsible land use.

The IDP emphasises the importance of environmental sustainability and the protection of natural resources, particularly within sensitive coastal environments. The proposed development supports this objective through its low-impact design, which incorporates elevated and permeable structures that minimise disturbance to dune systems and allow natural coastal processes to continue. The footprint of the development is small and largely confined to previously disturbed areas, thereby avoiding unnecessary impacts on intact vegetation and ecological systems.

The IDP further promotes sustainable spatial planning and efficient land use, encouraging development within existing settlements and on already transformed land. The proposal is located within an existing residential property and does not contribute to urban sprawl or the expansion of development into undeveloped areas. The limited extension into State-owned land is undertaken using soft engineering methods, ensuring that impacts remain minimal and reversible.

In terms of infrastructure and service delivery, the IDP supports appropriate, small-scale developments that do not place additional strain on municipal infrastructure. The

proposed deck and boardwalk do not require bulk services or municipal infrastructure upgrades and therefore do not impose additional demands on municipal resources.

The IDP also highlights the importance of local economic development and job creation. While the proposed development is small in scale, it will contribute modestly to the local economy through short-term employment opportunities during the construction phase.

Importantly, the IDP recognises the need for coastal management and resilience to environmental risks, including climate change. The proposed development aligns with this objective by adopting a precautionary and risk-averse approach, using lightweight and reversible structures that can adapt to coastal dynamics such as erosion and sea-level rise.

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. There is only a minor portion – 20.5m^2 of the proposed boardwalk that will follow a new route before terminating at the property boundary. 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.

Authority consultation has resulted in the Preferred Alternative.

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

The WCBSP (2023) influenced the proposal by requiring that the development remain low-impact, reversible, and biodiversity-sensitive, particularly in dune and foredune Ecological Support Areas zones. The boardwalk is consistent with WCBSP 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 Critical Biodiversity Areas/CBAs or an Ecological Support Areas/ESAs.

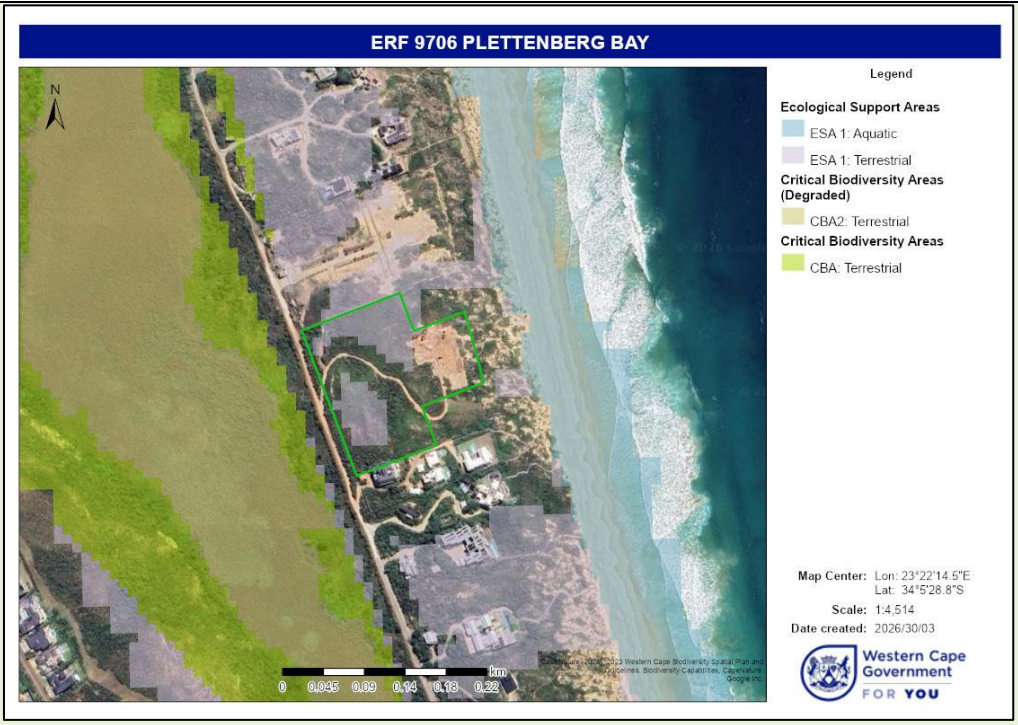


Figure 5: CBA and ESA Map

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

The proposed development is located within the Coastal Protection Zone (CPZ) and within 100 m of the High-Water Mark, and is aligned with the objectives of the Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) as follows:

Section 2 – Objectives of the ICMA (Protection of Coastal Environment):

The proposal protects the natural coastal environment by confining development largely to previously disturbed areas.

The small new section of the boardwalk (±20.5 m²) has been carefully routed to avoid sensitive vegetation and minimise ecological disturbance.

The development supports the objective of preserving coastal ecosystems and biodiversity.

Section 17 – Purpose of the Coastal Protection Zone:

The CPZ aims to maintain the natural functioning of coastal ecosystems and protect people and property from coastal hazards.

The development is low-impact, small-scale, and designed to be compatible with dynamic coastal processes.

Elevated and permeable structures ensure that dune dynamics and natural processes are not disrupted.

Section 63 – Environmental Authorisation for Coastal Activities:

The design avoids significant adverse effects on the coastal environment by:

- Limiting the development footprint;
- Avoiding sensitive and high-value biodiversity areas;

- Using construction methods that minimise disturbance.

The development is therefore consistent with the requirement to consider environmental impacts and adopt mitigation measures.

Section 7 – National Coastal Management Objectives (Sustainable Coastal Use):

Promotes sustainable use of coastal resources while ensuring environmental protection.
The development enables reasonable private use of the property without resulting in overexploitation or degradation of coastal resources.

Section 18 – Public Access to Coastal Public Property:

While the development is for private use, it does not restrict existing public access to coastal public property.

The defined boardwalk route helps prevent uncontrolled trampling within the property, indirectly supporting the protection of adjacent coastal areas.

Precautionary and Risk-Averse Approach (aligned with NEMA principles underpinning ICMA):
The development incorporates a precautionary approach through:

- Minimal disturbance design;
- Reversible construction methods;
- Consideration of coastal risks such as erosion and sea-level rise.

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 change

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 the 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) are 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.

PPP undertaken according to Regulation 41 of the EIA Regulations, 2014.

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

Refer to Appendix F

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

Please consult the I&AP register in Appendix F.

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

N/A

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

1. DFFE Directorate: Biodiversity & Conservation
2. Department of Health
3. Transport & Public Works / Department of Infrastructure
4. Department of Forestry, Fisheries & the Environment (DFFE) – Forestry Branch
5. Cape Nature Land Use Advice
6. Southern Cape Fire Protection Agency
7. SANPARKS
8. South African Civil Aviation Authority

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.

Refer to the Comments and Response Report (Appendix F1) for detailed comments and responses.

1. DEA&DP Comments:

Incomplete documentation

- Missing specialist reports (biodiversity and geotechnical), despite being referenced.
- Specialist declarations are unsigned.
- The BAR therefore does not meet minimum information requirements.

Land ownership and consent

- No landowner consent provided for Portion 57 of Farm Brakkloof.
- Unclear whether development will occur on land not owned by the applicant.
- Activities on State land (Erf 2132) require:
  - Proof that existing structures are lawful.
  - Permission from the relevant State authority for continued and new use.

Legislative and regulatory clarity

- Uncertainty whether a Water Use Licence is required; confirmation from the authority is needed.
- EIA and Water Use processes must be aligned.

- The OSCA permit submitted relates to a house, not the proposed boardwalk—this inconsistency must be explained.

Climate change considerations

- The BAR does not adequately assess risks such as:
  - Sea level rise
  - Storm surges
  - Coastal erosion

These risks must be properly evaluated given the coastal location.

Public participation concerns

- It is unclear whether:
  - Interested and affected parties (I&APs) received the full report.
  - All relevant landowners and stakeholders were notified.
  - A complete Comments and Responses Report is required.

Public participation must comply fully with regulatory requirements.

Environmental Management Programme (EMPr)

- An EMPr is required but not adequately addressed.
- It must include:
  - Impact mitigation across the project lifecycle
  - Monitoring and auditing measures

2. DEA&DP Biodiversity and Coastal Management

Coastal protection and policy conflict

- The site falls within the Coastal Protection Zone (CPZ).
- Development must avoid increasing risks from:
  - Sea level rise
  - Coastal erosion
  - Storm impacts

The proposal must align with the Integrated Coastal Management Act and related policies.

Development on State land

The proposed boardwalk extends onto unalienated State coastal land.
Requires:

- A lease agreement with the relevant authority
- Proof of lawful historic use (previous boardwalk approvals)

Public access concerns

The area is identified as "restricted access" with existing issues of private encroachment.

The Department:

- Does not support private boardwalks
- Recommends shared access paths instead
- Emphasises protecting and rehabilitating dune systems

Environmental sensitivity and missing information

- The site has high environmental sensitivity.
- Missing required documentation:
  - Site Sensitivity Verification Report
  - Environmental Compliance Statements
  - Biodiversity specialist report

Coastal risk assessment deficiencies

Coastal risk mapping:
- Lacks a clear legend/key
- Uses less accurate national data instead of refined provincial data
- A more accurate and detailed coastal risk assessment is required.

Unverified previous development

The proposal claims to replace a boardwalk destroyed in 2017.
However, no proof is provided that the original structure was lawfully approved.

The Coastal Management Unit does not support the proposed development in its current form due to policy conflicts, missing information, and coastal risk concerns.

3. DFFE Oceans and Coasts

Public vs private access

- Unclear whether the boardwalk and deck are for public or private use.
- "Beach access" typically implies public access under legislation.
- The application must clarify:

Purpose of access (public vs private)
Alignment with municipal responsibilities and by-laws

Property boundaries and land ownership

- Uncertainty about whether the boardwalk is located on:
- Private property, or
- Coastal public property
- Requires:
  - Title deeds and survey diagrams
  - Clear spatial confirmation of the footprint

Legislative compliance

Must align with the Integrated Coastal Management Act, especially:
  - Public access provisions

- Consideration of coastal protection measures (e.g., for sea level rise) under relevant sections of the Act

Clarity and completeness of information

Abbreviations (e.g., "ESA") must be clearly defined.
Supporting information must be understandable to all stakeholders.

Positive note

The Department acknowledges efforts to:
- Minimise vegetation clearing
- Use raised/permeable structures
- Rehabilitate disturbed areas

The Department objects to the granting of environmental authorisation if the development:

- Occurs on coastal public property, or
- Restricts public access, unless it is clearly in the public interest.

4. Bitou Municipality Environmental Management

The Draft Basic Assessment Report does not clearly indicate on which cadastral properties the proposed structures will be located. It appears from the plans that portions of the proposed boardwalk extend beyond Erf 9706 and may traverse Unalienated State Land (Erf 2132).

- A clear site development plan must be provided that identifies cadastral boundaries and the extent of the development footprint in relation to neighbouring properties and state land.
- Should the proposal include infrastructure located on Unalienated State Land (Erf 2132), the applicant must demonstrate the legal basis upon which such development would occur.
- From a municipal coastal management perspective, the privatisation of beach access is generally not supported.
- The use of hard structures within the dynamic coastal environment is discouraged.
- Where beach access is required, softer coastal engineering approaches are generally preferable.
- The Draft Basic Assessment Report does not adequately assess the potential risks associated with coastal flooding, storm surge events, sea level rise, and extreme weather events over the expected lifespan of the development.
- The Draft Basic Assessment Report does not include all relevant specialist reports for review despite indicating that they are attached as Appendix G.
- The alternatives considered within the Draft BAR appear limited. Additional alternatives should therefore be investigated and presented in the BAR,

5. National Department: Public Works and Infrastructure

The National Department of Public Works and Infrastructure (NDPWI) has assessed the locality, context and content of the Basic Assessment Report for the proposed Environmental Authorisation and has no objection the proposed development.

The Department has observed that the proposed development site, Erf 9706, is a privately owned residential property and does not fall within or encroach upon any state-owned land under the custodianship of the NDPWI.

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.		
BOCMA had their in-house freshwater ecologist comment on the proposal – the wetland to the west of the property will not be impacted by the proposal. Please see Appendix F.			

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.		

Section 63 of the Integrated Coastal Management Act (ICMA) requires that the potential impacts of coastal activities on the environment, coastal processes, and public interests be carefully considered prior to authorisation. The relevant considerations have been taken into account as follows:

Impact on Coastal Processes:

The proposed deck and boardwalk are designed as elevated, permeable timber structures. This ensures that natural processes such as sand movement, dune dynamics, and vegetation regeneration are not impeded. As a result, the development avoids interference with the natural functioning of the coastal system.

Impact on Coastal Ecosystems and Biodiversity:

The majority of the development is located within previously disturbed areas. A small portion of the boardwalk (±20.5 m²) follows a new alignment but has been carefully positioned to avoid sensitive vegetation. Vegetation clearance is minimised, and ecological processes are maintained, thereby limiting biodiversity impacts.

Extent and Significance of Environmental Impacts:

The overall footprint of the development is small and localised. No Critical Biodiversity Areas are affected, and impacts are assessed as low to moderate and mitigatable. The design and siting reduce both direct and cumulative environmental impacts.

Risk of Coastal Hazards:

The development takes into account risks such as coastal erosion, storm events, and sea-level rise. Structures are lightweight, elevated, and reversible, allowing for adaptation to changing coastal conditions. No permanent or high-risk infrastructure is introduced within the dynamic coastal zone.

Public Interest and Access Considerations:

The development is located within a private property and does not restrict existing public access to coastal public property. The formalisation of a defined access route within the property reduces uncontrolled movement and associated environmental degradation.

Alternatives and Mitigation Measures:

Alternatives were assessed, and the preferred option limits the development to within the property boundary.
Mitigation measures include minimising vegetation clearance, using low-impact construction methods, and rehabilitating disturbed areas. The layout avoids environmentally sensitive areas and reduces the extent of new disturbance.

Cumulative Impacts:

The development is small-scale and located within an already modified environment. By consolidating access and limiting expansion into State land, cumulative impacts on the broader coastal environment are reduced.

Influence on Development Proposal:

The need to comply with Section 63 resulted in:

- Reduction of the development footprint;
- Avoidance of sensitive ecological areas;
- Limiting the boardwalk largely to its historical alignment;
- Careful routing and minimisation of the new boardwalk section;
- Adoption of a low-impact, reversible design approach.

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.

Coastal Risk Zones:

The site falls within a dynamic coastal environment where risks such as erosion, storm surges, and sea-level rise are relevant.

The development has been designed to be low-impact, lightweight, and reversible to accommodate these risks.
No permanent or hard infrastructure is proposed, thereby reducing vulnerability to coastal hazards and avoiding long-term damage.

Coastal Protection Zone (CPZ):

The proposed development is located within the CPZ and has therefore been designed to align with its purpose of protecting ecological integrity and coastal processes.

The footprint is minimised and largely confined to previously disturbed areas.

The development avoids sensitive coastal features and limits additional disturbance within the CPZ.

Littoral Active Zone (LAZ):

Although the development is located landward of the High-Water Mark, consideration has been given to the dynamic nature of the littoral system.

The elevated boardwalk design ensures that natural sand movement and dune processes associated with the LAZ are not impeded.

No structures are placed directly within the active littoral zone, thereby avoiding direct impacts.

Overall Influence on the Development:

- The development footprint has been kept small and carefully positioned.
- The boardwalk alignment largely follows a previously disturbed route, with only a minor new section introduced and carefully sited.
- Elevated, permeable construction methods were selected to maintain natural coastal dynamics.
- A precautionary and risk-averse approach was adopted to ensure resilience to coastal hazards.
- The proposal avoids sensitive areas while enabling appropriate private use of the property.

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), a portion of 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 footprint was kept within already modified or previously disturbed zones and does not intersect with the mapped ESA.
- The boardwalk alignment follows an existing historical pathway, thereby avoiding undisturbed dune vegetation and limiting new impacts.
- 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)

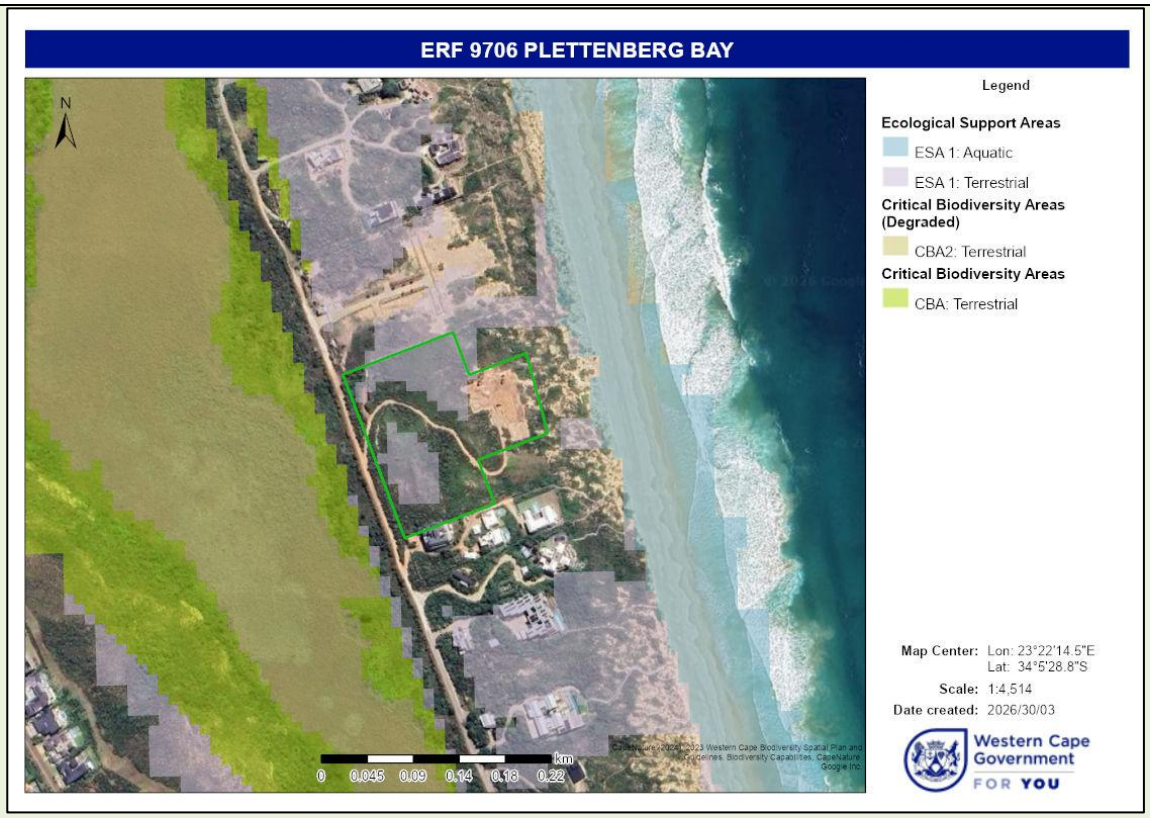


Figure 6: Critical Biodiversity Areas and Ecological Support Areas

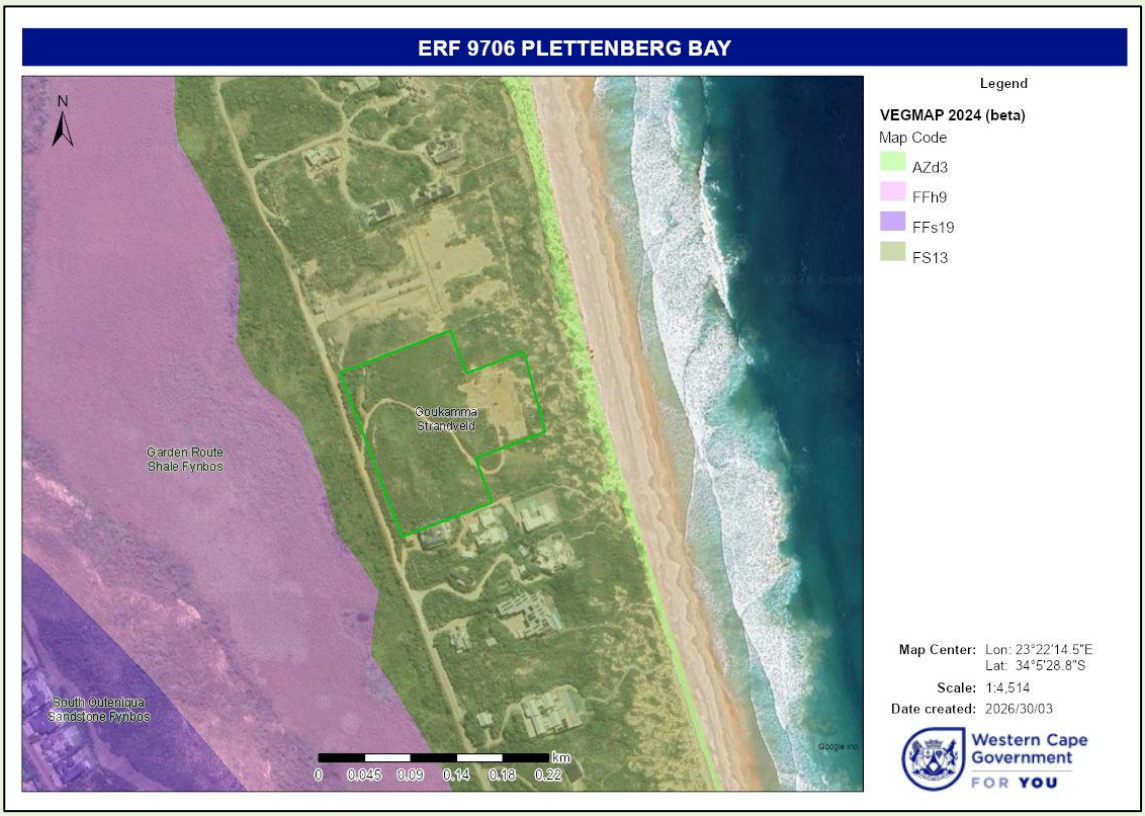


Figure 7: VegMap 2024

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. However, the footprint of the proposal will not be within the ESA.

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 impacts 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.

The findings of the fauna specialist assessment have informed the design and layout of the proposed development, and have influenced the proposal as follows:

The site is located within a transformed coastal dune system of relatively low to moderate faunal sensitivity, supporting common and widespread species typical of the region, including small mammals, reptiles, invertebrates, and avifauna.

The specialist identified that the site does not constitute critical habitat for threatened or endemic fauna species, and that faunal assemblages are adapted to a degree of disturbance. In response to these findings, the development footprint has been:

- Restricted to previously disturbed and transformed areas as far as practicable.
- Designed to avoid unnecessary encroachment into intact dune vegetation.

The elevated and permeable design of the boardwalk and deck was informed by the need to:

- Maintain habitat connectivity.
- Allow continued movement of small terrestrial fauna beneath the structures;
- Retain underlying vegetation that supports faunal habitat.

The alignment of the boardwalk:

- Largely follows an existing disturbed pathway, thereby limiting additional habitat fragmentation.
- Includes a minor new section, which has been positioned in areas of lower ecological sensitivity, as confirmed by the specialist assessment.

The specialist findings indicated that potential impacts on fauna would be localised, low in significance, and largely confined to the construction phase, provided that mitigation measures are implemented. Based on this, the development incorporates:

- Low-impact construction methods to minimise disturbance (noise, vibration, vegetation clearance).
- A limited construction footprint to reduce habitat loss.
- Avoidance of features that could result in long-term faunal disturbance (e.g. lighting, barriers).

- The formalisation of access via the boardwalk reduces uncontrolled trampling and habitat degradation, which was identified as a potential indirect impact on fauna.

Overall Influence on the Development

- The proposal is consistent with the specialist's conclusion that the site is of low faunal sensitivity.
- Design measures ensure that impacts remain low and acceptable.
- The development maintains ecological functioning and faunal movement, in line with specialist recommendations.

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.
The boardwalk alignment mostly 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. Only a minor portion of the total boardwalk – 20.5m^2 will take on a new path before terminating at the property boundary. 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.
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.
The proposed structures are confined to previously disturbed and modified areas where a deck and boardwalk historically existed with only a minor portion – 20.5m2 of the proposed boardwalk that will follow a new route before terminating at the property boundary. 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. There will be no impact on people's health and well-being.	

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.	
Erf 9706, Plettenberg Bay located along Robberg Beach. Site was chosen as the previously existing deck and boardwalk had burned down in the 2017 fires.	
Provide a description of any other property and site alternatives investigated.	
Only one property was assessed as the proposed activity is relevant to the reconstruction of the dwelling currently taking place on Erf 9706.	
Provide a motivation for the preferred property and site alternative including the outcome of the site selectin matrix.	
The proposed structures are mainly confined to previously disturbed and modified areas where a deck and boardwalk historically existed. The preferred site area was reduced from the boardwalk being developed on State Land to now being restricted to the applicant's property following feedback from several organs of state. The site area will reduce cumulative impacts that the activity may have on the receiving environment.	
Provide a full description of the process followed to reach the preferred alternative within the site.	
The initial site selection was made, and input from various organs of state guided the end result of the preferred alternative.	
Provide a detailed motivation if no property and site alternatives were considered.	
N/A	

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

Positive Impacts:

- Utilises an existing, already transformed residential property, avoiding the need to develop on undisturbed land.
- Reduces pressure on more sensitive coastal properties or undeveloped sites.
- Makes use of existing access, thereby avoiding additional environmental impacts elsewhere.
- Largely follows a previously disturbed/historical boardwalk alignment, reducing new habitat disturbance.
- Minimises vegetation clearance and avoids sensitive areas as far as practicable.
- The elevated, permeable design maintains natural processes and allows faunal movement.
- Consolidates movement into a defined pathway, reducing uncontrolled trampling and erosion.

Negative Impacts:

- Development occurs within the Coastal Protection Zone, where sensitivity is higher.
- Potential for localised disturbance to dune vegetation and associated fauna.
- Introduction of a structure within a dynamic coastal environment, with some exposure to coastal processes.
- A small portion of new boardwalk alignment (±20.5 m²) introduces disturbance into an area that was previously less impacted.
- Temporary disturbance during construction (noise, movement, minor vegetation clearing).
- Localised and short-term disruption to fauna during construction.

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.

No other activity alternatives were investigated. The EIA was commissioned for the sole purpose of developing a deck and boardwalk on Erf 9706.

Provide a motivation for the preferred activity alternative.

The preferred activity alternative entails the construction of a small-scale, elevated deck and boardwalk within the existing residential property, and is considered the most appropriate option for the following reasons:

- The activity is low-impact in nature, involving lightweight, elevated, and permeable structures that minimise disturbance to the underlying environment.
- The development footprint is small and carefully contained, largely within previously disturbed areas, thereby avoiding unnecessary impacts on intact dune vegetation and ecological processes.
- The boardwalk alignment predominantly follows a historical disturbed route, with only a minor new section introduced and positioned in an area of lower ecological sensitivity.
- The design maintains natural coastal processes, including sand movement and dune dynamics, and allows for continued faunal movement beneath the structure.
- The activity adopts a precautionary and risk-averse approach, incorporating reversible construction methods that can respond to coastal risks such as erosion and sea-level rise.

- The proposal enables reasonable private use of the property without resulting in significant environmental degradation or overdevelopment of the coastal zone.
- The formalisation of a defined access route reduces uncontrolled trampling and associated environmental degradation, thereby providing a long-term environmental benefit.
- The activity aligns with applicable legislative and policy frameworks, including the Integrated Coastal Management Act and relevant spatial planning policies, which support low-impact, sustainable development within the Coastal Protection Zone.
- No feasible alternative activity was identified that would achieve the same functional outcome with a lower environmental impact.

Provide a detailed motivation if no activity alternatives exist.

The EIA was commissioned for the sole purpose of developing a deck and boardwalk on Erf 9706 where the previously existing deck and boardwalk had burned down in the 2017 fires.

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

Positive Impacts:

- Provides a formalised access route, reducing uncontrolled trampling of dune vegetation.
- Limits environmental disturbance by using a small footprint and elevated, permeable design.
- Maintains natural coastal processes such as sand movement and dune dynamics.
- Allows for continued faunal movement and habitat connectivity beneath the structure.
- Concentrates human movement into a defined pathway, reducing wider habitat degradation.
- Located largely within previously disturbed areas, thereby avoiding unnecessary new impacts.

Negative Impacts:

- Localised vegetation clearance required for construction.
- Temporary disturbance to fauna during the construction phase (noise, activity, movement).
- A minor new section of boardwalk (±20.5 m^2) introduces disturbance into a previously less impacted area.
- Potential for minor localised visual impact within the coastal landscape.
- Risk (although low) of minor interference with dune processes if not properly maintained.

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 Preferred design will consist of the construction of a timber deck (281m^2) and boardwalk (42.5m^2) within 100m inland of the High-Water Mark of the sea that will terminate within the applicant's property boundary. The boardwalk was previously existing and originally extended beyond the property boundary into State-Owned land until a fire destroyed it in 2017. There is only a minor portion – 20.5m^2 of the proposed boardwalk that will follow a new route before terminating at the property boundary.

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

Alternative 2 design/layout: The development of a timber deck and boardwalk (total 379.3m^2) within Erf 9706 and extending into State-Owned land. The boardwalk within the State Land will make use of soft engineering methods i.e. demarcated pathways using timber stakes and logs.

*This alternative is only possible if landowner consent is obtained.

Provide a motivation for the preferred design or layout alternative.

The preferred design and layout alternative, which comprises an elevated deck and boardwalk that largely follows the historical alignment with a minor new section, is considered the most appropriate option for the following reasons:

- The layout is largely aligned with an existing disturbed pathway, thereby minimising intrusion into previously undisturbed dune vegetation and reducing habitat fragmentation.
- The minor new section of boardwalk has been carefully positioned within an area of lower ecological sensitivity, ensuring that additional disturbance is kept to a minimum.
- The design incorporates elevated, permeable structures, which:
    - Allow for continued sand movement and dune dynamics;
    - Maintain natural vegetation beneath the structure;
    - Enable faunal movement and ecological connectivity.
- The overall footprint has been minimised and optimised, ensuring that only the necessary area is affected to achieve the functional requirements of the development.
- The layout avoids environmentally sensitive features and is responsive to site-specific constraints, including vegetation, topography, and coastal processes.
- The design adopts a risk-averse and precautionary approach, using lightweight and reversible construction methods that can accommodate coastal change, such as erosion and sea-level rise.
- By formalising a defined access route, the layout reduces uncontrolled trampling and associated degradation of surrounding dune vegetation.
- Alternative layouts were considered but would have resulted in greater environmental disturbance, including increased vegetation clearance, disruption of intact habitat, and a larger visual and ecological footprint.

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.

1. Preferred Design Alternative (elevated, permeable deck and boardwalk with limited footprint):

Positive Impacts:

- Elevated and permeable design allows for natural sand movement and dune dynamics to continue.
- Maintains vegetation beneath the structure, preserving habitat for fauna.
- Allows for faunal movement and ecological connectivity.
- Results in a small and localised footprint, minimising vegetation clearance.
- Reduces long-term impacts by formalising access and limiting uncontrolled trampling.
- Reversible construction reduces long-term risk and allows adaptation to coastal change.
- Visually less intrusive due to its lightweight design.

Negative Impacts:

- Requires localised vegetation disturbance during installation.
- Temporary disturbance to fauna during construction.
- Minor visual impact within the coastal landscape.
- Ongoing maintenance may be required to ensure minimal environmental impact.

2. Alternative 2 Design (elevated, permeable deck and boardwalk, but extending onto State land and making use of soft engineering methods i.e. demarcated pathways of timber logs and stakes):

Positive Impacts:

- The use of timber and soft engineering methods reduces the need for hard infrastructure, thereby minimising disturbance to the natural coastal environment.
- Demarcated pathways (timber stakes and logs) guide movement and help prevent uncontrolled trampling of dune vegetation, reducing erosion and habitat degradation.
- The elevated deck and boardwalk sections maintain natural dune processes by allowing sand movement and vegetation growth beneath the structure.
- The design supports faunal movement and habitat connectivity, particularly where soft engineering methods are used instead of solid structures.
- The development footprint is relatively lightweight and partially permeable, reducing long-term environmental impacts compared to more intensive construction methods.
- The use of reversible and low-impact materials allows for removal or adaptation in response to coastal change (e.g. erosion or sea-level rise).

Negative Impacts:

- The extension of the development into State-owned land increases the overall area of disturbance and introduces impacts into an area that may be less transformed.
- The total footprint (±379.3 m²) results in vegetation disturbance and potential habitat loss, particularly within sensitive dune systems.
- Installation of timber stakes and logs may still cause localised disturbance to vegetation and dune substrate, especially during construction.
- Potential for cumulative impacts on coastal systems due to encroachment beyond the private property boundary.
- Increased human access into previously less disturbed areas may result in secondary impacts, such as disturbance to fauna, and vegetation damage.
- Although low-impact, the structures may still result in visual intrusion within a natural coastal landscape.
- There is a risk that the demarcated pathways could shift or degrade over time, potentially leading to renewed informal access and associated environmental impacts if not maintained.

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:

Erosion and Sediment Control Technologies

Use of geotextiles or biodegradable erosion control mats (if required):

- Stabilises disturbed areas during and after construction.
- Prevents sediment movement and vegetation loss.

Provide a description of any other technology alternatives investigated.

N/A

Provide a motivation for the preferred technology alternative.

The implementation of erosion and sediment control technologies (such as biodegradable erosion control mats, geotextiles, and stabilisation measures) is motivated by the need to protect the integrity of the sensitive coastal dune environment during and after construction.

The site is located within a dynamic coastal system, where soils are typically sandy, unconsolidated, and highly susceptible to erosion, particularly when disturbed.
Construction activities, even at a small scale, have the potential to destabilise dune surfaces, leading to localised erosion and sediment movement if not appropriately managed.

The use of erosion and sediment control measures ensures that:

Disturbed areas are stabilised immediately following construction; wind and water erosion are minimised; sediment does not migrate into adjacent undisturbed areas.

The selection of biodegradable and environmentally compatible materials ensures that:

- No long-term artificial barriers are introduced into the system;
- Natural vegetation can re-establish over time;
- The measures integrate with and support natural ecological processes.

These technologies support the precautionary approach, by preventing secondary impacts that may arise from initial disturbance. The use of such measures also aligns with best practice environmental management and reduces the risk of cumulative degradation of the dune system.

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.

Positive Impacts:

- Stabilisation of disturbed dune surfaces, reducing the risk of wind and water erosion.
- Prevention of sediment movement into adjacent undisturbed areas, protecting surrounding vegetation and habitats.
- Supports vegetation re-establishment by providing a stable substrate for plant growth.
- Reduces the likelihood of secondary environmental impacts, such as dune destabilisation and habitat degradation.
- Assists in maintaining natural coastal processes by preventing excessive disturbance during construction.
- Use of biodegradable materials ensures that interventions are temporary and integrate into the natural environment over time.
- Contributes to overall site rehabilitation and ecological recovery.

Negative Impacts:

- Localised disturbance during installation of erosion control measures.
- If not correctly installed, materials may impede natural sand movement in the short term.
- Potential for visual intrusion until vegetation re-establishes and materials degrade.
- Risk of material displacement (e.g. by wind or storm events), which could create debris in the surrounding environment.
- Some geotextiles (if not biodegradable) may introduce artificial materials into the environment if not removed.
- Temporary restriction of faunal movement in small areas where mats or stabilisation measures are placed.

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.

The 'No-Go' option, which entails not proceeding with the proposed development, is not considered the preferred alternative for the following reasons:

- While the 'No-Go' option would avoid any direct construction-related impacts, it would not address existing and ongoing environmental impacts on the site.
- In the absence of a formalised access structure, informal and uncontrolled movement across the site is likely to continue, resulting in:
  - Ongoing trampling of dune vegetation;
  - Increased risk of erosion and dune destabilisation;
  - Gradual degradation of habitat for fauna.
- The lack of a defined pathway may lead to the widening of disturbed areas over time, thereby increasing the overall environmental footprint.
- The proposed development provides a low-impact, managed solution that consolidates access and reduces long-term cumulative impacts, which would not be achieved under the 'No-Go' option.
- The 'No-Go' option does not take advantage of an opportunity to implement environmentally sensitive design measures, such as elevated structures that maintain ecological processes and reduce disturbance.
- From a land-use perspective, the 'No-Go' option prevents the reasonable and sustainable use of the property, despite the proposal being small-scale and appropriately designed for the coastal context.

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.

1. Location/site – only one site was assessed as the location for the deck and boardwalk are limited.
2. Activity - The EIA was commissioned for the sole purpose of developing a deck and boardwalk on Erf 9706 where the previously existing deck and boardwalk had burned down in the 2017 fires.
3. Design/ Layout - the construction of a timber deck (281m^2) and boardwalk (42.5m^2) that will terminate within the applicant's property boundary; therefore, no landowner consent is required.
4. Technology - The implementation of erosion and sediment control technologies (such as biodegradable erosion control mats, geotextiles, and stabilisation measures) is motivated by the need to protect the integrity of the sensitive coastal dune environment during and after construction.

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 a no-go zone for development i.e. State-Owned land will be a no-go zone for development as there is no consent from the state to utilise this land.

During construction of the deck and boardwalk there will be strict access control and clearly demarcated boundaries to ensure that no construction-related activities, material storage, or movement of personnel occur within these sensitive areas.

34° 5'24.97"S 23°22'17.29"E
34° 5'24.53"S 23°22'19.61"E
34° 5'30.26"S 23°22'21.28"E
34° 5'30.31"S 23°22'18.93"E

Figure 7: No-Go area during construction

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:	$S = [(E + D + M)/3 \times (R + I + T + C)/4]/5$ $Significance = (Extent + Duration + Magnitude)/3 \times (Reversibility + Irreplaceability + Threshold + Condition)/4$				
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.

PREFERRED/ ALTERNATIVE 1

Alternative:	
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 portion of the overall biodiversity resource
Extent and duration of impact:	Extends for a limited distance – remains in site boundary. Long term: Project life, 10-25 years
Consequence of impact or risk:	Vegetation would be impacted. Possible minor erosion.
Probability of occurrence:	Probable without mitigation
Degree to which the impact may cause irreplaceable loss of resources:	Low
Degree to which the impact can be reversed:	Medium
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:	High
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.
Residual impacts:	N/A
Cumulative impact post mitigation:	Negligible
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Negligible

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:	Certain
Degree to which the impact may cause irreplaceable loss of resources:	Low. No SCC were noted on site.
Degree to which the impact can be reversed:	High
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
Degree to which the impact can be avoided:	Moderate
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:	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:	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. • Employment of the local community should take place for the duration of construction.
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:	Medium
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:	Low
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

ALTERNATIVE 2:

Alternative:	
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.

Plants, Animals and Terrestrial Biodiversity Assessment – BioCensus (Pty) Ltd (Dr David Hoare), 30 July 2025

1. The proposed infrastructure is within one regional vegetation type, Goukamma Strandveld, which is not listed. in any threat category. However, the foredunes in the Plettenberg Bay area have high value from a biodiversity perspective, a coastal process perspective, and in terms of protecting coastal development from marine natural processes.

2. The proposed infrastructure is not within any CBA or ESA area, although the seaward side of the dunes is within an ESA1 area (outside of footprint area).

3. The vegetation within the proposed infrastructure footprint is natural dune shrubland. There is a bare pathway in the footprint of the previous boardwalk that existed there. This habitat is naturally exposed to long-term natural dune dynamics, but is vegetated and should be maintained in this condition.

4. An impact assessment considered three potential impacts that were relevant to the Terrestrial Biodiversity Theme, namely:

a. Destabilization of dunes: assessed as having LOW significance.
b. Possible loss or damage to protected trees (milkwoods): assessed as having LOW significance.
c. Invasion by alien invasive plants: assessed as having MEDIUM significance.

The main issue that is relevant to the proposed infrastructure is the possible destabilisation of the natural dune system. However, the proposed boardwalk is a measure that would be proposed to protect the dunes, if pedestrian traffic was expected. Nevertheless, it should be constructed and maintained in a way that takes into account the sensitivity of the dune ecosystem, and protects this ecosystem as best as possible.

Terrestrial Biodiversity Statement:

1. Based on the site verification and impact assessment it is confirmed that the site has LOW sensitivity from a Terrestrial Biodiversity perspective.
2. Based on the low risks to surrounding ecosystem function of the proposed project, it is regarded to be an acceptable proposal for the site and can be approved.
3. This statement is subject to any conditions contained in the final approved EMPr.

Plant Species Theme

No flagged, sensitive or listed plant species were found within the proposed development footprint and none are likely to occur on site under current ecological conditions. The footprint area therefore has LOW sensitivity with respect to the Plant Species Theme and a Plant Species Compliance Statement was therefore required. The following is therefore stated:

1. The habitat of the proposed footprint area has low sensitivity with respect to the Plant Species Theme.
2. The proposed development will not have any impacts on any terrestrial plant SCC.
3. Although not threatened, bulbs of Brunsvigia orientalis must be rescued prior to construction, as per requirements of Bitou Municipality.

Animal Species Theme

Of the animal species flagged for the site, there are several bird species and one antelope species that may possibly migrate through the site, or else it forms part of the overall foraging resource of these species. It is possible (but unlikley) that the Knysna Warbler (Vulnerable) migrates trough the site. The Marsh Harrier could occur in the large wetland to the west of the property, but is unlikley to occur on site. The site therefore has LOW sensitivity with respect to the Animal Species Theme. None of these were found during the site inspection. An Animal Species Compliance Statement was therefore required. The following is therefore stated:

1. The habitat of the proposed footprint area has medium sensitivity with respect to the Terrestrial Animal Species Theme.
2. The proposed development may have impacts of Low significance on terrestrial animal SCC.

Aquatic Biodiversity:

Although the site is on coastal dunes, no marine species or ecosystems are directly affected - the proposed infrastructure is located well above the high-tide level and falls within the defined (terrestrial) CBA/ESA mapped areas and a mapped terrestrial vegetation type (Goukamma Dune Strandveld). In the specialist report, ecosystem processes were described at length, and it was emphasized that they are driven by coastal sand-movement processes, which is partly a marine process but located in the terrestrial realm.

Coastal dunes are highly permeable to water, therefore surface aquatic features do not form unless an impermeable layer develops, or if the sand forms hollow areas at or below the level of the water-table. In dune ecosystems the most commonly occurring wetland features that occur are often dune-slack wetlands that are found at the foot of dunes where soil moisture is located close to the surface. Depending on the degree of sand movement, these may be transient systems that develop in the lowest parts of the dune systems. No such features occur on site, nor any other aquatic features.

RECOMMENDATIONS:

1. 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.

2. 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.

3. Retain existing protected trees within the proposed development.

4. If any trees need to be removed or pruned then a permit is required, according to the National Forests Act.

5. 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.

6. Compile and implement an alien management plan, which highlights control priorities and areas and provides a programme for long-term control.

7. Undertake regular monitoring to detect alien invasions early so that they can be controlled, as per the Alien Management Plan.

Geotechnical Soil Test Report – Outeniqua Geotechnical Services (Iain Paton), 20/09/2024)

The natural topography of the site was generally characterised as a coastal dune ridge, sloping to the west and east. Robberg beach was located less than 100m to the east of the site. There were no significant natural drainage features or surface water bodies on the site such as streams, marshes or dams, but the ground surface was fairly irregular with several depressions and small hillocks, typical of a dune field.

Geology & soil profile:

The geological map of the area indicated that the site was underlain by thick deposits of unconsolidated dune sands overlying sedimentary rocks of the Robberg formation at unknown depth.

The profile excavated in test pits correlated with the local geology of the area. The natural soil profiles

were dominated by fine aeolian (dune) sand… The underlying bedrock was not exposed on surface or in test pits and was not expected within a depth of at least 10m.
No groundwater or perched water tables were observed in test pits.

The lab results indicated that the insitu soil was dominated by non-plastic, silty fine sand with negligible clay content and zero heave potential. The soil type was classified according to the Unified

Soil Classification as SM (sand with >12% fines) and was deemed suitable for use as a general filling material (probably G8 quality).

Handheld penetration tests (DCP) conducted through the upper 4m of the profile indicated that the upper 1.5m was very loose, but consistently improving below 2m to medium dense state.

Drainage: The soil was generally permeable but fine grained and may drain slowly in heavy downpours. The soil is also potentially highly erodible under the action of concentrated stormwater, so an effective stormwater management system is highly recommended to collect and discharge stormwater in a controlled manner away from structures. Preventative measures, such as good landscaping, will also mitigate the effect of stormwater on structures.

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

All of the above will be included in the EMPr.

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.

N/A

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

The proposed development will temporarily support local economic activity.

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 proposed development is located within a dynamic coastal environment that is inherently vulnerable to the impacts of climate change. Key risks include sea-level rise, increased storm intensity and frequency, coastal erosion, and shifting dune dynamics. These factors have been carefully considered in the planning and design of the proposed development.

Over time, the site may be affected by coastal erosion and shoreline retreat, which could undermine structures located too close to active dune systems. In addition, increased storm events and storm surges may result in temporary inundation, structural stress, or displacement of infrastructure. Sea-level rise may further alter the position of the shoreline and expand the extent of the littoral active zone, while changing climatic conditions may affect vegetation stability and dune resilience, increasing susceptibility to disturbance.

In response to these risks, the development adopts a precautionary and risk-averse approach that recognises the uncertainty associated with future climate scenarios. The proposed deck and boardwalk are designed as lightweight, elevated, and permeable structures, which reduce resistance to wind and water forces and allow natural processes such as sand movement and dune dynamics to continue. This approach minimises the likelihood of structural failure and reduces potential impacts on the surrounding environment.

The design also incorporates a high degree of reversibility and adaptability, allowing the structures to be removed or modified should coastal conditions change over time. The development footprint has been minimised and is largely confined to previously disturbed areas, thereby reducing exposure to high-risk zones and limiting environmental consequences should impacts occur.

Furthermore, in terms of the Alternative 2; the use of soft engineering methods, such as timber stakes and logs within the State land portion, avoids the introduction of rigid infrastructure that could

exacerbate erosion or interfere with natural coastal processes. The proposal does not include permanent or high-value infrastructure within areas of highest risk, thereby reducing long-term vulnerability.

Overall, the proposed development has been designed to respond proactively to climate change risks. By incorporating low-impact, flexible, and environmentally responsive design measures, the development supports natural coastal resilience and ensures that it remains adaptable to future changes in coastal conditions.

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.

The investigation of the construction of a deck and boardwalk was presented by the applicant for initial desktop study. Specialists were appointed to assess the feasibility of the proposed activity and organs of the state were provided an opportunity to comment on the Draft proposal. Once this was done, the Preferred Alternative was amended to incorporate these findings.

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

As explained above, specialist input and mitigation measures influenced the final proposed activity in order to apply for the best practicable environmental option.

SECTION J: GENERAL

1. Environmental Impact Statement

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

The Environmental Impact Assessment (EIA) has determined that the proposed development of a timber deck and boardwalk within Erf 9706, is environmentally acceptable, subject to the implementation of appropriate mitigation measures.

The assessment confirmed that the site is located within a sensitive coastal environment, including the Coastal Protection Zone; however, it is also partially transformed and does not contain features of high ecological sensitivity such as Critical Biodiversity Areas. The affected vegetation and fauna are typical of coastal dune systems and are considered to be of low to moderate sensitivity, with no significant loss of irreplaceable habitat anticipated.

Potential impacts associated with the development are primarily localised, low in significance, and largely confined to the construction phase. These include limited vegetation disturbance, temporary disruption to fauna, and minor impacts on the visual character of the area. A small portion of the boardwalk follows a new alignment, introducing some additional disturbance; however, this has been minimised through careful siting and design.

The design of the development incorporates elevated, permeable, and reversible structures, which maintain natural coastal processes such as sand movement and dune dynamics, while allowing for faunal movement and vegetation persistence. In terms of Alternative 2, the use of soft engineering methods within the State land portion further reduces environmental impact and avoids hard infrastructure within sensitive areas. This alternative is only possible if landowner consent is obtained.

Importantly, the proposal is expected to result in long-term environmental benefits by formalising access and reducing uncontrolled trampling of dune vegetation, thereby limiting ongoing degradation and supporting ecosystem stability.

No significant cumulative impacts are anticipated, and the development is consistent with applicable legislative and policy frameworks, including coastal management objectives. Climate change risks, such as erosion and sea-level rise, have been taken into account through the adoption of a risk-averse and adaptable design approach.

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:

- Formalisation of access via a deck and boardwalk reduces uncontrolled trampling of dune vegetation.
- Decreases erosion and ongoing habitat degradation.
- Elevated, permeable design allows natural coastal processes (e.g. sand movement, dune dynamics) to continue.
- Maintains habitat connectivity and faunal movement.
- Development is largely confined to previously disturbed areas, avoiding unnecessary impacts on intact environments.
- Alternative 2 - use of soft engineering methods within State land reduces the intensity of development and supports ecological functioning.
- Enables reasonable and sustainable private use of the property.
- Provides minor short-term economic benefits (e.g. construction-related employment).
- Controlled access contributes to long-term environmental protection of the surrounding area.

Negative Impacts:

- Localised vegetation clearance required during construction.
- Temporary disturbance to fauna due to noise, movement, and activity during the construction phase.
- Minor visual impact within the coastal landscape.
- A small new section of boardwalk introduces disturbance into a previously less impacted area.
- Alternative 2 - extension into State-owned land increases the overall area of disturbance and environmental risk.
- Potential for increased human activity in less disturbed areas.
- Exposure to coastal risks such as erosion, storm events, and sea-level rise.
- Risk of degradation of demarcated pathways over time if not properly maintained.

- Possible secondary impacts (e.g. vegetation damage) if access is not well managed.

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

Protection of Coastal Processes:

- Natural coastal processes, including sand movement and dune dynamics, must be maintained.
- No hard engineering structures may be introduced beyond the property boundary that could disrupt the functioning of the coastal system.

Minimisation of Vegetation Disturbance:

- Disturbance to indigenous dune vegetation must be limited to the minimum footprint required for construction.
- No unnecessary clearing or damage to surrounding vegetation may occur.
- Disturbed areas must be rehabilitated using appropriate indigenous species where required.
- Permits for the removal of protected plants must be undertaken prior to construction.

Faunal Protection and Movement:

- Impacts on fauna must be minimised, particularly during construction.
- The design must allow for continued movement of fauna beneath and around the structures.
- No trapping, injury, or disturbance of fauna may occur.

Control of Construction Impacts:

- Construction activities must be low-impact, localised, and of short duration.
- Noise, dust, and general disturbance must be minimised.
- Construction areas must be clearly demarcated to prevent unnecessary disturbance.

Erosion and Sediment Control:

- All disturbed areas must be stabilised to prevent erosion.
- Appropriate erosion and sediment control measures (e.g. biodegradable mats, stabilisation techniques) must be implemented where necessary.
- No sediment movement into surrounding undisturbed areas may occur.

Maintenance of a Small Development Footprint:

- The development footprint must remain confined to approved areas, including the defined boardwalk alignment.
- No expansion beyond the authorised footprint, including into State-owned land, may occur without landowner consent.

Use of Environmentally Sensitive Materials and Methods:

- Construction materials must be environmentally appropriate, preferably sustainable and non-toxic.
- Structures must be elevated, permeable, and reversible, in line with the approved design.

Access Control and Prevention of Secondary Impacts:

- Movement must be restricted to the demarcated boardwalk and pathways.
- Measures must be implemented to prevent uncontrolled access, trampling, and habitat degradation.
- Littering and other indirect impacts must be prevented.

Rehabilitation and Site Clean-Up:

- All disturbed areas outside the permanent footprint must be rehabilitated.
- All construction-related waste and materials must be removed from site.
- The site must be left in a stable and environmentally acceptable condition.
- All redundant pathways must be rehabilitated.

Climate Change Resilience:

- The development must remain adaptable to coastal change, including erosion and sea-level rise.
- Structures must be maintained in a condition that does not pose a risk to the environment in the event of damage or failure.

Monitoring and Maintenance:

- The boardwalk, deck, and demarcated pathways must be regularly inspected and maintained.
- Any signs of erosion, vegetation damage, or structural degradation must be promptly addressed.

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.

All recommendations made by specialists must be conditions of the authorisation to ensure minimal impact is experienced.

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 of the specialists. 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 - N/A

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 – SEE SPECIALIST ASSESSMENTS

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 – N/A

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):