

1. INTRODUCTION

Confluent Environmental was appointed by Cape EAPrac to undertake a site verification for the re-development of the Arch Rock resort, in Keurboomstrand, Plettenberg Bay, in the Western Cape (Figure 1). The site has been classified as having '**Low**' aquatic biodiversity by the Department of Environment, Forestry and Fisheries (DFFE) screening tool.

The scope of work for this report is guided by the legislative requirements of the National Environmental Management Act (NEMA) and the National Water Act (NWA).



Figure 1: Site development plan on Portion 5/296 Keurboomstrand.

1.1 National Environmental Management Act

According to the protocols specified in GN 320 (Protocol for the specialist assessment and minimum report content requirements for environmental impacts on aquatic biodiversity) of the National Environmental Management Act (NEMA; Act No. 107 of 1998), assessment and

reporting requirements for aquatic biodiversity are associated with a level of environmental sensitivity identified by the national web-based environmental screening tool (screening tool). An applicant intending to undertake an activity identified in the scope of this protocol on a site identified by the screening tool as being of:

- **Very High** sensitivity for aquatic biodiversity, must submit an Aquatic Biodiversity Specialist Assessment; or
- **Low** sensitivity for aquatic biodiversity, must submit an Aquatic Biodiversity Compliance Statement.

The screening tool classified the site as being of **Low** aquatic biodiversity as it is not located in a Freshwater Ecosystem Priority Area (FEPA; Nel *et al.*, 2011), or a Strategic Water Source Area, and has no mapped watercourses (wetlands or drainage lines) in or near the property boundary.

According to the protocol, prior to commencing with a specialist assessment a site sensitivity verification must be undertaken to confirm the sensitivity of the site as indicated by the screening tool:

- Where the information gathered from the site sensitivity verification differs from the screening tool designation of **Very High** aquatic biodiversity sensitivity, and it is found to be of a **Low** sensitivity, an Aquatic Biodiversity Compliance Statement must be submitted.
- Similarly, where the information gathered from the site sensitivity verification differs from the screening tool designation of **Low** aquatic biodiversity sensitivity, and it is found to be of a **Very High** sensitivity, an Aquatic Biodiversity Specialist Assessment must be submitted.

1.2 Scope of Work

The objectives of this assessment included the following:

- To undertake a desktop analysis and site inspection to verify the sensitivity of aquatic biodiversity as **Very High** or **Low**; and
- Compile an Aquatic Biodiversity Compliance Statement or Aquatic Biodiversity Specialist Assessment based on the site verification of the sensitivity of the site.

1.3 Assumptions and exclusions

- Much of the present site has been transformed as a tourist resort and it is therefore not possible to determine whether any small watercourses were present on the site and subsequently transformed.

2. APPROACH

The following rationale was adopted to determine the sensitivity of aquatic biodiversity within the footprint of the site:

- In the event that unmapped watercourses are confirmed to fall within the development footprint then the site sensitivity is confirmed as **Very High** and a full specialist freshwater assessment is required; and



Figure 3: Photographs showing the beachfront site (archrock.co.za)

1.2 Scope of work

The Coastal Engineer's investigation for this site involved:

- review of the supplied relevant site information (topographical surveys, spatial development plans, services information, site photographs, etc.);
- analysis of historical images in order to determine the dominant coastal processes at play and possible implications for the property;
- review of the extreme run-up levels expected for the site considering waves, winds, storm surges and sea level rise;
- suggestion of risk mitigation measures considered appropriate for the site and the proposed development; and
- presentation of the findings in the form of a technical report.

1.3 Limitations

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

POWER OF ATTORNEY

I, I.T. DE WAAL (ID 7106245266083), being the Representative/ Person holding Proxy for Keurbooms Rock (Pty) Ltd, being the Registered Owner of the **REMAINDER OF ARCH ROCK 296/5 (KEURBOOMSTRAND), KNYSNA DISTRICT AND BITOU MUNICIPALITY**, hereby nominate Stéfán de Kock of *PERCEPTION Planning*, with power of substitution, to be my agent in name, place and stead, (as set out in their quotation dated 7th September 2021) to sign on my behalf and submit to the appropriate authorities the following application, which mandate shall, without limiting the generality of the a foregoing, include:

- a.) Notification of Intent to Develop (incl. Background Information Document) with relation to redevelopment of the above property, as required in terms of Section 38(1) of the National Heritage Resources Act, 1999 (Act 25 of 1999).

I hereby accept the Terms of Agreement as set out in abovementioned quotation dated 7th September 2021.

Signed at PAAL on 30/09/21.

I.T. de Waal

Registered Owner

(F)

Witness

M. J. de Kock

Witness

Tony Barbour

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PROPOSAL

SOCIO-ECONOMIC ASSESSMENT

FOR

ARCH ROCK DEVELOPMENT

KEURBOOMSTRAND, WESTERN CAPE PROVINCE

SEPTEMBER 2021

1. INTRODUCTION

CapeEAPrac has requested a proposal to undertake a socio-economic assessment for the redevelopment of the Arch Rock resort on Portion 5 of 296 Keurboomstrand near Plettenberg Bay. The applicant is proposing the demolition of the current facility and the reconstruction of new units. The new layout will accommodate 22 units, less than the current 26 units.

2. EXPERIENCE WITH SOCIAL AND SOCIO-ECONOMIC IMPACT ASSESSMENTS

Tony Barbour has undertaken in the region of 230 SIA's, including SIA's for a number of housing, mixed-use and infrastructure projects throughout Africa. All of the SIAs have included a description of the socio-economic baseline conditions and an assessment of the socio-economic impacts. In addition, he is the author of the Guidelines for undertaking SIA's as part of the EIA process commissioned by the Western Cape Provincial Environmental Authorities in 2007. These guidelines have been used throughout South Africa.

3. APPROACH TO SIA

The proposed approach to the assessment will be informed by the Guidelines for SIA endorsed by Western Cape Provincial Environmental Authorities (DEA&DP) in 2007. The Guidelines are based on accepted international best practice guidelines, including the Guidelines and Principles for Social Impact Assessment (Inter-organizational Committee on Guidelines and Principles for Social Impact Assessment, 1994). The approach will also be informed by IAIA Guidance for Assessing and Managing Social Impacts (2015).

The activities will include:

- Review of existing project information;
- Collection and review of baseline socio-economic data (Census 2011 and 2016 Community Survey) and relevant planning and policy documents for the area, including Integrated Development Plan, Spatial Development Plan and Local Economic Development Plan;
- Site visit and semi-structured interviews with selected key affected parties, including the client, local councilors, business, local resident organisations and community representatives, key local government officials, local community representatives, adjacent landowners etc.;
- Identification and assessment of key social and socio-economic issues;
- Assessment of potential impacts (positive and negative) associated with the construction and operational phase. The issues associated with the construction phase include estimate of timing of construction phase, total capital expenditure, number of employment opportunities created, breakdown of the employment opportunities in terms of skill levels (low, medium and high skilled), breakdown of wages per skill level, and assessment procurement policies etc.. The benefits associated with the operational phase include provision of housing and community facilities, contribution to the rates base, etc.
- Identification of potential mitigation and enhancement measures;
- Preparation of Draft Report for comment;
- Incorporate comments on Draft Report and prepare Final Report.

Comments on the interview process

The interview process is a fundamental component of the SIA process. The experience with previous SIA's is that the interview process (identifying interviewees, setting up meetings, confirming interviews, and undertaking interviews) can be a time consuming process that is not always fully understood and or appreciated by the client.

4. OBJECTIVES OF THE STUDY

The objectives of the study are to provide input into the EIA on local socio-economic conditions affected by the proposed project and to identify the potential socio-economic opportunities and risks associated with the project. In so doing the study will seek to identify measures that can be implemented to enhance opportunities (construction and operational phase) and avoid and or minimize the potential socio-economic risks.

5. BUDGET AND TIME

A breakdown of professional fees and disbursements is provided in the table below.

1. INTRODUCTION

A redevelopment of the existing infrastructure has been proposed for Portion 5 of Farm 296 Arch Rock, Keurboomstrand. The proposed redevelopment will take place in an area where cottages are already present (and have been present in some capacity since the 1940s), and will consist of changing internal access and positioning of accommodation units. See Figure 1 for a map of the area that will be impacted by the redevelopment. The Department of Forestry, Fisheries and the Environment (DFFE) screening tool (performed on 6 September 2021) identified the site as having a **Medium** Animal Species Theme sensitivity. A medium sensitivity requires the submission of a Terrestrial Animal Species Compliance Statement. This Compliance Statement, as per the protocol set out by the DFFE (2020) reports on a site visit to the area that will be impacted by the development (the study area), during which the presence or possible presence of the Species of Conservation Concern (SCC) identified by the screening tool was determined.

For this proposed development, these species identified in the screening tool are the following:

- *Sarophorus punctatus* (Scarabaeidae beetle)
- *Aneuryphymus montanus* – Yellow-winged Agile Grasshopper (grasshopper)

This report's scope follows the legislative requirements set out by the National Environmental Management Act 107 of 1998, as per the latest government gazetted notice (No. 1150, Protocol For The Specialist Assessment And Minimum Report Content Requirements For Environmental Impacts On Terrestrial Animal Species, October 2020)

(1) Introduction and Terms of Reference

The terms of reference is to conduct a vegetation survey to confirm the vegetation unit and conservation status; and describe the vegetation and sensitivity, with reference to the fynbos forum ecosystems and NEMA specialist guidelines. This is to inform the environmental impact of activities within transformed Goukamma Dune Thicket habitat; and identify risks, suggest mitigation and make recommendations for implementation. The sensitivity of the study area (see Fig. 1) at Keurboomstrand is described in context of the remaining natural habitat, current land use and suitability of redevelopment.



Figure 1: Showing the property (yellow polygon) at Keurboomstrand (image courtesy of Google Earth).