

SUMMARY OF THE PUBLIC PARTICIPATION PROCESS

This section of the report is included in compliance with the Regulations. Public participation is an integral part of the EIA process, and affords potentially interested and potentially affected parties (I&APs) an opportunity to participate in the EIA process, or to comment on any aspect of the development proposals.

Other relevant considerations regarding the public participation process being undertaken for this project are that:

- The public participation process being undertaken for this project complies with the requirements of the Regulations.
- The description of the public participation process included in sections below itemises the steps and actions undertaken.

Adverts were placed in the following newspaper:

- Weslander on the 09 February 2017

The notice boards were placed on site from 3 February 2017.

The Pre-Application Consultative Basic Assessment Report was sent to the following key Departments:

1. Bergrivier Local Municipality
2. CapeNature
3. DEA&DP: Pollution Management
4. DEA&DP: Waste Management
5. Department of Agriculture, Western Cape
6. Department of Water and Sanitation
7. Heritage Western Cape
8. West Coast Aboriginal Council
9. West Coast District Municipality

Six notices were sent via e-mail on 03 February 2017 to identified owners and occupiers of land adjacent to the site where the activity is undertaken. The notice requested them to register as Interested and Affective Parties (I&APs) and invited them to provide written comments together with the above reference number, their name, contact details and an indication of any direct business, financial, personal or other interest which they have in the application to the contact person indicated below within 30 days from the date of this notice. The notice also requested the owner to inform all persons residing on the property.

STEPS TAKEN TO NOTIFY POTENTIALLY INTERESTED AND AFFECTED PARTIES

This section of the report is included in compliance with the Regulations.

Potential I&APs were notified about the project by:

1. Fixing a notice board at the boundary of the site in compliance with the Regulations. All relevant and required information was displayed on the notice board.

The notice board contained the following minimum information (Size of Board 70 x 50 cm):

- how to register as an interested and affected party;
- the manner in which representations on the application may be made;
- where further information on the application or activity can be obtained; and
- the contact details of the person(s) to whom representations may be made.
- The fact that the public participation process had commenced, that a basic assessment process will be followed, the dates within which they can register or send comments and what the proposed activity constituted, was displayed.

Photos of the notice board are included. The notice board was placed on site on 03 February 2017.

2. Giving written notice to owners and occupiers of land adjacent to the site where the activity is to be undertaken, the municipal councillor of the ward within which the site is located, the local municipality and those organs of state having jurisdiction in respect of any aspect of the project as required by the Regulations.
3. Placing an advertisement in a local newspaper in compliance with the Regulations. An advert was placed in the Weslander on 09 February 2017 notifying the public of the development and inviting them to register as Interested and Affected Parties within 30 days.
4. Lists of Identified and Registered Interested and Affected Parties.

This section of the report is included in compliance with the Regulations. This list includes the potential as well as the registered Interested and Affected Parties. The list of parties who were identified as potential I&APs as per the requirements of the Regulations and the list of parties who requested registration as an I&AP, and who are registered on the I&AP database for the project as required in terms of the Regulations were included. A Comments and Response Report from registered I&AP's will be included.

5. Workshop with Key Role players
No workshops were held.

COPY OF NOTICE OT NEIGHBOURS

From: Yolandie Henstock [mailto:3olandie@ecoimpact.co.za]

Sent: 03 February 2017 09:32 AM

To: cjkotze@wcdm.co.za

Subject: Public Participation Process: Expansion of the Kliphoek River Resort on Portion 1 of farm no. 1196 & farm no. 1196, Velddrif.

From: Yolandie Henstock [mailto:3olandie@ecoimpact.co.za]

Sent: 03 February 2017 09:38 AM

To: antoinettelaubscher3@gmail.com

Subject: Public Participation Process: Expansion of the Kliphoek River Resort on Portion 1 of farm no. 1196 & farm no. 1196, Velddrif.

**PUBLIC PARTICIPATION PROCESS
EXPANSION OF THE KLIPHOEK RIVER RESORT ON PORTION 1 OF FARM NO. 1196 & FARM NO.
1196, VELDDRIF.
DEA&DP REFERENCE NR: 16/3/3/6/7/1/F1/14/2210/16**

Notice is hereby given to the public participation process commenced by Kliphoek River Resort for the expansion of the Kliphoek River Resort on portion 1 of farm no. 1196 and farm no. 1196, Velddrif.

Location: The property is situated on the southern banks of the Berg River, approximately 5.5km southeast of Velddrif off the Velddrif/Hopefield road.

Listed Activities:

Activity No(s):	Provide the relevant Basic Assessment Listed Activity(ies) as set out in Listing Notice 1 (GN No. R. 983)
12	The development of- (21) canals exceeding 100 square metres in size; (ii) channels exceeding 100 square metres in size; (iii) bridges exceeding 100 square metres in size; (iv) dams, where the dam, including infrastructure and water surface area, exceeds 100 square metres in size; (v) weirs, where the weir, including infrastructure and water surface area, exceeds 100 square metres in size; (vi) bulk storm water outlet structures exceeding 100 square metres in size; (vii) marinas exceeding 100 square metres in size; (viii) jetties exceeding 100 square metres in size; (ix) slipways exceeding 100 square metres in size; (x) buildings exceeding 100 square metres in size; (xi) boardwalks exceeding 100 square metres in size; or (xii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs- (a) within a watercourse; (b) in front of a development setback; or I if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; - excluding- (aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;

	<p>(bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;</p> <p>(cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies;</p> <p>(dd) where such development occurs within an urban area; or</p> <p>(ee) where such development occurs within existing roads or road reserves</p>
13	<p>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-</p> <p>(i) a watercourse;</p>
17	<p>Development-</p> <p>(21) in the sea;</p> <p>(ii) in an estuary;</p> <p>(iii) within the littoral active zone;</p> <p>(iv) in front of a development setback; or</p> <p>(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;</p> <p>in respect of-</p> <p>(a) fixed or floating jetties and slipways;</p> <p>(b) tidal pools;</p> <p>(c) embankments;</p> <p>(d) rock revetments or stabilising structures including stabilising walls;</p> <p>(e) buildings of 50 square metres or more; or</p> <p>(f) infrastructure with a development footprint of 50 square metres or more – but excluding-</p> <p>(aa) the development of infrastructure and structures within existing ports or harbours that will not increase the development footprint of the port or harbour;</p> <p>(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;</p> <p>(cc) the development of temporary infrastructure or structures where such structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared; or</p> <p>(dd) where such development occurs within an urban area.</p>
19	<p>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</p> <p>(i) a watercourse;</p> <p>(iii) 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</p>
27	<p>The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation</p>
28	<p>Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 01 April 1998 and where such development:</p> <p>(ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare;</p>
49	<p>The expansion of –</p> <p>(v) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; where such expansion or expansion and related operation occurs-</p> <p>(a) within a watercourse;</p> <p>(a) (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;</p>

Activity No(s):	Provide the relevant Basic Assessment Listed Activity(ies) as set out in Listing Notice 3 (GN No. R. 985)
14	<p>The development of (viii) jetties exceeding 10 square metres in size; (x) buildings exceeding 10 square metres in size; (xi) boardwalks exceeding 10 square metres in size; or (xii) infrastructure or structures with a physical footprint of 10 square metres or more; Where such development occurs (a) within a watercourse If no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of the a watercourse; (f) In Western Cape: i. Outside urban areas, in: bb) National Protected Area Expansion Strategy Focus areas; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; (gg) Core areas in biosphere reserves; or (hh) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined.</p>
17	<p>The expansion of a resort, lodge, hotel and tourism or hospitality facilities where the development foot print will be expanded. (f) In Western Cape: ii. Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; or iii. All areas outside urban areas.</p>

Exemption: No application for any exemption is sought.

Opportunity to participate: Interested and Affected Parties are invited to register interest within the process, or provide written comments to Eco Impact within 30 days of this notice. The project title, your full name, contact details, plus indication of any direct business, financial, personal or other interest you may have in this application must please be provided and fully described.

Contact: Nicolaas Hanekom
 PO Box 45070, Claremont, 7735
Tel: 021 671 1660
Email: admin@ecoimpact.co.za
Date: 03 February 2017



COPY OF NOTICE ERECTED ON SITE

PUBLIC PARTICIPATION PROCESS

EXPANSION OF THE KLIPHOEK RIVER RESORT ON PORTION 1 OF FARM NO. 1196 & FARM NO. 1196, VELDDRIF.

DEA&DP REFERENCE NR: 16/3/3/6/7/1/F1/14/2210/16

Notice is hereby given to the public participation process commenced by Kliphoek River Resort for the expansion of the Kliphoek River Resort on portion 1 of farm no. 1196 and farm no. 1196, Velldrif.

Location: The property is situated on the southern banks of the Berg River, approximately 5.5km southeast of Velldrif off the Velldrif/Hopefield road.

Listed Activities:

Activity No(s):	Provide the relevant Basic Assessment Listed Activity(ies) as set out in Listing Notice 1 (GN No. R. 983)
12	The development of- (21) canals exceeding 100 square metres in size; (ii) channels exceeding 100 square metres in size; (iii) bridges exceeding 100 square metres in size; (iv) dams, where the dam, including infrastructure and water surface area, exceeds 100 square metres in size; (v) weirs, where the weir, including infrastructure and water surface area, exceeds 100 square metres in size; (vi) bulk storm water outlet structures exceeding 100 square metres in size; (vii) marinas exceeding 100 square metres in size; (viii) jetties exceeding 100 square metres in size; (ix) slipways exceeding 100 square metres in size; (x) buildings exceeding 100 square metres in size; (xi) boardwalks exceeding 100 square metres in size; or (xii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs- (a) within a watercourse; (b) in front of a development setback; or I if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; - excluding- (aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such development occurs within an urban area; or (ee) where such development occurs within existing roads or road reserves
13	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- (i) a watercourse;

17	<p>Development-</p> <p>(21) in the sea;</p> <p>(ii) in an estuary;</p> <p>(iii) within the littoral active zone;</p> <p>(iv) in front of a development setback; or</p> <p>(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;</p> <p>in respect of-</p> <p>(a) fixed or floating jetties and slipways;</p> <p>(b) tidal pools;</p> <p>(c) embankments;</p> <p>(d) rock revetments or stabilising structures including stabilising walls;</p> <p>(e) buildings of 50 square metres or more; or</p> <p>(f) infrastructure with a development footprint of 50 square metres or more – but excluding-</p> <p>(aa) the development of infrastructure and structures within existing ports or harbours that will not increase the development footprint of the port or harbour;</p> <p>(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;</p> <p>(cc) the development of temporary infrastructure or structures where such structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared; or</p> <p>(dd) where such development occurs within an urban area.</p>
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27	<p>The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation</p>
28	<p>Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture or afforestation on or after 01 April 1998 and where such development:</p> <p>(ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare;</p>
49	<p>The expansion of –</p> <p>(v) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; where such expansion or expansion and related operation occurs-</p> <p>(a) within a watercourse;</p> <p>(a) (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;</p>
Activity No(s):	Provide the relevant Basic Assessment Listed Activity(ies) as set out in Listing Notice 3 (GN No. R. 985)

<p>14</p>	<p>The development of (viii) jetties exceeding 10 square metres in size; (x) buildings exceeding 10 square metres in size; (xi) boardwalks exceeding 10 square metres in size; or (xii) infrastructure or structures with a physical footprint of 10 square metres or more; Where such development occurs (a) within a watercourse If no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of the a watercourse; (f) In Western Cape: i. Outside urban areas, in: bb) National Protected Area Expansion Strategy Focus areas; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; (gg) Core areas in biosphere reserves; or (hh) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined.</p>
<p>17</p>	<p>The expansion of a resort, lodge, hotel and tourism or hospitality facilities where the development foot print will be expanded. (f) In Western Cape: ii. Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; or iii. All areas outside urban areas.</p>

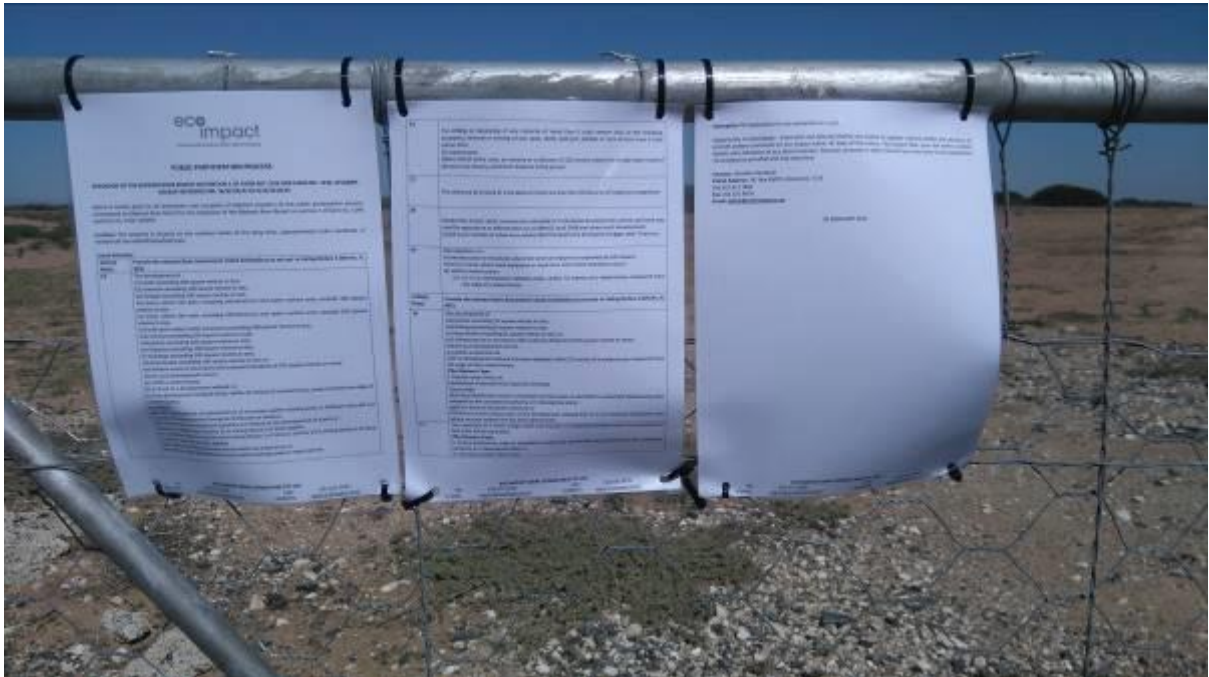
Exemption: No application for any exemption is sought.

Opportunity to participate: Interested and Affected Parties are invited to register interest within the process, or provide written comments to Eco Impact within 30 days of this notice. The project title, your full name, contact details, plus indication of any direct business, financial, personal or other interest you may have in this application must please be provided and fully described.

Contact: Nicolaas Hanekom
PO Box 45070, Claremont, 7735
Tel: 021 671 1660



PROOF OF NOTICES ERECTED ON SITE ON 03 FEBRUARY 2017.



COPY NOTICE PUBLISHED IN NEWSPAPER

PUBLIC PARTICIPATION PROCESS

PROPOSED EXPANSION OF THE KLIPHOEK RIVER RESORT ON PORTION 1 OF FARM NO. 1196 AND FARM NO. 1196, VELDDRIF

DEA&DP DEVELOPMENT MANAGEMENT REFERENCE NR: 16/3/3/6/7/1/F1/14/2210/16

Notice is given of the public participation process commenced by Kliphoeek River Resort for the proposed expansion of the Kliphoeek River Resort on portion 1 of farm no. 1196, and farm no. 1196, Velddrif, on approximately 135.4ha on Farm 1196 Velddrif.

Location: The property is situated on the southern banks of the Berg River, approximately 5.5km southeast of Velddrif off the Velddrif /Hopefield road.

Listed Activities: GNR 983 Listing Notice 1 – Listed Activities 12, 13, 17, 19, 27, 28 & 49: GNR 985 Listing Notice 3 – Listed Activities 14 & 17.

Exemption: No application for any exemption is sought.

Opportunity to participate: Interested and Affected Parties are invited to register interest within the process, or provide written comments to Eco Impact within 30 days of this notice. The project title, your full name, contact details, plus indication of any direct business, financial, personal or other interest you may have in this application must please be provided and fully described.

Contact: Nicolaas Hanekom
PO Box 45070, Claremont, 7735
Fax: 088 021 671 1660
Tel: 021 671 1660
Email: admin@ecoimpact.co.za



9 Februarie 2017

SALDANHA - 3-sterre-keuse, met dubbel-kamer, slaan en buite-keuse, 3 motorhuise, by onderdak, 41 900 000, Sun-Mare 083 259 1146.

SALDANHA - 4-sterre-keuse met twee slaan, twee motorhuise, by onderdak, 41 900 000, Sun-Mare 083 259 1146.

SALDANHA - Netjies 2-sterre-keuse met dubbelkeuse, 41 200 000, Sun-Mare 083 259 1146.

SALDANHA - 3890 000 OMA, twee 2-slaan-keuse, twee motorhuise, dubbelkeuse, by onderdak, 41 200 000, Sun-Mare 083 259 1146.

John Steyn Properties
161 710 0000

VELDRIF
4445 900
3 slaan, 1000 7 haak, twee motorhuise, dubbelkeuse, by onderdak, 41 200 000, Sun-Mare 083 259 1146.

VREDENBURG - Green-Estate Eiensame, aparte motorhuise, dubbelkeuse, by onderdak, 41 200 000, Sun-Mare 083 259 1146.

VREDENBURG - 4-sterre-keuse met dubbelkeuse, 41 200 000, Sun-Mare 083 259 1146.

VREDENBURG - 4-sterre-keuse met dubbelkeuse, 41 200 000, Sun-Mare 083 259 1146.

Breinkos

Ken jou gemeenskap.



**Dekking van
gemeenskapsnuus,
stories van
plaaslike glanspersone,
sport,
opvoedkundige sake,
gemeenskapsprojekte
en heelwat meer.**

Weslander

SIMON SAYS BUY...
WHAT YOU LIKE IN THE SMALLads
YOU NEVER KNOW WHAT YOU MIGHT FIND!

0801 76255 237 • e-mail: jacobens.fourie@media24.com

**PUBLIC PARTICIPATION PROCESS
PROPOSED MALMESBURY SEWER PIPELINE
DEA&DP REFERENCE NR: 16/3/3/6/7/1/F1/14/2210/16**

Notice is given of the public participation process commenced by Malmesbury Municipality for the construction of a new 800mm diameter sewer pipeline to be constructed from the proposed On the Edge high density urban housing development to the Malmesbury Sewerage Works, Location: The proposed pipeline is located adjacent to the existing railway line, which crosses the R17 at the entrance to Malmesbury. The proposed route extends to the Malmesbury Waste Water Treatment Works.

Listed Activities: GNR 983 Listing Notice 1 - Listed Activity 10.
Exemption: No application for any exemption is sought.
Opportunity to participate: Interested and Affected Parties are invited to register interest within the process, or provide written comments to Eco Impact within 30 days of this notice. The project title, your full name, contact details, plus indication of any direct business, financial, personal or other interest you may have in this application must please be provided and fully described.

Contact: Lauren Anshere
PO Box 45070, Claremont, 7735
Fax: 021 671 1660
Tel: 021 671 1660
Email: admin@ecoimpact.co.za

**PUBLIC PARTICIPATION PROCESS
PROPOSED EXPANSION OF THE KLIPHOEK RIVER RESORT
ON PORTION 1 OF FARM NO. 1196 AND FARM NO. 1196, VELDDRIF
DEA&DP DEVELOPMENT MANAGEMENT REFERENCE NR:
16/3/3/6/7/1/F1/14/2210/16**

Notice is given of the public participation process commenced by Kliphoeek River Resort for the proposed expansion of the Kliphoeek River Resort on portion 1 of farm no. 1196, and farm no. 1196, Velddrif, on approximately 135.4ha on Farm 1196 Velddrif.

Location: The property is situated on the southern banks of the Berg River, approximately 5.5km southeast of Velddrif off the Velddrif /Hopefield road.

Listed Activities: GNR 983 Listing Notice 1 - Listed Activities 12, 13, 17, 19, 27, 28 & 49: GNR 985 Listing Notice 3 - Listed Activities 14 & 17.
Exemption: No application for any exemption is sought.
Opportunity to participate: Interested and Affected Parties are invited to register interest within the process, or provide written comments to Eco Impact within 30 days of this notice. The project title, your full name, contact details, plus indication of any direct business, financial, personal or other interest you may have in this application must please be provided and fully described.

Contact: Nicolaas Hanekom
PO Box 45070, Claremont, 7735
Fax: 088 021 671 1660
Tel: 021 671 1660
Email: admin@ecoimpact.co.za

PROOF OF POSTAGE / DELIVERY/E-MAIL

**MAILING LIST – KLIPHOEK RIVIEROORD EXPANSION ON PORTION 1
OF FARM 1196, VELDDRIF**

Swartjiesbaai Trust / Farm 59
C. Kotze
082 804 4544
dienssentrum@ddcswartland.co.za

Jan Kotze Familie Trust / Farm 60
Christo Kotze
083 609 8051
cjkotze@wdcn.co.za

Gerhard Tredoux / Farm 110
079 730 6054
brakfontein@outlook.com

Anelia Coetzee / Farm 115
082 39 438
stringer@leapsd.co.za

Antionette Laubscher Wolmarans / Farm 61
079 905 4383
antionettelautscher3@gmail.com

Athur Melck
083 565 1110
kruispad120@gmail.com

Hannes Tredoux / Farm 110
083 286 1578

never answers his phone

PRE-APPLICATION BAR

MAILING LIST KLIPHOEK RIVER RESORT PRE APPLICATION BAR

Bergrivier Municipality
Municipal Manager, Mayor & WC
PO Box 60
Piketberg
7320

REGISTERED LETTER
(with a domestic business reply)
ShareCall 0800 111 502 www.sapo.co.za
RC250845080ZA
CUSTOMER COPY 301029R

CapeNature
Alana Duffell-Canham
Private Bag X5014
Stellenbosch
7599

REGISTERED LETTER
(with a domestic business reply)
ShareCall 0800 111 502 www.sapo.co.za
RC250845078ZA
CUSTOMER COPY 301029R

DEA&DP: Pollution Management
Ms. W Kloppers
Private Bag X9086
Cape Town
8000

HD

DEA&DP: Waste Management
Mr. Eddie Hanekom
Private Bag X9086
Cape Town
8000

HD

Department of Agriculture
Brandon Layman
Private Bag X1
Elsenburg
7606

REGISTERED LETTER
(with a domestic business reply)
ShareCall 0800 111 502 www.sapo.co.za
RC250844963ZA
CUSTOMER COPY 301020R

Department of Water & Sanitation
D Daniels / N.Ndobeni
Private Bag X16
Sanlamhof
7532

REGISTERED LETTER
(with a domestic business reply)
ShareCall 0800 111 502 www.sapo.co.za
RC250845102ZA
CUSTOMER COPY 301028R

Heritage Western Cape
Waseefa Dhansay
Private Bag X9067
Cape Town

HD

8000

West Coast District Municipality
Municipal Manager, Mayor & WC /
Ms D Kotze
PO Box 242
Moorreesburg
7380

REGISTERED LETTER
(with a domestic business reply)
ShareCall 0800 111 502 www.sapo.co.za
RC250845093ZA
CUSTOMER COPY 301028R

DEA&DP Development Management
Ms M Engelbrecht
Private Bag X9086
Cape Town
8000

HD

REGISTERED IAPs
Ms Lana Ignjatovic
Unit 232, First Floor, Quays Commercial
C/o Parklane & Century Way
Century City
Cape Town
7441

REGISTERED LETTER
(with a domestic business reply)
ShareCall 0800 111 502 www.sapo.co.za
RC250845045ZA
CUSTOMER COPY 301028R

Birdlife SA
Dr Giselle Murison
5 Chelsea Crescent
Kirstenhof
7345

REGISTERED LETTER
(with a domestic business reply)
ShareCall 0800 111 502 www.sapo.co.za
RC250845059ZA
CUSTOMER COPY 301028R

M Pienaar
EMAIL

GLOSDERRY
POST OFFICE
2017 -05- 12
FOLIO 2

EcoImpact
P.O. Box 45070
CLAREMONT
7735

7

PROOF

eco impact

Environmental Health & Safety Legal Consulting

12 May 2017

DEA&DP Development Management
Private Bag X9086
Cape Town
8000

Attention: Ms M Engelbrecht



DEA&DP REFERENCE NUMBER: 16/3/3/6/7/1/F1/14/2210/16
PROPOSED EXPANSION OF THE KLIPHOEK RIVER RESORT ON PORTION 1 OF FARM NO. 1196 AND FARM NO. 1996, VELDDRIF

We write to inform the Department that the Pre-Application BAR for the above mentioned application will be sent to all Key Departments and registered I&APs for a regulatory 30 day commenting period on 12 May 2017. Enclosed please find a printed copy of the Pre-Application BAR.

Yours sincerely

NZ Loebenberg (Ms)
EIA Administration and Compliance

Eco Impact Legal Consulting (Pty) Ltd
Reg: 2010/015546/07
Directors: Mark Duckitt
Nicolaas Hanekom
Daniel Weber

Postal Address:
PO Box: 45070
Claremont
South Africa
7735

Office: +27 (0) 21 671 1660
Fax: +27 (0) 21 671 9976
Email: admin@ecoinpact.co.za
Web: www.ecoinpact.co.za



PROOF

eco
impact

Environmental Health & Safety Legal Consulting

12 May 2017

Heritage Western Cape
Private Bag X9067
Cape Town
8000

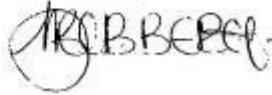
Attention: Waseefa Dhansay

HWC CASE NUMBER: 16102413
DEA&DP REFERENCE NUMBER: 16/3/3/6/7/1/F1/14/2210/16
PROPOSED EXPANSION OF THE KLIPHOEK RIVER RESORT ON PORTION 1 OF FARM NO. 1196 AND FARM NO. 1996, VELDDRIF

Enclosed please find a printed and a CD copy of the Pre-Application BAR for the above mentioned application. Your comments would be appreciated within the regulatory 30 day commenting period or by 15 June 2017.

Refer to Annexure G Specialist Reports for a copy of the HWC Notice of Intent and proof of payment.

Yours sincerely



NZ Loebenberg (Ms)
EIA Administration and Compliance



Eco Impact Legal Consulting (Pty) Ltd
Reg: 2010/015546/07
Directors: Mark Duckitt
Nicolaas Hanekom
Daniel Weber

Postal Address:
PO Box: 45070
Claremont
South Africa
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impact

Environmental Health & Safety Legal Consulting

12 May 2017

DEA&DP Waste Management
Private Bag X9086
Cape Town
8000

Attention: The Director – Mr Eddie Hanekom



DEA&DP REFERENCE NUMBER: 16/3/3/6/7/1/F1/14/2210/16
PROPOSED EXPANSION OF THE KLIPHOEK RIVER RESORT ON PORTION 1 OF FARM NO. 1196 AND FARM NO. 1996, VELDDRIF

Enclosed please find a printed copy of the Pre-Application BAR for the above mentioned application.

Your comments would be appreciated within the regulatory 30 day commenting period or by 15 June 2017.

Yours sincerely

A handwritten signature in black ink, appearing to read 'NZ LOEBENBERG'.

NZ Loebenberg (Ms)
EIA Administration and Compliance

Eco Impact Legal Consulting (Pty) Ltd
Reg: 2010/015546/07
Directors: Mark Duckitt
Nicolaas Hanekom
Daniel Weber

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PROOF

eco impact

Environmental Health & Safety Legal Consulting

15 May 2017

DEA&DP Pollution & Chemicals Management
Private Bag X9086
Cape Town
8000

Attention: The Director – Ms Wilna Kloppers



DEA&DP REFERENCE NUMBER: 16/3/3/6/7/1/F1/14/2210/16
PROPOSED EXPANSION OF THE KLIPHOEK RIVER RESORT ON PORTION 1 OF FARM NO. 1196 AND FARM NO. 1996, VELDDRIF

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TABLE 1: LIST OF KEY DEPARTMENTS AND POTENTIAL INTERESTED AND AFFECTED PARTIES

STAKEHOLDER	CONTACT PERSON	TELEPHONE	FAX NUMBER	EMAIL ADDRESS
Bergrivier Municipality PO Box 60 Piketberg 7320	Municipal Manager, Mayor and Ward Councillor	022 913 6000	022913 1406	bergmun@telkomsa.net burgemeester@bergmun.org.za
CapeNature Private Bag X5014 Stellenbosch 7599	Alana Duffell-Canham	021 866 8000	021 866 1523	aduffell-canham@capenature.co.za
DEA&DP: Pollution Management Private Bag X9086 Cape Town 8000	Ms. W Kloppers /	021 483 2752	021 483 3254	Wilna.kloppers@westerncape.gov.za
DEA&DP: Waste Management Private Bag X9086 Cape Town 8000	Mr. Eddie Hanekom	021 483 2728	021 483 4425	ehanekom@westerncape.gov.za
Department of Agriculture Private Bag X1 Elsenburg 7606	Brandon Layman	021 808 5099	021 808 5092	brandonl@elsenburg.co.za
Department of Water & Sanitation Private Bag X16 Sanlamhof 7532	D Daniels / N.Ndobeni	021 941 6189	086 585 6935	danielsd@dwa.gov.za ndobenin2@dwa.gov.za
Heritage Western Cape Private Bag X9067 Cape Town 8000	Waseefa Dhansay	021 483 9533	021 483 9842	Waseef.dhansay@westerncape.gov.za

West Coast District Municipality PO Box 242 Moorreesburg 7380	Municipal Manager, Mayor & WC Ms D Kotze	022 433 8700	086 692 6113	westcoastdm@wcdm.co.za dkotze@wcdm.co.za
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NEIGHBOURS (OWNERS & OCCUPIERS OF PROPERTY ADJACENT TO THE PROPOSED DEVELOPMENT SITE)

Farm 59
Swartjiesbaai Trust
Attention: C. Kotze
082 804 4544
dienssentrum@ddcswartland.co.za

Farm 60
Jan Kotze Familie Trust
Attention: Christo Kotze
083 609 8051
cjkotze@wcdm.co.za

Gerhard Tredoux
Farm 110
079 730 6054
brakfontein@outlook.com

Anelia Coetzee
Farm 115
082 39 438
stringer@leapsd.co.za

Antionette Laubscher Wolmarans
Farm 61
079 905 4383
antionettelaubscher3@gmail.com

Athur Melck
083 565 1110
kruispad120@gmail.com

Hannes Tredoux
Farm 110
083 286 1578

TABLE 2: LIST OF KEY DEPARTMENTS AND REGISTERED INTERESTED AND AFFECTED PARTIES

STAKEHOLDER	CONTACT PERSON	TELEPHONE	FAX NUMBER	EMAIL ADDRESS
Bergrivier Municipality PO Box 60 Piketberg 7320	Municipal Manager, Mayor and Ward Councillor	022 913 6000	022913 1406	bergmun@telkomsa.net burgemeester@bergmun.org.za
CapeNature Private Bag X5014 Stellenbosch 7599	Alana Duffell- Canham	021 866 8000	021 866 1523	aduffell-canham@capenature.co.za
DEA&DP: Pollution Management Private Bag X9086 Cape Town 8000	Ms. W Kloppers /	021 483 2752	021 483 3254	Wilna.kloppers@westerncape.gov.za
DEA&DP: Waste Management Private Bag X9086 Cape Town 8000	Mr. Eddie Hanekom	021 483 2728	021 483 4425	ehanekom@westerncape.gov.za
Department of Agriculture Private Bag X1 Elsenburg 7606	Brandon Layman	021 808 5099	021 808 5092	brandonl@elsenburg.co.za
Department of Water & Sanitation Private Bag X16 Sanlamhof 7532	D Daniels	021 941 6189	086 585 6935	danielsd@dwa.gov.za

Heritage Western Cape Private Bag X9067 Cape Town 8000	Waseefa Dhansay	021 483 9533	021 483 9842	Waseef.dhansay@westerncape.gov.za
West Coast District Municipality PO Box 242 Moorreesburg 7380	Municipal Manager, Mayor & WC Ms D Kotze	022 433 8700	086 692 6113	westcoastdm@wcdm.co.za dkotze@wcdm.co.za
REGISTERED INTERESTED AND INFECTED PARTIES				
STAKEHOLDER	POSTAL ADDRESS		TELEPHONE	FAX/E-MAIL
Ms Lana Ignjatovic	Unit 232, First Floor, Quays Commercial C/o Parklane & Century Way Century City Cape Town 7441		021 250 0109	lanal@L2B.co.za
Birdlife SA Dr Giselle Murison	5 Chelsea Crescent Kirstenhof 7345		011 789 1122	Giselle.murison@birdlife.org.za
M Pienaar	NA		071 874 8628	marietjiemmpienaar@gmail.com

TABLE 3: COMMENTS & RESPONSES REPORT FOR PRE-APPLICATION PHASE

STAKEHOLDER	DATE	COMMENT	RESPONSE
<p>BirdLifeSA Ms Giselle Murison</p>	<p>15/06/17</p>	<p>1. Additional specialist input/ assessment required, including estuarine habitat and bird surveys:</p> <p>As stated in the BAR, the proposed new jetties and bird hide fall within Estuarine and Riverine Critical Biodiversity Areas (CBAs). However, what is not clear from the BAR, is that other proposed facilities, such as the BMX Bike Trail and Camping Grounds, are also located within the Estuarine and Terrestrial CBA network, respectively. The existing resort and immediate area comprise elements of both the Estuarine and Terrestrial CBA network, as well as small areas of degraded Terrestrial CBA network.</p> <p>While it is understood that this site is already heavily transformed, it still forms part of the Berg River Estuary floodplain, the extent of which is unique in the southwestern Cape. The vegetation within the site originally comprised xeric floodplain, with smaller areas of halophytic floodplain, open pans, halophytic intertidal and supratidal saltmarsh and it is likely that the remaining fragments of natural vegetation conform to these vegetation types.</p> <p>In order to better understand the impacts of the proposed expansion, and to allow for the recommendation of alternative new facility/ unit locations with lower environment impact, as well as the</p>	<p>Noted. Correct. Jetties, lapa and bird hide is within the Aquatic CBA. The camp site that accommodates 8 sites and BMX tract was on the edge of the Aquatic CBA, But the alternative layout has removed the 8 stand campsite in totality and the BMX tract was moved further away from the river and placed next to the other proposed camp site. Please refer to amended layout and report.</p> <p>Noted.</p> <p>Please refer to the specialist study attached under Appendix G by Anchor Environmental dated December 2017 for more details and the impact assessment.</p>

		<p>possibility of more focused mitigation works (including terrestrial/ estuarine habitat rehabilitation and/ or restoration), there is a requirement for specific surveys of the estuarine and riverine habitats; employing the expertise of an estuarine specialist. The need for a terrestrial, botanical survey appears less likely, but could be asked for at the discretion of the estuarine specialist, once the initial surveys have taken place.</p> <p>The value of the Berg River Estuary Important Bird and Biodiversity Area (IBA) is described in the BAR, as are its threats. Specifically, the decline in water-bird numbers due to alteration in habitat quality and other disturbances. Of particular concern is the number of water-bird species which no longer have the numbers to qualify under the IBA congregatory bird category, including several waterfowl species relevant to this site. Previous surveys (and the photos provided) indicate that the wetland area where the proposed bird hide and existing access trails are situated, hereafter known as 'the island', comprises sedge marsh and pans, short reed marsh, and likely halophytic floodplain and saltmarsh. Bird surveys carried out on the island in 2000-2001, found this area of sedge marsh to be one of most valuable in the floodplain, maintaining steady numbers and good diversity of waterfowl throughout the winter, and attracting large numbers of breeding waterfowl during the breeding season, notably, with one of the highest recorded water-bird densities of all habitat sites in the floodplain.</p>	<p>Noted. Please refer to the specialist study attached under Appendix G by Anchor Environmental dated December 2017 for more details and the impact assessment.</p>
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		<p>As stated above, specific surveys of the estuarine and riverine habitats must be undertaken at the island (and across the whole site), particularly as regards the placement of the bird hide (see concerns around proposed location of bird hide below). In addition, the site, including the island, requires specialist bird surveys to establish the current value of the area for birdlife, and to better evaluate the impacts of the increased disturbance resulting from these proposed facilities. These surveys should not be snapshot, once-off surveys, but must instead target periods of high occupancy by, for example, migrant waders and breeding waterfowl (e.g.: previously recorded peak numbers of these species groups have occurred in May-June, Oct-Nov, Feb-March). Continued monitoring of the avian and botanical make-up of the site, particularly the island, would also be required, during and post-construction.</p> <p>Although not specific to the site, the bird monitoring carried out through the Coordinated Waterbird Counts (CWAC – CWAC Site Berg River 7: Kliphoek River and Floodplain 32491813 http://cwac.adu.org.za), as noted in the BAR (Page 18), will provide valuable historical and current bird data, and should be used in conjunction with the additional surveys.</p> <p>It is unclear from this application whether the island is already zoned Open Space 3, or if there is only the intention to do so. The land owner has expressed a</p>	<p>Noted. Please refer to the specialist study attached under Appendix G by Anchor Environmental dated December 2017 for more details and the impact assessment.</p> <p>Noted.</p> <p>The Land Use Planning process and application is submitted to Bergriver Municipality and the zoning of the Island is proposed for Open Space</p>
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	<p>willingness to secure this land for conservation, via rezoning and/ or other means of formal protection. This would be a positive step and one strongly supported by BirdLife South Africa. We are already actively engaged with landowners at the Berg River</p> <p>Estuary, including Kliphoek, to formally protect riparian land through Biodiversity Stewardship, as part of our Western Cape Estuaries Conservation Project (as referenced in the BAR, Page 17). It is hoped that the island, as well as other key areas will receive formal protection through a biodiversity stewardship agreement.</p> <p>However, in order to secure the long term viability of the island as a conservation area, it needs to be sufficiently buffered and subject to minimal disturbance (both from land and from water). An increase in disturbance from human activities, in or adjacent the site, such as boating on the river, foot traffic, BMX biking, or noise etc. may pose a threat to the birds of this site. Birds breeding and foraging in the neighbouring wetlands, including the island, are likely to be affected and may be forced out of highly disturbed areas.</p> <p>Specialist survey input is required in order to assess the potential development and associated disturbance impacts on the birdlife and biodiversity of the site, in order that the integrity of the island and wider area (including the riparian edge and river), as well as other</p>	<p>3.</p> <p>Noted.</p> <p>Noted. Please refer to the specialist study attached under Appendix G by Anchor Environmental dated December 2017 for more details and the impact assessment.</p> <p>Noted. Please refer to the specialist study attached under Appendix G by Anchor Environmental dated December 2017 for more details and the impact assessment.</p>
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		<p>nearby natural habitats be maintained and improved.</p> <p>2) Reduction and re-location of proposed facilities, specifically, a reduction in the number of proposed new jetties and the re-location of the 3 new units at 7, BMX bike trail and potentially, the bird hide.</p> <p>BirdLife South Africa would like to see a reduction in the number of proposed new jetties (please note that proposed new jetties are in red in the SDP, not blue as indicated in the key). We recommend that no new jetties be built in section f-t, and that the site be re-assessed for a maximum of two new jetties in section u-y (for use by campsite and caravan park), and section a-e. It is unclear as to why so many new jetties are being proposed. Ideally, only a single access point/ area should be allowed. This would help to monitor boat numbers and general recreational use of the estuary, as well as reduce the disturbance footprint.</p> <p>The proposed jetties fall within an Estuarine CBA, and therefore maintaining the ecological integrity of the riparian and riverine area should be of paramount importance. The photos provided in Appendix C, indicate that several of the sites for new jetties comprise natural vegetation. Any loss of existing riparian habitat should be prevented, and any negative impact on riparian vegetation should be mitigated for through bankside habitat restoration/ rehabilitation. The reduction in the number of proposed new jetties will help maintain a more natural riparian profile and reduce soil erosion</p>	<p>Please refer to Appendix G, Anchor Environmental for an assessment on the proposed development, including boating and jetties and their impacts. According to the specialist studies (<i>“Some planned development activities (i.e. the construction of new jetties) is likely to cause disturbance to shallow, subtidal sediment adjacent to the construction footprint. The impact of this is rated ‘insignificant’ as the size of the area likely to be impacted is very small”</i>)</p> <p>Noted. Please refer to above.</p>
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		<p>impacts by preserving a vegetated shoreline/ bank. The presence of natural vegetation will also continue to provide habitat for foraging and roosting birds.</p> <p>The BMX bike trail is located within an Estuarine CBA and within relatively close proximity to the river's edge. The trail should be re-located away from river, to discourage disturbance to the river and wetland areas, and to allow for the possible restoration of floodplain habitat in that location. It is assumed that BMX biking refers only to low impact mountain biking, and not motor biking, to which there would be strong objection. Even so, the suitability of a BMX biking trail in an estuarine environment of such high conservation importance should be considered.</p> <p>The building of additional units (most notably the 3 new units at 7 on the SDP) so close to the river's edge is to be discouraged. New units should not be located in front of development setback lines, or for estuaries, within a distance of 100m inland of the high water mark; or at least not within 32m of a watercourse, measured from the edge of the watercourse. Given the nationally recognized importance of this estuary for conservation, proposals should look to comply with the relevant legislation (i.e. ICMA; coastal setback lines etc.). It sets a poor precedent where spatial planning and conservation action have been forward thinking in establishing estuarine functional zones and setback lines to better protect sensitive ecosystems like estuaries. These units should be relocated away from the river's edge, in order</p>	<p>Noted. Please take note that the BMX tract was moved away from the river and is now placed next to the proposed new camp site.</p> <p>Correct; please take note that the purpose of the BMX tract is to provide a place for visitors to ride the bicycles in a confined place and not all over the farm.</p> <p>Please take note that the new layout proposes 5 new units. Although closer than 100m, the units are further than 32 m from the edge of the river and above the 10m above mean sea level contour. Furthermore, there are already chalets in between the proposed 5 new chalets and the river and the impact of the 5 new units is neutralized by the existing development in between the river and the chalets. Please also refer to the Anchor Environmental Specialist study for more detail on the impacts assessed of the proposed activities and infrastructure.</p>
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		<p>to maintain a more natural riparian profile and to preserve the remaining floodplain habitat, which however degraded, is necessary for estuarine function and health.</p> <p>Construction within the floodplain should be avoided, and the placement of the proposed bird hide within the estuarine floodplain needs to be looked at carefully, to avoid negatively impacting wetland habitat and to avoid disturbance to bird populations. BirdLife South Africa would like to offer assistance in the placement of the hide and/ or in surveying alternative locations with lower impact. Please see additional offers of support below.</p> <p>3) Establish bankside erosion control measures</p> <p>While erosion is referenced amongst the potential impacts in the BAR, specific notice should be given to the issue of bankside erosion. Development within the estuary and floodplain at this site, as well as the associated disturbance from construction, and the potentially higher levels of land and river-based recreational disturbance (including wave action from boats), will contribute to bankside erosion. The current points and causes of bankside erosion need to be identified and assessed, and specific bankside erosion control measures put in place to mitigate for these effects and to ensure that no new erosion takes place (as a result of any development/ associated disturbance). These may include reinforcing banks, through revegetation, as well as the restoration and/ or rehabilitation of riparian and floodplain habitat.</p>	<p>Noted. Birdlife South Africa assistance in this regard is appreciated. Currently, the area is visited by bird watchers without the bird hide facility and such a facility will reduce the impact on bird life.</p> <p>Noted. Please refer to Anchor Environmental specialist on possible impacts and proposed mitigation w.r.t erosion.</p> <p>Noted. Areas were identified. These areas are marked on a map and included in the EMP. Management and mitigation measures are included in the operation EMP. Management actions entail the fixing and replacement of rocks at existing erosion areas in order to prevent erosion from happening. Rocks and material wash away from time to time and needed to be replaced to prevent erosion.</p>
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		<p>Erosion has been identified as one of the key environmental issues faced by land owners at the Berg River Estuary. Prolonged erosion causes irreversible soil loss over time. Soil erosion not only involves the loss of land available for farming; the loss of fertile topsoil and the reduction of soil productivity, but is also linked to serious off-site impacts related to the increased mobilisation of sediment and its delivery to rivers, causing siltation and pollution of our water resource.</p> <p>BirdLife South Africa would like to offer our support going forward. As part of our Western Cape Estuaries Conservation Project, land that is being considered for Biodiversity Stewardship will undergo formal Biodiversity Site Assessments in September this year, including estuarine habitat and bird surveys. We are working with partners from the Western Cape Department of Agriculture on trialling several soft-engineering erosion control options at key sites at the estuary, as part of an evolving erosion control programme for the lower Berg River and would be happy to share best practice and the detail of the recommended interventions.</p> <p>We are also able to offer guidance around the bird hide proposal and the bird survey requirements for the site, as well as being able to assist with additional bird and biodiversity data.</p>	<p>Noted. Refer to responses above.</p> <p>Noted.</p>
CapeNature	06/06/17	CapeNature has recently released the Western Cape	Noted.

<p>Ms Alana Duffell-Canham SSD14/2/6/1/8/1/1196-1&1196rem_Resort_Exp_Kliphoek</p>		<p>Biodiversity Spatial Plan (WCBSB) 2017 which replaces the Western Cape Biodiversity Framework. The products depict Critical Biodiversity Areas and Ecological Support Areas and provide other information to be used in land and resource-use planning and decision-making. This WCBSB should be used as a key informant when assessing the impacts of this application. It should be noted that even areas that may appear to be degraded may be of ecological importance or, for example, represent areas that may be flooded, even if only intermittently.</p> <p>The south bank of the Berg River represents an extremely rare and important opportunity to conserve relatively undeveloped estuarine shores and land. Protecting the southern banks of the river is of high importance as the Berg River is the most important estuary on the West Coast of South Africa in terms of providing safe breeding and nursery areas for many fish species. The estuary also provides important breeding, feeding and roosting sites for several species of water-birds.</p> <p>CapeNature has concerns regarding any new development or expansion of existing development on the southern bank or within the Berg River estuary. Although there are existing buildings within the Kliphoek Resort, in principle no new infrastructure is supported within the 1:100 year flood line or 5m contour of the estuary (whichever is greater).</p>	<p>Noted. Please refer to the specialist study attached under Appendix G by Anchor Environmental dated December 2017 for more details and the impact assessment.</p> <p>Noted. No development, other than the jetties and bird hide is within the 1:100 year flood line or below the 10m above mean sea level contour.</p>
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		<p>From a terrestrial perspective, the site is generally quite degraded and even transformed in places. However, as discussed in point 2 above, the ecological importance of the Berg River estuary is high and any new infrastructure, particularly within the river, should be clearly motivated for and the potential impacts should be thoroughly investigated. The number of new jetties proposed is very high and it is not clear why so many are required. Even though this section of the estuary has been zoned for recreational use, the impacts of the additional jetties as well associated boats on the ecology of the river should be considered in more detail. Potential impacts could include impacts on water flow, sedimentation, water quality and fish breeding areas as well as noise and other disturbance related impacts. An estuarine specialist ecologist must be appointed to assess the impacts of the jetties, slipway and the additional boat traffic that may arise as a result of the proposed development.</p> <p>Bank erosion will also need to be addressed. There is already existing erosion and this will increase with additional boating activities.</p> <p>Impacts on birds are also of high concern. A more detailed description and needs analysis of the proposed bird hide should be provided. An avifaunal specialist should assess the potential impacts on birds that may</p>	<p>Correct. Noted. Please refer to the specialist study attached under Appendix G by Anchor Environmental dated December 2017 for more details and the impact assessment.</p> <p>Noted. Please refer to Anchor Environmental specialist on possible impacts and proposed mitigation w.r.t erosion. Noted. Management and mitigation measures are included in the operation EMP.</p> <p>Noted. Please refer to the specialist study attached under Appendix G by Anchor Environmental dated December 2017 for more</p>
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		<p>result from the development including additional walkers as well as the boat traffic around the study area.</p> <p>Areas that are flooded, even if only intermittently, should be excluded from the development proposal. This may include the proposed BMX track. These areas should rather be allowed to naturally rehabilitate.</p> <p>From the photographs and captions provided, it seems that some of the new cottages are already being constructed. Please confirm if this is the case.</p> <p>What is the purpose of the proposed dam that is to be built on an old quarry site?</p> <p>The Environmental Management Programme (EMPr) currently provided is completely generic with no reference to the importance of the Berg River estuary and protection thereof. The EMPr must comply with the Berg River Estuary Management Programme and all by-laws for the area.</p>	<p>details and the impact assessment.</p> <p>Noted. Please take note that the BMX tract was moved away from the river and is now placed next to the proposed new camp site.</p> <p>The construction activities is associated to the old existing infrastructures and not related to the proposed expansion infrastructure.</p> <p>Will be for landscape purposes.</p> <p>Noted. EMP was amended to include the specialist study mitigation measures and additional management actions.</p>
<p>DEA&DP Chemical & Pollution Management Mr G Frantz 16/3/3/6/7/1F1/14/2210/16</p>	<p>15/06/17</p>	<p>Development Set-back lines/ Flood line Delineation Flooding poses a high risk to developments along the banks of rivers/estuaries and ideally no development should take place below the 1:100 flood line. The report on Coastal set-back lines for the WCD uses the 5m above mean sea level (amsl) contour as the development set-back line and the 10m amsl contour to depict the flooding risk zone for a rural estuary setting. These</p>	<p>Noted. No development, other than the jetties and bird hide is within the 1:100 year flood line or below the 10m above mean sea level contour.</p>

		<p>contours should be displayed on the site development plan in Appendix B.</p> <p>This directorate recommends that the applicant considers developing all new/proposed conservancy tanks or abluent blocks above 10 amsl counter in order to minimise the pollution impact during flooding events.</p> <p>Sewage management Given the sensitive environment of the Berg River estuary and close proximity of the resort to the river, NO French drains or “soak-aways” may be used on site.</p> <p>According to Section F.2(a) of the Pre Application BAR all domestic effluent will be captured in closed tanks for collection and disposal at the Velddrif Municipal WWTW. The positions of these conservancy tanks and any existing historical tanks must be undated/displayed on the map in Appendix B.</p> <p>Correspondence of confirmation from the Municipality that there is sufficient capacity for the removal of and disposal/treatment of sewage at the Municipal WWTW, must be included in the final application.</p> <p>In the event that the municipality cannot service the conservancy tanks (due to municipal strikes or truck breakdown) the applicant must devise a contingency plan for the alternative safe pumping of the conservancy tanks. This contingency plan must be included in the</p>	<p>Please refer to amended SDP which display the 10m contour line in red.</p> <p>Noted. All new/proposed conservancy tanks or abluent blocks will be developed above 10 amsl counter.</p> <p>Noted. All close systems and sewerage will be collected and disposed at the Velddrif WWTW.</p> <p>Noted. Refer to Appendix B, SDP.</p> <p>Noted. Correspondence of confirmation of services availability from Berg River Municipality will be included in the final report submitted to DEA&DP.</p> <p>Noted. Included in EMP.</p>
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		Operational Phase of the EMP.	
DEA&DP Waste Management Stefani Milandri 19/2/5/7/F1/14/WL0048/ 17	08/06/17	<p>All general and hazardous waste generated during construction and operational phases, which cannot be reused or recycled, must be stored separately and disposed of at licenced waste disposal facilities to accept such waste. In this regard please note that hazardous waste must be stored in containers within a bunded area and be disposed of at a hazardous waste disposal facility. Hazardous waste may not be disposed of with general construction waste.</p> <p>Please note that any fuel or other hazardous liquids or waste stored on site must be stored in bunds with 110% capacity of the stored liquid to reduce the possibility of soil and water contamination. Alternatively if portable fuel tanks are used drip trays must be used when refuelling and the integrity of such tanks must be maintained.</p> <p>In the event that the storage of general waste (Builders rubble) exceeds 100m³ or that hazardous waste exceeds 80m³, such storage activities must comply with the National Norms and Standards for Storage of Waste, promulgated in Government Notice No 926 of 29 November 2013.</p> <p>In terms of Category A 3(9) of GN. No. 921 of 29 Nov. 2013 of NEM:WA as amended that a waste management licence is required for the disposal of 25 to 25000 tons of inert waste, unless such disposal has been authorised by</p>	<p>Noted. Included in EMP.</p> <p>Noted. Included in EMP.</p> <p>Noted. These fresh holds will not be exceeded. However, it is Included in EMP should the need arise.</p> <p>Noted. No inert waste will be disposed that exceeds these volumes.</p>

		<p>or under other legislation. As such should more than 25tons of inert waste (builder's rubble, sand/soil) be levelled at the proposed facility permission needs to be obtained under the relevant municipal by-laws prior to the said levelling. Should permission not be obtained, a waste management licence needs to be obtained prior to levelling occurring.</p> <p>The EMP must be easily accessible to the persons responsible for managing the proposed activity construction and operation and the adherence to its conditions must be strictly monitored.</p>	<p>Noted. EMP must be on site and available at all times.</p>
<p>Department of Water & Sanitation Ms Nelisa Ndobeni 16/2/7/G10M/A/11</p>	<p>01/06/17</p>	<p>DWS has perused the document and has noted that the proposed activities trigger water uses in terms of Section 21(c) and Section 21(i) of the NWA. This is because the proposed extension impacting the banks of the Berg River.</p> <p>Please advise your client to apply for and obtain a Water Use Authorisation from DWS prior to the commencement with any activities. As per GN 40229 in GN 509 dated 28 August 2016, a Risk Matrix must be submitted as part of the Water Use Authorisation application.</p>	<p>Noted. A WUA application will be submitted together with the formal EIA application process in terms of the One Environmental System Guideline.</p> <p>Please refer to Appendix E attached WUA application proof and Risk Matrix document.</p>
<p>Heritage Western Cape Mr Andrew September 16102413AS0608E</p>	<p>03/08/2017</p>	<p>Since there is no reason to believe that the proposed resort upgrade will impact on heritage resources no further action under Section 38 Of the NHRA is required. However should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered</p>	<p>Noted.</p>

		<p>during the execution of the activities above, all works must be stopped immediately and HWC must be notified without delay.</p> <p>This letter does not exonerate the application from obtaining any necessary approval from any other applicable statutory authority.</p>	
DEA&DP DM	2018/02/08	<p>Following a review of the pre-application BAR, this department has the following advise pertaining to the development proposal:</p> <p>...The following listed activities are therefore applicable to the development proposal: LN1: 12, 17, 19, 19A, 28, 48, 54 and LN3: 14, 17, 23.</p> <p>It is noted that the applicant and the Environmental Assessment Practitioner did not sign the relevant declaration forms. Please ensure that the declarations are completed by the applicant and the EAP and must be duly dated and the signature thereon must be original. It is important to note that by signing the declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, by signing the declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report.</p> <p>This department reminds you that upon of the specific fee reference number, it must be inserted into the</p>	<p>Noted</p> <p>Noted. The necessary amendment to the BAR and application were made and the listed activities amended and included.</p> <p>Noted. The final BAR and Application when submitted will be duly signed.</p> <p>Noted. Specific fee reference details and proof of payment included in the reports.</p>

		<p>application form for Environmental Authorization and proof of payment of the applicable fee must be attached when the Application Form for Environmental Authorization is submitted to this department.</p> <p>You are advised that when undertaking the Basic Assessment process, you must take into account applicable guidelines, including the guidelines developed by this Department. These can be downloaded from the department's website. In particular, the guidelines that may be applicable to the proposed development include, inter alia, the following:</p> <p>Circular EADP 0028/2014: One environmental system Guideline for the review of specialist input in the EIA process (June 2005) Guideline for Environmental Management Plans (June 2005) Guideline on alternatives (March 2013) Guideline on need and desirability (March 2013)</p> <p>Please ensure the BAR and EMPr contain all information requirements outlined in Appendices 1 and 4 respectively of GN R.982 (as amended).</p> <p>A public participation process (PPP) that meets the requirements of Regulation 41 of the EIA Regulations, 2014 (as amended) must be undertaken. It is the EAP discretion at what stage the requirements of Regulation 41 are met, i.e., whether during the pre-application process or formal application process. You are reminded</p>	<p>Noted. Guidelines were taken into account into the BAR and application.</p> <p>Noted. The EMPr and BAR contain all information requirements outlined in Appendices 1 and 4 respectively of GN R.982 (as amended).</p> <p>Noted. Please take note that the dates is 2017 and not 2018 as reported in the departments letter.</p>
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	<p>that a period of at least 30 days must be provided to all potential or registered Interested and Affected Parties (“I&AP’s”) to submit comment on the BAR and EMPr.</p> <p>The following PPP has been undertaken: Identification of potential I&AP’s Fixing a site notice at a place conspicuous to and accessible by potential I&AP’s from 03 February 2018; Giving written notification to potential I&AP’s to provide comment on the development proposal on 03 February 2018; Advertisements were placed in the Westlander on 09 February 2018; and Making the pre-application BAR available for a commenting period of 30 days.</p> <p>In terms of Section 24O (2) and (3) of the NEMA and Regulations 7(2) and 43(2) of the EIA Regulations, 2014 (as amended), any State Department that administers a law relating to a matter affecting the environment relevant to the application must be given 30 days to provide comment. Please note that the EAP is responsible for such consultation. Therefore, it is requested that the EAP include proof of such notification to the relevant State Departments in terms of Section 24O (2) and (3) of NEMA in the BAR, where appropriate. It is noted that, among others, the following State Departments and Organs of State will be consulted during the pre-application process and formal application process as part of the PPP:</p>	<p>Noted. The draft BAR and reports will be send for a 30 day comment period to all registered I&AP’s and State Departments.</p>
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<p>DEA&DP: Waste Management Etienne Roux Etienne.Roux@westerncape.gov.za REF: 19/2/5/3/F1/14/WL0093/18</p>	<p>16/05/2018</p>	<ol style="list-style-type: none"> 1. The abovementioned dBAR (hereafter 'the Report') dated 12 January 2018 and received by the Department of Environmental Affairs and Development Planning, Directorate: Waste Management (hereafter 'the Department') on 17 April 2018, refers. 2. The Department has reviewed the Report and has the following comments: <ol style="list-style-type: none"> 2.1 There is information lacking in the dBAR. This relates to section A (1) AND 2 (c), sections G and section H which have not been filled in. Kindly ensure that all sections are filled in appropriately. 2.2 Kindly fill in the amount of waste expected to be generated by the project during the operational phase, on page 39, in the final BAR. Kindly also confirm that the Municipality has capacity to accommodate the waste expected to be produced by this project. 2.3 The EMP states on page 35 that <i>"Domestic waste not suitable for compost or bio electricity"</i> 	<p>Noted.</p> <p>Noted. BAR amended.</p> <p>Noted. BAR amended.</p> <p>Please take note that the composting referred to in the EMP is small scale in the farm yard or farm area</p>

		<p><i>generation needs to be stored in skips for transport to the Local Authorities registered landfill site". Kindly elaborate on the mentioned composting activity should it be envisioned that composting will occur at the Facility.</i></p> <p>2.4 Kindly provide more information related to the conservancy tanks to be used on site. What will the size of these tanks be? Related to the expected amount of waste water generated, at what frequency will the waste water be removed? How will the integrity of these conservancy tanks be ensured?</p> <p>2.5 Page 47 of the EMPr states that ground and surface water monitoring will be done as per the Department of Water Sanitation's requirements. Kindly elaborate on where this monitoring will occur, as well as at what frequency. Will any monitoring occur in the vicinity of the conservancy tanks?</p> <p>2.6 The Department reserves the right to revise its initial comments and request further information from you based on any new or revised information received.</p>	<p>in order to avoid organic waste from being disposed at landfill.</p> <p>Refer to amended BAR. Five 5 cubic meter close sewerage tanks will be installed at the back (away from the river) of each chalets which can be serviced from the access road to the chalets above the 5m amsl contour, as well as two 5 cubic meters tanks (one on the male side and one on the female side) at the back of the newly to be constructed ablution facilities.</p> <p>It is difficult to elaborate on the frequency and where monitoring will occur. It is however anticipated that DWS will require quarterly ground and surface water quality monitoring. Surface water monitoring in the Berg River is recommended. No groundwater monitoring is recommended. The conservancy tanks are sealed units and any possible pollution will be surface water for which the monitoring in the Berg River will be sufficient.</p> <p>Noted.</p>
<p>BirdLife South Africa Giselle Murison Giselle.murison@birdlife.org.za</p>	<p>16/05/2018</p>	<p>BirdLife South Africa would like to take this opportunity to comment on the draft Basic Assessment Report (BAR) for the proposed expansion of the Kliphoek River Resort. Reference is made throughout to the findings of the Estuarine Specialist Study and Impact Assessment (ESS&IA).</p> <p>1. As stated in the BAR and ESS&IA, the Berg River estuary</p>	<p>Noted.</p>

		<p>is one of the most important estuaries for conservation in South Africa, particularly with respect to its fish and bird species, and the variety and extent of its composite estuarine vegetation types¹.</p> <p>2. In general, BirdLife South Africa does not support the construction of buildings or the development of any other hard infrastructure within the 1:100 year flood line, or estuarine functional zone (5m contour line), whichever is greater, and strongly discourages any loss of Critical Biodiversity Area (CBA).</p> <p>3. However, it is understood that the proposed developments outlined in the BAR fall mostly within existing development and disturbance footprints in an area now largely transformed; and that existing foundations for the new cottages and jetties will be used as far as possible. The new developments will still fall within an active floodplain area and the landowner should be prepared to accept that there is some flooding risk and that no further hardening or changes to the river frontage to reduce this risk will be supported.</p> <p>Rehabilitation of disturbed and eroded areas</p> <p>4. Key mitigation for the proposed development is the rehabilitation of disturbed areas immediately after construction and the prevention of any negative impacts on the remaining intact natural vegetation. Much more detail of these measures is required in the Environmental Management Programme (EMPr).</p> <p>5. The additional hardened infrastructure at this site, the associated disturbance from construction, including the loss of mature riparian vegetation, and the increased levels of land and river-based recreational disturbance (including wave action from boats) will contribute to bankside</p>	<p>Noted.</p> <p>Noted. Please take note that except for the upgrade of the lapa, the new developments will all be above the 5 m above mean sea level contour.</p> <p>Noted. Mitigation measures included in EMP. EMP amended to refer to include more detail and the best practice, environmentally sound, soft-engineering techniques for bank stabilisation at the estuary as produced by the Department of Agriculture.</p> <p>Noted. EMP amended.</p>
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		<p>erosion. Mitigation should also include the immediate rehabilitation of existing eroded areas. Erosion is accelerating due to drought conditions, which have caused massive die-off of reed marsh and other natural riparian vegetation, destabilizing banks and mobilising sediment, resulting in increased siltation and pollution of the river (both of which will be exacerbated by construction activities). BirdLife South Africa is currently exploring a River Maintenance Plan for the estuary, as well as other means of implementing erosion control options, in collaboration with Western Cape Department of Agriculture (DoA) and CapeNature. The DoA has produced a report outlining best practice, environmentally sound, soft-engineering techniques for bank stabilisation at the estuary. The EMPr should include mitigation for the rehabilitation of existing erosion areas and should draw from the interventions outlined in this report.</p> <p>Monitoring and mitigation for increased recreational disturbance</p> <p>6. Kliphoek forms part of the Berg River Estuary Important Bird and Biodiversity Area (IBA), a site of global significance for the conservation of birds and their habitats. The value of the Berg River Estuary IBA is described in the BAR, as are its threats; specifically, the decline in waterbird numbers due to alteration in habitat quality and other disturbances. Of particular concern is the number of waterbird species which no longer have the numbers to qualify under the IBA congregatory bird category, including several waterfowl species relevant to this site. Although the ESS&IA submit that the additional foot and boat traffic will have a very low impact, the number of boats and people using the site and surrounding natural areas should be monitored, especially</p>	<p>Noted. The use of boats on the river will be in accordance with the Berg River Municipality By-Law that is in process of being finalised and is currently in terms of the permit required in place for the Berg River estuary.</p>
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	<p>during peak season. Signage should be erected near the jetties and other information material should be made available, to make people aware of the conservation value of Kliphoek and the estuary, and to encourage people to reduce noise and disturbance impacts. No access to the river should be permitted before sunrise or after sunset to limit disturbance to roosting birds. Monitoring of the avian and botanical make-up of the development site, river channel and estuarine CBA immediately to the north (where the proposed bird hide is located), before, during and post-construction, should be required. Details of monitoring should be included in the EMPr and should draw from BirdLife South Africa's best practice monitoring guidelines. In general, operational requirements need more detail in the EMPr.</p> <p>7. The adjacent estuarine CBA comprises sedge marsh and pans, reed marsh and saltmarsh, and supports high numbers and diversity of waterfowl throughout the winter, in non-drought conditions, notably, with one of the highest recorded waterbird densities from the floodplain area. Together with the river channel itself, these sites also support several Species of Conservation Concern, including the threatened African Marsh Harrier and Eastern White Pelican. No direct access to the pans, sedge and larger reed marsh areas should be allowed, and paths must be set well back from these areas and clearly demarcated. Use must be made of existing paths where possible. Access to this area must be on foot only, and restricted to these paths to prevent trampling of vegetation and additional disturbance. Although some of these areas appear degraded due to the current drought situation, they will likely recover after rain if not disturbed. While</p>	<p>Noted. Refer to amended EMP.</p> <p>Correct. Noted. EMP amended.</p>
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	<p>acknowledging that most of these birds have generally wide distribution ranges, it is still of concern that they might be excluded from this area. The Berg River estuary is a sanctuary for waterbirds, one of the primary reasons for its high conservation importance. Estuarine CBAs are key areas for foraging, breeding and roosting waterbirds and warrant protection.</p> <p>8. The design, placement and construction of the proposed bird hide requires careful consideration to avoid negatively impacting sensitive estuarine habitat and to prevent disturbance to bird populations. BirdLife South Africa is able to offer assistance in the placement and build of the hide. Hide construction should adhere to BirdLife South Africa’s best practice guidelines³.</p> <p>Formal protection of key biodiversity areas</p> <p>9. With the loss of CBA and natural riparian vegetation within the development footprint, and the threat of increased disturbance, the adjacent estuarine CBA should be safeguarded, as it comprises intact estuarine habitat of high conservation value. South Africa’s estuaries remain some of the most threatened ecosystem types in the country⁴ and the Berg River estuarine and floodplain areas require at least partial protection in order to reach its biodiversity protection targets. There is therefore national and provincial imperative to drive formal protection and active conservation at this estuary. The adjacent sensitive estuarine CBA should be formally protected through Biodiversity Stewardship. BirdLife South Africa is currently facilitating Stewardship agreements at the Berg River estuary through our Western Cape Estuaries Conservation Project and may be contacted in this regard. The stewardship agreement should be at least a Biodiversity</p>	<p>Noted. The design and final placement of the bird hide will be done in collaboration with Birdlife South Africa.</p> <p>Noted. The whole island portion is in process to be zoned open space 3. The landowner already indicated willingness and started discussions with CapeNature to incorporate areas into a stewardship agreement.</p>
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		<p>Agreement with title deed endorsements and an associated Management Plan. It should be noted however, that a Protected Environment (PE) is currently being established at the Berg River estuary and the landowners would be strongly encouraged to become part of the PE, which offers higher protection status and greater benefits for landowners.</p> <p>10. A stewardship Management Plan would include habitat rehabilitation and management of natural areas, including reed (<i>Phragmites</i>) management, erosion control and prevention interventions, monitoring of recreational activities and visitor numbers, estuarine and terrestrial vegetation surveys, as well as monitoring of bird numbers and bird and plant species diversity.</p> <p>Other</p> <p>11. The summary of the public participation process contains a table titled “Table 3: Comments and Responses for pre-application phase”. However, no responses have been provided to the comments. Certain issues have not been adequately addressed including motivation for new jetties and the new dam.</p>	<p>Noted.</p> <p>Noted. Refer to above responses.</p>
<p>West Coast District Municipality Doretha Kotze REF: 13/2/12/5/1</p>	<p>24/04/2018</p>	<p>I refer to your letter dated 13 April 2018 and the Draft BAR for the application.</p> <p>The West Coast District Municipality submitted comments on the Pre-Application BAR via email on 14 June 2017 (see below). These have not been included in the Comments and Responses Report for the Pre-Application phase contained in the Draft BAR. Eco Impact is requested to consider and respond to these comments and include them in the relevant documents.</p> <p>1. I refer to your letter dated 12 May 2017 and the Pre-Application BAR for the above-mentioned</p>	<p>Noted.</p> <p>Noted.</p>

		<p>proposal. The West Coast District Municipality's comments are set out below.</p> <ol style="list-style-type: none"> 2. The proposed development is situated within the Berg River Estuary and IBA. All jetties (existing and proposed new jetties) must be applied for. Being situated below the High Water Mark (HWM), all jetties must be registered and leased via CapeNature. 3. All new jetties must be designed to float to prevent erosion and the least environmental damage and impact on the environment. Jetties must be easily removable with limited impact on the estuary and river bank. 4. Bergrivier Municipality does not provide a waste collection service to the farm and all solid waste generated by Kliphoek River Resort must be handled, stored, transported and disposed at a registered municipal waste disposal facility. Costs in this regard to be borne by the developer. To prevent any impact on the natural environment and the Berg River, no solid waste may be incinerated, buried or disposed on the farm. 5. No permits, licences from any organ of state, including service letters from Bergrivier Municipality, the Department of Water and Sanitation Water Use Permit/Licence, were included in the report. 6. Water supply and demand were not adequately addressed, especially regarding daily requirements for the overnight accommodation facilities during peak season and holiday periods (summer). Proof must be provided that the municipality will be in a position to supply in the water requirements of all proposed facilities at the Kliphoek River Resort, especially during times of drought and level 4 water 	<p>Noted. All jetties permit applications will be submitted and applied for authorization once authorized.</p> <p>Noted. All jetties will be floating jetties.</p> <p>Noted. Please refer to Berg River Municipalities letters attached.</p> <p>Services letter from Berg River Municipality attached. Other permits, licenses and authorizations must still be issued.</p> <p>Noted. Please refer to amended BAR under Technological alternatives for more details on water saving installations. Water supply confirmation letter will be included in final BAR submitted to DEA&DP.</p>
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		<p>restrictions. Alternative measures to reduce water demand (reusing or recycling of grey water) was not explored in the Report. Possible utilisation of grey water from showers for reuse in toilets should be investigated, as well as rainwater harvesting.</p> <ol style="list-style-type: none"> 7. In order to become energy efficient the use of alternative/renewable energy sources (solar panels for lighting and geysers, etc) must be investigated. 8. Details on the Wastewater Treatment Systems/Septic Tanks are lacking and were not adequately addressed or indicated on the maps. Specialist reports were also not included. Confirmation from the municipality needs to be provided regarding regular pumping of septic tanks and disposal of effluent at the nearest municipal Waste Water Treatment Works. 9. The existing slipway must be registered as a Public Boat Launch Site (PBLs) as it currently provides access to Coastal Public Property and the Berg River Estuary. Since the slipway is being utilised by the general public, a PBLs Operational Management Plan needs to be compiled. 10. In order to secure the slipway as public access to Coastal Public Property, the developer of the property must register a public access servitude in favour of Bergrivier Municipality as part of the application as required by Section 18(9) of the Integrated Coastal Management Act. 11. Bergrivier Municipality is in the process to gazette a by-law for boating related activities on the water surface of the Berg River Estuary. The resort should, at all times, assist with education and awareness regarding the Berg River Estuary By-law by informing visitors at the resort of the by-law and the health and 	<p>Noted. Please refer to amended BAR.</p> <p>Refer to amended BAR. Five 5 cubic meter close sewerage tanks will be installed at the back (away from the river) of each chalets which can be serviced from the access road to the chalets above the 5m amsl contour, as well as two 5 cubic meters tanks (one on the male side and one on the female side) at the back of the newly to be constructed ablution facilities.</p> <p>The existing slipway is already registered. No new slipways will be registered.</p> <p>The existing slipway is already registered. No new slipways will be registered.</p> <p>Noted. EMP amended to include the by-law requirements once gazetted.</p>
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		<p>safety aspects related to boating in the estuary. The resort should also assist in the issuing of boat licences over weekends and after hours to all visitors. The relevant signage, which will be provided by the municipality, to educated all visitors of the health and safety issues, must be erected at the resort.</p> <p>12. Alien vegetation and eradication/monitoring on the property must be addressed in terms of the National Environmental Management Biodiversity Act (NEMBA).</p>	<p>Noted. Alien vegetation and eradication/monitoring is included in the EMP.</p>
CapeNature	16 May 2018	<p>CapeNature would like to thank you for the opportunity to comment on this application and wish to make the following comments:</p> <p>1. As stated in the estuarine specialist report, the Berg River estuary is considered one of the most important estuaries for conservation in South Africa. The estuary has been identified as an Important Bird Area (IBA) and is also of high conservation importance for fish, invertebrates and vegetation. The south bank of the Berg River represents an extremely rare and important opportunity to conserve relatively undeveloped estuarine floodplains and land.</p> <p>2. In principle, CapeNature does not support the development of any new hard infrastructure within the 1:100 year floodplain or 5m contour of the estuary – whichever is greater. Although we recognise that the terrestrial component of the site is largely transformed, it does still form part of the Berg River Estuary floodplain and the remaining natural vegetation on site is indicative that the site does still function as a floodplain from time to time, despite the impoundment of water higher up the Berg River catchment. The proposed new jetties and bird hide as well as the BMX track and camping areas are located within areas determined as estuarine and riverine Critical Biodiversity Areas (CBAs).</p>	<p>Noted. Recorded as such.</p> <p>Noted. Please take note that except for the upgrade of the lapa, the new developments will all be above the 5 m above mean sea level contour.</p> <p>Please take noted that in the amended layout the BMX track and camping site is moved</p>

	<p>3. However, we acknowledge that most of the proposed development will be within areas where there are existing disturbance footprints and existing foundations and platforms for the cottages and jetties will be used as far as possible. The landowner must still be prepared to accept that there is some flooding risk and no further hardening or changes to the river frontage area to reduce flooding risk will be supported.</p> <p>4. An important mitigation for the proposed development is rehabilitation of disturbed areas immediately after construction. Rehabilitation of existing eroded areas should also be addressed. Much greater detail in this regard is required in the Environmental Management Programme (EMPr).</p> <p>5. Kliphoek is very important site for feeding and sheltering for wading birds and waterfowl. Although the estuarine specialists are of the opinion that the additional foot and boat traffic will have a very low impact, the number of boats and people should be monitored especially during peak season. Signage should be erected near the jetties encouraging people to limit noise and reduce boat speeds. No access to the river should be permitted before sunrise or after sunset to limit disturbance to roosting birds. Direct access to the pans, sedge and reed marsh areas must not be permitted and paths should be set well back from these areas. Although some of these areas appear degraded due to the current drought situation, they will recover after rain if not disturbed. In general, operational requirements need more detail in the EMPr. The EMPr must comply with the Berg River Estuary Management Programme and all by-laws for the area.</p> <p>6. More information is required on access to the bird hide and maintenance of the path to the bird hide. The bird hide should be constructed according to BirdLife's best practice bird hide building guidelines.</p>	<p>outside the estuarine and riverine Critical Biodiversity Areas.</p> <p>Noted. Refer to amended EMP.</p> <p>Noted. Recorded as such.</p> <p>Noted. Mitigation measures included in EMP. EMP amended to refer to include more detail and the best practice, environmentally sound, soft-engineering techniques for bank stabilisation at the estuary as produced by the Department of Agriculture.</p> <p>Noted. EMP amended.</p> <p>Existing footpath will be used to the bird hide. The design and construction of the bird hide will be done in collaboration with Birdlife South Africa.</p>
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	<p>7. The adjacent sensitive estuarine CBAs should be formally protected through Biodiversity Stewardship. Stewardship agreements at the Berg River are currently being facilitated by BirdLife SA through their Western Cape Estuaries Conservation Project and the landowners should approach BirdLife in this regard. A Protected Environment (PE) is currently being established at the Berg River Estuary and the landowners would be strongly encouraged to become part of the PE. At this stage, the stewardship agreement should be at least a Biodiversity Agreement with an associated management plan. The management plan should include habitat rehabilitation and management, especially control of <i>Phragmites</i> reeds, erosion management and prevention and monitoring of recreational activities and number of visitors in sensitive areas.</p> <p>8. All access tracks and roads must be clearly demarcated and no off-road driving should be permitted. Launching sites must be kept to a minimum (preferably only the one existing launching site) and also be clearly demarcated.</p> <p>9. Construction of the new jetties should take place in the dry season. Cement is highly toxic to aquatic fauna and plants and use thereof should be kept to the absolute minimum. If cement is required, ready mix should be used and no cement should be mixed within 30 metres of the river.</p> <p>10. The Draft Scoping Report contains table titled "Table 3: Comments and Responses for pre application phase". However, no responses have been provided to the comments. Certain issues have not been adequately addressed including motivation for new jetties in addition to restoration of the existing jetties.</p> <p>11. Areas that are flooded, even if only intermittently, should be excluded from the development proposal. This may include the proposed BMX track. These areas should rather be</p>	<p>Noted. The whole island portion is in process to be zoned open space 3. The landowner already indicated willingness and started discussions with CapeNature to incorporate areas into a stewardship agreement.</p> <p>Noted. Included in EMP. Only the one existing permitted launch site will be used.</p> <p>Noted. Included in EMP.</p> <p>Noted. Refer to above responses.</p> <p>Noted. Refer to above responses.</p>
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	<p>allowed to naturally rehabilitate.</p> <p>12. From the photographs and captions provided, it seems that some of the new cottages are already being constructed. Please confirm if this is the case.</p> <p>13. What is the purpose of the proposed dam that is to be built on an old quarry site?</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>The cottages constructed in the photographs are existing and approved and does not form part of this expansion application.</p> <p>Old unsightly quarry that will be for landscape purposes.</p>
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CORRESPONDENCE RECEIVED DURING REGISTRATION PERIOD

From: Nicolaas Hanekom [mailto:nicolaas@ecoimpact.co.za]
Sent: 04 February 2017 01:31 PM
To: 'Rocky Roads'; yolandie@ecoimpact.co.za; admin@ecoimpact.co.za
Subject: RE: Public Participation Process: Expansion of the Kliphoeck River Resort on Portion 1 of farm no. 1196 & farm no. 1196, Velddrif.

Goeie more Marietjie

Baie dankie vir epos. Dit is moeilik om nou jou vrae onder te beantwoord in detail. Ons sal julle registreer as Interested and Affected Party end an al die inligting stuur. Email wat link na webtuiste gee waar al die inligting is.

Onder voorlopige en basiese aktiewiteit beskrywing wat kan verander soos wat ons vorder in die proses.

The proposed development will entail:
the construction of 17 new jetties one with a deck and the extension of an existing jetty;
the construction of a bird hide and trail on the island as well as access to the bird hide and trail;
the construction of a new lapa and braai facilities on the foundation of the existing lapa;
the conversion of the old quarry to a dam;
the establishment of a new camping and caravan stands;
the construction of a new boat storage unit (1.1ha);
the construction of 8 new units (cottages);
the expansion of existing accommodation with 4 units; and
the development of a BMX bicycle track (1.1ha).

Kontak my gerus sou daar enige vrae wees.

Kind Regards / Vriendelike Groete

Nicolaas Hanekom
Pri.Sci.Nat (Ecology) 400274/11



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From: Rocky Roads [<mailto:marietjiemmpienaar@gmail.com>]

Sent: Friday, 03 February 2017 1:09 PM

To: yolandie@ecoimpact.co.za; admin@ecoimpact.co.za

Subject: Public Participation Process: Expansion of the Kliphoek River Resort on Portion 1 of farm no. 1196 & farm no. 1196, Velddrif.

Geagte Nicolaas en Yolandie, ek doen graag navraag i v m die uitbreiding van Kliphoek River Resort -

Presies wat behels die aandoek ? daar is listed activities, maar geen duidelik oor die presiese beplanning of toekomstige gebruik nie, kan u asb net kortliks uitlê wat dit basies sou behels ?

PUBLIC PARTICIPATION PROCESS

EXPANSION OF THE KLIPHOEK RIVER RESORT ON PORTION 1 OF FARM NO. 1196 & FARM NO. 1196, VELDDRIF.

DEA&DP REFERENCE NR: 16/3/3/6/7/1/F1/14/2210/16

Respects/Groetnis

M Pienaar

Tel 0718748628

PRE APPLICATION BAR



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

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Enquiries: Ms. N Ndobeni Ndobenin2@dws.gov.za **Telephone:** +27 21 941 6140

File Number: 16/2/7/G10MA/11

EcolImpact Legal Consulting (Pty) Ltd
P. O. Box 45070
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Ms NZ Loebenberg

**PRE-APPLICATION BASIC ASSESSMENT REPORT FOR PROPOSED
EXPANSION OF THE KLIPHOEK RIVER RESORT ON PORTION 1 OF
FARM NO 1196 AND FARM NO 1996, VELDDRIF**

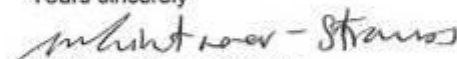
Reference is made to the above-mentioned document dated 12 May 2017.

This Department has perused the document and has noted that the proposed activities trigger water uses in terms of section 21 (c) impeding or diverting the flow of water in a watercourse and section 21 (i) altering the bed, banks, course or characteristics of a watercourse of the National Water Act, 1998 (Act 36 of 1998). This is because the proposed extension impacting the banks of the Berg River.

Please advise your client to apply for and obtain a Water Use Authorisation from this Department prior to commencing with any of the activities. As per Government Gazette No. 40229 in Government Notice 509 dated 28 August 2016, a Risk Matrix must be submitted as part of the Water Use Authorisation application. The Risk Matrix can be found on www.gpwonline.co.za

Please do not hesitate to contact the above office should there be any queries.

Yours sincerely


Melissa Lintnaar-Strauss
Control Environmental Officer
Date 1 June 2017



NATIONAL DEVELOPMENT PLAN
Our Future - make it work



REFERENCE: 19/2/5/7/F1/14/WL0048/17

The Director(s)
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For attention: Mr Nicolaas Hanekom

Dear Sir

COMMENT ON THE PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED EXPANSION OF THE KLIPHOEK RIVER RESORT, PORTION 1 OF FARM NO. 1196 AND FARM NO. 1996, VELDDRIF

1. This letter serves as an acknowledgement of receipt and comment on the aforementioned report dated 12 May 2017 and received by the Department on 15 May 2017.
2. The Sub-Directorate: Waste Management Licencing has the following comments on the aforementioned report and associated Environmental Management Programme ("EMPr");
 - 2.1. All general and hazardous waste generated during the construction and operational phases, which cannot be reused or recycled, must be stored separately, and disposed of at Waste Disposal Facilities ("WDFs") that are licenced to accept such waste. In this regard, please note that hazardous waste must be stored in containers within a bunded area and be disposed of at a hazardous WDF (i.e. it may not be disposed of with general construction waste).
 - 2.2. Please note that any fuel or other hazardous liquids or waste stored on site must be stored in bunds with a 110% capacity of the stored liquid to reduce the possibility of soil and water contamination. Alternatively, if portable fuel tanks are used, drip trays must be used when refuelling, and the integrity of such tanks must be maintained.
 - 2.3. In the event that the storage of general waste (e.g. builders' rubble) exceeds 100m³ or that of hazardous waste exceeds 80m³, such storage activities must comply with the *National Norms and Standards for Storage of Waste*, promulgated in Government Notice No. 926 of 29 November 2013.
 - 2.4. Please note that in terms of Category A 3(9) of Government Notice No. 921 of 29 November 2013 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), as amended ("NEM:WA"), that a waste management license is

required for the disposal of 25 to 25 000 tons of inert waste, unless such disposal has been authorised by or under other legislation. As such, should more than 25 tons of inert waste (e.g. builders' rubble, waste sand/soil) be levelled at the proposed facility, permission needs to be obtained under the relevant municipal by-laws prior to the said levelling. Should permission not be obtained, a waste management licence needs to be obtained prior to the levelling occurring.

- 2.5. The EMPr must be easily accessible to the persons responsible for managing the proposed activity construction and operation and the adherence to its conditions must be strictly monitored.
- 2.6. Please amend *Goal 2: Pollution Control* of the EMPr to state that the applicant is responsible for the sourcing and management of the waste containers.
3. This Department reserves the right to revise its initial comments and request further information from you based on any information received.

Yours faithfully,



LANCE MCBAIN-CHARLES
DEPUTY DIRECTOR: WASTE MANAGEMENT LICENSING

DATE 2017/6/8



ENQUIRIES: G. Frantz

Attention: Ms NZ Loebenberg
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PROPOSED EXPANSION OF THE KLIPHOEK RIVER RESORT ON PORTION 1 OF FARM NO. 1196 AND FARM NO. 1996, VELDRIFT. Pre-APPLICATION BASIC ASSESSMENT REPORT (PrBAR).

The Directorate: Pollution & Chemicals Management (D: PCM) hereby acknowledges receipt of the above-mentioned application on the 12 May 2017. The D: PCM has reviewed the above-mentioned document and has the following comments:

1. Development Set-back lines/ Floodline delineation

- 1.1 Flooding poses a high risk to developments along the banks of rivers/estuaries and ideally no development should take place below the 1:100 floodline.
- 1.2 The report on Coastal set-back lines for the West Coast District uses the 5m above mean sea level (amsl) contour as the development set-back line and the 10m amsl contour to depict the flooding risk zone for a rural estuary setting. These contours should be displayed on the site development plan map in appendix B.
- 1.3 The D: PCM recommends that the applicant considers developing all new/proposed conservancy tanks or ablution blocks above the 10m amsl contour in order to minimize the pollution impact during flooding events.

2. Sewage Management

- 2.1 Given the sensitive environment of the Berg river estuary and close proximity of the resort to the river, no French drains or 'soak-aways' may be used on the site.
- 2.2 According to Section F.2(a) of the pre-application BAR, all domestic effluent will be captured in closed tanks for collection and disposal to the Veldrif Municipal WWTW.
The positions of these conservancy tanks and any existing historical tanks must be updated/displayed on the map in appendix B.

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reference SSD14/2/6/1/8/1/1196-1&1196rem_Resort_Exp_Kliphoek
date 06 June 2017

Nicole Loebenberg
EcoImpact
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By email: admin@ecoimpact.co.za

Dear Ms Loebenberg

Re: Proposed expansion of the Kliphoek River Resort in portion 1 of Farm No. 1196 and remainder of Farm 1196, Veldrif – Pre-application Basic Assessment Report.
DEA&DP ref: 16/3/3/6/7/1/F1/14/2210/16

CapeNature would like to thank you for the opportunity to comment on this application and wish to make the following comments:

1. CapeNature has recently released the Western Cape Biodiversity Spatial Plan (WCBSP)¹ 2017 which replaces the Western Cape Biodiversity Framework. The products depict Critical Biodiversity Areas and Ecological Support Areas and provide other information to be used in land and resource-use planning and decision-making. This WCBSP should be used as a key informant when assessing the impacts of this application. It should be noted that even areas that may appear to be degraded may be of ecological importance or, for example, represent areas that may be flooded, even if only intermittently.
2. The south bank of the Berg River represents an extremely rare and important opportunity to conserve relatively undeveloped estuarine shores and land. Protecting the southern banks of the river is of high importance as the Berg River is the most important estuary on the West Coast of South Africa in terms of providing safe breeding and nursery areas for many fish species. The estuary also provides important breeding, feeding and roosting sites for several species of waterbirds.

¹ Geographic Information System (GIS) layers are available for download on the South African National Biodiversity Institute's BGIS website: <http://bgis.sanbi.org/Projects/Detail/194> or for viewing on the Western Cape Department of Agriculture's CapeFarmMapper website: <https://gis.elsenburg.com/apps/cfm/>

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

Board Members: Ms Merle McOmring-Hodges (Chairperson), Dr Colin Johnson (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Bruce McKenzie, Adv Mandla Mdludlu, Mr Danie Nel, Prof Aubrey Reddinghuis, Mr Paul Slack

3. CapeNature has concerns regarding any new development or expansion of existing development on the southern bank or within the Berg River estuary. Although there are existing buildings within the Kliphoek Resort, in principle no new infrastructure is supported within the 1:100 year flood line or 5m contour of the estuary (whichever is greater).
4. From a terrestrial perspective, the site is generally quite degraded and even transformed in places. However, as discussed in point 2 above, the ecological importance of the Berg River estuary is high and any new infrastructure, particularly within the river, should be clearly motivated for and the potential impacts should be thoroughly investigated. The number of new jetties proposed is very high and it is not clear why so many are required. Even though this section of the estuary has been zoned for recreational use, the impacts of the additional jetties as well as associated boats on the ecology of the river should be considered in more detail. Potential impacts could include impacts on water flow, sedimentation, water quality and fish breeding areas as well as noise and other disturbance related impacts. An estuarine specialist ecologist must be appointed to assess the impacts of the jetties, slipway and the additional boat traffic that may arise as a result of the proposed development.
5. Bank erosion will also need to be addressed. There is already existing erosion and this will increase with additional boating activities.
6. Impacts on birds are also of high concern. A more detailed description and needs analysis of the proposed bird hide should be provided. An avifaunal specialist should assess the potential impacts on birds that may result from the development including additional walkers as well as the boat traffic around the study area.
7. Areas that are flooded, even if only intermittently, should be excluded from the development proposal. This may include the proposed BMX track. These areas should rather be allowed to naturally rehabilitate.
8. From the photographs and captions provided, it seems that some of the new cottages are already being constructed. Please confirm if this is the case.
9. What is the purpose of the proposed dam that is to be built on an old quarry site?
10. The Environmental Management Programme (EMPr) currently provided is completely generic with no reference to the importance of the Berg River estuary and protection thereof. The EMPr must comply with the Berg River Estuary Management Programme and all by-laws for the area.

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

Yours sincerely



Alana Duffell-Canham
For: Manager (Scientific Services)

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

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Member of IUCN (International Union for Conservation of Nature).
Reg No: 001 - 298 NPO
PBO Exemption No: 930004518

15th June 2017

To: Eco Impact Legal Consulting (Pty) Ltd
PO Box: 45070
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South Africa
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For Attention: Nicole Loebenberg

RE: Proposed expansion of the Kliphoek River Resort on Portion 1 of Farm No. 1196 and Farm No. 1196, Velddrif

BirdLife South Africa would like to take this opportunity to comment on the Pre-Application Basic Assessment Report (BAR), hereafter referred to as the BAR, for the proposed expansion of the Kliphoek River Resort.

1. Additional specialist input/ assessment required, including estuarine habitat and bird surveys:

As stated in the BAR, the proposed new jetties and bird hide fall within Estuarine and Riverine Critical Biodiversity Areas (CBAs). However, what is not clear from the BAR, is that other proposed facilities, such as the BMX Bike Trail and Camping Grounds, are also located within the Estuarine and Terrestrial CBA network, respectively. The existing resort and immediate area comprise elements of both the Estuarine and Terrestrial CBA network, as well as small areas of degraded Terrestrial CBA network.

While it is understood that this site is already heavily transformed, it still forms part of the Berg River Estuary floodplain, the extent of which is unique in the south-western Cape. The vegetation within the site originally comprised xeric floodplain, with smaller areas of halophytic floodplain, open pans, halophytic intertidal and supratidal saltmarsh and it is likely that the remaining fragments of natural vegetation conform to these vegetation types.

In order to better understand the impacts of the proposed expansion, and to allow for the recommendation of alternative new facility/ unit locations with lower environment impact, as well as the possibility of more focused mitigation works (including terrestrial/ estuarine habitat rehabilitation and/ or restoration), there is a requirement for specific surveys of the estuarine and riverine habitats; employing the expertise of an estuarine specialist. The need for a terrestrial, botanical survey appears less likely, but could be asked for at the discretion of the estuarine

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Partnership
for conservation



Honorary Patrons: Mrs Geyser Rupert, Dr Praxias Mool-Matthee, Mr Mark Shuttleworth



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Erosion has been identified as one of the key environmental issues faced by land owners at the Berg River Estuary. Prolonged erosion causes irreversible soil loss over time. Soil erosion not only involves the loss of land available for farming; the loss of fertile topsoil and the reduction of soil productivity, but is also linked to serious off-site impacts related to the increased mobilisation of sediment and its delivery to rivers, causing siltation and pollution of our water resource.

BirdLife South Africa would like to offer our support going forward. As part of our Western Cape Estuaries Conservation Project, land that is being considered for Biodiversity Stewardship will undergo formal Biodiversity Site Assessments in September this year, including estuarine habitat and bird surveys. We are working with partners from the Western Cape Department of Agriculture on trialling several soft-engineering erosion control options at key sites at the estuary, as part of an evolving erosion control programme for the lower Berg River and would be happy to share best practice and the detail of the recommended interventions.

We are also able to offer guidance around the bird hide proposal and the bird survey requirements for the site, as well as being able to assist with additional bird and biodiversity data.

Please do not hesitate to contact me with any questions or requests for further information. Thank you for your consideration of the above points.

Kind Regards,

Giselle Murison

Project Manager: Western Cape Estuaries Conservation Project
BirdLife South Africa
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The BMX bike trail is located within an Estuarine CBA and within relatively close proximity to the river's edge. The trail should be re-located away from river, to discourage disturbance to the river and wetland areas, and to allow for the possible restoration of floodplain habitat in that location. It is assumed that BMX biking refers only to low impact mountain biking, and not motor biking, to which there would be strong objection. Even so, the suitability of a BMX biking trail in an estuarine environment of such high conservation importance should be considered.

The building of additional units (most notably the 3 new units at 7 on the SDP) so close to the river's edge is to be discouraged. New units should not be located in front of development setback lines, or for estuaries, within a distance of 100m inland of the high water mark; or at least not within 32m of a watercourse, measured from the edge of the watercourse. Given the nationally recognized importance of this estuary for conservation, proposals should look to comply with the relevant legislation (i.e. ICMA; coastal setback lines etc.). It sets a poor precedent where spatial planning and conservation action have been forward thinking in establishing estuarine functional zones and setback lines to better protect sensitive ecosystems like estuaries. These units should be relocated away from the river's edge, in order to maintain a more natural riparian profile and to preserve the remaining floodplain habitat, which however degraded, is necessary for estuarine function and health.

Construction within the floodplain should be avoided, and the placement of the proposed bird hide within the estuarine floodplain needs to be looked at carefully, to avoid negatively impacting wetland habitat and to avoid disturbance to bird populations. BirdLife South Africa would like to offer assistance in the placement of the hide and/ or in surveying alternative locations with lower impact. Please see additional offers of support below.

3) Establish bankside erosion control measures

While erosion is referenced amongst the potential impacts in the BAR, specific notice should be given to the issue of bankside erosion. Development within the estuary and floodplain at this site, as well as the associated disturbance from construction, and the potentially higher levels of land and river-based recreational disturbance (including wave action from boats), will contribute to bankside erosion. The current points and causes of bankside erosion need to be identified and assessed, and specific bankside erosion control measures put in place to mitigate for these effects and to ensure that no new erosion takes place (as a result of any development/ associated disturbance). These may include reinforcing banks, through revegetation, as well as the restoration and/ or rehabilitation of riparian and floodplain habitat.

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Estuary, including Kliphoek, to formally protect riparian land through Biodiversity Stewardship, as part of our Western Cape Estuaries Conservation Project (as referenced in the BAR, Page 17). It is hoped that the island, as well as other key areas will receive formal protection through a biodiversity stewardship agreement.

However, in order to secure the long term viability of the island as a conservation area, it needs to be sufficiently buffered and subject to minimal disturbance (both from land and from water). An increase in disturbance from human activities, in or adjacent the site, such as boating on the river, foot traffic, BMX biking, or noise etc. may pose a threat to the birds of this site. Birds breeding and foraging in the neighbouring wetlands, including the island, are likely to be affected and may be forced out of highly disturbed areas.

Specialist survey input is required in order to assess the potential development and associated disturbance impacts on the birdlife and biodiversity of the site, in order that the integrity of the island and wider area (including the riparian edge and river), as well as other nearby natural habitats be maintained and improved.

2) Reduction and re-location of proposed facilities, specifically, a reduction in the number of proposed new jetties and the re-location of the 3 new units at 7, BMX bike trail and potentially, the bird hide.

BirdLife South Africa would like to see a reduction in the number of proposed new jetties (please note that proposed new jetties are in red in the SDP, not blue as indicated in the key). We recommend that no new jetties be built in section f-t, and that the site be re-assessed for a maximum of two new jetties in section u-y (for use by campsite and caravan park), and section a-e. It is unclear as to why so many new jetties are being proposed. Ideally, only a single access point/ area should be allowed. This would help to monitor boat numbers and general recreational use of the estuary, as well as reduce the disturbance footprint.

The proposed jetties fall within an Estuarine CBA, and therefore maintaining the ecological integrity of the riparian and riverine area should be of paramount importance. The photos provided in Appendix C, indicate that several of the sites for new jetties comprise natural vegetation. Any loss of existing riparian habitat should be prevented, and any negative impact on riparian vegetation should be mitigated for through bankside habitat restoration/ rehabilitation. The reduction in the number of proposed new jetties will help maintain a more natural riparian profile and reduce soil erosion impacts by preserving a vegetated shoreline/ bank. The presence of natural vegetation will also continue to provide habitat for foraging and roosting birds.

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specialist, once the initial surveys have taken place.

The value of the Berg River Estuary Important Bird and Biodiversity Area (IBA) is described in the BAR, as are its threats. Specifically, the decline in waterbird numbers due to alteration in habitat quality and other disturbances. Of particular concern is the number of waterbird species which no longer have the numbers to qualify under the IBA congregatory bird category, including several waterfowl species relevant to this site. Previous surveys (and the photos provided) indicate that the wetland area where the proposed bird hide and existing access trails are situated, hereafter known as 'the island', comprises sedge marsh and pans, short reed marsh, and likely halophytic floodplain and saltmarsh. Bird surveys carried out on the island in 2000-2001, found this area of sedge marsh to be one of most valuable in the floodplain, maintaining steady numbers and good diversity of waterfowl throughout the winter, and attracting large numbers of breeding waterfowl during the breeding season, notably, with one of the highest recorded waterbird densities of all habitat sites in the floodplain.

As stated above, specific surveys of the estuarine and riverine habitats must be undertaken at the island (and across the whole site), particularly as regards the placement of the bird hide (see concerns around proposed location of bird hide below). In addition, the site, including the island, requires specialist bird surveys to establish the current value of the area for birdlife, and to better evaluate the impacts of the increased disturbance resulting from these proposed facilities. These surveys should not be snapshot, once-off surveys, but must instead target periods of high occupancy by, for example, migrant waders and breeding waterfowl (e.g.: previously recorded peak numbers of these species groups have occurred in May-June, Oct-Nov, Feb-March). Continued monitoring of the avian and botanical make-up of the site, particularly the island, would also be required, during and post-construction.

Although not specific to the site, the bird monitoring carried out through the Coordinated Waterbird Counts (CWAC – CWAC Site Berg River 7: Kliphoeck River and Floodplain 32491813 <http://cwac.adu.org.za>), as noted in the BAR (Page 18), will provide valuable historical and current bird data, and should be used in conjunction with the additional surveys.

It is unclear from this application whether the island is already zoned Open Space 3, or if there is only the intention to do so. The land owner has expressed a willingness to secure this land for conservation, via rezoning and/ or other means of formal protection. This would be a positive step and one strongly supported by BirdLife South Africa. We are already actively engaged with landowners at the Berg River

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- 2.3 Correspondence of confirmation from the Municipality that there is sufficient capacity for the removal of and disposal/treatment of sewage at the Municipal WWTW, must be included in the final application.
- 2.4 In the event that the municipality cannot service the conservancy tanks (due to municipal strikes or tanker truck break downs etc.) the applicant must devise a contingency plan for the alternate safe pumping of the conservancy tanks. This contingency plan must be included in the operational phase of the EMP.

Please contact Gunther Frantz at the contact details indicated, should you have any enquiries to these comments.

Yours faithfully



PK

Wilna Kloppers

Director: Pollution & Chemicals Management

Date: 15 June 2017

Our Ref: HM/WEST COAST/VELDRIF/PORCION1 OF FARM 1196 & FARM 1196
Case No.: 16102413AS0608E
Enquiries: Andrew September
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Date: 03 August 2017



Nz Loebenberg
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RESPONSE TO NOTIFICATION OF INTENT TO DEVELOP: FINAL
In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape
Provincial Gazette 6061, Notice 298 of 2003

NOTIFICATION OF INTENT TO DEVELOP: PROPOSED EXPANSION OF KLIPHOEK RESORT ON PORTION 1 OF FARM 1196 & FARM 1196, VELDRIFT, SUBMITTED IN TERMS OF SECTION 38(8) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)

CASE NUMBER: 16102413AS0608E

The matter above has reference.

Heritage Western Cape is in receipt of your application for the above matter received on 12 May 2017.

You are hereby notified that, since there is no reason to believe that the proposed resort upgrade will impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required.

However, should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately and Heritage Western Cape must be notified without delay.

This letter does not exonerate the applicant from obtaining any necessary approval from any other applicable statutory authority.

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

Yours faithfully

Mr Mxolisi Dlamuka
Chief Executive Officer, Heritage Western Cape

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COMMENTS RECEIVED DRAFT BAR – 17 APRIL 2018



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reference SSD14/2/6/1/8/1/1196-1&1196form_Resort_Exp_Kilphoek
date 16 May 2018

Yolandie Henstock
EcoImpact
PO Box 45070
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By email: admin@ecoimpact.co.za

Dear Ms Henstock

Re: Proposed expansion of the Kilphoek River Resort in portion 1 of Farm No. 1196 and remainder of Farm 1196, Velddrif – Draft Basic Assessment Report.
DEA&DP ref: 18/3/3/6/7/1/F1/14/2210/18

CapeNature would like to thank you for the opportunity to comment on this application and wish to make the following comments:

1. As stated in the estuarine specialist report, the Berg River estuary is considered one of the most important estuaries for conservation in South Africa. The estuary has been identified as an Important Bird Area (IBA) and is also of high conservation importance for fish, invertebrates and vegetation. The south bank of the Berg River represents an extremely rare and important opportunity to conserve relatively undeveloped estuarine floodplains and land.
2. In principle, CapeNature does not support the development of any new hard infrastructure within the 1:100 year floodplain or 5m contour of the estuary – whichever is greater. Although we recognise that the terrestrial component of the site is largely transformed, it does still form part of the Berg River Estuary floodplain and the remaining natural vegetation on site is indicative that the site does still function as a floodplain from time to time, despite the impoundment of water higher up the Berg River catchment. The proposed new jetties and bird hide as well as the BMX track and camping areas are located within areas determined as estuarine and riverine Critical Biodiversity Areas (CBAs).
3. However, we acknowledge that most of the proposed development will be within areas where there are existing disturbance footprints and existing foundations and platforms for the cottages and jetties will be used as far as possible. The landowner must still be prepared to accept that there is some flooding risk and no further hardening or changes to the river frontage area to reduce flooding risk will be supported.
4. An important mitigation for the proposed development is rehabilitation of disturbed areas immediately after construction. Rehabilitation of existing eroded areas should also be addressed. Much greater detail in this regard is required in the Environmental Management Programme (EMPr).

The Western Cape Nature Conservation Board trading as CapeNature
Board Members: Prof Denver Handrick (Chairperson), Prof Gavin Maree (Vice Chairperson), Mr Marguerite Gord Smith, Mr Mervyn Dutton, Dr Colin Johnson, Prof Aubrey Reddinghuis, Mr Paul Slack

-
5. Kliphoek is very important site for feeding and sheltering for wading birds and waterfowl. Although the estuarine specialists are of the opinion that the additional foot and boat traffic will have a very low impact, the number of boats and people should be monitored especially during peak season. Signage should be erected near the jetties encouraging people to limit noise and reduce boat speeds. No access to the river should be permitted before sunrise or after sunset to limit disturbance to roosting birds. Direct access to the pans, sedge and reed marsh areas must not be permitted and paths should be set well back from these areas. Although some of these areas appear degraded due to the current drought situation, they will recover after rain if not disturbed. In general, operational requirements need more detail in the EMP. The EMP must comply with the Berg River Estuary Management Programme and all by-laws for the area.
 6. More information is required on access to the bird hide and maintenance of the path to the bird hide. The bird hide should be constructed according to BirdLife's best practice bird hide building guidelines.
 7. The adjacent sensitive estuarine CBAs should be formally protected through Biodiversity Stewardship. Stewardship agreements at the Berg River are currently being facilitated by BirdLife SA through their Western Cape Estuaries Conservation Project and the landowners should approach BirdLife in this regard. A Protected Environment (PE) is currently being established at the Berg River Estuary and the landowners would be strongly encouraged to become part of the PE. At this stage, the stewardship agreement should be at least a Biodiversity Agreement with an associated management plan. The management plan should include habitat rehabilitation and management, especially control of *Phragmites* reeds, erosion management and prevention and monitoring of recreational activities and number of visitors in sensitive areas.
 8. All access tracks and roads must be clearly demarcated and no off-road driving should be permitted. Launching sites must be kept to a minimum (preferably only the one existing launching site) and also be clearly demarcated.
 9. Construction of the new jetties should take place in the dry season. Cement is highly toxic to aquatic fauna and plants and use thereof should be kept to the absolute minimum. If cement is required, ready mix should be used and no cement should be mixed within 30 metres of the river.
 10. The Draft Scoping Report contains table titled "Table 3: Comments and Responses for pre-application phase". However, no responses have been provided to the comments. Certain issues have not been adequately addressed including motivation for new jetties in addition to restoration of the existing jetties.
 11. Areas that are flooded, even if only intermittently, should be excluded from the development proposal. This may include the proposed BMX track. These areas should rather be allowed to naturally rehabilitate.
 12. From the photographs and captions provided, it seems that some of the new cottages are already being constructed. Please confirm if this is the case.
 13. What is the purpose of the proposed dam that is to be built on an old quarry site?

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

Yours sincerely



Alana Duffell-Canham
For: Manager (Scientific Services)

The Western Cape Nature Conservation Board trading as CapeNature

Board Members: Prof Denver Handrick (Chairperson), Prof Gavin Maree (Vice Chairperson), Ms Margarita Bond-Smith, Mr Mervyn Dutton, Dr Colin Johnson, Prof Aubrey Reddinghuis, Mr Paul Slack



REFERENCE: 19/2/5/3/F1/14/WL0093/18

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For attention: Ms Yolandie Henstock

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT (dBAR) FOR THE PROPOSED KLIPHOEK RIVER RESORT EXPANSION ON PORTION 1 OF FARM 1196 AND FARM 1196, VELDDRIF

1. The abovementioned dBAR (hereafter 'the Report') dated 12 January 2018 and received by the Department of Environmental Affairs and Development Planning, Directorate: Waste Management (hereafter 'the Department') on 17 April 2018, refers.
2. The Department has reviewed the Report and has the following comments:
 - 2.1 There is information lacking in the dBAR. This relates to section A (1) and 2 (c), section B (5), section D (3), (4), (5), (6) and (7), section F (6), (7) and (8), as well as most of sections G and section H which have not been filled in. Kindly ensure that all sections are filled in appropriately.
 - 2.2 Kindly fill in the amount of waste expected to be generated by the project during the operational phase, on page 39, in the final BAR. Kindly also confirm that the Municipality has the capacity to accommodate the waste expected to be produced by this project.
 - 2.3 The EMPr states on page 35 that "Domestic waste not suitable for compost or bio electricity generation needs to be stored in skips for transport to the Local Authorities registered landfill site". Kindly elaborate on the mentioned composting activity should it be envisioned that composting will occur at the Facility.
 - 2.4 Kindly provide more information related to the conservancy tanks to be used on site. What will the size of these tanks be? Related to the expected amount of waste water generated, at what frequency will the waste water be removed? How will the integrity of these conservancy tanks be ensured?

- 2.5 Page 47 of the EMPr states that ground and surface water monitoring will be done as per the Department of Water and Sanitation's requirements. Kindly elaborate on where this monitoring will occur, as well as at what frequency. Will any monitoring occur in the vicinity of the conservancy tanks?
3. The Department reserves the right to revise its initial comments and request further information from you based on any new or revised information received.

Yours faithfully,


LANCE MCCAIN-CHARLES
DEPUTY DIRECTOR: WASTE MANAGEMENT LICENSING
DATE: 2018/5/15

cc: (1) Ms Mariette Kotze (Kliphoek Rivieroord)

Email: Kliphoekeinfo@kliphoeek.co.za



Living Conservation Wings

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Reg No: 001 – 298 NPO
PBO Exemption No: 93004518

16th May 2018

To: Eco Impact Legal Consulting (Pty) Ltd
PO Box: 45070
Claremont
South Africa
7735

By email: admin@ecolmpact.co.za

For Attention: Yolande Henstock

RE: Proposed expansion of the Kliphoek River Resort on Portion 1 of Farm No. 1196 and Farm No. 1196, Velddrif – draft Basic Assessment report

BirdLife South Africa would like to take this opportunity to comment on the draft Basic Assessment Report (BAR) for the proposed expansion of the Kliphoek River Resort. Reference is made throughout to the findings of the Estuarine Specialist Study and Impact Assessment (ESS&IA).

1. As stated in the BAR and ESS&IA, the Berg River estuary is one of the most important estuaries for conservation in South Africa, particularly with respect to its fish and bird species, and the variety and extent of its composite estuarine vegetation types¹.

2. In general, BirdLife South Africa does not support the construction of buildings or the development of any other hard infrastructure within the 1:100 year flood line, or estuarine functional zone (5m contour line), whichever is greater, and strongly discourages any loss of Critical Biodiversity Area (CBA).

3. However, it is understood that the proposed developments outlined in the BAR fall mostly within existing development and disturbance footprints in an area now largely transformed; and that existing foundations for the new cottages and jetties will be used as far as possible. The new developments will still fall within an active floodplain area and the landowner should be prepared to accept that there is some flooding risk and that no further hardening or changes to the river frontage to reduce this risk will be supported.

¹ The Berg River estuary is ranked 2nd in the top 50 estuaries for conservation in South Africa (Turpie *et al.* 2002)

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Rehabilitation of disturbed and eroded areas

4. Key mitigation for the proposed development is the rehabilitation of disturbed areas immediately after construction and the prevention of any negative impacts on the remaining intact natural vegetation. Much more detail of these measures is required in the Environmental Management Programme (EMPr).

5. The additional hardened infrastructure at this site, the associated disturbance from construction, including the loss of mature riparian vegetation, and the increased levels of land and river-based recreational disturbance (including wave action from boats) will contribute to bankside erosion. Mitigation should also include the immediate rehabilitation of existing eroded areas. Erosion is accelerating due to drought conditions, which have caused massive die-off of reed marsh and other natural riparian vegetation, destabilizing banks and mobilising sediment, resulting in increased siltation and pollution of the river (both of which will be exacerbated by construction activities). BirdLife South Africa is currently exploring a River Maintenance Plan for the estuary, as well as other means of implementing erosion control options, in collaboration with Western Cape Department of Agriculture (DoA) and CapeNature. The DoA has produced a report² outlining best practice, environmentally sound, soft-engineering techniques for bank stabilisation at the estuary. The EMPr should include mitigation for the rehabilitation of existing erosion areas and should draw from the interventions outlined in this report.

Monitoring and mitigation for increased recreational disturbance

6. Kliphoek forms part of the Berg River Estuary Important Bird and Biodiversity Area (IBA), a site of global significance for the conservation of birds and their habitats. The value of the Berg River Estuary IBA is described in the BAR, as are its threats; specifically, the decline in waterbird numbers due to alteration in habitat quality and other disturbances. Of particular concern is the number of waterbird species which no longer have the numbers to qualify under the IBA congregatory bird category, including several waterfowl species relevant to this site. Although the ESS&IA submit that the additional foot and boat traffic will have a very low impact, the number of boats and people using the site and surrounding natural areas should be monitored, especially during peak season. Signage should be erected near the jetties and other information material should be made available, to make people aware of the conservation value of Kliphoek and the estuary, and to encourage people to reduce

²H. King, 2017. Lower Berg River – report regarding proposed bank stabilization techniques. WC Dpt. of Agriculture.

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noise and disturbance impacts. No access to the river should be permitted before sunrise or after sunset to limit disturbance to roosting birds. Monitoring of the avian and botanical make-up of the development site, river channel and estuarine CBA immediately to the north (where the proposed bird hide is located), before, during and post-construction, should be required. Details of monitoring should be included in the EMPr and should draw from BirdLife South Africa's best practice monitoring guidelines. In general, operational requirements need more detail in the EMPr.

7. The adjacent estuarine CBA comprises sedge marsh and pans, reed marsh and saltmarsh, and supports high numbers and diversity of waterfowl throughout the winter, in non-drought conditions, notably, with one of the highest recorded waterbird densities from the floodplain area. Together with the river channel itself, these sites also support several Species of Conservation Concern, including the threatened African Marsh Harrier and Eastern White Pelican. No direct access to the pans, sedge and larger reed marsh areas should be allowed, and paths must be set well back from these areas and clearly demarcated. Use must be made of existing paths where possible. Access to this area must be on foot only, and restricted to these paths to prevent trampling of vegetation and additional disturbance. Although some of these areas appear degraded due to the current drought situation, they will likely recover after rain if not disturbed. While acknowledging that most of these birds have generally wide distribution ranges, it is still of concern that they might be excluded from this area. The Berg River estuary is a sanctuary for waterbirds, one of the primary reasons for its high conservation importance. Estuarine CBAs are key areas for foraging, breeding and roosting waterbirds and warrant protection.

8. The design, placement and construction of the proposed bird hide requires careful consideration to avoid negatively impacting sensitive estuarine habitat and to prevent disturbance to bird populations. BirdLife South Africa is able to offer assistance in the placement and build of the hide. Hide construction should adhere to BirdLife South Africa's best practice guidelines³.

Formal protection of key biodiversity areas

9. With the loss of CBA and natural riparian vegetation within the development footprint, and the threat of increased disturbance, the adjacent estuarine CBA should be safeguarded, as it comprises intact estuarine habitat of high conservation value. South Africa's estuaries remain some of the most threatened ecosystem types

³ A guide to build universally accessible bird hides <https://www.birdlife.org.za/publications/building-bird-hides>

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in the country⁴ and the Berg River estuarine and floodplain areas require at least partial protection in order to reach its biodiversity protection targets. There is therefore national and provincial imperative to drive formal protection and active conservation at this estuary. The adjacent sensitive estuarine CBA should be formally protected through Biodiversity Stewardship. BirdLife South Africa is currently facilitating Stewardship agreements at the Berg River estuary through our Western Cape Estuaries Conservation Project and may be contacted in this regard. The stewardship agreement should be at least a Biodiversity Agreement with title deed endorsements and an associated Management Plan. It should be noted however, that a Protected Environment (PE) is currently being established at the Berg River estuary and the landowners would be strongly encouraged to become part of the PE, which offers higher protection status and greater benefits for landowners.

10. A stewardship Management Plan would include habitat rehabilitation and management of natural areas, including reed (*Phragmites*) management, erosion control and prevention interventions, monitoring of recreational activities and visitor numbers, estuarine and terrestrial vegetation surveys, as well as monitoring of bird numbers and bird and plant species diversity.

Other

11. The summary of the public participation process contains a table titled "Table 3: Comments and Responses for pre-application phase". However, no responses have been provided to the comments. Certain issues have not been adequately addressed including motivation for new jetties and the new dam.

Please do not hesitate to contact me with any questions or requests for further information. Thank you for your consideration of the above points.

Kind Regards,

Giselle Murison

Project Manager: Western Cape Estuaries Conservation Project
BirdLife South Africa
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⁴ The National Biodiversity Assessment: Technical Report Volume 3: Estuaries (Van Niekerk & Turpie 2012)

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Yolandie Henstock

From: Doretha Kotze <dkotze@wcdm.co.za>
Sent: 24 April 2018 04:17 PM
To: admin@ecoimpact.co.za
Cc: Collaborate Mailbox
Subject: Draft BAR: Expansion of the Kliphoek River Resort, Remainder and Portion 1 of Farm 1196, Division Malmesbury, Bergrivier Municipality

Ref: 13/2/12/5/1

ATTENTION: Yolandie Henstock

Madam

I refer to your letter dated 13 April 2018 and the Draft BAR for the application.

The West Coast District Municipality submitted comments on the Pre-Application BAR via email on 14 June 2017 (see below). These have not been included in the Comments and Responses Report for the Pre-Application phase contained in the Draft BAR. Eco Impact is requested to consider and respond to these comments and include them in the relevant documents.

Regards

Doretha Kotze
Stads- en Streek beplanner/Town and Regional Planner
Weskus Distriksmunisipaliteit
Langstraat 58 Long Street
Posbus 242 PO Box
MOORREESBURG 7310
Tel: 022 433 8523
West Coast District Municipality



From: Doretha Kotze

Sent: 14 June 2017 03:27 PM

To: 'admin@ecoiimpact.co.za'

Cc: Collaborate Mailbox

Subject: Pre-Application BAR: Expansion of the Kliphoek River Resort, Remainder and Portion 1 of Farm 1196, Division Malmesbury, Bergrivier Municipality

Ref: 13/2/12/5/1

ATTENTION: NZ LOEBENBERG

Madam

1. I refer to your letter dated 12 May 2017 and the Pre-Application BAR for the above-mentioned proposal. The West Coast District Municipality's comments are set out below.
2. The proposed development is situated within the Berg River Estuary and IBA. All jetties (existing and proposed new jetties) must be applied for. Being situated below the High Water Mark (HWM), all jetties must be registered and leased via CapeNature.
3. All new jetties must be designed to float to prevent erosion and the least environmental damage and impact on the environment. Jetties must be easily removable with limited impact on the estuary and river bank.
4. Bergrivier Municipality does not provide a waste collection service to the farm and all solid waste generated by Kliphoek River Resort must be handled, stored, transported and disposed at a registered municipal waste disposal facility. Costs in this regard to be borne by the developer. To prevent any impact on the natural environment and the Berg River, no solid waste may be incinerated, buried or disposed on the farm.

-
5. No permits, licences from any organ of state, including service letters from Bergrivier Municipality, the Department of Water and Sanitation Water Use Permit/Licence, were included in the report.
 6. Water supply and demand were not adequately addressed, especially regarding daily requirements for the overnight accommodation facilities during peak season and holiday periods (summer). Proof must be provided that the municipality will be in a position to supply in the water requirements of all proposed facilities at the Kliphoek River Resort, especially during times of drought and level 4 water restrictions. Alternative measures to reduce water demand (reusing or recycling of grey water) was not explored in the Report. Possible utilisation of grey water from showers for reuse in toilets should be investigated, as well as rainwater harvesting.
 7. In order to become energy efficient the use of alternative/renewable energy sources (solar panels for lighting and geysers, etc) must be investigated.
 8. Details on the Wastewater Treatment Systems/Septic Tanks are lacking and were not adequately addressed or indicated on the maps. Specialist reports were also not included. Confirmation from the municipality needs to be provided regarding regular pumping of septic tanks and disposal of effluent at the nearest municipal Waste Water Treatment Works.
 9. The existing slipway must be registered as a Public Boat Launch Site (PBLs) as it currently provides access to Coastal Public Property and the Berg River Estuary. Since the slipway is being utilised by the general public, a PBLs Operational Management Plan needs to be compiled.
 10. In order to secure the slipway as public access to Coastal Public Property, the developer of the property must register a public access servitude in favour of Bergrivier Municipality as part of the application as required by Section 18(9) of the Integrated Coastal Management Act.
 11. Bergrivier Municipality is in the process to gazette a by-law for boating related activities on the water surface of the Berg River Estuary. The resort should, at all times, assist with education and awareness regarding the Berg River Estuary By-law by informing visitors at the resort of the by-law and the health and safety aspects related to boating in the estuary. The resort should also assist in the issuing of boat licences over weekends and after hours to all visitors. The relevant signage, which will be provided by the municipality, to educated all visitors of the health and safety issues, must be erected at the resort.
 12. Alien vegetation and eradication/monitoring on the property must be addressed in terms of the National Environmental Management Biodiversity Act (NEMBA).

Regards

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