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PUBLIC PARTICIPATION PROCESS REPORT

In terms of Section 56 of the National Environmental Management Act (NEMA Act No 107 of 1998, Amended July 2006) and Environmental Impact Regulations, 2014 (as amended)

FOR THE PROPOSED CAIRNBROGIE RESORT CAMPS ON THE REMAINDER OF FARM KRANSHOEK NO 432, PLETTENBERG BAY



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PUBLIC PARTICIPATION REPORT

in terms of Section 56 of
NATIONAL ENVIRONMENTAL MANAGEMENT ACT

For

**THE PROPOSED CAIRNBROGIE RESORT CAMPS REMAINDER OF THE
FARM KRANSHOEK NO 432, PLETTENBERG BAY**

Submitted for:

Decision making

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1 INTRODUCTION

HillLand Environmental have been appointed as the Environmental Assessment Practitioners (EAPs) by the applicant, **Cairnbrogie Farms (Pty) Ltd**, represented by **Mr. Andrew Hill**, to ensure compliance with the regulations contained in the National Environmental Management Act (NEMA, Act no. 107 of 1998) and Environmental Assessment Regulations (2014, as amended), for the proposed development of resort camps on the Remainder of Farm No. 432, Plettenberg Bay.

2 REQUIREMENTS OF THE PUBLIC PARTICIPATION PROCESS

Section 41 of NEMA specifies that a person conducting a public participation process must comply with the following minimum requirements as stipulated in the Regulations:

- (a) *fixing a notice board (of a size at least 60cm by 42cm; and must display the required information in lettering and in a format as may be determined by the competent authority) at a place conspicuous to the public at the boundary or on the fence of (i) the site where the activity to which the application relates is or is to be undertaken; and (ii) any alternative site mentioned in the application; **(Annexure C)***
- (b) *giving written notice to (i) the owner or person in control of that land if the applicant is not the owner or person in control of the land; (ii) the occupiers of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken; (iii) owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken; (iv) the municipal councilor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area; (v) the municipality which has jurisdiction in the area; (vi) any organ of state having jurisdiction in respect of any aspect of the activity; and (vii) any other party as required by the competent authority; **(Annexure A and F)***
- (c) *placing an advertisement in (i) one local newspaper; or (ii) any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations; **(Annexure B)***
- (e) *using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desiring of but unable to participate in the process due to (i) illiteracy; (ii) disability; or (iii) any other disadvantage.*

3 ROLES OF INTERESTED AND AFFECTED PARTY

In terms of Section 42 of NEMA EIA Regulations, a registered interested & affected party (I&AP) is entitled to comment, in writing, on all written submissions, including draft reports made to the competent authority by the applicant or the Environmental

Assessment Practitioner (EAP) managing an application, and to bring to the attention of the competent authority any issues which that party believes may be of significance to the consideration of the application, provided that –

- a) Comments are submitted within (i) the timeframes that have been approved or set by the competent authority; (ii) any extensions of a timeframe agreed to by the Applicant or EAP.
- b) A copy of comments submitted directly to the competent authority is served on the Applicant or EAP; and
- c) The I&AP discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application, via an advert in the local press.

Sections 43 & 44 of NEMA further specify that all written comments received by the EAP from a registered I&AP must accompany the (public participation) report when the report is submitted to the competent authority with the Final BAR.

- J The pre-application Basic Assessment Report (BAR) was available for public review and comment. I&APs had a 30-day comment period **(14 December 2017 - 16 February 2018)**.
- J The draft Basic Assessment Report (BAR) was available for public review and comment. I&APs had a 30-day comment period **(29 May 2019 - 01 July 2019)**.
- J The updated draft BAR replaced the draft BAR and was available for public review and comment. I&APs had a 30-day comment period **(19 June 2019 - 19 July 2019)** to submit comment on this proposal. All I&AP's were notified of the update and the request to comment on the updated draft BAR and not the original document.
- J Due to the request for visual assessment at the Coastal Camp, an additional 50 days in terms of regulation 19, 1(b) was required
- J The amended draft BAR which included incorporation alternative structures and a visual impact assessment, was available for public review and comment. I&APs had a 30-day comment period **(18 September 2019 – 21 October 2019)**.
- J Due to the counting of days for the 30 day comment period and the public holiday and weekend, the end date was the 21st October 2019 and not the 18th October 2019 as initially advised. All I&AP's were advised of this change. Please refer to Annexure F of this report.

All comments received have been added into the **Comment and Responses table** to form part of this **Public Participation Report** and are submitted to the competent authority for review and decision making.

4 LIST OF INTERESTED AND AFFECTED PARTIES (I&APs)

The direct adjacent neighbouring property owners were all notified of the 30-day commenting period, as well as of the need to register as I&APs.

Besides the authorities, **only Registered I&AP's** received further notifications with regards to the BAR process.

List of neighbouring properties:

-) 38/432
-) Erf 565
-) Erf 556
-) Erf 555
-) Erf 538
-) 23/432
-) 22/432
-) 19/432
-) Erf 1217
-) Erf 554
-) RE/436
-) 4/432
-) 25/432
-) 24/432
-) 21/432
-) 20/432
-) Erf 1159
-) Erf 1160
-) Erf 1218
-) 2/432
-) 1/432
-) 15/433
-) 18/433
-) RE/17/433
-) 7/433
-) 25/431
-) 532
-) RE/558

The following authorities were requested to comment on the amended Draft BAR:

State Departments:

-) Department of Environmental Affairs and Development Planning (DEADP) – Steve Kleinhans
-) Department of Agriculture - Cor van der Walt & Clyde Lamberts
-) Department of Forestry - Melanie Koen, Fire Advisor – Paul Gerber
-) Department of Health - Manie Abrahams
-) Heritage Western Cape - Lwanzi Bhengu

Organs of State:

-) CapeNature – Colin Fordham
-) BGCMA – Carlo Abrahams, Philisiwe Ntanzu & Thembela Bushula
-) SANParks - Maretha Alant

Local Authorities:

-) Bitou Municipality - Chris Schliemann & Anje Taljaard
-) Garden Route District Municipality - Nina Viljoen

Non-Governmental Organisation:

-) Plettenberg Bay Community Environmental Forum
-) Robberg Coastal Corridor Landowners Association - Joan Berning
-) Fynbos Nature Reserve (Pty) Ltd - Chris von Christerson

Ward Councilor:

-) Annelise Olivier

Other:

-) Plett South Fire Management Unit – Steve Eric Myburgh

5 PUBLIC PARTICIPATION PROCESS

5.1 PRE-APPLICATION BASIC ASSESSMENT REPORT (BAR) COMMENTING PERIOD

Table 1: Summary of commenting period - Pre-Application BAR

Report	Commenting period
Pre-Application BAR	14 December 2017 - 16 February 2018

The Pre-Application BAR was available for comment to the following Authorities and Organs of State:

State Departments:

-) Department of Environmental Affairs and Development Planning (George Office), Danie Swanepoel
-) Department of Agriculture, Forestry and Fisheries (Agriculture), Clyde Lamberts

Organs of State

-) CapeNature, Colin Fordham,
-) Breede-Gouritz Catchment Management Agency (BGCMA), Carlo Abrahams

Comments were received from the following parties:

Organs of State:

-) CapeNature – Colin Fordham
-) BGCMA – Carlo Abrahams

The following comments were received on the Pre-Application BAR:

Table 2: Comments and response table - Pre-Application BAR PPP

BGCMA – 24 May 2018	
COMMENT	RESPONSE
1. Be advised that the instream dam present on the property is regarded as a	An aquatic specialist confirmed that the risk of the proposed activities (associated with the

<p>watercourse, with a riparian area, therefore any activity undertaken within 100m from the water course requires authorisation in terms of section 21 (c) impeding or diverting the flow of water in a watercourse and (i) altering the bed, banks, course or characteristics of a watercourse, in terms of the National Water Act, 1998 (Act 36 of 1998). Thus, the proposed activity triggers water use and it must be authorised.</p>	<p>dam camp) to the watercourse (i.e. farm dam) is low (in accordance with the DWS Risk Assessment Matrix). A General Authorisation (GA) application was submitted to BGCMA on the 17th of July 2019 (acknowledgment of receipt 22nd of July 2019) and approval was received on the 2nd of August 2019. Please refer to Appendix E of the BAR</p>
<p>2. The applicant is advised to appoint a freshwater specialist that will undertake the necessary authorisation requirements (e.g. freshwater assessment and Risk Matrix that will determine if the risk is low, medium or high).</p>	<p>Noted and incorporated</p>
<p>3. The BGCMA acknowledge the receipt of water authorisation documents submitted on the 10 May 2018.</p>	<p>Noted</p>
<p>4. From the documents submitted it has been established that registered water is for agricultural use. Therefore, you are required to apply for water use for the new activity.</p>	<p>The water will continue to be used for Agriculture</p> <p>In terms of the proposed development, a GA application have been submitted and approved by BGCMA</p>
<p>5. Be advised that should water be used for the proposed activity then it will be a sector change from agricultural to industrial use. Also note that the water use will not fall under Schedule 1 and therefore you will need to apply for authorisation.</p>	<p>Noted and incorporated</p>
<p>6. Please provide proof of agreement between the client and Bitou Municipality for removal of sewage from the conservancy tanks.</p>	<p>Noted and incorporated, please refer to the agreement that is in place between Cairnbrogie and Bitou Municipality as Appendix E of the BAR</p>
<p>7. Furthermore, BGCMA does not have objections regarding the proposed activity.</p>	<p>Noted and incorporated</p>
<p>8. All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use and pollution prevention must be adhered to.</p>	<p>Noted and incorporated</p>
<p>Thembela Bushula (Pr.Sci.Nat) Freshwater Ecologist Breede-Gouritz Catchment Management Agency</p> <p>7 February 2019 -I do hereby confirm that the activity can be generally authorised, as the risk is low. You can submit the necessary DW forms to BGCMA.</p>	<p>Noted and the GA application was submitted and approved by BGCMA - please refer to Appendix E of the BAR</p>

CapeNature – 5 March 2018	
COMMENT	RESPONSE
<p>1. CapeNature would like to remind the landowner that in terms of the Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983) ("CARA") landowners must prevent the spread of alien invasive plants on the property. The level of alien infestation is therefore not be seen as reducing the sensitivity of a site, nor is the subsequent removal of alien vegetation from a property regarded as a mitigation measure due to this is a legal requirement. Infestation by alien plants does not necessarily mean that an area is not important for biodiversity as some vegetation types are particularly prone to invasive alien infestation but may recover when cleared of alien vegetation.</p>	<p>The proposed site has been highly transformed / disturbed due to extensive agricultural practices over the years. The areas of conservation value on the property have been included in the protected environmental located on the southern part of the property</p> <p>The sites for the 2 camps are transformed and not of conservation value</p> <p>Ongoing eradication, control and follow-up clearing of alien invasive plant species is in progress</p>
<p>2. In addition to CARA, in terms of the Alien and Invasive Species Regulations, NEM: BA, 2014, specific alien plant species (e.g. <i>Acacia mearnsii</i>) are either prohibited or listed as requiring a permit; aside from restricted activities concerning, <i>inter alia</i>, their spread, and should be removed.</p>	<p>Noted, please refer to above comment, alien clearing is ongoing on the property</p>
<p>3. CapeNature would like to reiterate that all endangered species or protected species listed in Schedules 3 and 4 respectively, in terms of the Western Cape Nature Conservation Laws Amendment Act, 2000 (Act No. 3 of 2000) may not be picked or removed without the relevant permit, which must be obtained from CapeNature. This is also to ensure that rescued plant material is accounted for and used in the rehabilitation or relocation process.</p>	<p>Noted and incorporated in the EMPr (please refer to Appendix H)</p>
<p>4. The Cape Floristic Region is largely a fire-dependant system and natural fire regimes must be maintained and managed in the landscape.</p> <p>The exclusion of fire from certain habitats will be considered unacceptable as this may ultimately cause loss of species. Where appropriate, the location of fire-breaks should be indicated and these fire-</p>	<p>Noted and incorporated in the EMPr (please refer to Appendix H)</p> <p>The property owner is a member of the South African Fire Protection Association. The firebreaks are controlled by the FPA. Firebreak mapping has been included within the EMPr (refer to Appendix H)</p> <p>The entire protected environment on the southern part of the property burnt recently (2017), therefore there is no need for the area to burn again in the near future. Cairnbrogie is a member of the FPA / local FMU and FPA</p>

<p>breaks may be considered part of the development footprint. Fire-breaks vegetation must not be completely removed. Brush-cutting under must occur as infrequently as possible as brush cutting will lead to loss of species diversity over time. Comment from the Southern Cape Fire Protection Association is recommended and CapeNature will not support the establishment of a fire-break within the extent of the protected area. It is recommended that any infrastructure be setback far enough within the disturbed area to accommodate this request.</p>	<p>approved firebreaks area located along the boundaries of the property. As recommended by DAFF fire advisor, a FPA approved firebreak will be located between the protected environment and the coastal camp. Please refer to comment received from DAFF fire advisor in Appendix F, Annexure G & Appendix H, Annexure H and confirmation letter from the local FMU in Appendix H, Annexure H of the BAR</p>
<p>5. A combined No-Go Areas map should be appended to the report. This map should also be appended to the Environmental Management Programme (EMPr) to notify contractors of the extent of sensitive ecosystems near to the proposed construction activities.</p>	<p>Noted and incorporated in the EMPr (please refer to Appendix H)</p>
<p>6. The northern site near the dam appears to be located on a transformed area, however there are no pictures, or detailed vegetation habitat maps attached to illustrate the extent of these infrastructure relative to the NFEPA wetland habitat or fynbos. This area is also located near the edge of the extent of the South Outeniqua Sandstone Fynbos, where it transitions into the Knysna Sand Fynbos. These locations are often mosaic vegetation communities where there are elements of the Critically Endangered vegetation unit growing within the extent of the delineated vulnerable vegetation unit. The description of the vegetation within the DBAR in terms of species and habitat at each alternative tent location needs to be expanded for reviewers to understand that these impacts have been suitably quantified.</p>	<p>Noted and incorporated</p> <p>Please refer to site development plans in Appendix B of the BAR The units will be located above the full supply level of the dam and behind the planted yellowwood trees. The proposed area for the dam camp area consist of transformed vegetation, including alien invasive and disturbed indigenous vegetation. Detailed description of the species present within these areas are described under the executive summary of the BAR and in relevant sections throughout.</p>
<p>7. The EAP must append a letter from relevant engineering department of the Bitou Local Municipality Town Planning Department, to the DBAR and EMPr. This letter must confirm that the Gansevallei Waste Water Treatment Works (WWTW) has the available capacity to accommodate for the treatment of the additional sewage.</p>	<p>Noted and incorporated, please refer to the agreement that is in place between Cairnbrogie and Bitou Municipality attached as Appendix E of the BAR</p>

To conclude, CapeNature may provide additional comment on any required further applications and reserves the right to revise initial comment and request further information based on any additional information that may be received.	Noted
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5.2 DRAFT BAR PUBIC PARTICIPATION PROCESS AND COMMENTING PERIOD

Table 3: Summary of commenting periods - Draft BAR PPP

Report	Commenting period
Draft BAR	29 May 2019 - 01 July 2019
Updated Draft BAR	19 June 2019 - 19 July 2019
Amended Draft BAR	18 September 2019 – 21 October 2019

In response to the acknowledgement of receipt of the amended Draft BAR from DEADP, it was noted that I&AP's needed to be informed in writing that the correct 30-day commenting period ended on the 21st of October 2019 and not the 18th October 2019 as indicated. Correspondence was sent out by HilLand Environmental to the stakeholders / I&AP's that had not already provided their final comment.

The following I&AP's and Stakeholders were notified via email (please refer to attached correspondence and proof of notification in Appendix H:

I&AP / Stakeholder	Date of notification
BGCMA - Carlo Abrahams	02 October 2019
Bitou Municipality - Chris Schliemann & Anje Taljaard	01 October 2019
Cape Nature - Colin Fordham	01 October 2019
DAFF - Melanie Koen	02 October 2019
Department of Agriculture - Clyde Lamberts & Cor van der Walt	01 October 2019
Garden Route District Municipality - Nina Viljoen	01 October 2019
Eden to Addo Corridor Initiative - Joan Berning	01 October 2019
Fynbos Nature Reserve and registered neighbouring property owner - Chris von Christienson	01 October 2019
Plettenberg Bay Community Environmental Forum	01 October 2019
SANParks - Maretha Alant	02 October 2019
Ward Councilor - Annelise Olivier	08 October 2019
Department of Health - Manie Abrahams	08 October 2019

A site inspection was held upon request by the relevant stakeholders:

	<p>Date: 08 August 2019 Attendees:</p> <ul style="list-style-type: none">) HillLand Environmental - Cathy Avierinos) Applicant - Andrew Hill) SANParks - Maretha Alant) Fynbos Nature Reserve - Chris von Christierson) RCCPE – A Conyngham) Visual specialist - The Planet Thing represented by Luke Bran
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The development zone for camp area 2 (coastal camp), the alternative structure (container and not tent), visual impacts and proposed mitigation measures were discussed and agreed on on site.

Table 4: Comment and response table - Updated Draft BAR PPP

Fynbos Nature Reserve (9 July 2019)	
Informal comment and discussions	
COMMENT	RESPONSE
<p>We have received the attached letter in the post today from yourselves. Please note that we did not receive any notification on 29 May 2019 and have only received this letter, dated 18 June 2019, today 9 July 2019. As such we respectfully request an extension of the 19 July 2019 deadline so we may have sufficient time to submit our comments/concerns. I declare that we, Fynbos Nature Reserve (Pty) Ltd, have an interest in this matter.</p>	<p>Both of the notification letters was sent via the postal service. Extension was granted by HillLand Environmental.</p>
<p>I must advise that you have incorrectly depicted the boundaries of Portion 38 of Kranhoek 432 (owned by Fynbos Nature Reserve and situated within the Robberg Coastal Corridor Protected Environment) on the following maps/diagrams in your Basic Assessment Report on your website link: Figs 2a, 2b, 2c, 3a, 4, Fig 1 of Appendix E1 and Figs 1, 1A, 2A of Appendix H. These should be amended to reflect the correct Survey Diagram boundaries of Portion 38.</p>	<p>Response sent by HillLand Environmental 10 July 2019: "Thank you so much for pointing out the cadastral variation. The cadastral information that we have on our maps is from the SG office, however, it is possible that they have errors in relation to portion 38. We have requested that the SG confirm the lines and provide updated lines if that is the case. Any reference to your property (Fynbos Nature Reserve) is for indication purposes only as a neighbouring property and does not affect the mapping which indicates the proposed locations of the tents proposed by Andrew on Cairnbrogie.</p> <p>The updated plans were sent by HillLand</p>

	Environmental to Fynbos Nature Reserve (Chris von Christierson) on the 17th of July 2019. The updated plans showed the cadastral boundaries received in the updates from the SG's office. All updated maps have been included within the BAR.
Ward Councillor - Ward 7 - Annelise Olivier (10 June 2019)	
Final	
COMMENT	RESPONSE
Noted with thanks	Noted
Department of Health (19 June 2019)	
Final	
COMMENT	RESPONSE
This office subjected to the following conditions has no objection to the proposed activity.	Noted
An adequate supply of potable water that complies with the bacteriological and chemical quality standards must be available.	Noted and incorporated
The disposal of untreated sewage on site is not allowed.	Noted and incorporated
All sewage is to be contained in conservancy tanks and removed by the Bitou Municipality to the Bitou Municipal waste water treatment plant on a regular basis.	Noted and incorporated An agreement is in place between Cairnbrogie and Bitou Municipality - please refer to Appendix E of the BAR
The Bitou municipal waste water treatment plant must have the spare capacity to treat the additional load without any adverse effect.	Noted An agreement is in place between Cairnbrogie and Bitou Municipality - please refer to Appendix E of the BAR
All refuse must be incorporated into the Bitou municipal solid waste stream.	Noted and incorporated
Heritage Western Cape - Final Comment (28 June 2019)	
COMMENT	RESPONSE
You are hereby notified that, since there is no reason to believe that the proposed Cairnbrogie Resort Tented Camps on Remain of Farm Kranshoek 432, Plettenberg Bay, will impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required.	Noted
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.	Noted and incorporated into the EMPr (please refer to Appendix H of the BAR)
SANParks (17 July 2019)	
COMMENT	RESPONSE
<u>Tented camp area 2</u> The disturbance footprint is for 6 tents linked by	Noted and incorporated

<p>wooden decks, an ablution block and a kitchen lounge (217m²). Parking was not specified.</p> <p>The proposed location of Area 2 will have a significant negative visual impact on the coastline and will be visible from the SANParks Coastal Hiking Trail and it is adjacent to the Robberg Coastal Corridor Protected Environment (PE). This location is not supported by SANParks. An alternative site was identified during the site visit.</p> <p>The alternative site is setback approximately 15m from the PE boundary on the grazing field and visually less sensitive. SANParks could support the development of 6 accommodation units that is visually not obtrusive on this site. We suggest that the footprint of structures are demarcated on site and that the proposed heights of the structures are indicated. Tented or more permanent structures could be developed but the potential visual impact has to be mitigated. Views from the Kranshoek Viewpoint, the Coastal Hiking Trail or the adjacent property in the PE should not be affected negatively.</p> <p>The layout at Site 2 could be modified to blend in better with the environment while still providing a good visitor experience.</p>	<p>Please refer to the attached site development plans - Appendix B of the BAR. Parking will be located at unit within the dam camp area. Demarcation of these areas will be done by means of logs (alien invasive trees) or permeable / loose pavers for a low impact. The maintenance of these areas will entail mowing of grass or placement of woodchip / permeable pavers.</p> <p>An alternative design has been introduced within the amended draft BAR. Container units replaced the tented accommodation due to security (possible baboon damage and remote accessibility) and durability (withstand wind). The containers will be painted a dark charcoal colour for visual absorption and will be clad in natural weathered timber that will follow a natural profile (not block shaped) to assist in blending the containers into the landscape. Although the containers are located in the pasture area they are fenced off from the pastures behind them and are viewed against this higher ground which forms a visual backdrop. As the vegetation in the Protected Environment in front of the camp area re-grows (at the coastal camp site) after the fire it, will further soften the visual appearance of the containers.</p> <p>A site layout was agreed on site to the satisfaction of all involved. Please refer to the visual specialist report attached as Appendix G of the BAR.</p>
<p>Tented camp area 1 SANParks has no objection to the proposed development at Area 1. We recommend that an Invasive Alien Plant Control Plan is developed and implemented.</p>	<p>Noted and incorporated. Continual alien clearing is done on the property</p>
<p>SANParks would like to visit the property again when the footprints at Site 2 are demarcated and the type of structures to be constructed finalised.</p>	<p>Noted and incorporated. Site inspection was conducted on the 8th of August 2019 and the new layout alternative was agreed to by all on site.</p>
<p>18 July 2019 Informal comment and discussions</p> <p>I suggest we visit the site when Chris is back in Plett. Site 2 is complex and will need a creative</p>	<p>Noted and incorporated</p> <p>Visual mitigation measures have been incorporated as per recommendation by the</p>

<p>design to mitigate potential visual impacts.</p> <p>The decision should also be made if it will be tents or more formal structures. The area is generally windy.</p> <p>In future, the tents/units may be used for the proposed hiking trail and this should be kept in mind.</p>	<p>visual specialist.</p> <p>The introduction of more structurally sound container units is proposed as the preferred alternative. The containers will be able to withstand wind better than the previously proposed tented units (alternative 2).</p> <p>Noted and incorporated. The camp area 2 will be able to accommodate 12 guests as required for hikers using the proposed hiking trail from Robberg to Harkerville (12 guests was the requirement indicated by the RCC)</p>
<p>Eden to Addo Corridor Initiative (17 July 2019)</p>	
<p>Informal comments and discussions</p>	
<p>COMMENT</p>	<p>RESPONSE</p>
<p>I have read the comments from SANParks prepared by Maretha Alant as attached re the above and, on behalf of Eden to Addo Corridor Initiative, support the comments made.</p>	<p>Noted and addressed above</p>
<p>I do think that the neighbour on the east, Chris von Christierson, should have an opportunity to comment as he will be most affected by the development. He is based in London but will be in Plett as from 9th August till the 30th August. Please could you consider extending the date for comment till after the 9th August? And especially as many of us, including myself, did not receive the documents for comment for this development.</p>	<p>Response sent by HilLand Environmental 18 July 2019</p> <p>A site meeting was held with Chris on his return.</p> <p>A revised layout was considered at the site meeting and agreed to by all.</p>
<p>Fynbos Nature Reserve (18 July 2019)</p>	
<p>Informal comments and discussions</p>	
<p>In response to above response from HilLand Environmental 18 July 2019 (please refer to the above row two, second column)</p> <p>I will attend the meeting on 8 August at 11am. However, the RCCPE cannot be rushed into making decisions of such potential significance without full consideration of all implications in terms of all prevailing environmental laws and we do not want this process dictated by the time bar you refer to, especially when some of us never even received the first lot documentation you apparently sent us. Accordingly, the RCCPE will request environmental attorneys Cullinan and Associates to apply for an extension to the time</p>	<p>HilLand Environmental response sent on the 18th of July 2019:</p> <p>The comment period was extended and the additional study undertaken to ensure that the site layout at the Coastal camp has the support of all involved.</p> <p>Extension was requested from DEADP in accordance with the regulations and this allows for the additional 30 day comment on this report.</p>

<p>period and also to review in detail the full legal implications of what is being proposed so the RCCPE will have the comfort that the proposed project is fully compliant. As Andrew Hill is clearly conflicted in the matter, he must recuse himself from any representation of the RCCPE and it has been proposed that Joan Berning (CEO of Eden to Addo) will act as Chair of the RCCPE with respect to this matter. I have copied in Sarah Kavalsig of Cullinan and Associates who will proceed accordingly to obtain said extension and review all relevant implications of the proposed Site 2 in so far as the RCCPE is concerned.</p>	<p>Joan will be commenting on behalf of the RCCPE.</p>
<p>DAFF (15 July 2019)</p>	
<p>COMMENT</p>	<p>RESPONSE</p>
<p>DAFF studied the supporting documents for the above mentioned application and the following point related to DAFF's mandate i.e. the implementation of the NFA are applicable:</p> <ul style="list-style-type: none"> a. Report not clear enough on the indigenous/protected species on above property, especially within the Coastal Protected area. DAFF request a specialist report to provide more informed comments. 	<p>Our letter (ref: PLE19/955/15) and email sent on the 18th of September 2019 has reference. Clarification on the species composition of the camp areas have been provided within the attached specialist statement (also attached as Appendix G in the BAR).</p> <p>In summary the two sites are both in vegetation transformed through agricultural uses (pastures and plantation). The coastal site is specifically set out within the agricultural pastures adjacent to the Protected Environment. The Protected Environment is coastal fynbos that has been burnt out in the 2017 fires and is restoring well and will remain protected. The proposed coastal camp (construction and operational) will have no impact on the Protected Environment and will not infringe on this area. The camp includes the installation of a Small viewing deck in the protected environment. The installation will not require any clearance of sensitive vegetation as it is to be located within an area that is already cleared and used as a viewing area with existing footpaths leading to the proposed footprint area. The location of the viewing deck was approved and agreed upon by the RCC and SANParks on site.</p> <p>The dam site is located in the plantation area adjacent to the farm dam. A row of planted</p>

	<p>Yellowwood trees fall between the camp and the water in addition to wetland elements typically occurring around farm dams. The units are proposed within the pioneer regenerating fynbos along the boundary of the pine plantation.</p> <p>Neither site will have any impact on any protected trees in terms of the NFA.</p>
<p>b. Section 15 of the National Forest Act (NFA) (Act No. 84 of 1998) as amended prohibits the cutting, disturbing, damaging or destroying of protected tree species without a license. Section 7 of the National Forest Act, act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a license.</p>	<p>Noted and incorporated</p> <p>No protected trees will be cut, disturbed, damaged or destroyed in the proposal. The location of the container units proposed at the dam camp area have been set back and are to be located behind the row of planted Yellowwood trees.</p> <p>No natural forest occurs in or near the areas proposed for the tourist facilities.</p> <p>To conclude, it is not anticipated that any protected tree species will be disturbed / removed / cut.</p>
<p>c. DAFF request that a 20-30m buffer between the tented areas & protected area in order to avoid any disturbance/encroachment</p>	<p>No vegetation in terms of the NFA occurs adjacent to the proposed camps. The portion of the private property now included in the Protected Environment has been set out by CapeNature and SANParks. Both CapeNature and SANParks have commented on and accepted the proposed position of the “development zones for the two camps”. This includes the buffer required between the PE and the units.</p> <p>Cape Nature confirmed that no buffer has been required and the Protected Environment EMPr has been signed off without a buffer area between the protected environment and bordering agricultural area.</p> <p>The proposed coastal camp area has been incorporated into the PAMP from the start. Legally, the owners are, therefore, allowed to farm the portion bordering the protected environment and the proposal of tourist accommodation is a better use of the property (from a conservation point of view).</p> <p>A firebreak buffer will be retained between the units and the PE vegetation</p>
<p>d. Kindly note that more detailed comments will be provided in future</p>	<p>Noted</p>

<p>once specialist information is made available</p>	
<p>e. DAFF request that DAFF: Fire Advisor Paul Gerber be consulted- as it is critical that the consultation advice be taken into account.</p>	<p>Noted and incorporated Comments received have been attached to the BAR as Appendix E</p> <p>Paul Gerber has visited the site and commented on the fire safety requirements. Cairnbrogie are members of the SCFPA. The requirements have been included in the management of the proposed facility.</p>
<p>DEADP (19 July 2019)</p>	
<p>COMMENT</p>	<p>RESPONSE</p>
<p><i>2.1. Scope of proposal</i></p> <p>According to the DBAR it is proposed to establish a tented camp resort on the Remainder of the Farm Kranshoek No. 432, Plettenberg Bay. The resort will consist of two separate tented camp sites with a total footprint of approximately 1 855 square metres. Tent Area 1 will consist of 12 tent structures (480 square metres), ablution facility (96 square metres) and walkways (648 square metres). Tent Area 2 will consist of six tent structures (240 square metres), ablution facilities (126 square metres), walkways (126 square metres) and a central area (217 square metres). It is understood that the tents will be positioned on raised wooden platforms which will only require excavation for the timber supports of the raised decks and the sewage infrastructure.</p> <p>Based on discussions held with the Applicant during the inspection of the site on 18 July 2019, possible alternative designs and layout of the accommodation units may be considered. Please be informed that the design alternative for these units must be described and assessed as a separate alternative to the tented camps. It is also understood that alternative sewage treatment and disposal alternatives may be considered too.</p> <p>The proximity of Tented Area 2 and the proposed access route to the edge of the Protected Environment needs to be considered carefully.</p> <p>The requirements of the Protected Environment and its management objectives and outcomes must be</p>	<p>Noted, an alternative structure has been incorporated within the amended draft BAR. The installation of container units is now proposed within a development zone at the dam and coastal camp area</p> <p>The development zone of the dam camp area will be approximately 2800 m² of which approximately 270 m² will be transformed for the installation of the units and associated infrastructure. The development zone for the coastal camp will be approximately 2290 m² of which approximately 350 m² will be transformed within the development zone. Approximately 290 m² is remote to the rest of the development zone and includes the installation of a viewing deck (overlooking the ocean as agreed upon by the RCC and SANParks), parking area located on agricultural pastures and footpaths leading to the associated infrastructure. The development zone makes allowance for the installation of a conservancy tank and transformation required for the installation of the associated pipelines.</p> <p>The tented accommodation units are now proposed as Alternative 2 within the amended draft BAR.</p> <p>No alternative sewage treatment is considered. The use of the existing conservancy tank is proposed for the dam camp area and the installation of a conservancy tank within the proposed development zone of the coastal camp</p> <p>The containers will be installed on concrete plinths and associated decking areas and</p>

<p>described and the assessment and EMP must clearly reflect how the placement of the resort units in close proximity to the edge have been considered and will be dealt with. This site will also influence the hiking trail which traverses the Protected Environment (and vice versa). Issues such as safety and security need to be considered too.</p>	<p>boardwalks will be installed on wooden poles. Sewage infrastructure includes the connection of the dam camp area to the existing conservancy tank which currently supports the boathouse and the coastal camps' development footprint allows for the installation and connection to the proposed conservancy tank.</p> <p>Please note that the placement within the Development Zone of the units is not fixed but will be "tweaked" on site. As such the Development zone should be approved as the transformation area.</p> <p>The proximity of the coastal camp to the protected environment was considered carefully and the placement of the units was agreed upon by the relevant stakeholders during a site inspection on the 8th of August 2019. CapeNature confirmed that the RCCPE's EMP already takes this area into account.</p> <p>It was confirmed that the proposed footprint of the coastal camp will have minimal to no impact on the protected environment and the proposed locality of the viewing deck has been agreed upon on site by the RCC and SANParks. Any potential impacts will be mitigated. The camp will be used as an overnight stopover for hikers of the proposed Robberg to Hakerville hiking trail (as proposed by Cape Nature and SANParks) and will be able to accommodate 12 people as requested by the RCC.</p> <p>The use of container units has been proposed due to security (possible baboon damage and remote accessibility) and durability (withstand wind)</p>
<p>2.2. <i>Engineering Services:</i></p> <ul style="list-style-type: none"> ❖ <i>Potable water supply:</i> Potable water will be obtained from existing boreholes on the property and conveyed via pipelines. The following discrepancy in the DBAR must be clarified. Under Section A.2(b) (page 28) it is stated that water will be conveyed via pipelines that will follow existing roads or through cultivated pastures to avoid disturbing natural vegetation. However, under Section D.6 (page 49) and the 	<p>Potable water will be used at each camp area. The proposed units will connect to the existing water network which is located within the existing main road (for the connection to the dam camp area) and cultivation field (for the connection north of the coastal camp area). The connection length between the units and existing network will be minimal (does not exceed 300 m in length) and will be located within disturbed areas, such as the proposed access roads/within the proposed</p>

<p>Environmental Management Programme ("EMP") (page 4), it is stated that water will be "channelled through existing pipelines to reach the tented camps". Confirmation is required whether new pipelines will be constructed and if so whether these pipelines will be more than 300 metres in length.</p>	<p>development zones or hanging under a board walk.</p>
<p>❖ <i>Electricity:</i> According to the D BAR, Tent Area 1 will connect to the existing Eskom power supply, while solar and gas sources will be used to generate electricity for Tent Area 2 for lighting and heating purposes.</p>	<p>Correct</p>
<p>❖ <i>Sewage treatment and disposal:</i> On site sanitation will be by means of conservancy tanks to be installed at each of the two tented sites. The DBAR states that sewage will be periodically removed by the Bitou Municipality for disposal at Ganse Vallei Wastewater Treatment Works as part of the existing agreement between the applicant and the Bitou Municipality. In light of the above, a copy of the written agreement with the Bitou Municipality in respect of the sewage disposal must be attached to the BAR. The agreement must include the servicing of the conservancy tanks which will form part of the proposal. With due consideration of the access route to Tent Area 2, the Bitou Municipality must also provide written confirmation that the access route is suitable and that it is a feasible to service the site with the available service vehicles. Should alternative sewage treatment and disposal technologies be considered, these must be clearly described and assessed and reported on. In this regard, written input from the BGCMA must be obtained on the applicability of the National Water Act, 1998 and the applicable application requirements. Please be reminded that the respective application processes must be synchronised.</p>	<p>Noted and incorporated - an agreement is in place between Cairnbrogie and Bitou Municipality for the removal of sewage. Please refer to Appendix E of the BAR The applicant will maintain the road to ensure that access is possible at all times for his guests and as such the municipal truck will be able to access the conservancy tanks.</p> <p>No alternative sewage treatment is proposed</p>
<p>2.3. <i>BAR Requirements</i> The BAR must contain all the information</p>	

<p>outlined in Appendix 1 of GN No. R. 982 of 4 December 2014 (as amended) and must also include the information requested in this letter. Omission of any of the said information may result in the application for Environmental Authorisation being refused. In this regard, the following must be attached to the BAR:</p> <ul style="list-style-type: none"> ❖ A copy of the Environmental Assessment Practitioner's ("EAP") curriculum vitae, including relevant experience. 	<p>The required CV was attached to the draft BAR. Please refer to Appendix H (EMPr)</p>
<p>2.4. <i>Legislative requirements</i></p> <ul style="list-style-type: none"> ❖ <i>National Water Act {Act No. 36 of 1998}</i> According to the DBAR the proposal triggers water uses in terms of the Section 21 National Water Act, Act No. 36 of 1998 ("NWA"). It is noted that a Risk Assessment Matrix was undertaken by Confluent Environmental for Section 21 (i) water use; and submitted to the Breede-Gourits Catchment Management Agency (BGCMA). The outcome of the Risk Assessment determined that the impact of the proposal on the watercourse is LOW for the construction and operational phases. The BGCMA subsequently confirmed (via e-mail correspondence) that the proposal can be generally authorised in terms of Section 39 of the NWA. <p>Important: A copy of the formal written response from the BGCMA must be attached to the BAR. The applicant must ensure that the necessary DW-registration forms are submitted to the BGCMA prior to the commencement of construction activities.</p>	<p>Formal acknowledgement of the GA application submission was received from BGCMA on the 22nd of July 2019 and approval of the GA application was received on the 2nd of August 2019. Please refer to Appendix E of the BAR</p>
<ul style="list-style-type: none"> ❖ <i>National Veld and Forest Fire Act, Act No. 101 of 1998</i> It is noted that Tent Area 2 is located on the edge of a Protected Area i.e. Fynbos Nature Reserve. The fynbos does require periodic burning and the concern is that the proposed structures (mainly wooden structures) will be burnt during a fire in the future. In this regard a 20 metre buffer between the proposed structures should be established to minimise the risk of the structures from 	<p>Noted an incorporated. In terms of fire safety, an FPA approved firebreak will be in place between the coastal camp area and the protected environment (as recommended by DAFF fire advisor). Additionally, galvanised sprinkler system will be erected on the roofs of the units (as per recommendation received from DAFF fire advisor)</p>

<p>being burnt down. It is further noted that the property owner is a member of the Southern Cape Fire Protection Association (FPA). Comment on the placement of the structures associated with Tent Area 2 must therefore be obtained from the FPA.</p> <p>Furthermore, the NVFFA must be included under Section B.11 (a). Comment in this regard must be obtained from the Department of Agriculture, Forestry and Fisheries.</p>	<p>Noted and incorporated - a site inspection was held with the local FMU and DAFF fire advisor on the 20th of August 2019. Please refer to confirmation letter received from the local FMU in Appendix H, Annexure H and comments received from DAFF fire advisor in Appendix F, Annexure G.</p>
<p>2.5. <i>Public participation Process</i> The person (EAP) conducting the public participation process must ensure that the Public Participation Process ("PPP") meets the requirements of Regulations 40 and 41 of the Environmental Impact Assessment Regulations, 2014 (as amended). In this regard, proof the PPP must be included in the final BAR.</p> <p>It is unclear if all the neighbouring property owners have indeed been notified and provided an opportunity to comment on the reports for the proposed development.</p>	<p>Noted and incorporated</p> <p>All neighbouring properties were notified and have been provided an opportunity to comment on the various reports including this amended Draft BAR.</p>
<p>2.6. <i>Specialist report(s)</i> It is noted that a specialist aquatic report was compiled by Confluent Environmental and that the main purpose of this report was to determine the type of water use authorisation in terms of Section 21 (c) and (i) of the NWA. The specialist report must contain all the information as required by Appendix 6 of GN No. R. 982 of 4 December 2014 (as amended).</p> <p>Notwithstanding the above, it must be ensured that the mitigation measures as described in Sections 5.1.1 and 5.2.1 the specialist report must be incorporated into the BAR and can be strictly implemented and adhered to.</p>	<p>Noted and incorporated</p>
<p>2.7. <i>Environmental Management Programme (EMPr)</i> The contents of the EMPr must meet the requirements outlined in Section 24N (2) and (3) of the NEMA (as amended) and Appendix 4 of GN No. R. 982 of 4 December 2014. The EMPr must address the potential environmental impacts of</p>	<p>Noted and incorporated</p> <p>Noted and incorporated</p>

<p>the activity throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing). The EMPr as included and received by this Directorate does not meet all the requirements in Appendix 4 as mentioned above. The EMPr must be revised to comply with the requirements. The following aspects must also be amended and reflected in the final EMPr that must be submitted to this Directorate with the Final BAR:</p> <ul style="list-style-type: none"> ❖ <i>Impact Management Outcomes</i> The impact management outcomes have not been properly described in the EMP. This must be addressed. For example, the impact management outcomes associated with the clearance of vegetation are to minimise / prevent erosion, to restrict disturbance to the minimum, etc. 	<p>Noted and incorporated</p>
<ul style="list-style-type: none"> ❖ <i>Monitoring and auditing</i> According to Section 5.1 of the EMPr the ECO will undertake weekly site inspection to monitor compliance with the EMPr and include the findings in a monthly monitoring report. However, under Section 11.4, no provision is made for the compilation and submission of monthly monitoring reports. This discrepancy must be corrected in the EMP. The EMPr must specify that the ECO must submit monthly monitoring reports to this Directorate during construction and the post construction rehabilitation and monitoring phase and that the final construction phase monitoring report must be submitted to this Directorate within two months of the construction activities being concluded. 	<p>Noted and incorporated</p> <p>Noted and incorporated</p>
<p>3. The Department awaits the submission of the BAR as prescribed by Regulation 19 of the EIA Regulations, GN No. R. 982 of 4 December 2014. In accordance with Regulation 19 of GN No. R. 982 of 4 December 2014, the Department hereby stipulates that the BAR must be submitted to this Department for decision within 90-days from the date of receipt of the application by the</p>	<p>Noted and incorporated</p>

<p>Department, calculated from 30 May 2019. If, however, significant changes have been made or significant new information has been added to the BAR, the applicant/EAP must notify the Department that an additional 50 days (i.e. 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information. If the BAR is not submitted within the prescribed timeframe, the application will lapse in terms of Regulation 45 of Government Notice Regulation No. 982 of 4 December 2014 and your file will be closed. Should you wish to pursue the application again, a new application process would have to be initiated. A new Application Form would have to be submitted and the prescribed application fee would have to be paid again. Please note that two printed copies as well as two electronic copies (saved on CD/DVD) of the BAR must be submitted to the Department.</p>	<p>An additional 50 days was requested and the amended Draft BAR is out for a final 30 day commenting period. The Final BAR will be submitted to the competent authority within the required time period which ends shortly after the commenting period on the amended draft BAR</p>
<p>4. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p>	<p>Noted</p>
<p>5. Please note that the proposed activities may not commence prior to an Environmental Authorisation being granted by the Department. It is an offence in terms of Section 49A(1)(a) of the NEMA for a person to commence with a listed activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity.</p>	<p>Noted No activities will commence prior to the receipt of the EA</p>
<p>6. The Department reserves the right to revise initial comments and request further information based on any new or revised information received.</p>	<p>Noted</p>
<p>BGCMA (31 July 2019)</p>	
<p>COMMENT</p>	<p>RESPONSE</p>
<p>This office acknowledges that application</p>	<p>Noted</p>

Swanepoel, Francois Naude, Steve Kleinhans, Cape Nature: Colin Fordham, C. van Tonder, RCC
- A. Conyngham, Applicant - Andrew Hill

"A quick update on where we are now in the process.

Subsequent to our site visit with Tessa's office, she has now completed her report and we will be updating our Draft BAR and circulating it for a final 30 day comment period in the next few days (we will send a notification as soon as they have been uploaded onto the website – we anticipate early next week).

In brief the changes to the Draft BAR are as follows:

- Introducing the alternative design of the containers to replace the tents due to security (possible baboon damage and remote accessibility) and durability (withstand the wind). These will be placed on plinths and will be linked with boardwalks so that all guest movement is off the ground and the impact on the ground is limited. In the event of decommissioning the containers can simply be lifted and moved to a new location.
- The containers will be painted a dark charcoal colour for visual absorption and will be clad in natural weathered timber that will follow a natural profile (not block shaped) to assist in blending the containers into the landscape.
- Although the containers are located in the pasture area they are fenced off from the pastures behind them and are viewed against this higher ground which forms a visual backdrop.
- As the vegetation in the Protected Environment in front of the camp area regrows (at the coastal camp site) after the fire it will further soften the visual appearance of the containers.
- The visual specialist has confirmed that the containers will not be visible from Chris' property and will not be visually obtrusive from SANParks property, if visible at all, due to the distance.
- That the number of guests that can be accommodated at the coastal camp is to be set to be able to accommodate hikers using the proposed hiking trail from Robberg to Harkerville that is planned (12 guests was the requirement indicated by the RCC)
- Andrew has requested flexibility of two potential set up options at the coastal site being either in 6 smaller containers (each sleeping 2 guests) or 3 larger containers (each sleeping 4 guests) – both options accommodate a maximum of 12 guests as required for the proposed hiking trail so they will be suitable for this use. This allows him the flexibility based on availability of containers and cost of refurbishing the containers for accommodation. With either option the ablutions will be inside each contain as en suite bathrooms, with a toilet servicing the central area.
- They will be located within the “designated development zone” as set by the visual specialist and she has confirmed that there is no difference between the two options. The Environmental Authorisation will be required to allow the applicant to make that decision at the time of implementation as to whether he is using 3 large or 6 smaller containers.
- The camp area at the dam will also be done in containers with the proposal for 6 of the larger containers (sleeping 24 guests in total). This is a reduction from the 12 tents previously proposed. The site plan shows that there will either be two communal ablution containers set back behind the individual units, or that each unit will contain its own ablution facilities. Again the owner would like the flexibility to make that decision at the time of implementation based on costs of refurbishing and the requirements of his market.
- At DEADP's site inspection they requested the units to be located behind the planted yellowwood trees and not between them as previously proposed. This has been done by Andrew and the orientation changed to suit.
- The sewage from both camp sites will be pumped from the bathrooms to the central

conservancy tanks and from there it is collected by the municipal sewage collection vehicle. The municipality have confirmed that they can offer this service.

- The FPA and DAFF fire advisor have given their inputs and have confirmed the suitability of the proposals.
- The BGCMA have confirmed the General Authorisation of the proposed accommodation units next to the dam site (section 21i water use).
- Heritage Western Cape have confirmed that they have no further requirements for the proposal.

I have attached the two layout options at the coastal site for your information. They are contained in the amended Draft BAR and form part of the Visual Specialist report. I have also attached Andrew's indicative layout at the dam site.

We had to notify DEADP of the need to make use of the additional 50 days in the BAR process which means we have until the 22nd October 2019 to SUBMIT the Final BAR to them. This means that the 30 day comment period is going to cut this very fine and we would appeal to you all to please submit your comment as quickly as you can and not wait till day 29. If you are not going to provide any further comment, or are happy to acknowledge that this email covers all your issues and concerns, please advise us in writing by return email."

Table 5: Comment and response table - Amended Draft BAR PPP

RCCPE - Final Annabelle Conyngham (20 September 2019)	
COMMENT	RESPONSE
"I have no additional comments. Thank you for the comprehensive update"	Noted
Cape Nature - Colin Fordham (02 October 2019)	
COMMENT	RESPONSE
Cape Nature previously provided comment on the Pre-Application BAR and has attended numerous meetings where all our concerns were adequately addressed. Therefore Cape Nature does not object to the proposed Amended Draft Basic Assessment Report. Cape Nature may provide additional comment on any required further applications and reserves the right to revise initial comment and request further information based on any additional information that may be received.	Noted
Fynbos Nature Reserve / Registered Neighbouring Property Owner - Chris von Christierson (03 October 2019)	
COMMENT	RESPONSE
"Thank you for this. Provided the outcome is in accordance with what we agreed on site in August, I have no further comments."	Noted
SANParks - Maretha Alant (11 October 2019)	
COMMENT	RESPONSE
SANParks had no objection to the alternative	Noted and incorporated.

¹ DEADP corrected the date from the 23rd to the 22nd for submission of the final BAR.

design, it was however recommended to remain conscious of the potential visual impact a higher structure on plinths. Boardwalks can be slippery in wet weather. Perhaps use of non-slip material as a finish.	Boardwalks will take ensure a non-slip material where they are used. Natural pathways can be used where no boardwalk is necessary.
SANParks supported the amendment to and the proposal of a development zone of the dam camp area (including layout alternative for the associated infrastructure). The amendment to the positioning of the containers behind the planted yellowwood trees was also supported.	Noted
SANParks had no objection to the development zone of the coastal camp and alternatives (installation of 3/6 container units and associated infrastructure alternatives).	Noted
SANParks supported the amendments made to the visual mitigation measures that will be implemented at each unit.	Noted
HilLand Environmental "Although the coastal camp containers are located in the pasture are, they will be fenced off from the pastures behind them and are viewed against this higher ground which forms a visual backdrop." SANParks confirmed that they have no objections to this statement.	Noted
SANParks noted and confirmed that there is no objection to the other amendments that was raised to the draft BAR: <ul style="list-style-type: none">) "The visual specialist confirmed that the containers will not be in the direct line of sight of neighbouring properties located south east of Cairnbrogie and the development zone is too far from neighbouring properties south west of the property (including SANParks) / the proposed hiking trail to have a visual impact. Additionally, it was confirmed that both options proposed for the coastal camp area (installation of 3 /6 units) will have low visual impact.) The sewage from both camp areas will be pumped from the bathrooms to the central conservancy tanks and from there it is collected by the municipal sewage collection vehicle. The municipality has confirmed that they can offer this service.) The FPA and DAFF fire advisor have provided their inputs and have confirmed the suitability of the proposals.) The Breede Gouritz Catchment Management Area (BGCMA) has confirmed the General Authorisation (GA) of the proposed accommodation units next to the dam site (Section 21 (i) water use).) Heritage Western Cape (HWC) has confirmed that they have no further requirements for the proposal." 	Noted
Fynbos Nature Reserve - Chris von Christierson (11 October 2019)	
COMMENT	RESPONSE
Fynbos Nature Reserve supported SANPark's comments. "Of particular importance is that	Noted

there will be no visual impact on neighbouring properties, especially with respect to the Fynbos Property (Ptn 38 Kranshoek 432) to the South East"	
BGCMA - RM Mphahlele (11 October 2019)	
COMMENT	RESPONSE
With respect to sewage management connected to the above activity; your BAR states: "Bitou Municipality confirmed that the honey sucker currently services the farm additional sewage will be removed in the same manner and as required." Kindly request Bitou Municipality to provide this confirmation in writing and submit the written confirmation/agreement to BGCMA within 30 working days of receipt of this comments.	A service agreement is in place between Cairnbrogie and Bitou Municipality and was included within the amended Draft BAR as Appendix E. The service agreement was sent in response to the comments on the 15th of October 2019
The BGCMA has no further requirements or concerns with respect to the proposed development.	Noted
All previous comments made by this office must be adhered to.	Noted and incorporated
DAFF - Melanie Koen (dated 18 October 2019, received 21 October 2019)	
COMMENT	RESPONSE
2. Further to DAFF's previous comments on 15 July 2019, kindly note the following: a. Section 15 of the National Forest Act (NFA) (Act No 84 of 1998) as amended prohibits the cutting, disturbing, damaging or destroying of protected tree species without a license. Section 7 of the National Forest Act (NFA), act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a license.	Noted and incorporated into the BAR and EMPr (Appendix H of the BAR)
b. DAFF request that the units be placed a distance of 8m - 10m from protected trees along the dam to avoid any further encroachment/ disturbance of protected trees.	Noted, the container units at the dam site have been set back behind the planted Yellowwood trees in order to prevent any encroachment / disturbance to the trees. The containers are placed onto small concrete plinths so there is minimal to no disturbance to the root zone. At time of pre-construction activities, the ECO will request a site visit with DAFF to confirm the placement of the containers in relation to the proximity to the trees within the development zone.
DEADP - (dated 18 October 2019, received 21 October 2019)	
COMMENT	RESPONSE
2.2 Alternative layouts associated Coastal Camp (Area 2) It is understood that two alternative layouts are being proposed at the Coastal Camp (Area 2) (i.e. six container and a communal area or, 3	Correct

<p>large containers with a communal area. Both these layouts will be located with an area of 2 000 square metres and will be able to accommodate 12 guests.</p> <p>In this regard please note that this Department may authorise any alternative or combination of alternatives. An additional option which could be considered and would provide 12-beds is a combination of 2-small containers and 2-large containers.</p>	<p>It is requested that the development zones of both of the camp areas be authorised, so that at time of construction the applicant can decide on the combination of container units that will be installed based on the economics of his business model.</p> <p>All I&AP's have confirmed that the selection of 3 larger or 6 smaller or any combination of the above is a decision to be made by the applicant at the time of installation as there is no significant environmental reason for specifying a particular combination of unit sizes.</p> <p>It is recommended that DEADP request the submission of a Site Development Plan once the applicant has made their decision regarding the container configuration.</p>
<p>Furthermore, it is understood that a boardwalk and viewing deck is proposed within the RCCPE. It is recommended that comment be obtained from CapeNature regarding the infrastructure within the protected environment.</p>	<p>Comments have been received from CapeNature (dated: 2 October 2019). CapeNature had not objections to the proposed amended Draft BAR and site development plan including the viewing deck. Construction of this will be done with the RCCPE managers in attendance.</p>
<p>Specialists Reports</p> <p>Visual Impact Report</p> <p>It is noted that a Visual Impact Report was commissioned to assess the visual impact of the preferred alternative (at the Coastal Camp) on the receiving environment. According to the report the visual intrusion/impact associated with the containers, as opposed to tents, is that the footprint of each unit proposed in Option A is considerably smaller and the maximum height is lower, while Option B (three large containers) will ensure that the overall development footprint is smaller than if the tents were used. However, no comparative assessment of the Preferred Alternative (containers) and Alternative 2 (tents) were undertaken to substantiate this finding. As such, the visual impact report must include a comparative assessment of the Preferred Alternative and</p>	<p>The Specialist has updated their report to include the items indicated.</p>

<p>Alterative 2 in the BAR.</p> <p>Furthermore, it must be ensured that the specialist reports contain all information specified in Appendix 6 of the EIA Regulations, 2014 and recommendations and mitigation measures proposed in the specialist reports are included in the BAR and Environmental Management Programme.</p>	
<p>2.4 Environmental Management Programme</p> <p>It must be ensured that the Environmental Management Programme ("EMPr") contains all the required information as per Appendix 4 of the EIA Regulations, 2014.</p> <p>A clear distinction must be made between an environmental monitoring report (to be compiled by the Environmental Control Officer ("ECO")) and an environmental audit report (to be compiled by independent person with the relevant environmental auditing expertise). In this regard please note that the environmental auditor cannot be the EAP or the ECO. Furthermore, take note that the auditing requirements with regard to environmental authorisations and EMPr's under Regulation 24 of the EIA Regulations, 2014 (as amended). In this regard, the EMPr must be amended to ensure compliance with the requirements. The contents of the environmental audit report must comply with Appendix 7 of the EIA Regulations.</p>	<p>Noted. The checklist at the beginning of the EMPr confirms compliance with the NEMA appendix 4 requirements.</p> <p>Noted and incorporated in the updated EMPr (attached as Appendix H of the BAR)</p> <p>The ECO will undertake the required compliance monitoring and the Audits will be undertaken as part of the RCCPE audits by an independent auditor.</p>
<p>2.5. Public Participation Process</p> <p>It must be ensured that all comments submitted during the public participation process are adequately addressed in the final BAR.</p>	<p>Noted and incorporated. All comments received have been addressed in this report - Public Participation Report - Appendix F - within the comments and response tables</p>
<p>In addition to the above, comments from the relevant conservation body as well as the South African National Parks ("SANParks") must be obtained regarding the new proposed design and layout at the Coastal Camp (Area 2). The comment / input must be included in the final BAR.</p>	<p>Comments have been received from CapeNature and SANParks, supporting all the amendments that have been made to the proposed development</p>
<p>Furthermore, it is noted that comment was obtained from the Fire Advisor of the Department of Environment, Forestry and Fisheries ("DEFF") and it is understood that the fire risk is currently moderate to low due to the fire in 2017. According to the letter that fire risk</p>	<p>Noted, DAFF comment received and incorporated in the EMPr (Appendix H). The letter has also been attached as an Annexure to the EMPr</p>

will increase every year, especially after six years where the risk will increase exponentially. The recommendations of the DEFF Fire Advisor must therefore be strictly implemented.	
BITOU MUNICIPALITY – Anje Taljaard (21 October 2019)	
COMMENT	RESPONSE
The Municipality do not have any objections to the proposal. Please ensure that the proposed container units comply with all necessary national building regulations. Assistance in this regards can be obtained from the Building Control Department before submission of relevant building plans.	Noted. The owner will ensure to comply with the necessary building regulations.

6 CONCLUSION

The public participation process for the proposed Cairnbrogie Resort Camp has been concluded.

All concerns raised by Stakeholder and / or Interested and Affected Parties (I&AP's) have been addressed adequately and appropriately throughout the basic assessment process. This report forms part of the submission of the Final BAR to the Department of Environmental Affairs and Development Planning (DEADP) for their review and decision making.

The proposed resort camps have no significant adverse impacts that cannot be mitigated.

Initial concerns regarding the visual impact of the Coastal camp has been adequately addressed. A visual impact study has been conducted, resulting in the defining of an amended development zone and the submission of an amended Draft BAR for comment and review. Mitigation measures proposed will be implemented through the approved EMPr and proposed mitigation measures recommended by various specialists involved in the project.

The proposed resort camps will have a positive socio-economic impact through the creation of additional job opportunities and the increase of available tourist accommodation units within the Kranshoek area which has been highlighted through the Bitou SDF as a tourism functional area, while not detracting from the successful agricultural operation at Cairnbrogie.

The coastal resort camp incorporates the request made during the public participation to ensure that it can accommodate hikers of the proposed Robberg Coastal trail. As such 12 guests will be able to overnight (ties in with the standard size of a hiking group). This will allow hikers on the proposed Robberg – Harkerville Coastal trail to overnight at camp area 2 (coastal camp). As the coastal camp area has been already excluded

from the active agricultural areas, the impact on agricultural land will be minimal to none.

To conclude, all recommendation and concerns raised have been adequately taken in consideration and all possible impacts have been assessed and addressed through the Environmental Impact Assessment process.