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ENVIRONMENTAL CONSULTANCY

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DRAFT AMENDMENT ENVIRONMENTAL IMPACT REPORT

The Proposed Development of a Beachfront Security Estate (Athina Estate) on Portion 66 & 67 of Farm 443, Plettenberg Bay, Western Cape.

in terms of the
National Environmental Management Act, 1998 (Act No. 107 of 1998 as amended) &
Environmental Impact Regulations 2014 (as amended)

10/10/2025

DEA&DP REF: 16/3/3/5/D1/14/0011/25



PREPARED FOR:	ATHINA DEVELOPMENT PTY LTD
PREPARED BY:	ECO ROUTE ENVIRONMENTAL CONSULTANCY
EAP:	JANET EBERSOHN (EAPASA REG 2019/1286)
DATE:	10/10/2025

PURPOSE OF THIS REPORT: STAKEHOLDER REVIEW AND COMMENT PUBLIC
PARTICIPATION DATES 13/10/2025 to 13/11/2025

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STATEMENT OF INDEPENDENCE

I, Janet Ebersohn, of Eco Route Environmental Consultancy, in terms of section 33 of the NEMA, 1998 (Act No. 107 of 1998), as amended, hereby declare that I provide services as an independent Environmental Assessment Practitioner (EAPASA Reg: 2019/1286) and receive remuneration for services rendered for undertaking tasks required in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), and the Environmental Impact Assessment Regulations, 2014 (as amended). I have no financial or other vested interest in the project.

SCOPE OF ASSESSMENT AND CONTENTS OF AMENDMENT TO BE APPLIED FOR IN TERMS OF PART 2

As per Section 32 in NEMA Regulations (Act 107 of 1998, as amended in 2014), Process and consideration of application for amendment a report must be compiled reflecting the following:

- (i) An assessment of all impacts related to the proposed change;
 - (ii) Advantages and disadvantages associated with the proposed change; and
 - (iii) Measures to ensure avoidance, management and mitigation of impacts associated with such a proposed change;
- and
- (iv) Any changes to the EMP

Scope of Substantial Amendment Report	Index
(1) An amendment report must contain the information that is necessary for the competent authority to consider and come to a decision on the application, and must include -	
(a) Details of – (i) The EAP who prepared the report; and (ii) The expertise of the EAP, including curriculum vitae.	See Appendix A
(b) The location of the activity, including – (i) The 21 digit surveyor General Code of each cadastral land parcel. (ii) Where available the physical address and farm name. (iii) Where the required information items (i) and (ii) is not available, the co-ordinates of the boundary of the property. (iv) Property Description	(i) Section B of the Report. (ii) Section B of the Report. (iii) Section B of the Report. (iv) Section B of the Report.
(c) Locality Plan, Environmental Conservation Maps and development concept	Section C of this Report
(d) Legal Requirements	Section D of this Report
(e) A description of the policy and legislative context within which the development is proposed, including – (i) An identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and have been considered in preparation of the report; and (ii) How the proposed activity complies with and responds to the legislation and policy context, plans, guidelines, tools frameworks and instruments.	Section E of this Report (i) Section E of this Report (ii) Section E of this Report
(f) A motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred location.	Section F of this report

(g) An Assessment of all impacts related to the proposed change: (i) The impacts and risks identified for the amendment, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts – (aa) can be reversed (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated.	Section G of this report Section G of this report
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SECTION A

1. INTRODUCTION

The Athina Estate development is on Portion 66 and 67 of the Farm Brakkloof 443 along the coastal strip between the Beacon Isle Hotel and the Robberg Nature Reserve. Access will be directly from Robberg Bay Road and OP07209.

The Environmental Authorisation (16/3/3/1/D1/14/0028/22) was issued on 31 July 2024 which authorises the Holder to undertake the following activities that includes the listed activities as it relates to the development of structures and infrastructure within 100 metres of the high-water mark of the sea and the littoral active zone, the clearance of indigenous vegetation of more than 300m², development of roads wider than 4 metres and the excavation of more than 5m³ of sand within 100 metres of the high-water mark of the sea and littoral active zone for the development of a small beachfront estate (9 residential stands).

The development includes 9 residential stands that vary between $\pm 1319\text{m}^2$ and $\pm 1987\text{m}^2$ in size. There is some designated communal open space that will be rehabilitated with natural indigenous vegetation. The property will be fenced and gated, however access to the frontal / coastal beach walking trail will not be denied. The development will be controlled by the Homeowners Association, and the design of houses will be subject to architectural design guidelines that will ensure an aesthetically pleasing development that blends in with the surroundings.



Condition D in the title deed states the following:

"Subject further to a servitude right of way 6 meter wide parallel to and along the entire length of the line D as shown on Diagram 8363/1970 annexed to Deed of Transfer T35111/1975 with ancillary rights in favour of Portion 60 (portion of portion 57) of the Farm Brakkloof No.442 held by deed of transfer No. T36740/1984, as will more fully appear from Notarial Deed of Servitude No. K750/1996." Please refer to appendix B with a copy of the title deeds. Therefore, the servitude was not meant as a general public access point to the beach.

3. SPECIALIST STUDIES THAT WERE REVIEWED

Unlike the initial application for environmental authorisation that necessitated the consideration and assessment of a wide variety of potential impacts, this amendment application focus on the possible change in Biodiversity/ landscape/character/visual impacts. All other impacts are assumed to be similar and therefore need not be re-assessed as part of this amendment investigation.

The following Specialist studies were reviewed for the proposed amendments, Appendix E1:

1. Aquatic Impact Assessment
2. Visual Impact Assessment
3. Animal Species & Terrestrial Biodiversity
4. Archaeological Impact Assessment

The specialist studies conducted for the Basic Assessment Process is attached as Appendix E2.

3.1 Conclusion of Specialist Aquatic Impact Assessment

As per Confluent Specialist:

The specialist freshwater assessment focussed on a large depression wetland which lies across Robberg Road to the west of the development and provides a detailed assessment of potential impacts to the wetland based on the SDP that was provided at the time.

I can confirm that the amendments as described above are all confined to the development footprint to the east of Robberg Road (Figure 2) and will have no additional nor a new and unassessed impact on the wetland. The impacts described and assessed in the original freshwater assessment report are therefore also applicable to the updated SDP. Refer to Appendix E1.

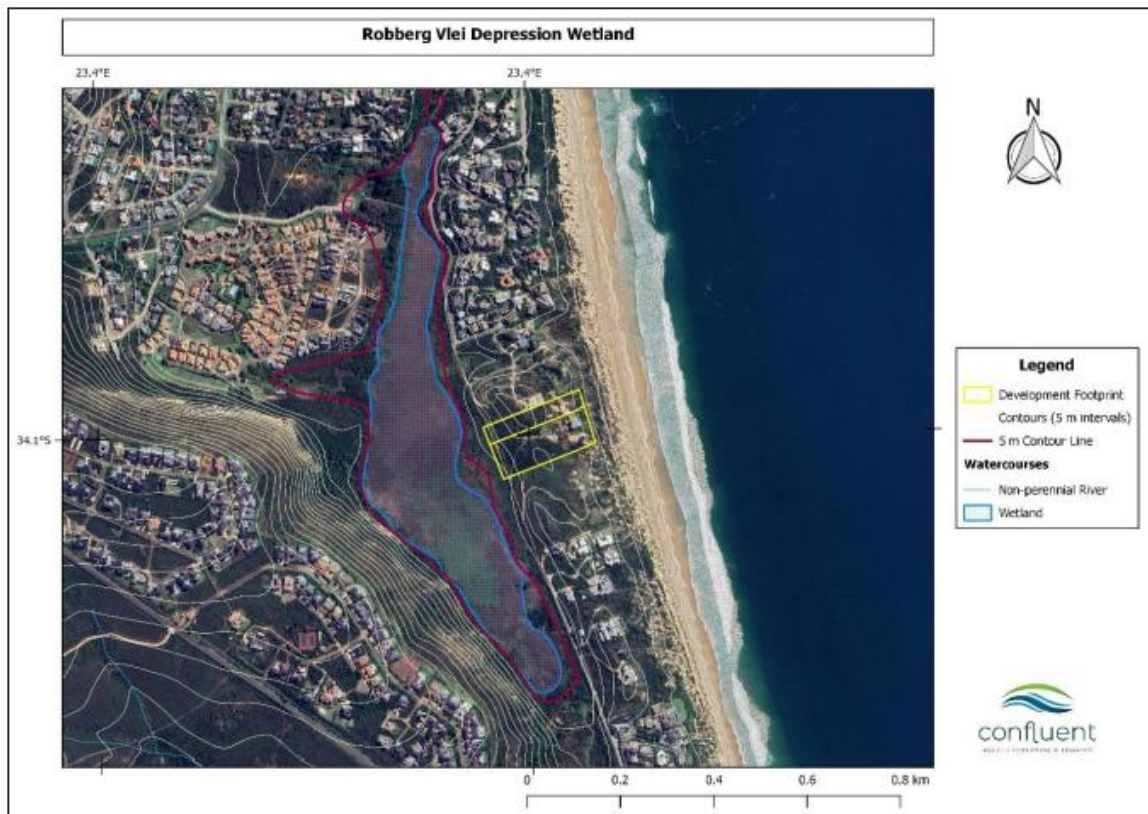


Figure 2: Map of the wetland in relation to the development footprint.

3.2 Conclusion of Specialist Visual Impact Assessment

The impacts assessed and the mitigation measures/recommendations made in the EIA phase remain unchanged. Please refer to Appendix E1.

3.3 Animal Species & Terrestrial Biodiversity Assessment

Ken Coetzee:

A raised boardwalk system is considered as having less impact on the dune system than a footpath as it allows for the establishment of some dune vegetation under the structure. It will also ensure that people wanting to access the beach are restricted to the boardwalk, therefore reducing potential erosion of the sandy substrate and trampling of the dune vegetation due to foot traffic.

*These modifications to the building plate will have no negative impact on the biodiversity of the site due to fact that the natural habitats available on the study site are all anthropogenically impacted, to a variable degree (natural vegetation removal and invasion by *A. cyclops*). Apart from past anthropogenic impact the biodiversity assessment clearly found that the study site habitats do not represent any kind of critical or specialized resource for any of the sensitive animal species or their habitats. Please refer to Appendix E1.*

As per Jan Vlok the Botanical Specialist:

My comments are as follows:

1. *A boardwalk is preferable to reduce impacts on the primary dune system.*
2. *The minor increase in the number of units will not alter the botanical impacts of the proposed development.*

Please refer to AppendixE1.

SECTION B

1. LOCATION INFORMATION

Province:	Western Cape
District Municipality:	Garden Route Municipality
Local Municipality:	Bitou Municipality
Ward number(s):	Ward 2
Nearest town(s):	Plettenberg Bay
Erf name(s) and number(s):	Portion 66 and 67 of the Farm Brakkloof 443 (Erf 16830)

2. PROPERTY INFORMATION

Erf Number	Portion 66 and 67 of the Farm Brakkloof 443 (Erf 16830)
Surveyor General 21 digit code:	C03900080001683000000
Zoning:	Subdivisional Area
Urban Edge:	Yes
Applicant name:	ATHINA DEVELOPMENT (PTY) LTD
Registration number (if applicant is a company):	2018/081918/07
Trading name (if any):	ATHINA DEVELOPMENT (PTY) LTD
Responsible person name:	Kyle Powter
Physical address of applicant:	1 st Floor, Dean Street Arcade, Main Street, Newlands
Postal address:	1 st Floor, Dean Street Arcade, Main Street Newlands
Postal code:	7700
Telephone:	+27(0) 82 505 1770
E-mail:	kylepowter1@gmail.com
GPS point middle of property:	34° 5'24.10"S / 23°22'13.35"E

3. PROPERTY DESCRIPTION

3.1 Location

The Athina Estate development is on Portion 66 and 67 of the Farm Brakkloof 443 along the coastal strip between the Beacon Isle Hotel and the Robberg Nature Reserve. It is located about 3.9 km south of the Plettenberg Bay CBD, positioned between the Whale Rock Ridge development and the coastline. It is bordered to the north by the "Duin n See" development and to the south by Portion 57/443, a serviced property. Along the western boundary, a 20 m servitude for access and services is in place, together with a 10 m road reserve.

Access will be directly from Robberg Bay Road and OP07209. The properties consist of transformed urban land located within an area earmarked for residential development in the approved Spatial Development Framework of the Bitou Municipality.

The property has been consolidated (Portion 66 and 67) and rezoned to Subdivisional Area as per the Town Planning requirements.

3.2 Town Planning

The following was extracted from the Town Planning Motivation Report for erven 16835 and 16836, Appendix G..

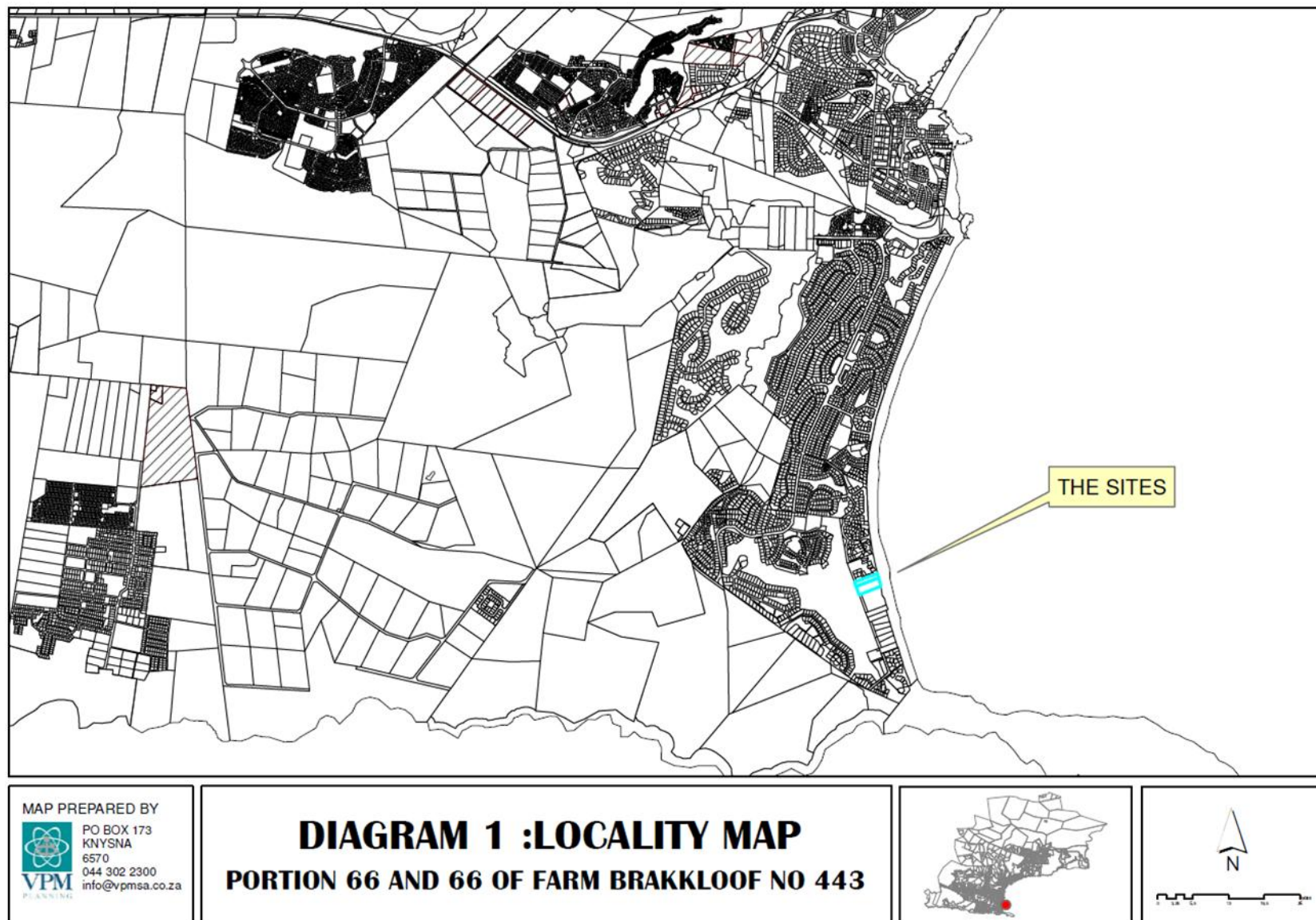
In 2021, an application for the consolidation, rezoning, and subdivision of Portions 66 and 67 of the Farm Brakkloof No. 442 was submitted to the Bitou Municipality to facilitate the establishment of a residential development. The application was approved in November 2023.

Following approval, the two farm portions were consolidated into a single property, resulting in the creation of Erf 16830. Erf 16830 was then subdivided into 9 residential erven (Erven 16831 to 16839), 2 Communal Private Open Space Erven (16840 -16841), and a public road (16842). The development rights have been implemented, and the subdivision has been registered and is now formally known as Athina Estate.

As per the conditions of approval, the submission of Design Guidelines, an estate Constitution, and Estate Rules were required. These documents were submitted to the Municipality and were granted approval (see Appendix H).

The consolidation of Erven 16835 and 16836 (stand 06 and 07) within the estate is proposed to allow for a large single residential stand. The rationale of the proposed consolidation is to create a larger, more private property that allows for a well-designed residential dwelling with substantial outdoor space. A single, consolidated stand will offer significantly more flexibility in terms of architectural layout and landscaping options. This will enable the owners to design a residence that is both functionally efficient and aesthetically aligned with the premium character of Athina Estate.

4. LOCALITY MAP



5. ENVIRONMENTAL CONSIDERATIONS

5.1 Vegetation

Following the 2022 National Biodiversity Assessment map the proposed development area consists of Goukamma Dune Thicket (status = Least Concerned) and a narrow strip of Garden Route Shale Fynbos (status = Vulnerable), see figure 4. The inclusion of Garden Route Shale Fynbos is, however, a mapping mistake due to the coarse scale of the national vegetation types. None of the species that are present on the properties are typical of Garden Route Shale Fynbos and the entire property consists of Goukamma Dune Thicket (Vlok, 2022). The Ecosystem Threat Status is Least Concern (Figure 5).

The Botanical Report by Jan Vlok of Regalis Environmental Services (2022), and comments regarding the amendments are attached as Appendix E1 & E2.



Figure 2: Vegetation type (VegMap 2018).



Figure 3: Ecosystem Threat Status (SANBI Red List of Ecosystems).

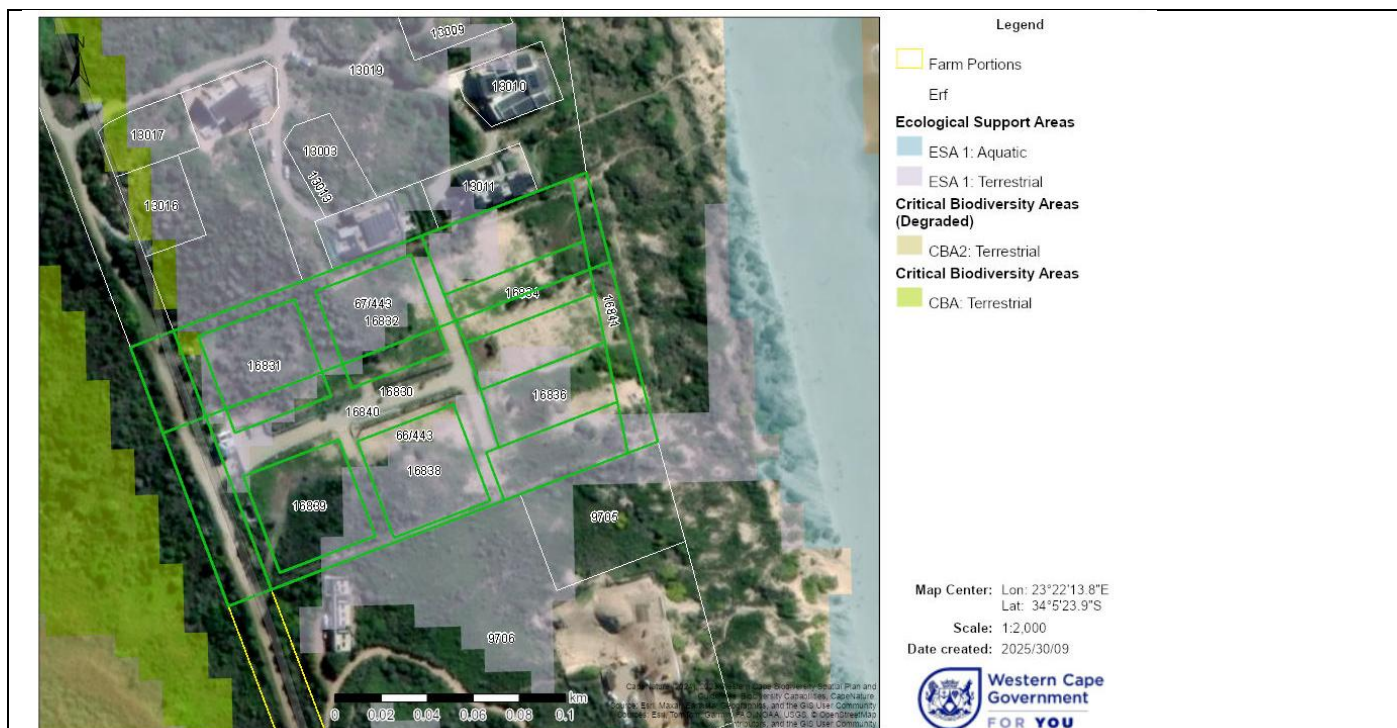
5.2 Western Cape Spatial Development Plan

The study site does not contain any Critical Biodiversity areas but is classified as a terrestrial Ecological Support Area (Figure 6).

Ecological Support Areas

Feature:	ESA: Coastal Corridor
Category 1:	ESA 1: Terrestrial
Definition:	Areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of PAs or CBAs, and are often vital for delivering ecosystem services.
Objective:	Maintain in a functional, near-natural state. Some habitat loss is acceptable, provided the underlying biodiversity objectives and ecological functioning are not compromised.

The Botanical Report by Ken Coetzee of *Conservation Management Services (2023)*, and comments regarding the amendments are attached as Appendix E1 & E2.



5.3 Species of Conservation Concern

The screening tool noted a number of rare and threatened plant species that may occur on the proposed development area, but no rare or threatened species were found or are suspected to occur on the proposed development site as the local habitat is not suitable for any of these species (Vlok 2022).

SECTION C

6. DESCRIPTION OF THE SCOPE OF THE PROPOSED ACTIVITY

The proposed changes to the EA are as follows:

- The amendment of the Site Development Plan ("SDP") to reflect a boardwalk instead of a footpath.
- A revised layout proposed for the amendment of building plates that will have an overall increase in the development footprint of the building plates by 165m² for P06 and P07.
- The inclusion of an additional development footprint area on building plate P08 of 54m², and removal of development footprint area from P09 of 71m² that will have an overall decrease of 17m².
- An amended EMPr has been included in the application, should the boardwalk be approved. The changes to the EMPr are highlighted in red.
- Amendment of Condition 21 as contained in the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025.

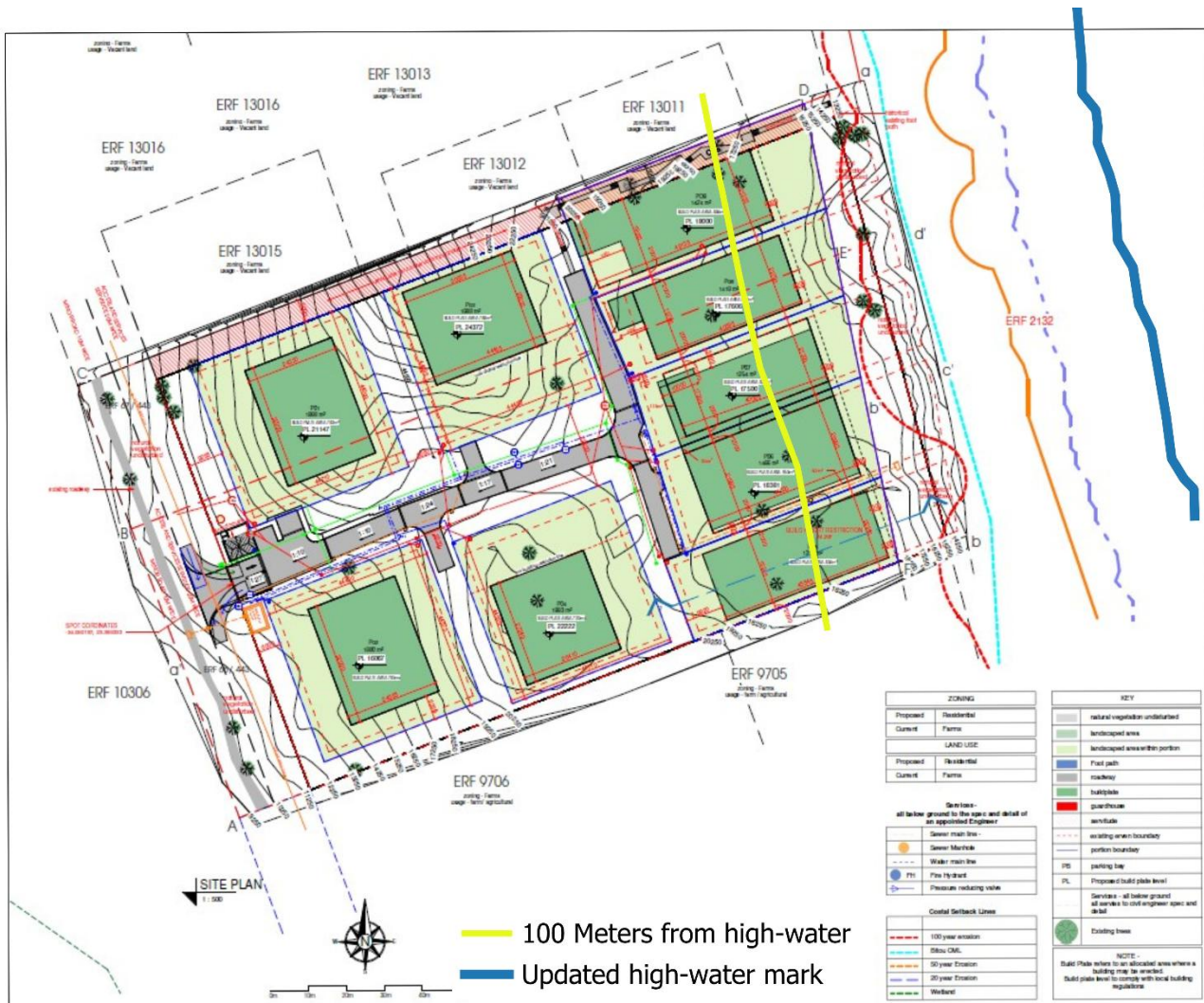


Figure 5: New proposed amended SDP.

Boardwalk:

The construction of the boardwalk will require a raised wooden structure of approximately 96.5m long and 1.2m wide, including staircases and landings, resulting in a footprint of 148.9m².

The boardwalk will follow the shape of the proposed footpath as far as possible; its position and level will be determined on site. The width of the boardwalk will be 1200mm wide, with the substructure sitting 300mm

inside the 1200mm boardwalk width. A supporting floor joist will extend the full width of the boardwalk to support the 300mm cantilever on both sides.

The gum poles for the footing of the boardwalk will require excavation and concrete foundations. The poles will be 1.5m apart, requiring approximately 140 poles. This will result in approximately 3.9m³ of excavation for the holes.

The boardwalk will be elevated off the ground, approximately 0.5m above ground level. The boardwalk design will be such that the decking planks will be spaced to allow for light to penetrate under the boardwalk. This will be to facilitate revegetation under the boardwalk.

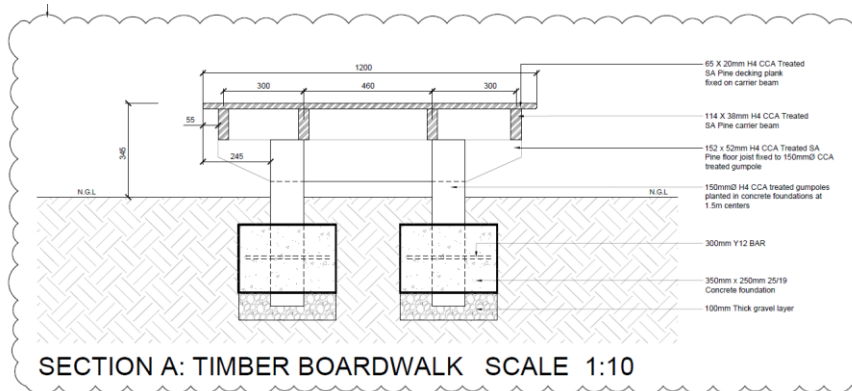
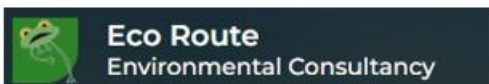


Figure 6: Cross section of boardwalk.

The boardwalk design is such that the section within the 100-meter highwater mark of the sea is under the 50m² threshold for Activity 17 of Listing Notice 1. The boardwalk footprint in this area is 48.6m² and the 100-metre line from the high-water mark of the sea is shown by the yellow line in Figure 10 below.



High-water map – Athina Estate (Erf 66/443)

Created by: Justin Britton 2025/10/13

Figure 7: Proposed boardwalk in relation to 100 meters from the highwater mark of the sea.

Build Plates:

An adjustment in the building plate layout and increase in build plate area by 165m² is required due to the consolidation of Stand PO7 and PO6. The building plate adjustment also includes an additional area on PO8 and reduction of PO9. The build plate for PO9 has been reduced by 71m², and PO8 increased by 54m² resulting in a reduction of the total build plate area for the two stands by 17m². The reduction of build plates is shown as pink, and increase is shown as orange in figure 7 below. The overall increase in build plate area is 148m².



Figure 8: Proposed building plate layout.

Servitude Right of Way:

Condition 21 of the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025 is as follows –

The Holder must ensure the development provides the public unrestricted access to the coastal public property. A coastal access point should be established and maintained on the site.

It is proposed to amend this condition to the following –

The Holder must ensure that access to the coastal public property over the servitude" right of way" remains unrestricted in accordance with the title deed condition.

There is a servitude registered over Portion 67, giving access to Portion 60, which today comprises most of Whale Rock Estate. It must be made clear that this is not public access. It is also not a new proposal and has been the *status quo* since 1987. The Conveyancer's Certificate attached as Appendix B contains the Notarial Deed of Servitude K750/1996. This servitude grants the owner of Portion 60 access over the property and permits them to landscape and pave the servitude area.

The servitude area is within the 6m ecological corridor along the northern boundary of the development. Condition 20 of the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025 is as follows –

The Holder must establish and maintain a six (6) metre wide ecological corridor along the northern boundary of the development. Further to this–

20.1. The ecological corridor must be incorporated in the site development plan as a servitude for conservation purposes.

20.2. The servitude / corridor must be rehabilitated and maintained with locally indigenous plant species and kept clear of alien invasive vegetation.

20.3. No structures or infrastructure may be constructed in this servitude without authorisation. This ecological servitude must not be fenced on the eastern and western boundaries.

As per Condition 20.3, any structures within the servitude must be authorised. Furthermore, the servitude is for a conservation purpose and should limit movement over sensitive dune vegetation where there are no designated footpaths or boardwalks. The servitude will remain unfenced as per condition 20.3.

Comments received from DFFE: Oceans and Coasts dated 25 June 2025 state that controlled access through the estate is not recommended –

While on the subject of public coastal access, the EA amendment, states that “The property will be fenced and gated, however access to the frontal/coastal beach walking trail will not be denied. The Homeowners Association will control the development...” the branch wishes to express concerns regarding private players such as a HOA burdening itself with the responsibility of managing and controlling the public exercising the right of access to the coast. Even though this is a good gesture that could be appreciated, the concern is that this should be a municipal function or a function of a public body. In this regard, it is recommended that such an undertaking be recorded in a manner that guarantees that the coastal access right-of-way will remain in perpetuity.

The access right of way will remain in perpetuity as per the condition of the Title Deed and Notarial Deed of Servitude K750/1996.

SECTION D

7. DESCRIPTION OF THE POLICY AND LEGISLATIVE CONTEXT WITHIN WHICH THE DEVELOPMENT IS PROPOSED:

The applicant is required to comply with all the required legislation and policies for the proposed development. The following table below indicates the legislation, and guidelines of all spheres of government that are applicable to the application as contemplated in the EIA regulations.

NATIONAL LEGISLATION	RELEVANT YES / NO	ADMINISTERING AUTHORITY	TYPE Permit/ license/ authorization/comment / relevant consideration (e.g. rezoning or consent use, building plan approval)
CONSTITUTION OF THE REPUBLIC OF SOUTH AFRICA. (ACT 108 OF 1996)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
ENVIRONMENTAL CONSERVATION ACT (ACT 73 OF 1989) OUTENIQUA SENSITIVE COASTAL AREA EXTENSION REGULATIONS	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT 107 OF 1998)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION

		identified as relevant Competent Authorities.	
NATIONAL ENVIRONMENTAL MANAGEMENT AMENDMENT ACT (ACT 62 OF 2008)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (ACT NO 10 OF 2004)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
NATIONAL ENVIRONMENTAL MANAGEMENT: INTERGRATED COASTAL MANAGEMENT ACT (ACT NO 24 OF 2008)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE ACT (ACT 59 OF 2008)	NO	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
NATIONAL VELD AND FOREST FIRE ACT (ACT 101 OF 1998)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities. <u>DAFF Jurisdiction</u>	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
NATIONAL WATER ACT (ACT 36 OF 1998)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities. <u>Dept of Water Affairs Jurisdiction</u>	PERMIT/ LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
WATER SERVICES ACT (ACT 108 OF 1997)	NO	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities. <u>Dept of Water Affairs Jurisdiction</u>	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
SUBDIVISION OF AGRICULTURAL LAND ACT (ACT 70 OF 1970)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities. <u>Dept. of Agriculture Jurisdiction</u>	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION

CONSERVATION OF AGRICULTURAL RESOURCES ACT (ACT 43 OF 1983)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities. <u>Dept. of Agriculture Jurisdiction</u>	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
NATIONAL HEALTH ACT (ACT 61 OF 2003)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities. <u>Dept. of Health Jurisdiction</u>	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
NATIONAL ROAD TRAFFIC ACT (ACT 93 OF 1996)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities. <u>WC Roads Dpt, Jurisdiction</u>	PERMIT / LICENSE/AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
LAND USE PLANNING ACT (ACT 3 OF 2014)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
SPLUMA (ACT 13 OF 2013)	YES	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
PROVINCIAL LEGISLATION WESTERN CAPE	RELEVANT YES / NO	ADMINISTERING AUTHORITY	TYPE Permit/ license/ authorization/comment / relevant consideration (e.g. rezoning or consent use, building plan approval)
WESTERN CAPE CONSTITUTION ACT 1 OF 1998	NO	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION

WESTERN CAPE NATURE CONSERVATION LAWS AMENDMENT ACT (ACT 3 OF 2000)	NO	Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities. <u>CapeNature Jurisdiction</u>	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
WESTERN CAPE NATURE CONSERVATION BOARD ACT (ACT 15 OF 1998)	NO	Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities. <u>CapeNature Jurisdiction</u>	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
WESTERN CAPE PLANNING AND DEVELOPMENT ACT (ACT 7 OF 1999)	NO	Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities. <u>CapeNature Jurisdiction</u>	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
MUNICIPAL ORDINANCE 20 OF 1974	NO	Local Authorities that have been identified as relevant Competent Authorities. <u>Local Government Jurisdiction</u>	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
MUNICIPAL PLANNING BYLAW 2015	YES	Local Authorities that have been identified as relevant Competent Authorities. <u>Municipality</u>	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION
WESTERN CAPE LAND ADMINISTRATION ACT (ACT 6 OF 1998)	NO	Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities. <u>DEA&DP Jurisdiction</u>	PERMIT / LICENSE/ AUTHORIZATION / COMMENT/ RELEVANT CONSIDERATION

POLICIES AND GUIDELINES	ADMINISTERING AUTHORITY
DEA (2014), Companion to the EIA Regulations 2014, Integrated Environmental Management Guideline Series 5, Department of Environmental Affairs, (DEA), Pretoria, South Africa	Department of Environmental Affairs, Republic of South Africa. All Provincial Departments that have been identified as Competent Authorities.
DEA&DP (2014) Guideline on Public Participation, EIA Guideline and Information Document Series. Western Cape Department of Environmental Affairs & Development Planning (DEA&DP)	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
Guideline for Involving Heritage Specialists in EIA Processes June 2005	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
Guideline for Environmental Management Plans June 2005	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
Ecosystem Guidelines for Environmental Assessment in the Western Cape	Fynbos Forum
Guidelines for Resort Developments in the Western Cape	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)

NEMA EIA Regulations Guideline and Information Document Series: Guideline on Alternatives	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
NEMA EIA Regulations Guideline and Information Document Series: Guideline on Appeals	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
NEMA EIA Regulations Guideline and Information Document Series: Guideline on Exemption Applications	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
NEMA EIA Regulations Guideline and Information Document Series: Guideline on Need and Desirability	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
NEMA EIA Regulations Guideline and Information Document Series: Guideline on Public Participation	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
NEMA EIA Regulations Guideline and Information Document Series: Guideline on Transitional Arrangements	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
Guideline for determining the Scope of Specialist Involvement in EIA Processes	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
Guideline for involving Visual and Aesthetic Specialists in EIA Processes	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
Guideline for involving Social Assessment Specialists in EIA Processes	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
Guideline for involving Hydro-geologists in EIA Processes	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
Guideline for involving Biodiversity Specialists in EIA Processes	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)
Guideline for Environmental Management Plans	Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)

SECTION E

8. NEED AND DESIRABILITY FOR THE PROPOSED DEVELOPMENT

The need for and the desirability of a proposed development forms a key component of any EIA application. The consideration of proposed developments in context of the various spatial planning tools and policy applicable to the study area forms an integral part of the present environmental processes. DEA&DP Guidelines on Need and Desirability (2010 & 2011) were referenced to provide the following estimation of the activity in relation to the broader societal needs. The concept of need and desirability can be explained in terms of its two components, where need refers to time, and desirability refers to place. Questions pertaining to these components are answered in the Sections below.

1.1 Need

In accordance with the guidelines on need and desirability, a project should be able to answer a series of questions to demonstrate 'need'. These are highlighted in the table below:

Need	Discussion	
Is the land use considered within the timeframe intended by the existing approved Spatial Development Framework (SDF)? (I.e., is the proposed development in line with the projects and programmes identified as priorities within the credible IDP?	Yes	The Garden Route SDF aims to promote balanced development that supports the integration and densification of settlements within the District. In general, it promotes the creation of a walkable, integrated, and compact urban environment. The report states that the financial and economic viability of towns in the District should be improved by promoting the intensification of existing urban areas. This can be achieved through infill, densification, and redevelopment, which in turn makes the use of existing infrastructure capacity and services more efficient. This vacant site presents an ideal opportunity for densification and urban infill. The Bitou SDF 2021 identifies the properties as being within a settlement area. Both properties are earmarked for urban development and the proposal is in-line with this land use designation. Furthermore, in general the SDF support the densification of urban areas, although the document does not have any specific densification policy pertaining to this area. The approval of this application would not compromise the integrity of the applicable policy documents agreed to by the relevant authorities.
Should the development occur here at this point in time?	Yes	As per the Specialists' input on the Part 2 amendment no further negative impacts are expected on the receiving environment

Does the community / area need the activity, and the associated land use concerned?	Partially	The amendment will not benefit the community within the area as it is a private development. The community has several beach access points in close vicinity with parking areas to access coastal public property.
Are the necessary services with adequate capacity currently available?	Yes	There will be no change on capacity of services as assessed in the EIA process
Is this development provided for in the infrastructure planning of the municipality?	Yes	Athina Estate is an approved residential development with already installed services and allocations
Is this project part of a national programme to address an issue of national concern or importance?	No	Athina Estate is a private residential development with a Private Home Owners Association

1.2 Desirability

As per the DEA&DP guidelines on need and desirability, a proposed development should be able to answer a series of questions to demonstrate desirability. These are highlighted in the table below:

Desirability	Discussion	
Is the development the best practicable environmental option for this land / site?	Yes	The development has a valid environmental authorisation and the proposed amendments will have no further negative impacts on the receiving environment
Would the approval of this application compromise the integrity of the existing approved and credible municipal IDP and SDF?	No	Efficiency relates to the form of settlements and use of resources - compaction as opposed to sprawl; mixed-use, as opposed to mono-functional land, uses; residential areas close to work opportunities as opposed to dormitory settlement. This principle can only be addressed through spatial development frameworks. The Bitou SDF supports this principle in its stride to limit urban development to certain areas. Being compatible with the SDF can therefore be regarded as being compatible with the principle of Spatial Efficiency
Would the approval of this application compromise the integrity of the existing approved environmental	NO	Environmental management priorities are informed by: The biophysical environment (e.g., fynbos, forests, wetlands, slopes, species of conservation concern)

management priorities for the area?		• The spatial context (Critical Biodiversity Areas, ecological corridors, proximity to protected areas) • The socio-economic setting (tourism, sustainable livelihoods, rural character) • The policy framework (SPLUMA, GMSDF, WLH LSDF, NEM:BA, NEM:PAA, etc.) The proposed amendment would not impact negatively as stated per the revised specialist reports on the receiving environment.
Do location factors favour this land use at this place?	Yes	The proposed amendment would not impact negatively as per the revised specialist reports on the receiving environment.
How will the activity or the land use associated with the activity applied for impact on sensitive natural and cultural areas?	N/A	The development has a valid environmental authorisation, and the new proposed changes will not have an additional negative impact on these areas.
How will the development impact on people's health and wellbeing?	N/A	This is an approved development, and the amendments will not impact negatively on the health and wellbeing of the community.
Will the proposed activity or the land use associated with the activity applied for, result in unacceptable opportunity costs?	No	This is an approved development, and the amendments will not result in unacceptable opportunity costs.

SECTION F

9. DETAILS OF THE PUBLIC PARTICIPATION PROCESS UNDERTAKEN

Please see Appendix H for the Comments and Response Report. The following has been undertaken:

- A 30-Day Public Participation Process was undertaken which ran from 05 June 2025 to 07 July 2025.
- All Registered Interested and Affected Parties identified in the BAR process were notified of the Amendment via email. Registered I&AP's that do not have email addressed were notified via registered mail.
- Advertisement of the Amendment Application was done via the local newspaper, the Knysna-Plett Herald on 5 June 2025.
- Two site notices were placed at the site on 5 June 2025 in areas that can be easily viewed by the public.
- All documents were made available on the Eco Route website.
- A second 30-Day Public Participation Process was undertaken following the submission of the Amendment application to DEA&DP, which ran from 24 July to 25 August 2025.

10. REGISTRATION OF KEY STAKE HOLDERS

A list of key stakeholders for this process is included in the table below. Please note that due to the POPI Act all contact information pertaining to private individuals has been excluded:

Table 2: Database of Interested and Affected Parties (I&APs).

STATE DEPARTMENTS			
Name	Contact Person	Contact Details	Email
Department of Environmental Affairs and Development Planning (DEA & DP)	Francois Naude Dorien Werth	Private Bag x 6509, George, 6530 <u>044 814 2011 (T)</u>	Francois.Naude@westerncape.gov.za Dorien.Werth@westerncape.gov.za
Department of Health	Nathan Jacobs	Private Bag x6592, George, 6530 044-803 2727 (T) 044-873 5929 (F)	Nathan.Jacobs@westerncape.gov.za
Department of Environmental Affairs and Development Planning (DEA & DP)	Danie Swanepoel		Danie.Swanepoel@westerncape.gov.za
DFFE Directorate: Biodiversity & Conservation	Mr Seoka Lekota	Environmental House 473 Steve Biko, Arcadia Pretoria 0083	BCAdmin@environment.gov.za
DFFE: Oceans and Coast	Rueben Molale		RMolale@dfpe.gov.za OCeia@environment.gov.za OCEIA@dfpe.gov.za

Department of Forestry, Fisheries and the Environment (DFFE): Integrated Environmental Authorisations	Ms Bathandwa Ncube Ms Lydia Kutu	012 399 9368 (T)	BNcube@dfre.gov.za LKutu@dfre.gov.za
DFFE Protected Areas, Planning and Management Effectiveness	Mr Thivhulawi Nethononda	Environmental House 473 Steve Biko, Arcadia Pretoria 0083	Tnethononda@dfre.gov.za
Heritage Western Cape	Noluvo Toto Stephanie Barnardt	Private Bag x9067, Cape Town, 8000 021-483 9729 (T) 021-483 9845 (F)	Noluvo.Toto@westerncape.gov.za Stephanie.barnardt@westerncape.gov.za
Provincial Roads Dept	Azni November Dirk Prinsloo	Private Bag x617, Oudtshoorn, 6620 044 272 6071 (T) 044 272 7243 (F)	Azni.November@westerncape.gov.za Dirk.Prinsloo@westerncape.gov.za
Department of Water & Sanitation	John Roberts	Private Bag x16, Sanlamhof, 7532 021 941 6179 (T) 021 941 6082 (F)	RobertsJ@dwa.gov.za
Dept of Agriculture Land Use Management	Cor van der Walt Brandon Layman	Private Bag x1, Elsenburg, 7601 021 808 5099 (T)	Cor.VanderWalt@westerncape.gov.za Brandon.Layman@westerncape.gov.za
Transport & Public Works / Department of Infrastructure	Vanessa Stoffels	24 th Floor, 9 Lower Burg Street, Cape Town 021 483 4669 (T)	Vanessa.Stoffels@westerncape.gov.za
DAFF: Forestry Management	Melanie Koen	Private Bag x12, Knysna, 6570 044 302 6902 (T) 044 382 5461 (F)	MKoen@dfre.gov.za

Coastal Management Unit, DEA&DP	leptieshaam Bekko	Private Bag x9086, Cape Town. 8000	leptieshaam.Bekko@westerncape.gov.za
	Mercia J Liddle	021 483 3370 (T)	Mercia.Liddle@westerncape.gov.za
	Hilda Hayward	078 744 9205 (Cell)	Hilda.Hayward@westerncape.gov.za
	Ryan Apolles	leptieshaam Bekko)	Ryan.Apolles@westerncape.gov.za
Department of Rural Develop. & Land Reform	Melvin Schwartz	P.O. Box 872 George 6530	Melvin.schwartz@dalrdd.gov.za

ORGANS OF STATE

Name	Contact Person	Contact Details	Email
Breede-Olifants Catchment Management Agency	Andiswa Sam R Mphahlele SI Ndlovu	PO Box 1205, George, 6530 <u>023 346 8000 (T)</u> <u>023 347 2012 (F)</u>	asam@bocma.co.za rmphahlele@bocma.co.za sndlovu@bocma.co.za
Cape Nature Land Use Advice	Megan Simons	Private Bag x6546, George, 6530 044 802 5328 (T)	msimons@capenature.co.za
SANRAL	Nicole Abraham s	Private Bag x19, Bellville, 7530 021 957 4602 (T)	AbrahamsN@nra.co.za
Southern Cape Fire Protection Agency	Dirk Smit	Private Bag x12, Knysna, 6570 044 302 6912 (T) 086 616 1682 (F)	managerfpa@gmail.com
SANPARKS	Dr. Vanessa Weyer	PO Box 3542, Knysna, 6570 044 302 5600 (T)	Vanessa.Weyer@sanparks.org
South African Civil Aviation Authority	Canny Mosebjadi Mothapo	083 461 6292	environment@caa.co.za

MUNICIPALITIES

Name	Contact Person	Contact Details	Email

Bitou Municipality	Chris Schliemann	PO Box 255, Plettenberg Bay, 6600 044 501 3324 (T) 086 659 7954 (F) 083 628 4001	cschliemann@plett.gov.za
Bitou Municipality	Michael Rhode	PO Box 255, Plettenberg Bay, 6600 044 501 3264 (T) 044 533 3485 (F)	mrhode@plett.gov.za
Bitou Municipality	Anje Minne	PO Box 255, Plettenberg Bay, 6600 044 501 3318 (T) 044 533 6885 (F)	aminne@plett.gov.za
Garden Route District Municipality	Mr. Lusanda Menze	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	info@gardenroute.gov.za
Garden Route District Municipality	Dr. Nina Viljoen	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	nina@gardenroute.gov.za

SECTION G

11. IMPACT ASSESSMENT

Impacts initially assessed as part of the valid Environmental Authorisation are shown in the tables below. There are only minor changes to the assessed impacts as a result of the amendment. No further substantial negative impacts are foreseen. The nature of the impact has however changed such that the impacts are associated with a boardwalk and not a footpath. The boardwalk extends beyond the approved development footprint, and the proposed building footprints will extend beyond those previously assessed. The impacts associated with the construction of the dwellings have been assessed in the Environmental Impact Assessment process and contained in the approved EMPr. The additional build plate footprint will not increase the impacts significantly.

Construction Phase (boardwalk):

Impact	Amended SDP
Clearance of vegetation for the construction of the dwellings and associated infrastructure	Additional clearance of vegetation will be limited as the boardwalk will be raised and will follow the footpath as far as possible.
Primary Dune System	No change – the primary dune system will not be affected.
Sedimentation	No change
Stormwater runoff and erosion	The boardwalk will not increase stormwater runoff or erosion. Limiting foot traffic to the boardwalk will reduce potential erosion. The raised boardwalk will allow for growth of some dune vegetation under the structure.
Disturbance / removal of topsoil	Excavation will be required to install the poles for the boardwalk footing. This will be undertaken in the footprint of the existing footpath.
Waste Pollution	No change
Construction Vehicles	No change
Geotechnical restraints due to sandy soils	Excavation will be required to install the poles for the boardwalk footing. Geotechnical constraints are not expected.
Noise pollution	No change
Visual impact and Landscaping	<i>As per the Visual Specialist: I therefore recommend that the proposed amendments be endorsed by the powers that be, as the proposed development (inclusive of the amendments described above), would have little to no visual impact on the cultural lands.</i>
Employment	Employment of local labour for the installation of the boardwalk.

Operational Phase (boardwalk):

Impact	Amended SDP
Visual / Sense of place	<i>As per the Visual Specialist: I therefore recommend that the proposed amendments be endorsed by the powers that be, as the proposed development (inclusive of the amendments described above), would have little to no visual impact on the cultural landscape</i>

Stormwater Management	By keeping people elevated above the dunes, boardwalks prevent the displacement of sand that would otherwise occur from foot traffic. Footpaths are more prone to erosion due to the constant shifting of sand and water movement, which can create uneven surfaces, gullies, and degradation over time.
Stormwater Runoff into Wetland	No change
Impervious Surfaces and Foundations	No change
Pollution entering surrounding environment	No change
Landscape Connectivity	No change
Primary Dune System	By keeping people elevated above the dunes, boardwalks prevent the displacement of sand that would otherwise occur from foot traffic.
Eradication of Alien Vegetation	No change
Formal gardens	No change

Construction Phase (building plates):

Impact	Amended SDP
Clearance of vegetation for the construction of the dwellings and associated infrastructure	Additional clearance of vegetation as the total proposed build plate footprints for the dwellings will be increased by 148m ² .
Primary Dune System	No change – the primary dune system will not be affected.
Sedimentation	No change
Stormwater runoff and erosion	Stormwater runoff or erosion will not be increased.
Disturbance / removal of topsoil	The amended building plates may result in minor additional excavation as the footprint has increased slightly. One larger house is proposed instead of two individual dwellings on the consolidated erven (P06 and P07).
Waste Pollution	No change
Construction Vehicles	No change
Geotechnical restraints due to sandy soils	Geotechnical constraints are not expected to change.
Noise pollution	No change
Visual impact and Landscaping	Impacts associated with visual pollution during construction of dwellings will not change.
Employment	Employment of local labour for the construction phase of the dwellings.

Operational Phase (building plates):

Impact	Amended SDP
Visual / Sense of place	<i>As per the Visual Specialist: I therefore recommend that the proposed amendments be endorsed by the powers that be, as the proposed development (inclusive of the amendments described above), would have little to no visual impact on the cultural landscape</i>
Stormwater Management	No change

Stormwater Runoff into Wetland	No change
Impervious Surfaces and Foundations	No change
Pollution entering surrounding environment	No change
Landscape Connectivity	No change
Primary Dune System	No change
Eradication of Alien Vegetation	No change
Formal gardens	No change

1.1. Methodology for Assessment of Impacts

Each potential environmental impact and risk identified was assessed according to specific criteria. These included the nature, extent, duration, consequence, probability and frequency of identified impacts, including the degree to which these impacts can be reversed, may cause irreplaceable loss of resources, and can be avoided, managed or mitigated. The criteria are based on the EIA Regulations, published by the Department of Forestry, Fisheries and the Environment (April 1998) in terms of the Environmental Conservation Act No. 73 of 1989. These criteria include:

Nature of the impact

This is an estimation of the type of effect the construction, operation and maintenance of a development would have on the affected environment. This description should include what is to be affected and how.

Extent of the impact

Describe whether the impact will be: local extending only as far as the development site area; or limited to the site and its immediate surroundings; or will have an impact on the region or will have an impact on a national scale or across international borders.

Duration of the impact

The specialist should indicate whether the lifespan of the impact would be short term (0-5 years), medium term (5-15 years), long term (16-30 years) or permanent.

Intensity

The specialist should establish whether the impact is destructive or benign and should be qualified as low, medium or high.

Probability of occurrence

The specialist should describe the probability of the impact actually occurring and should be described as improbable/unlikely (low likelihood), probable (distinct possibility), highly probable (most likely) or definite (impact will occur regardless of any prevention measures).

Reversibility

- Completely reversible (high) – the impact can be reversed with the implementation of minor mitigation measures.
- Partly reversible (medium) – the impact is reversible but more intense mitigation measures are required
- Barely reversible (low) – the impact is unlikely to be reversed even with intense mitigation measures
- Irreversible – the impact is irreversible, and no mitigation measures exist

Irreplaceable loss of resources

Describes the degree to which resources will be irreplaceably lost due to the proposed activity. It can be no loss of resources, marginal loss, significant loss or complete loss of resources.

Cumulative effect

An effect which in itself may not be significant but may become significant if added to other existing or potential impacts that may result from activities associated with the proposed development.

Significance

Significance of impacts are determined through a synthesis of the assessment criteria and is described as –

- Negligible negative– where it would have negligible effects and would require little or no mitigation
- Negligible positive – the impact will have negligible positive effects
- Minor negative - where it would have low negative impact and would require minor mitigation.
- Minor positive - the impact will have minor positive effects.
- Moderate negative – the impact will have moderate negative effects and will require moderate mitigation
- Moderate positive – the impact will have moderate positive effects
- High negative – the impact will have significant effects and will require significant mitigation measures to achieve an accepted level of impact
- High positive – the impact will have significant positive effects
- Very high negative – the impact will have highly significant effects and are unlikely to be able to be mitigated adequately
- High positive – the impact will have highly significant positive effects.

1.2 Impacts foreseen during the construction phase:

Project Phase	Construction			
Impact	Clearance of vegetation for the construction of the boardwalk			
Description of impact	Loss of sensitive dune vegetation, and habitat loss for terrestrial wildlife.			
Mitigable	High	Mitigation measures are included in the EMPr and will considerably reduce the significance of impacts		
Potential mitigation	• The boardwalk must follow the existing footpath as far as possible in order to reduce the disturbance of vegetation. • Protected plants must not be disturbed. The boardwalk must be designed to avoid protected plants if there are any. • Design the boardwalk such that vegetation may be able to recolonize underneath and so that small animals can move unhindered. • No access by heavy machinery will be allowed. All work to be done by hand. • Laydown areas for construction materials must be contained within already disturbed areas.			
Assessment	Without mitigation		With mitigation	
Nature	Negative		Negative	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Permanent	Impact may be permanent, or in excess of 20 years
Extent	Very limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Low	Natural and/or social functions and/or processes are somewhat altered	Very low	Natural and/or social functions and/or processes are slightly altered
Probability	Likely	The impact may occur.	Likely	The impact may occur.
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge

Reversibility	High	The affected environmental will be able to recover from the impact	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	Minor - negative		Negligible - negative	
Comment on significance	The boardwalk design aims to follow the existing footpath as far as possible, thereby reducing clearance of vegetation. A raised boardwalk system is considered as having less impact on the dune system than a footpath as it allows for the establishment of some dune vegetation under the structure. It will also ensure that people wanting to access the beach are restricted to the boardwalk, therefore reducing potential erosion due to foot traffic. A boardwalk minimizes the direct impact on sensitive dune ecosystems, reducing the trampling of plants and animal habitats. It preserves the natural dune structure, which helps maintain the dune's role in coastal protection (preventing erosion and acting as a barrier to storm surges).			
Cumulative impacts	The impact would result in insignificant cumulative effects			

Project Phase	Construction			
Impact	Excavation for the construction of the boardwalk			
Description of impact	Disturbance of topsoil, potential soil erosion and the loss of topsoil			
Mitigable	High	Mitigation measures are included in the EMPr and will considerably reduce the significance of impacts		
Potential mitigation	• Excavations for pole footings must be kept within the existing footpath as far as possible. • No access by heavy machinery will be allowed. All work to be done by hand. • Sand excavated for the pole footings must not be placed on surrounding vegetation. excess soil from excavation must be removed to a suitable area that will not cause loss of vegetation or harm to the environment. • The site must be stabilised where necessary using available materials, where possible. It is recommended that exposed sand is covered with wood chips. • Cement used for pole footing must not be mixed on the dune area or where it may cause pollution to the environment. Cement must not be allowed to spill.			
Assessment	Without mitigation		With mitigation	
Nature	Negative		Low negative	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Permanent	Impact may be permanent, or in excess of 20 years
Extent	Very limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Low	Natural and/or social functions and/or processes are somewhat altered	Very low	Natural and/or social functions and/or processes are slightly altered

Probability	Likely	The impact may occur.	Improbable/unlikely	It is unlikely that the impact will occur.
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	High	The affected environmental will be able to recover from the impact	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	Minor - negative		Negligible - negative	
Comment on significance	The boardwalk design aims to follow the existing footpath as far as possible in order to limit excavation to already disturbed areas.			
Cumulative impacts	The impact would result in insignificant cumulative effects			

1.3 Impacts foreseen during the operational phase

Project Phase	Operational			
Impact	Maintenance of the boardwalk			
Description of impact	Vegetation disturbance, soil compaction and erosion, wildlife disturbance, pollution and debris.			
Mitigable	High	Mitigation measures are included in the EMPr and will considerably reduce the significance of impacts		
Potential mitigation	• Maintenance activities should be scheduled outside sensitive seasons (e.g., breeding/nesting periods) to reduce disturbance to wildlife. • Use the designated boardwalk only to avoid trampling vegetation. • All maintenance work to be done by hand. • Use non-toxic, environmentally friendly materials for maintenance. • Provide environmental awareness training for workers. • Display informational signage for the public about dune sensitivity and protection efforts.			
Assessment	Without mitigation		With mitigation	
Nature	Negative		Low negative	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Permanent	Impact may be permanent, or in excess of 20 years
Extent	Very limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Low	Natural and/or social functions and/or processes are somewhat altered	Very low	Natural and/or social functions and/or processes are slightly altered
Probability	Likely	The impact may occur.	Improbable/unlikely	It is unlikely that the impact will occur.
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	High	The affected environmental will be able	High	The affected environmental will be

		to recover from the impact		able to recover from the impact
Resource irreplaceability				
Significance	Negligible - negative		Negligible - negative	
Comment on significance	Wooden boardwalks are generally more durable than footpaths, especially in areas with heavy foot traffic or erosion-prone environments. They are less likely to become damaged by weather, erosion, or frequent use. Accoya modified wood is proposed to be used for the structure. This wood has a lifetime warranty of 50 years above ground and 25 years in ground. Minimal maintenance will be required during the operational phase.			
Cumulative impacts	The impact would result in insignificant cumulative effects			

12. ENVIRONMENTAL MANAGEMENT PROGRAMME

The amended environmental Management Programme is attached as Appendix J. All changes are highlighted in red.