



**APPENDIX K: NEED AND
DESIRABILITY**

PROPOSED REFURBISHMENT OF THE
MUIZENBERG BEACHFRONT

DEA&DP REF.

APPLICANT

CITY OF CAPE TOWN

FEBRUARY 2023

**DRAFT BASIC ASSESSMENT REPORT
FOR PUBLIC PARTICIPATION**



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NEED AND DESIRABILITY

This appendix provides a description of the rationale and motivation for the proposed development. It outlines key aspects of the 'need and desirability' of the proposal, as required by the EIA Regulations.

The consideration of 'need and desirability' of a proposal is a key part of environmental impact assessment which relates to the context, broader societal needs, and the public interest. Need and desirability, although not defined in NEMA, are generally considered to relate to

- (a) the economic and/or societal benefit likely to be conferred by a proposed development, and
- (b) the policy and spatial planning context in which the proposed activity takes place.

Put another way, the concept of need and desirability relate to whether an activity is being proposed at the right *time* and in the right *place*.

The table below is based on the Guidelines for Need and Desirability (DEA, 2014 and DEA&DP, 2013) and sets out the key considerations motivating the need and desirability of the project proposal. This section should be read with Section E of the Basic Assessment Report, which sets out in more detail the legislative, policy, and planning contexts in which the project is proposed.

Table 1. Need and desirability guidelines as applied to the project proposal

Guideline question	Response
<ul style="list-style-type: none"> • How will this development (and its separate elements/aspects) impact on the ecological integrity of the area? 	<p>As the proposed development constitutes a refurbishment of existing infrastructure, there is little to no ecological integrity in the area because the site has already been developed. The ecological integrity of the site is likely to be enhanced by the proposed refurbishment, as it provides for the planning of indigenous vegetation as part of the landscaping.</p>
<ul style="list-style-type: none"> • How were the following ecological integrity considerations taken into account?: • <ul style="list-style-type: none"> ○ Threatened Ecosystems, 	<p>The original vegetation of the site (prior to human influence) would have been a mix of Cape Flats Sand Fynbos (critically endangered), Cape Flats Dune Strandveld (endangered), and Cape Seashore Vegetation. There is no natural vegetation on the site in its current form and it is therefore not representative of a threatened ecosystem. However, indigenous vegetation will be planted during the proposed refurbishment as part of the landscaping plans.</p>
<ul style="list-style-type: none"> ○ Sensitive, vulnerable, highly dynamic, or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to 	<p>Sensitive and vulnerable ecosystems do not occur on the site and will not be impacted.</p>

Guideline question	Response
<p>significant human resource usage and development pressure,</p> <ul style="list-style-type: none"> o Critical Biodiversity Areas ("CBAs") and Ecological Support Areas ("ESAs"), o Conservation targets, o Ecological drivers of the ecosystem, o Environmental Management Framework, o Spatial Development Framework, and <ul style="list-style-type: none"> • Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.). 	<p>There are no CBAs or ESAs on the site.</p> <p>The proposed refurbishment of the site will not impact on conservation targets for terrestrial ecosystems, as there is no natural vegetation remaining. This refurbishment will also not have an impact on conservation targets for marine ecosystems, as no development will take place in such an ecosystem.</p> <p>Ecological drivers of the ecosystem are absent from the site, as it has been transformed by past development.</p> <p>Please see section E, number 4.4 of the BAR.</p> <p>Please see section E, numbers 4.1 and 4.3 of the BAR.</p> <p>The proposed refurbishment will not negatively impact any of South Africa's global or international commitments. As stated above, the primary purpose of the proposed refurbishment is to protect the beachfront infrastructure from the effects of climate change, which is one of South Africa's international responsibilities.</p>
<ul style="list-style-type: none"> • How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity? What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts? 	<p>The proposed refurbishment is not anticipated to disturb ecosystems, nor to result in the loss of biological diversity, as the site has already been largely developed and there is no natural vegetation left. Therefore, no measures were needed to avoid potential negative impacts. The refurbishment has the potential to increase the biological diversity of the area as indigenous vegetation will be planted as part of the design plan. This is a measure that was explored to enhance positive impacts on enhancement of biological diversity.</p>
<ul style="list-style-type: none"> • How will this development pollute and/or degrade the biophysical environment? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts? 	<p>Rubble will be created during the construction phase of the proposed refurbishment. As the creation of rubble cannot be avoided, it will be transported off-site for disposal.</p> <p>Changes in stormwater runoff are expected, but this will be minimised through the upgrade and realignment of storm pipelines where needed. New pipelines will not be built, and the functions of the current pipelines will remain the same following the refurbishment.</p> <p>There will also be changes to the sewer system, as a new ablation facility will be built further inland. The current gravity sewer pipelines will be realigned to accommodate this. Again, no new pipelines will be built.</p>
<ul style="list-style-type: none"> • What waste will be generated by this development? What measures were explored to firstly avoid waste, and where waste could not be avoided altogether; 	<p>As stated above, rubble will be created during the construction phase of the proposed refurbishment, but</p>

Guideline question	Response
<p>what measures were explored to minimise, reuse and/or recycle the waste? What measures have been explored to safely treat and/or dispose of unavoidable waste?</p>	<p>this rubble will be transported off-site for disposal. This cannot be avoided.</p> <p>The ablution facility will generate sewage during the operational phase, but this is expected to be a similar amount to the current ablution facility on the site. To accommodate this change in location of the ablution facility, the current gravity sewer pipelines will be realigned.</p> <p>There will be a change is stormwater runoff during both the construction phase and the operational phase. As stated above, this will be minimised through the upgrade and realignment of the current storm pipelines where needed. No new pipelines will be built and the function of the current pipelines will remain the same following the refurbishment.</p>
<ul style="list-style-type: none"> How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts? 	<p>Disturbing the cultural heritage of the site is unavoidable, as there will be changes made to the current structures. However, these changes are necessary to mitigate against the increased impacts of climate change in the area. Where buildings are demolished (such as the current ablution facility), they will be reconstructed in the same manner and design as the current structures in an area further inland in order to protect them from wave action.</p>
<ul style="list-style-type: none"> How will this development use and/or impact on non-renewable natural resources? What measures were explored to ensure responsible and equitable use of the resources? How have the consequences of the depletion of the non-renewable natural resources been considered? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts? 	<p>Land can be classified as a non-renewable resource, and the proposed development optimises the use of land by only developing on portions of land that have already been developed (as the development constitutes a refurbishment).</p> <p>Electricity provided by the City of Cape Town will be used and is expected to be in the same quantum as before the refurbishment.</p>
<ul style="list-style-type: none"> How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part? Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds? What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources? What measures were taken to ensure responsible and equitable use of the resources? What measures were explored to enhance positive impacts? <ul style="list-style-type: none"> Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth or does it reduce resource dependency (i.e. dematerialised growth)? (note: sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life) 	<p>The proposed site is already in a developed area and impacts on ecosystems and natural resources are therefore minimised. There will be no effect on the integrity of natural resources.</p> <p>The refurbishment will have the effect of strengthening the area to protect it against the increased effects of climate change. This means that fewer resources will be required to maintain the area in the future, which reduces the number of resources needed to maintain economic growth (and therefore reduces resource dependency).</p>

Guideline question	Response
<ul style="list-style-type: none"> o Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra- and intergenerational equity, and are there more important priorities for which the resources should be used (i.e. what are the opportunity costs of using these resources of the proposed development alternative?) o Do the proposed location, type and scale of development promote a reduced dependency on resources? 	<p>Mitigation against the effects of climate change is arguably an important priority for the area, as climate change is expected to get worse, and the current infrastructure is not strong enough to withstand its effects (it is already beginning to fail). The proposed use of natural resources therefore constitutes the best use thereof.</p> <p>As stated above, the development constitutes a refurbishment to protect the area against the effects of climate change. This is the only location in which the refurbishment can take place (as it is where the current structures that need protection are located) and the type and scale of the development promote reduced dependency on resources by strengthening the area effectively to not need to be maintained in the future, therefore not using a lot of resources.</p>
<ul style="list-style-type: none"> • How were a risk-averse and cautious approach applied in terms of ecological impacts? <ul style="list-style-type: none"> o What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)? o What is the level of risk associated with the limits of current knowledge? o Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development? 	<p>This development constitutes a refurbishment of current structures. It therefore follows that the site has been largely developed. The ecological impacts are known to be minimal and easily manageable.</p> <p>As the site has been previously developed and the construction will only take place on this developed portion of land, there are no gaps, uncertainties, or assumptions.</p> <p>It therefore follows that there is a low level of risk associated with the limits of current knowledge.</p> <p>As the development is not risk in terms of ecological impact, the current refurbishment plan is the most risk-averse and cautious approach. It can also be said that the development itself is risk-averse and cautious, as it aims to protect the area and infrastructure against the increased effects of climate change.</p>
<ul style="list-style-type: none"> • How will the ecological impacts resulting from this development impact on people's environmental right in terms of the following: <ul style="list-style-type: none"> o Negative impacts: e.g. access to resources, opportunity costs, loss of amenity (e.g. open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts? o Positive impacts: e.g. improved access to resources, improved amenity, improved air or water quality, etc. What measures were taken to enhance positive impacts? 	<p>The proposed refurbishment is not expected to have significant impacts of people's environmental rights (it actually enhances them through providing for a safe environment). It will not impact on amenity value, air quality, or health. Visual impacts are expected to be low because of the nature of the current development. There will be nuisance impacts during the construction phase, but this cannot be avoided.</p> <p>Positive impacts include the creation of both temporary and permanent employment and improved access to community resources. There is also the positive effect that the infrastructure will be able to withstand the increased effects of climate change in the future.</p>
<ul style="list-style-type: none"> • Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socio-economic impacts (e.g. on livelihoods, loss of heritage site, opportunity costs, etc.)? 	<p>"Cultural services" are included in ecosystem services, which includes the use and enjoyment of an area. This is likely to be enhanced through the proposed development by improving the accessibility and safety of the area. In addition, the proposed refurbishment is linked to "human wellbeing" as it improves the structural</p>

Guideline question	Response
	safety and protects is against the effects of climate change.
<ul style="list-style-type: none"> Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives / targets / considerations of the area? 	The proposed development is not anticipated to impact on the ecological integrity targets of the area, as the site has been previously developed and not does support significant biodiversity or habitat. However, it has the potential to positively impact on the biodiversity of the site as indigenous vegetation will be planted as part of the design plan.
<ul style="list-style-type: none"> Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the "best practicable environmental option" in terms of ecological considerations? 	In this case, the best practicable option in terms of ecological considerations is one that makes use of optimal use of already developed land in an urban area, such as the proposed site. The refurbishment will increase the integrity of the area against the effects of climate change through its mitigating design. There is no alternative to the proposed site, as the development constitutes a refurbishment of current structures (which are failing) that need to be strengthened to withstand the increased effects of climate change.
<ul style="list-style-type: none"> Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and existing and other planned developments in the area? 	The proposed development is unlikely to result in any cumulative negative ecological or biophysical impacts given its location on an already transformed site.
<p>What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?</p>	
<ul style="list-style-type: none"> The IDP (and its sector plans' vision, objectives, strategies, indicators, and targets) and any other strategic plans, frameworks of policies applicable to the area, 	Please see section E, number 4.2 of the BAR.
<ul style="list-style-type: none"> Spatial priorities and desired spatial patterns (e.g. need for integration of segregated communities, need to upgrade informal settlements, need for densification, etc.), 	The proposed development constitutes a refurbishment of coastal infrastructure and therefore does not relate to the upgrade of informal settlements, densification, and integrating segregated communities.
<ul style="list-style-type: none"> Spatial characteristics (e.g. existing land uses, planned land uses, cultural landscapes, etc.) 	The land uses of the proposed site will not change following the refurbishment, as it aims to strengthen the area against the effects of climate change. The cultural landscape is not expected to change, as all new buildings will be constructed with the same design as the current buildings (eg: the ablution facility). The area will be used for the same purpose as it is being used for now.
<ul style="list-style-type: none"> Municipal Economic Development Strategy ("LED Strategy"). 	<p>The LED Strategy contains various strategies which are relevant to the proposed development –</p> <p><u>A globally competitive city</u></p> <p>Part of making Cape Town a globally competitive city is to increase its tourism potential. This potential will be enhanced through the proposed refurbishment as it will attract more people to the area and therefore increase its economic potential. Business clusters should be enhanced.</p> <p><u>Infrastructure for growth</u></p> <p>The development's infrastructure will allow for economic growth. The refurbishment will attract more tourists to the area, who will in turn spend more money and will therefore contribute to the growing economy.</p>

Guideline question	Response
	<p><u>Inclusive growth through jobs and skills</u></p> <p>The development will create both short-term and long-term jobs. Short-term jobs will be created during the construction phase and long-term jobs will be created through the increased business capacity in the area.</p> <p><u>Trade promotion and sector development</u></p> <p>Cape Town has a dedicated Tourism, Events, and Marketing Directorate whose responsibilities include the promotion of the City at home and abroad and marketing Cape Town as a desirable leisure vacation destination. Refurbishing the Muizenberg Beachfront has this effect, as it will attract more tourists (as well as locals) to the area.</p> <p><u>Sustaining growth for the future</u></p> <p>The LED Strategy recognises that there is a need to understand the "complex interrelationship" between economic growth and the environment and goes as far as to say that "global warming, and with it, changes to the climate and natural environment, will affect all spheres of human activity". The proposed refurbishment aims to make the area more sustainable as it will mitigate the effects of climate change.</p>
<ul style="list-style-type: none"> • Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area? <ul style="list-style-type: none"> ◦ Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs? 	<p>The proposed development compliments the socio-economic context of Muizenberg, as given by the LED Strategy outlined above.</p> <p>As already mentioned, the refurbishment is expected to create both short-terms and long-term jobs, as well as increase Cape Town's tourism potential.</p> <p>In addition, greater access will be provided to the area where there are important NGOs, such as Waves for Change. Waves for Change provides for surf therapy programmes, which aims to "build connections, provide respite from difficult thoughts and feelings, and develop skills to cope with stress". It is essentially a mental health service for children and young adults, and many of those who make use of their services are from disadvantaged backgrounds. This can be classified as a skills development programme.</p>
<ul style="list-style-type: none"> • How will this development address the specific physical, psychological, developmental, cultural, and social needs and interests of the relevant communities? 	<p>Waves for Change (outlined above) and Muizenberg adaptive surfing (through Surf Emporium) both positively impact the physical, psychological, developmental, cultural, and social needs and interests of the surrounding communities. The proposed refurbishment will make both of these institutions more accessible to the people who utilise them. For example, the proposed revetment will have a universal access ramp to allow wheelchairs down to the beach.</p>
<ul style="list-style-type: none"> • Will the development result in equitable (intra- and inter-generational) impact distribution, in the short- and long term? Will the impact be socially and economically sustainable in the short- and long-term? 	<p>The proposed development is not anticipated to have negative long term environmental impacts. It will therefore result in equitable impact distributions and will be socially and economically sustainable.</p>

Guideline question	Response
In terms of location, describe how the placement of the proposed development will:	
<ul style="list-style-type: none"> result in the creation of residential and employment opportunities in close proximity to or integrated with each other, 	<p>Employment opportunities will be created in both the short-term and the long-term. The proposed refurbishment is expected to complement the surrounding residential area as it will increase the use and enjoyment of the beachfront.</p>
<ul style="list-style-type: none"> reduce the need for transport of people and goods, 	<p>The free parking area will be refurbished and paved to match the current parking area. There will also be a bus stop in the vicinity, and the site is adjacent to the Muizenberg railway station. The promenade is expected to promote non-motorised transport between Muizenberg and Fish Hoek.</p>
<ul style="list-style-type: none"> result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport), 	<p>As stated above, there is both a bus stop and a railway station in the vicinity. The refurbishment of the promenade will also encourage forms of non-motorised transport between Muizenberg and Fish Hoek.</p>
<ul style="list-style-type: none"> compliment other uses in the area, 	<p>There are various other uses to the area, the biggest being use of the Muizenberg Beach. The proposed refurbishment will allow for greater access to the beachfront and allow for more people to use and enjoy the area, including those with disabilities through the universal access ramp.</p>
<ul style="list-style-type: none"> be in line with the planning for the area, 	<p>Please see section E of the BAR for reasons as to why the proposed refurbishment is in line with the City's SDF and District Plan (ie: planning framework).</p>
<ul style="list-style-type: none"> for urban related development, make use of underutilised land available with the urban edge, 	<p>The proposed site contains failing infrastructure within the urban edge. This infrastructure needs to be refurbished in order to withstand the increased effects of climate change.</p>
<ul style="list-style-type: none"> optimise the use of existing resources and infrastructure, 	<p>The proposed development only utilised existing resources as it is the refurbishment of existing structures.</p> <p>The proposed refurbishment will use existing service connections and infrastructure, and any required linkages will be installed if necessary.</p>
<ul style="list-style-type: none"> opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement), 	<p>The proposed refurbishment is aligned with the bulk infrastructure planning.</p>
<ul style="list-style-type: none"> discourage "urban sprawl" and contribute to compaction/densification, 	<p>The proposed refurbishment is within the urban edge on a site that is already developed and will contribute to compaction by making the fullest possible use of the land parcel in the context of its existing use.</p>
<ul style="list-style-type: none"> contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs, 	<p>The proposed refurbishment will increase access to the Muizenberg Beachfront which will benefit the broader community and add valuable amenities.</p>
<ul style="list-style-type: none"> encourage environmentally sustainable land development practices and processes, 	<p>The proposed development can be said to encourage environmentally sustainable land development practices and processes as the refurbishment aims to strengthen the area against the increased effects of climate change. This will decrease the need to continuously repair the area in the future, therefore reducing resource dependency. It is sustainable to use existing developed land for development.</p>
<ul style="list-style-type: none"> take into account special locational factors that might favour the specific location (e.g. the location 	<p>The Muizenberg Beachfront is in close proximity to public transport routes, including bus routes and railway stations.</p>

Guideline question	Response
of a strategic mineral resource, access to the port, access to rail, etc.),	
<ul style="list-style-type: none"> the investment in the settlement or area in question will generate the highest socio-economic returns (i.e. an area with high economic potential), 	<p>The Muizenberg community and surrounds is an area of varying economic status. The proposed refurbishment will allow for greater access to all members of these communities. In addition, the area is one of high economic potential and the development will increase economic activity in the area as it will attract more tourists and locals to the beachfront, where they will spend money.</p>
<ul style="list-style-type: none"> impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area, and 	<p>This will not be affected as all new buildings will be designed and built in the architectural style of the old buildings.</p>
<ul style="list-style-type: none"> in terms of the nature, scale and location of the development promote or act as a catalyst to create a more integrated settlement? 	<p>The proposed development is intended to contribute to a more integrated settlement by providing for a higher quality area to be utilised by the public.</p>
<p>How were a risk-averse and cautious approach applied in terms of socio-economic impacts?</p>	
<ul style="list-style-type: none"> What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)? 	<p>Current knowledge is limited insofar as the economic outcomes of the proposed development are not quantified.</p>
<ul style="list-style-type: none"> What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge? 	<p>The scale and nature of the development, and the fact that socio-economic impacts are anticipated to be positive while biophysical impacts are not significant, means that the above limitation of knowledge is acceptable and does not pose a risk.</p>
<ul style="list-style-type: none"> Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development? 	<p>Given the above, there was no need for a risk-averse and cautious approach to the development.</p>
<p>How will the socio-economic impacts resulting from this development impact on people's environmental right in terms following:</p>	
<ul style="list-style-type: none"> Negative impacts: e.g. health (e.g. HIVAids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts? 	<p>Negative impacts of this nature are not anticipated.</p>
<ul style="list-style-type: none"> Positive impacts. What measures were taken to enhance positive impacts? 	<p>Positive impacts of the proposed development relate to the creation of employment during both the construction and operational phase, as well as the creation of a public space that will enhance the integration of the neighbouring communities. In addition, the area will be able to withstand the effects of climate change through the proposed refurbishment.</p>
<ul style="list-style-type: none"> Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socioeconomic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)? 	<p>The development's socio-economic impacts are not expected to cause significant ecological impacts.</p>
<ul style="list-style-type: none"> What measures were taken to pursue the selection of the "best practicable environmental option" in terms of socio-economic considerations? 	<p>The "best practicable environmental option", which relates to the Constitution's requirement to secure "ecological sustainable development" requires the consideration of potential negative impacts, known and unknown, against the socio-economic benefits of development. There are no reasons not to consider the proposed development to be the best practicable option for the site, as it is consistent with the City's</p>

Guideline question	Response
	development planning. In addition, the refurbishment is necessary as the site, in its current condition, will not be able to withstand the increased effects of climate change.
<ul style="list-style-type: none"> What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)? Considering the need for social equity and justice, do the alternatives identified, allow the "best practicable environmental option" to be selected, or is there a need for other alternatives to be considered? 	<p>The proposed refurbishment will benefit every person visiting the area. There are few expected environmental impacts that would unfairly discriminate against any person (especially those who are vulnerable and disadvantaged). The development is also appropriately located at the Muizenberg Beachfront, which is an area surrounded by public transport opportunities and accessible to the surrounding community.</p> <p>Adverse environmental impacts include construction-related noise, dust, and vibration (which could be common to any development and are unavoidable, though they can be managed and mitigated), as well as traffic impacts.</p> <p>The only identified design of the project is sufficient to allow for the best practicable environmental option to be selected and no further alternatives need to be considered.</p>
<ul style="list-style-type: none"> What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination? 	<p>The proposed development is not expected to negatively impact access to environmental resources, benefits, and services to meet basic human needs and wellbeing.</p> <p>The proposed refurbishment will make the Muizenberg Beachfront more accessible to all, including those who come from surrounding disadvantaged communities and those who have disabilities (who may have been unfairly discriminated against in the past). For example, a universal access ramp will be added to the promenade to allow for easier beach access for those who may struggle using the steps.</p>
<ul style="list-style-type: none"> What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle? 	<p>As the proposed development constitutes a refurbishment of current infrastructure in an already developed area, there was no need to take measures to ensure that the responsibility for the environmental health and safety consequences of the development were addressed throughout the development's life cycle. The land use of the area will stay the same after the refurbishment and there will therefore be no new effects on the environment.</p>
<p>What measures were taken to:</p>	
<ul style="list-style-type: none"> ensure the participation of all interested and affected parties, 	<p>The Public Participation Process undertaken as part of the Basic Assessment is detailed in section F of the BAR. Various methods were employed to notify potential interested and affected parties of the proposed project, including media notices, written notifications, and site notices.</p>
<ul style="list-style-type: none"> provide all people with an opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, 	
<ul style="list-style-type: none"> ensure participation by vulnerable and disadvantaged persons, 	
<ul style="list-style-type: none"> promote community wellbeing and empowerment through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means, 	<p>Opportunities for participation will be provide to all interested and affected parties throughout the environmental assessment process in terms of the EIA Regulations.</p> <p>Community wellbeing is promoted through the proposed development because the development is a</p>

Guideline question	Response
	<p>refurbishment to strengthen the coastal infrastructure against the increased effects of climate change, therefore improving the area for continued use by the community.</p> <p>The NGOs present on the beachfront do their part in creating environmental education and awareness.</p>
<ul style="list-style-type: none"> ensure openness and transparency, and access to information in terms of the process, 	<p>Information will be made as accessible as possible in the public participation process: envisaged to include publication of all reports on the internet and sharing via WhatsApp if requested, and transparency in assessment and decision-making process.</p>
<ul style="list-style-type: none"> ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge, 	<p>The public participation process will take cognisance of the interests, needs, and values expressed by all interested and affected parties.</p>
<ul style="list-style-type: none"> ensure that the vital role of women and youth in environmental management and development were recognised and their full participation therein was promoted. 	<p>Participation by all interested and affected parties, including women and youth, will be promoted, Opportunities for engagement will be provided during the environmental assessment process.</p>
<ul style="list-style-type: none"> Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community (e.g. a mixture of low-, middle-, and high-income housing opportunities) that is consistent with the priority needs of the local area (or that is proportional to the needs of an area)? 	<p>The proposed development will allow for recreational amenities and opportunities for the local surrounding communities. The refurbishment will also allow for increased tourism in the area, uplifting the sense of place within the community and increasing beachfront job opportunities.</p> <p>Importantly, the refurbishment will allow for continued use of the area, as its ultimate aim is to strengthen the current failing infrastructure against the increased effects of climate change. This will benefit all users of the area now and in the future.</p> <p>It is also anticipated that the construction-phase employment will provide opportunities primarily for low-income residents.</p>
<ul style="list-style-type: none"> What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected? 	<p>There is no anticipated work that would be potentially harmful to human health or the environment.</p>
<p>Describe how the development will impact on job creation in terms of, amongst other aspects:</p>	
<ul style="list-style-type: none"> the number of temporary versus permanent jobs that will be created, 	<p>The job creation numbers are unknown at this point of the project.</p>
<ul style="list-style-type: none"> whether the labour available in the area will be able to take up the job opportunities (i.e. do the required skills match the skills available in the area), 	
<ul style="list-style-type: none"> the distance from where labourers will have to travel, 	<p>The development site is close to existing movement routes, including public transport.</p>
<ul style="list-style-type: none"> the location of jobs opportunities versus the location of impacts (i.e. equitable distribution of costs and benefits), 	<p>Impacts will be local and of low significance. Job creation will be primarily local.</p>
<ul style="list-style-type: none"> the opportunity costs in terms of job creation 	<p>No opportunity costs are anticipated if authorisation is granted.</p>
<p>What measures were taken to ensure:</p>	

Guideline question	Response
<ul style="list-style-type: none"> that there were intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment, that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures? 	<p>The authority consultation process carried out by the EAP will assist in coordinating the policies, legislation, and mandates of various organs of state.</p>
<ul style="list-style-type: none"> What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people's common heritage? 	<p>The EIA process, including the public participation that is an integral part of an EIA, is the means of managing potential impacts on environmental resources and determining whether the propose use of resources is in the public interest.</p> <p>It can also be said that refurbishing the coastal infrastructure of the area so that it can withstand the increased future effects of climate change is in the public interest, as this will allow for continuous public use of the area.</p>
<ul style="list-style-type: none"> Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left? 	<p>The mitigation measures are reasonable and realistic. No long-term negative legacy is expected.</p>
<ul style="list-style-type: none"> What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment? 	<p>Impacts have been determined and assessed with suitable mitigation measures identified. These measures will form part of the environmental authorisation, should it be granted. Responsibility for their implementation and for compliance with any authorisations would lie with the applicant.</p>
<ul style="list-style-type: none"> Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations 	<p>Due to the nature of the proposed project, there is only one option presented and this is deemed to be the only suitable scenario.</p>
<ul style="list-style-type: none"> Describe the positive and negative cumulative socio-economic impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and other planned developments in the area? 	<p>Negative cumulative socio-economic impacts are not expected in relation to the proposed development. Positive socio-economic impacts include the creation of employment, which will contribute cumulatively to economic development in the area, as well as providing better access to the beachfront for visitors.</p>