FINAL BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADE AND EXPANSION OF THE SEAGULLS BEACH HOTEL AND LIFESTYLE ESTATE LOCATED ON FARM 119 QOLORA MOUTH, MNQUMA LOCAL MUNICIPALITY, EASTERN CAPE.

Prepared on behalf of Marentia 511 cc

Submitted in support of an application for Environmental Authorisation in terms of Section 24(5) of the National Environmental Management Act, Act 107 of 1998, as amended

Volume 1 - Basic Assessment Report

DEDEA REF: AR/6/544, 546/1/11

30 January 2013 - J2011-26

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SEAGULLS BEACH HOTEL AND LIFESTYLE ESTATE
FINAL BASIC ASSESSMENT REPORT
CONTENTS

Key Definitions and Abbreviations

ADM	**Amathole District Municipality**
BLMC	**Biodiversity Land Management Class**
CBA	**Critical Biodiversity Area**
CFL	**Compact Fluorescent Lighting**
DWA	**Department of Water Affairs**
DAFF	**Department of Agriculture, Fisheries and Forestry**
DEAET	**Department of Economic Affairs, Environment and Tourism, now DEDEA**
DEDEAT	**Department of Economic Development, Environmental Affairs and Tourism**
DFA	**Development Facilitation Act**
DSEMGWC	**Draft Spatial and Environmental Management Guidelines for the Wild Coast**
ECBCP	**Eastern Cape Biodiversity Conservation Plan**
ECO	**Environmental Control Officer**
EIA	**Environmental Impact Assessment**
EMP	**Environmental Management Programme**
ICMA	**Integrated Coastal Management Act**
LA	**Local Authority**
LED	**Light Emitting Diode**
MLM	**Mnquma Local Municipality**
MMSDF	**Mnquma Municipality Spatial Development Framework**
WCSPF	**Wild Coast Spatial Development Framework**
WCTDP	**Wild Coast Tourism Development Policy**
ROD	**Record of Decision / Environmental Authorisation**
SAHRA	**South African Heritage Resource Agency**
SMME	**Small Medium and Micro Enterprises**

1 BASIC ASSESSMENT REPORT

PROVINCE OF THE EASTERN CAPE
DEPARTMENT OF ECONOMIC DEVELOPMENT
AND
ENVIRONMENTAL AFFAIRS

BASIC ASSESSMENT REPORT

(For official use only)

File Reference Number:	
Application Number:	
Date Received:	

Basic assessment report in terms of the Environmental Impact Assessment Regulations, 2010, promulgated in terms of the National Environmental Management Act, 1998(Act No. 107 of 1998), as amended.

Kindly note that:

1. This **basic assessment report** is a standard report that may be required by a competent authority in terms of the EIA Regulations, 2010 and is meant to streamline applications. Please make sure that it is the report used by the particular competent authority for the activity that is being applied for.
2. The report must be typed within the spaces provided in the form. The size of the spaces provided is not necessarily indicative of the amount of information to be provided. The report is in the form of a table that can extend itself as each space is filled with typing.
3. Where applicable **tick** the boxes that are applicable or **black out** the boxes that are not applicable in the report.
4. An incomplete report may be returned to the applicant for revision.
5. The use of "not applicable" in the report must be done with circumspection because if it is used in respect of material information that is required by the competent authority for assessing the application, it may result in the rejection of the application as provided for in the regulations.
6. This report must be handed in at offices of the relevant competent authority as determined by each authority.
7. No faxed or e-mailed reports will be accepted.
8. The report must be compiled by an independent environmental assessment practitioner.
9. Unless protected by law, all information in the report will become public information on receipt by the competent authority. Any interested and affected party should be provided with the information contained in this report on request, during any stage of the application process.
10. A competent authority may require that for specified types of activities in defined situations only parts of this report need to be completed.

SECTION A: ACTIVITY INFORMATION

Has a specialist been consulted to assist with the completion of this section?	YES	NO √

If YES, please complete form XX for each specialist thus appointed:
Any specialist reports must be contained in Appendix D.

1. ACTIVITY DESCRIPTION

Describe the activity, which is being applied for, in detail

Proposed Upgrade and Expansion of the Seagulls Beach Hotel

The proposed project involves the formalisation of the existing Seagulls Beach Hotel through the upgrading and expansion of the existing infrastructure as well as the development of the new Seagulls Lifestyle Estate **(See Appendix C).**

The proposed development activities include:

- The upgrading and expansion of 6 existing single storey hotel buildings to that of double storey buildings in order to accommodate an additional 12 units.
- The upgrading and expansion of the existing single storey conference centre to that of a double storey building which has the capacity to accommodate 100 delegates.
- The upgrading and expansion of the owners house to a double storey unit.
- The demolition of 2 existing buildings.
- The construction of 6 double storey buildings containing a double garage with a building footprint of 200m^2 each.
- The construction of 9 single storey buildings containing a single garage with a building footprint of 150m^2 each.
- The construction of 4 single storey timber units on stilts with a building footprint of 90m^2 each.
- The construction of 4 single storey buildings with a building footprint of 90m^2 each...
- The installation of a new waste water reticulation system and package plant.
- The construction of a total of 55 parking bays
- The construction of an internal road network that would service all existing and proposed buildings.
- The construction of a wooden boardwalk within the southern section of the site.
- The installation of a storm water pipeline network.
- The relocation of existing telephone lines.
- The relocation of existing electricity boxes.
- The upgrading of the existing water reservoir and potable water reticulation system.
- The off-site installation of a Clear Edge Sewage Treatment Works and the on-site installation of associated sewer pump and sewer pipeline network

Listed activities triggered by the project are tabulated below:

Listing Notice and Date	Activity No.	Activity Description
R544, 18 June 2010	11(x)(xi)	The construction of new buildings and infrastructure with a footprint of more than 50 square metres within 32 metres of a wetland which is located near the existing buildings.
R544, 18 June 2010	16(v)(vi)	There will be construction and earth moving activities related to buildings and infrastructure with a footprint of more than 50 square metres, 100 metres inland of the high water mark.
R544, 18 June 2010	40(iii)	The expansion of existing buildings by more than 50 square metres within 32 metres of a wetland
R544, 18 June 2010	45(v)(vi)	The expansion of facilities in the sea, an estuary, or within the littoral active zone or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater, for – (v) buildings by more than 50 square metres; (vi) infrastructure by more than 50 square metres;
R546, 18 June 2010	4(ii)(gg)(hh)	The construction of a road wider than 4 meters with a reserve less than 13.5 meters (hh) areas seaward of the development setback line or within 1 kilometre from the high-water mark of the sea if no such development setback line is determined.
R546, 18 June 2010	6(ii)(hh)	The construction of resorts, lodges or other tourism accommodation facilities that sleep 15 people or more. ii.Outside urban areas, in: (hh) Areas seawards of the development setback line or within 1 kilometre from the high-water mark of the sea if no such development setback line is determined
R546, 18 June 2010	12(b)(c)	Vegetation will be cleared for building with footprints in excess of 300 metres squared within an area delineated as Critical Biodiversity Area (CBA 1) and within 100 metres

		of the high water mark.
R546, 18 June 2010	18ii(ee)iii(cc)	The expansion of the existing hotel development footprint will take place within a first order node as defined by the Mnquma Spatial Development Framework which are the most urban areas as well as extensively developed resort areas. The existing hotel also falls within an area identified as CBA 1 and within 100 metres of the high water mark.
G.N. 718, 3 July 2009	Category A (11)	The construction of a new WWTW package plant for the treatment of effluent, wastewater or sewage with an annual throughput of more than 2000 m^3 but less than 15 000m^3 per annum.

2. FEASIBLE AND REASONABLE ALTERNATIVES

"alternatives", in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to—

(a) the property on which or location where it is proposed to undertake the activity.
(b) the type of activity to be undertaken;
(c) √ the design or layout of the activity
(d) the technology to be used in the activity
(e) the operational aspects of the activity;
(f) the option of not implementing the activity.

Describe alternatives that are considered in this application. Alternatives should include a consideration of all possible means by which the purpose and need of the proposed activity could be accomplished in the specific instance taking account of the interest of the applicant in the activity. The no-go alternative must in all cases be included in the assessment phase as the baseline against which the impacts of the other alternatives are assessed. The determination of whether site or activity (including different processes etc.) or both is appropriate needs to be informed by the specific circumstances of the activity and its environment. After receipt of this report the competent authority may also request the applicant to assess additional alternatives that could possibly accomplish the purpose and need of the proposed activity if it is clear that realistic alternatives have not been considered to a reasonable extent.

ALTERNATIVES CONSIDERED FOR THE UPGRADING AND EXPANSION OF THE SEAGULLS BEACH HOTEL AND LIFESTYLE ESTATE

1) Alternative Layout Plans

1.2) Alternative A1: (Plan No: 6555.05 Revised 01) – Preferred Alternative (See Appendix C)

Alternative A1 (Figure 1) is the preferred layout plan and comprises of the following activities:

- The upgrading and expansion of 6 existing single storey hotel buildings to that of double storey buildings in order to accommodate an additional 12 units.
- The upgrading and expansion of the existing single storey conference centre to that of a double storey building which has the capacity to accommodate 100 delegates.
- The upgrading and expansion of the owners house to a double storey unit.
- The demolition of 2 existing buildings.
- The construction of 6 double storey buildings containing a double garage with a building footprint of 200m^2 each.
- The construction of 9 single storey buildings containing a single garage with a building footprint of 150m^2 each.
- The construction of 4 single storey timber units on stilts with a building footprint of 90m^2 each.
- The construction of 4 single storey buildings with a building footprint of 90m^2 each...
- The installation of a new waste water reticulation system and package plant.
- The construction of a total of 55 parking bays
- The construction of an internal road network that would service all existing and proposed buildings.
- The construction of a wooden boardwalk within the southern section of the site.
- The installation of a storm water pipeline network.
- The relocation of existing telephone lines.
- The relocation of existing electricity boxes.
- The upgrading of the existing water reservoir and potable water reticulation system.
- The off-site installation of a Clear Edge Sewage Treatment Works and the on-site installation of associated sewer pump and sewer pipeline network

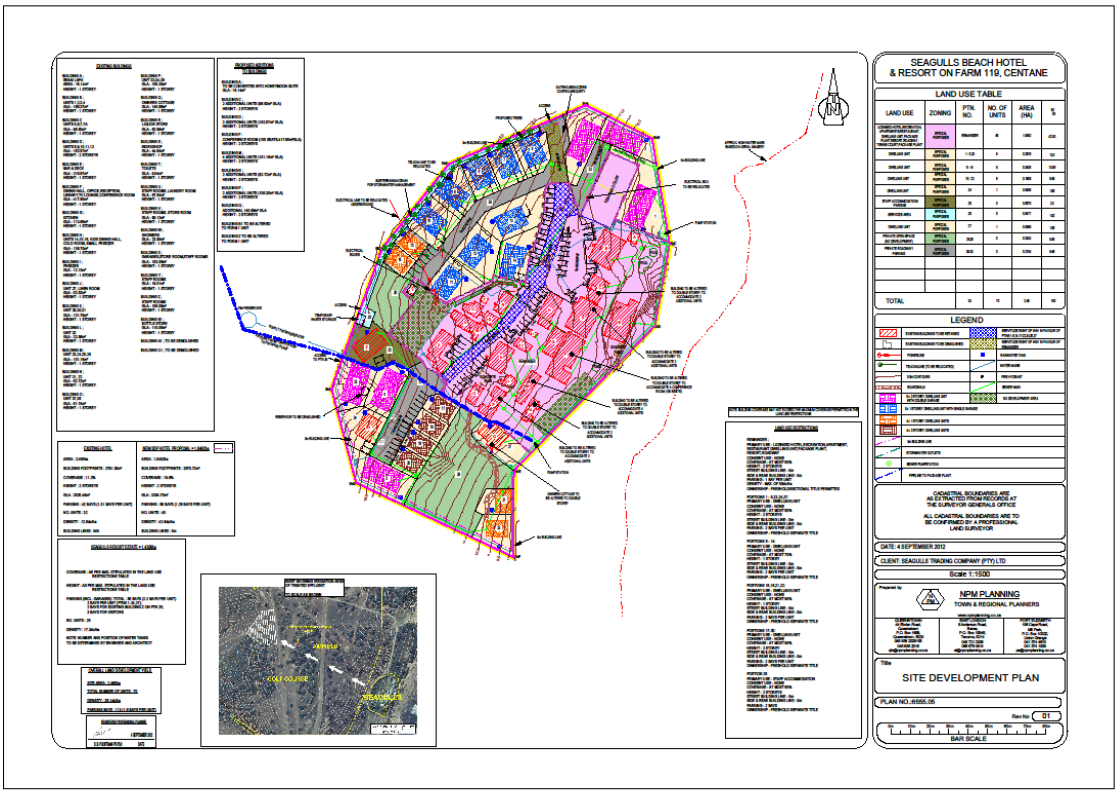

Figure 1: Preferred Site Layout Plan - Alternative A1 (Plan No: 6555.06 Revised 01)

1.2) Least Preferred Alternative A2: (Plan No: 6555.06) (See Appendix C)

Alternative A2 (Figure 2) is the Least Preferred layout plan and would comprise of the following activities:

- The upgrading and expansion of 6 existing single storey hotel buildings to that of double storey buildings in order to accommodate an additional 12 units.
- The upgrading and expansion of the existing single storey conference centre to that of a double storey building which has the capacity to accommodate 100 delegates.
- The upgrading and expansion of the owners house to a double storey unit.
- The demolition of 2 existing buildings.
- The construction of 5 double storey buildings containing a double garage with a building footprint of 200m2 each.
- The construction of 8 single storey buildings containing a single garage with a building footprint of 150m2 each.
- The construction of 12 single storey timber units on stilts with a building footprint of 90m2 each.
- The installation of a new waste water reticulation system and package plant.
- The construction of a total of 57 parking bays
- The construction of an internal road network that would service all existing and proposed buildings.
- The construction of a wooden boardwalk within the southern section of the site.
- The installation of a storm water pipeline network.
- The relocation of existing telephone lines.
- The relocation of existing electricity boxes.
- The upgrading of the existing water reservoir and potable water reticulation system.
- The on-site installation of a Clear Edge Sewage Treatment Works and associated sewer pump and sewer pipeline network

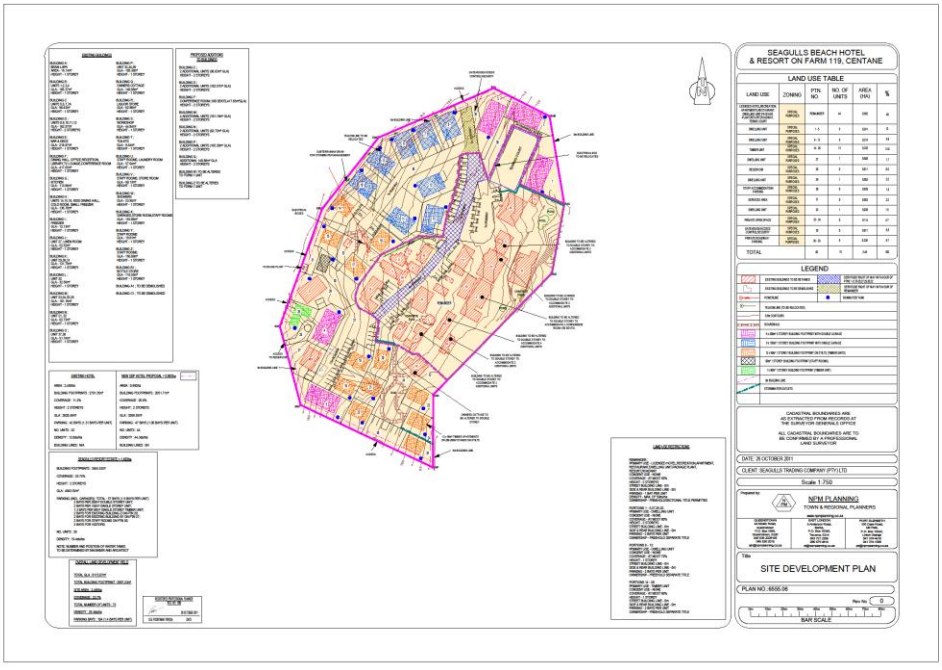

Figure 2: Least Preferred Site Layout Plan - Alternative A2 (Plan No: 6555.06)

NOTE: The design layout for the Preferred Alternative A1 differs from that of the Least Preferred Alternative A2 in that the number of new units for the estate section has been reduced; the position of the sewage treatment works has been moved from the south eastern boundary of the site to the golf course which is located approximately 250 metres west of the site and most importantly the wetland areas have been excluded from development which in turn allows for more open space areas.

Paragraphs 3 – 13 below should be completed for each alternative.

3. ACTIVITY POSITION

Indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates should be in degrees and decimal minutes. The minutes should have at least three decimals to ensure adequate accuracy. The projection that must be used in all cases is the WGS84 spheroid in a national or local projection.
List alternative sites if applicable.

	Latitude (S):		Longitude (E):	
Alternative:				
Alternative S1[1] (preferred or only site alternative)	32^0	38. 30 42	28^0	25.36 14
Alternative S2 (if any)				
Alternative S3 (if any)				

In the case of linear activities:

Alternative:	**Latitude (S):**		**Longitude (E):**	
Alternative S1 (Preferred or only route alternative)				
• Starting point of the activity				
• Middle point of the activity				
• End point of the activity				
Alternative S2 (if any)				
• Starting point of the activity				
• Middle point of the activity				
• End point of the activity				
Alternative S3 (if any)				
• Starting point of the activity				
• Middle point of the activity				
• End point of the activity				

For route alternatives that are longer than 500m, please provide an addendum with co-ordinates taken every 250 meters along the route for each alternative alignment.

4. PHYSICAL SIZE OF THE ACTIVITY

Indicate the physical size of the preferred activity/technology as well as alternative activities/technologies (footprints):

Alternative:	**Size of the activity:**
Alternative A1[2] (preferred activity alternative)	5753.24 m^2 (footprint)

[1] "Alternative S.." refer to site alternatives.

Alternative A2 (if any)	5897.23 m^2 (footprint)
Alternative A3 (if any)	
or, for linear activities:	
Alternative:	**Length of the activity:**
Alternative A1 (preferred activity alternative)	
Alternative A2	
Alternative A3	

Indicate the size of the alternative sites or servitudes (within which the above footprints will occur):

Alternative:	**Size of the site/servitude:**
Alternative A1 (preferred activity alternative)	
Alternative A2	
Alternative A3	

5. SITE ACCESS

Does ready access to the site exist?	YES
If NO, what is the distance over which a new access road will be built	

Describe the type of access road planned:

The Seagulls Beach Hotel is easily accessible from either the Pont road via Kei Mouth or from the town of Centane. The existing district road is currently being upgraded independently by the Mnquma Local Municipality in planned phases from gravel to that of a black top surface.

Include the position of the access road on the site plan and required map, as well as an indication of the road in relation to the site.

6. SITE OR ROUTE PLAN

A detailed site or route plan(s) must be prepared for each alternative site or alternative activity. It must be attached as **Appendix A** to this document. **(See Appendix A)**

The site or route plans must indicate the following:

6.1 the scale of the plan which must be at least a scale of 1:500;
6.2 the property boundaries and numbers of all the properties within 50metres of the site;
6.3 the current land use as well as the land use zoning of each of the properties adjoining the site or sites;
6.4 the exact position of each element of the application as well as any other structures on the site;
6.5 the position of services, including electricity supply cables (indicate above or underground), water supply pipelines, boreholes, street lights, sewage pipelines, storm water infrastructure and telecommunication infrastructure;
6.6 all trees and shrubs taller than 1.8metres;
6.7 walls and fencing including details of the height and construction material;
6.8 servitudes indicating the purpose of the servitude;

[2] "Alternative A.." refer to activity, process, technology or other alternatives.

6.9 sensitive environmental elements within 100metres of the site or sites including (but not limited thereto):

- rivers;
- the 1:100 year flood line (where available or where it is required by DWA);
- ridges;
- cultural and historical features;
- areas with indigenous vegetation (even if it is degraded or invested with alien species);

6.9 for gentle slopes the 1metre contour intervals must be indicated on the plan and whenever the slope of the site exceeds 1:10, the 500mm contours must be indicated on the plan; and

6.10 the positions from where photographs of the site were taken.

7(a) SITE DESCRIPTION

Describe the site on which the activity would take place:

The site is located on Farm 119, Centane on the Wild Coast within the Mnquma Local Municipality, Eastern Cape (Figure 3). It covers an area of 2.485 hectares and its current land use is that of a holiday resort called the Seagulls Beach Hotel.

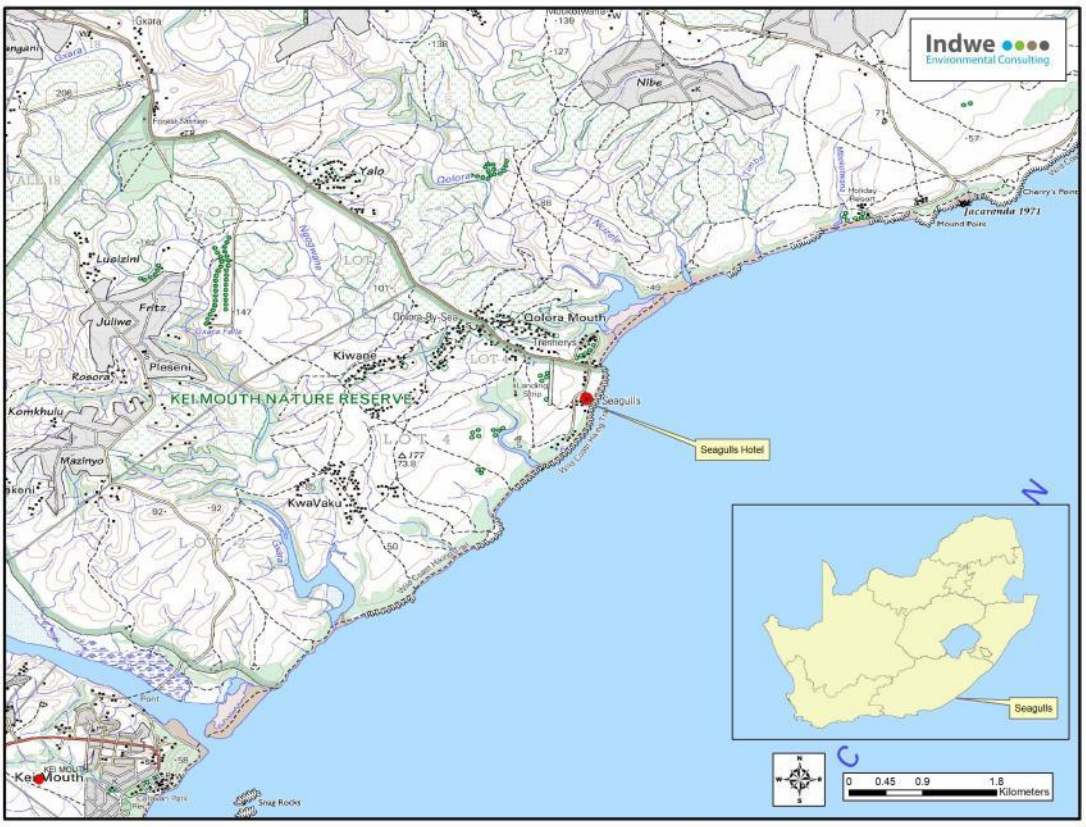

Figure 3: The site is located on Farm 119, Centane on the Wild Coast within the Mnquma Local Municipality, Eastern Cape

Seagulls has an existing total building footprint of 2791m^2 which comprises of a mix of buildings situated in close proximity to each other which all service the hotel in one form or another (Figure 4).

This site is bounded in the west by a District Road, the other side of which are a number of private holiday cottages. Two privately owned holiday cottages border the north eastern and southern boundaries respectively and the Indian Ocean borders the eastern boundary.

Apart from a few holiday cottages the rest of the land surrounding this site is un-alienated state owned land.

The land on which the existing hotel is located shows signs of extended mismanagement as there is evidence of previous solid waste dumping grounds in close proximity to the existing buildings as well as large quantities of alien vegetation interspersed amongst the indigenous vegetation.

Figure 4: The Seagulls Beach Hotel has an existing total building footprint of 2791m^2

Alignment with Spatial Planning Guidelines and Policies

The existing Seagulls Beach Hotel is located in Qolora Mouth on the Transkei Wild Coast.

According to the Wild Coast Tourism Development Policy (2001); Wild Coast Spatial Development Framework (2005) and the Draft Spatial and Environmental Management Guidelines for the Wild Coast (2012), Qolora Mouth along with Kobb In, Hole-in the Wall, Coffee Bay, Mthatha Mouth, Mdumbi and Mzamba have been identified by DEDEAT as First Order Nodes (Primary Nodes) which are defined as "*areas with low environmental sensitivity with existing infrastructure and/or the feasibility of providing infrastructure which can accommodate intensive development*".

In terms of the Wild Coast Spatial Development Framework (2005) the intent of a Primary Node is *"Intensively developed nodes to cater for holiday and leisure activities with large hotels and cluster developments. Private sector investment is encouraged in a diverse range of holiday and leisure products, facilities and enterprises. Primary attraction is the amenities provided by the built environment."*

The Mnquma Municipality Spatial Development Framework (2009) as well as the Strategic Environmental Assessment (2009) identify the Qolora First Order Node as the 4th most important node within Mnquma, after Butterworth, Nqamakwe and Centane.

As a matter of interest, the Wild Coast Tourism Development Policy (2001), defines Second Order Nodes as "*areas that are less developed and urban in nature, being more focused on 'family holiday' tourism and recreation facilities, provided by both the development and the environment. Within these nodes, cottages, cluster complexes and family hotels may be developed."*

These spatial planning, guideline and policy documents consistently define First Order Nodes (Primary Nodes) as "*the most urban and extensively developed resort areas and accordingly, the focus within these nodes should be on the recreational experience provided by the development and not specifically the environmental experience".*

Consequently, Qolora Mouth which is the only First Order Node along the Mnquma Municipality coastline has been prioritised for development as well as infrastructure investment.

Alignment with the Coastal Protection Zone

According to Section 16(1) of the Integrated Coastal Management Act 24 of 2008 (ICMA) the coastal protection zone consists of:

(a) land falling within an area declared in terms of the Environment Conservation Act, 1989 (Act No. 73 of 1989), as a sensitive coastal area within which activities identified in terms of section 21(1) of that Act may not be undertaken without an authorisation;
(b) any part of the littoral active zone that is not coastal public property;
(c) any coastal protection area, or part of such area, which is not coastal public property;
(d) Any land unit situated wholly or partially within one kilometre of the high-water mark which, when this Act came into force—
(i) was zoned for agricultural or undetermined use; or
(ii) was not zoned and was not part of a lawfully established township, urban area or other human settlement;
(e) any land unit not referred to in paragraph (d) that is situated wholly or partially within 100 metres of the high-water mark;
(f) any coastal wetland, lake, lagoon or dam which is situated wholly or partially within a land unit referred to in paragraph (d) or (e)
(g) any part of the seashore which is not coastal public property, including all 5 privately owned land below the high-water mark;
(h) any admiralty reserve which is not coastal public property: or
(i) any land that would be inundated by a 1:50 year flood or storm event.

In the case of Seagulls Beach Hotel Section 16 (d)(ii) would apply. This 1km coastal corridor is managed by DEDEAT which was appointed by the Premier under Section 38(1) of the ICMA as the lead agency for coastal management in the Province of the Eastern Cape.

The coastal protection zone is established to manage, regulate and restrict the use of land that is adjacent to coastal public property, or that plays a significant role in the coastal ecosystem.

In terms of the objectives of the coastal protection zone, Section 17 of the ICMA states that: The coastal protection zone is established for enabling the use of land that is adjacent to coastal public

property or that plays a significant role in a coastal ecosystem to be managed, regulated or restricted in order to:

(a) protect the ecological integrity, natural character and the economic, social and aesthetic value of coastal public property:
(b) avoid increasing the effect or severity of natural hazards in the coastal zone:
(c) protect people, property and economic activities from risks arising from dynamic coastal processes, including the risk of sea-level rise;
(d) maintain the natural functioning of the littoral active zone;
(e) maintain the productive capacity of the coastal zone by protecting the ecological integrity of the coastal environment
(f) make land near the seashore available to organs of state and other authorised persons for
(i) performing rescue operations; or
(ii) temporarily depositing objects and materials washed up by the sea or tidal waters.

In terms of DEDEAT's dual mandate of both economic development and environmental management within the coastal protection zone of the Wild Coast they have compiled a number of spatial planning guideline and policy documents (i.e. 2001 Wild Coast Tourism Development Policy; 2005 Wild Coast Spatial Development Framework and the 2012 Draft Spatial and Environmental Management Guidelines for the Wild Coast).
These policy and guideline documents have been used as instruments to align coastal development on the Wild Coast with the principals and guidelines set out in Section 17 of the ICMA.

The proposed upgrading and expansion of the Seagulls Beach Hotel which is located within a First Order Node is aligned with these stated objectives as the primary purpose of nodal development is to ensure that:

- Intensive development takes place in consolidated areas where infrastructure and services can be supplied efficiently and cost-effectively.
- Development takes place in areas of lower environmental sensitivity and that areas of high environmental sensitivity and importance are protected.
- The scenic beauty and biodiversity of large sections of coast are left untouched, as this is the primary resource that causes tourists to want to visit the Wild Coast.
- An unavoidable implication of the principle of nodal development is that some areas must remain undeveloped!

Socio-Economic Environment

According to the Mnquma Spatial Development Framework (2009), the Mnquma Local Municipality is the southernmost coastal municipality within the Wild Coast, and stretches from the Great Kei River in the south to the Qolora River to the north.

The entire municipal area falls within the former Transkei and covers an area of approximately 32, 995,240 km^2 with a total population of about 287 770. It comprises of 31 administrative wards and the main urban and peri-urban centres include: Butterworth, Centane, Nqamakwe, Manubi, Mazeppa Bay, Qoboqobo, Qolora Mouth and Wavecrest.

The most recent Community survey of 2007 reveals that Mnquma Municipality has a total population of approximately 297663 people, 99% of which are Xhosa speaking Africans. The remaining 1% of the population includes English, Afrikaans, Zulu and Sesotho speaking people. Mnquma is female dominated and comprises of, 54% female and 46% male of the total population. There are approximately 75410 households.

A study of the age distribution revealed that the bulk of the population, approximately 53%, are children (0-19 years). About 6.3% falls within the pension group (over 56years), whilst 38.5% are economically active (20-64 year). This indicates that there is a high dependency ratio, as 59% of the population are dependent on 41% of the workforce in the municipality.

Mnquma is one of the Municipalities with the highest levels of poverty, illiteracy and unemployment. An estimated 21% are unemployed, 13% are employed and the remaining 66% of the Municipal population are considered economically inactive.

Cultural Heritage

There is no indication of any archaeological or paleontological sites on Farm 119.
Some of the original buildings may be older than 60 years and therefore a demolition permit must be obtained by the relevant heritage resources agency.
Should any sites of heritage importance be discovered, the SAHRA would be notified.

Topography

The topography within the Seagulls site is fairly flat. There is however a gentle slope located between the south western boundary and the airstrip.
There is a small dune system which extends along the entire eastern boundary of the site, separating it from the Indian Ocean.

Geology

According to the geological map 3228 Kei Mouth the site falls within the Karoo Sequence Beaufort Group embracing the Adelaide Subgroup. These formations generally consist of sandstone, mudstone and alluvium deposits.

Climate

Qolora Mouth is situated in a predominantly summer rainfall area which varies between 700mm – 900mm per annum. It receives the lowest rainfall (13mm) in June and the highest (92mm) in November. There are however sporadic instances of rainfall in the winter period.

The average midday temperatures range from 20.4°C in July to 25.4°C in February. The region is the coldest during July when the average night time temperature drops to 9.5°C.

Vegetation

Mucina & Rutherford (2006), describe this area as falling within Subtropical Dune Thicket (Figure 5) and have classified this vegetation type as Least Threatened.

Subtropical Dune Thicket plays a crucial role in the stabilisation of the coastal dunes along the Wild Coast of Southern Africa and is home to a variety of endangered and protected plant species such as: *Mimusops caffra, Sideroxylon inerme* and *Strelitzia nicolai* to name a few.

This vegetation type also provides an important ecological service by creating an interface between the coast line and the inland region.

Figure 5: This site falls within Subtropical Dune Thicket as described by (Mucina & Rutherford, 2006)

The vegetation occurring within the site varies based on locality. The area along the front of the site comprises mostly of large stands of *Strelitzia nicolai* and *Phoenix reclinata* interspersed with dense tracts of alien vegetation such as *Cestrum laevigatum* and *Ricinus communis* (Figure 6).

Remnants of *Causarina spp* were also identified. These plants were previously planted along the coast line in an effort to stabilise coastal dunes.

Figure 6: Stands of *Strelitzia nicolai* interspersed with dense stands of alien vegetation

There are patches of land located in the northwest and southwest of the site which are water logged, the extent of which varies (Figure 7). These areas appear to be dominated by species of geophyte such as *Zantedeschia aethiopica* and *Typha capensis*. There are also various herbaceous species as well as alien vegetation present.

Figure 7: There are areas that are waterlogged which are dominated by species of geophytes

In general it could be said that the vegetation within this site has largely been transformed over an extended period of time and although there are patches of intact indigenous vegetation the area is largely dominated by either planted ornamental species; pioneer herbaceous plants or alien vegetation.

Fauna

Based on observations made during numerous site visits, there was no evidence of large indigenous fauna inhabiting this site. It is however highly likely that fauna such as Vervet Monkey's would frequent this site and species such as Scrub hare would inhabit the grasslands further inland.

Biodiversity Conservation Status

According to Berliner & Desmet (2007), the Eastern Cape Biodiversity Conservation Plan (ECBCP) designates the site as falling within the Terrestrial Critical Biodiversity Area 1, Biodiversity Land Management Class (BLMC) 1 Natural Landscapes (Figure 8).

Although the Eastern Cape Biodiversity Conservation Plan (ECBCP) designates the site as falling within the Terrestrial Critical Biodiversity Area 1, Natural Landscapes, the land on which the existing Seagulls Hotel is located as well as the land on which the proposed development is to take place is highly disturbed and cannot be regarded as a natural landscape.

This disturbance takes the form of planted gardens, dense stands of alien vegetation interspersed amongst the indigenous vegetation, buildings and associated infrastructure as well as years of dumping and burning of solid waste on site.

The ECBCP category of the current site most likely falls within Category 3 Town and Settlements rather than within a Critical Biodiversity Area. The classification of this site is questionable and is probably due to the scale at which the ECBCP plan was produced.

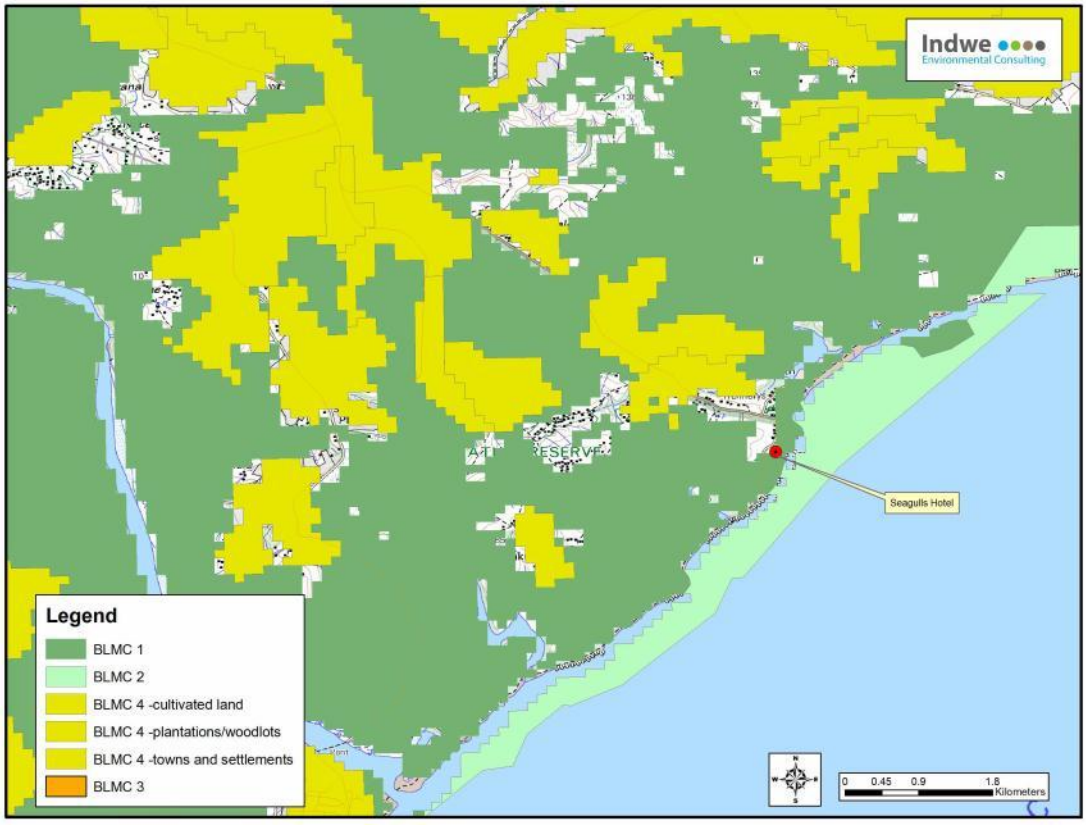

Figure 8: The Eastern Cape Biodiversity Conservation Plan (ECBCP) designates the site as falling within the Terrestrial Critical Biodiversity Area 1, Biodiversity Land Management Class (BLMC) 1 Natural Landscapes.

Threatened and Protected Species

It is possible but highly unlikely that blue duiker *Philantomba monticola* which are classified as rare by (DEAT, 2004) could occur within the riparian thicket of the surrounding rivers. It is also likely that large fauna such as Aardvark could inhabit the inland grasslands.

In terms of vegetation, large patches of *Strelitzia nicolai* which is a declared protected species in terms of the Former Transkei Decree No 9 (Environmental Conservation) of 1992 were identified.

Given that this site and its surrounds fall within Subtropical Dune Thicket it is highly likely that there are a number of endangered or protected plant species present.

7(b) SITE PHOTOGRAPHS

Colour photographs from the centre of the site must be taken in at least the eight major compass directions with a description of each photograph. Photographs must be attached under **Appendix B** to this form**.** It must be supplemented with additional photographs of relevant features on the site, if applicable.

8. FACILITY ILLUSTRATION

A detailed illustration of the activity must be provided at a scale of 1:200 as **Appendix C** for activities that include structures. The illustrations must be to scale and must represent a realistic image of the planned activity. The illustration must give a representative view of the activity.

9. ACTIVITY MOTIVATION

9(a) Socio-economic value of the activity

What is the expected capital value of the activity on completion?	R20 Million	
What is the expected yearly income that will be generated by or as a result of the activity?	R2 Million	
Will the activity contribute to service infrastructure?	Yes	
Is the activity a public amenity?	Partly	
How many new employment opportunities will be created in the development phase of the activity?	30	
What is the expected value of the employment opportunities during the development phase?	R3 Million	
What percentage of this will accrue to previously disadvantaged individuals?	R1.5 Million	
How many permanent new employment opportunities will be created during the operational phase of the activity?	8	
What is the expected current value of the employment opportunities during the first 10 years?	R5 Million	
What percentage of this will accrue to previously disadvantaged individuals?	R4 Million	

9(b) Need and desirability of the activity

Motivate and explain the need and desirability of the activity (including demand for the activity):

NEED

In terms of need, this site has been classified according to the Wild Coast Tourism Development Policy (2001); Wild Coast Spatial Development Framework (2005) and the Draft Spatial and Environmental Management Guidelines for the Wild Coast (2012), as a First Order Node (Primary Node) which is defined as *"an area with low environmental sensitivity with existing infrastructure and/or the feasibility of providing infrastructure which can accommodate intensive development".*

Consequently, Qolora Mouth which is the only First Order Node along the Mnquma Municipality coastline has been prioritised for development as well as infrastructure investment.

The need for this development is substantiated by the Municipal Manager (Mr. Pakade) of the Mnquma Municipality whom in a letter of support stated that the proposed Seagulls development is aligned with the Mnquma Local Municipality's Spatial Development Programme and is supported **(See Appendix G).**

Mr Pakade went on to state that the proposed Seagulls development forms part of the Qolora Node which has been earmarked for urban development which the Mnquma Local Municipality has identified for infrastructure upgrading and development.

The proposed development and upgrading of this existing holiday resort therefore falls directly in line with the planning objectives intended for this area.

From an environmental perspective, Seagulls is currently serviced by rudimentary sanitation infrastructure (septic tanks; french drains). This could potentially have a detrimental impact on the quality of surface and groundwater in this area. A new sewage treatment works and associated infrastructure will be a much needed improvement at this point in time.

DESIRABILITY (Placement)

The existing nature of the land use activity for this site (Holiday Resort) has not changed in 30 years and over this period of time Seagulls Beach Hotel has contributed significantly to the development of the Qolora Area as a tourist destination on the Wild Coast.

The current owners of Seagulls have opted to expand and modernise the facility in order that it may continue being used for tourism as they believe that the aesthetic nature of the surrounds compliments the current land use activity, which in turn compliments the surrounding towns and places of interest through the provision of indirect economic activity.

The commitment to the same land use over the past 30 years has in turn provided the surrounding local villages with a stable source of income and skills development through the provision of short and long term employment opportunities.

In terms of social impact (health and wellbeing) the current land use activity has a positive effect on the many tourists that visit this site for their annual holiday break as it promotes peace and tranquillity.

From a socio-economic perspective it is highly likely that, as a consequence of the proposed new development and improvement to the existing tourist infrastructure, the increase in number and type of tourist visiting Seagulls would significantly contribute to an increase in the number of stable employment opportunities as well as skills development and training opportunities in the tourism sector for members of the surrounding local communities.

Indicate any benefits that the activity will have for society in general:

The proposed upgrading and expansion of existing infrastructure and the development of new tourist accommodation within Seagulls would have a positive impact on society in general in that it would:

1. Promote the retention of the current land use which at present provides an aesthetically pleasing environment for holiday makers within which to relax and unwind.

2. Continue to promote the Qolora area as a prime holiday destination in line with the objectives of Nodal development for this area

3. Contribute to the long term economic growth of the Mnquma Local Municipality

4. Provide stable employment opportunities as well as skills development and training opportunities to members of the surrounding communities throughout the life of the activity i.e. jobs in the building sector during the upgrading and construction phase; jobs in the tourism sector during the operational phase of the activity

Indicate any benefits that the activity will have for the local communities where the activity will be located:

The proposed upgrading and expansion of existing infrastructure and the development of new tourist accommodation within Seagulls would have a positive impact on the surrounding local communities in that it would:

Provide stable employment opportunities as well as skills development and training opportunities to members of the surrounding communities throughout the life of the activity i.e. jobs in the building sector during the upgrading and construction phase; jobs in the tourism sector during the operational phase of the activity

*It is of note that, at present, Seagulls permanently employ 14 people from surrounding communities.

10. APPLICABLE LEGISLATION, POLICIES AND/OR GUIDELINES

List all legislation, policies and/or guidelines of any sphere of government that are applicable to the application as contemplated in the EIA regulations, if applicable:

Title of legislation, policy or guideline:	Administering authority:	Date:
National Environmental Management Act (NEMA) No. 107 0f 1998	Dept. of Environmental Affairs Dept. of Economic Development and Environmental Affairs	1998
Environmental Impact Assessment Regulations of 2010 (Government Notice No. R. 543,544 and 546 as amended)	Dept. of Environmental Affairs Dept. of Economic Development and Environmental Affairs	2010
Constitution of the Republic of South Africa Act No. (106 of 1996)	South African Government	1996
National Environmental Integrated Coastal Management Act 24 of 2008	National Department of Environmental Affairs	2008
National Environmental Management Waste Act (59 of 2008)	National Department of Environmental Affairs	2008
National Water Act (NWA) No. (36 of 1998)	Department of Water Affairs	1998
National Forest Act (NFAA) No. (84 of 1998)	Department of Agriculture, Fisheries and Forestry	1998
National Environmental Management Biodiversity Act (10 of 2004)	Dept. of Environmental Affairs Dept. of Economic	2004

	Development and Environmental Affairs	
Spatial Development Framework	Mnquma Local Municipality	2009
Wild Coast Tourism Development Policy	Dept. Economic Affairs Environment and Tourism Province of the Eastern Cape	2001
Wild Coast Spatial Development Framework	Dept. Economic Affairs Environment and Tourism Province of the Eastern Cape	2005
Draft Spatial and Environmental Management Guidelines for the Wild Coast of the Eastern Cape Province	Dept. Economic Affairs Environment and Tourism Province of the Eastern Cape	2012

11. WASTE, EFFLUENT, EMISSION AND NOISE MANAGEMENT

11(a) Solid waste management

Will the activity produce solid construction waste during the construction/initiation phase?	YES √	NO
If yes, what estimated quantity will be produced per month?	5 m^3	

How will the construction solid waste be disposed of (describe)?

Construction solid waste will be transported to the nearest permitted landfill site (Ibhika) and disposed of accordingly. No burning or burying of solid waste will occur on site.

Where will the construction solid waste be disposed of (describe)?

The nearest landfill site, which is located in Ibhika. The Construction EMP includes specifications concerning the disposal of construction waste. The Contractor will be responsible for disposal of construction waste.

Will the activity produce solid waste during its operational phase?	YES √	NO
If yes, what estimated quantity will be produced per month?	5 m^3	

Specifications for solid waste management have been compiled for the proposed project and are included in the Environmental Management Plan **(See Appendix F).**

Solid waste generated during the operational phase at Seagulls will be dealt with in the following manner:

- Because of its remote locality, emphasis will be placed on waste minimisation strategies such as green purchasing, re-use, waste separation and recycling i.e. recyclables such as glass bottles, cans, etc. will be returned to the source on supply trucks.

- Inorganic and organic waste will be separated at source and stored in separate storage receptacles at a dedicated re-cycling area. The organic waste will be given to the surrounding communities for use as animal feed/ compost, etc.

- Grease and old cooking oil generated from the kitchen will be stored separately and disposed of in an appropriate manner.

- Non-recyclable or non-re-usable waste will be stored in scavenger proof wheelie bins in the dedicated waste storage area.

- An independent contractor will be appointed to regularly collect and disposed of the recyclable and non-recyclable waste at the nearest registered landfill site (Ibhika).

- No waste will be buried or burnt on site or within Qolora.

In order to solve the on-going solid waste issue in Qolora Mouth, it is suggested that both Trennary's and Seagulls as well as all the cottage owners combine their efforts and appoint a private contractor to collect and transport solid waste to the Ibhika landfill facility.

Where will the solid waste be disposed if it does not feed into a municipal waste stream (describe)?

N/A

If the solid waste (construction or operational phases) will not be disposed of in a registered landfill site or be taken up in a municipal waste stream, then the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

Can any part of the solid waste be classified as hazardous in terms of the relevant legislation?	YES	NO √

If yes, inform the competent authority and request a change to an application for scoping and EIA.

Is the activity that is being applied for a solid waste handling or treatment facility?	YES	NO √

If yes, then the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

11(b) Liquid effluent

Will the activity produce effluent, other than normal sewage, that will be disposed of in a municipal sewage system?	YES	NO √
If yes, what estimated quantity will be produced per month?		
Will the activity produce any effluent that will be treated and/or disposed of on-site?	YES √	

If yes, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

Will the activity produce effluent that will be treated and/or disposed of at another facility?	YES	NO √

If yes, provide the particulars of the facility:

Facility name:			
Contact person:			
Postal address:			
Postal code:			
Telephone:		Cell:	
E-mail:		Fax:	

Describe the measures that will be taken to ensure the optimal reuse or recycling of waste water, if any:

All existing septic tanks and soakaway systems will be decommissioned and replaced by a Clear Edge Technologies Sewerage Treatment Plant. This type of sewerage treatment package plant has been implemented for similar developments on the Wild Coast (Umngazi River Bungalows).

The final treated effluent emanating from this treatment plant will be used to irrigate the golf course located approximately 250 metres west of Seagulls Hotel.

11(c) Emissions into the atmosphere

Will the activity release emissions into the atmosphere?	YES	NO √
If yes, is it controlled by any legislation of any sphere of government?	YES	NO

If yes, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

If no, describe the emissions in terms of type and concentration:

11(d) Generation of noise

Will the activity generate noise?	YES	NO √
If yes, is it controlled by any legislation of any sphere of government?	YES	NO

If yes, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

If no, describe the noise in terms of type and level:

12. WATER USE

Please indicate the source(s) of water that will be used for the activity by ticking the appropriate box(es)

Municipal √	water board	Groundwater √	river, stream, dam or lake	Other √ **Rainwater harvesting**	the activity will not use water

If water is to be extracted from groundwater, river, stream, dam, lake or any other natural feature, please indicate

the volume that will be extracted per month:	1682 m^3	
Does the activity require a water use permit from the Department of Water Affairs?	YES √	NO

If yes, please submit the necessary application to the Department of Water Affairs and attach proof thereof to this application if it has been submitted.

A General Authorisation in terms of Section 39 of the National Water Act 36 of 1998 was issued to Seagulls for the abstraction of a maximum of 20 184.5 cubic metres of water per annum from existing on-site springs **(See Appendix D).** An application in terms of Section 21(e) of the National Water Act 36 of 1998 for the irrigation of land with treated effluent will be applied for.

13. ENERGY EFFICIENCY

Describe the design measures, if any, that have been taken to ensure that the activity is energy efficient:

Comprehensive architectural guidelines have been compiled for this proposed project **(See Appendix D).**

In order to incorporate eco-friendly and energy conservation principles the main orientation of new buildings will be north / north east with a minimum of west facing windows.

Natural airflow and ventilation will be encouraged and additional energy saving measures will be incorporated into the building design as far as possible to minimize their carbon footprint.

All new buildings and infrastructure will also be designed in such a manner that rainwater can be harvested and stored for further use.

Energy saving lighting, like CFLs (compact fluorescent lights) and LEDs (light emitting diodes) will be used for lighting wherever possible.

Water saving devices will be installed e.g. cisterns, shower heads

Describe how alternative energy sources have been taken into account or been built into the design of the activity, if any:

Energy Efficiency Measures

The following measures are proposed and should be considered by the management of Seagulls as well as visiting tourists. Not all of these may be applicable, but could be introduced as the technology becomes more affordable.

1) Behaviour Management

These measures require that the staff and guests at Seagulls be made aware of the benefits of being "energy wise". The various Eskom and municipal energy efficiency campaigns are examples of how this may be attained. Particular focus could be placed on:

- Cooking times
- Bathroom times
- Geyser switching, either manually or automatically
- Lowering geyser temperature settings
- Changing lighting from filament to LED or florescent lighting
- Switching off electrical appliances when not in use

2) Technology

Electricity consuming devices could be managed by means of technology such as:

- Timing switches on swimming pool pumps
- Geyser load control switches
- The selection of energy efficient appliances i.e. fridges, washing machines and dish washers

3) Alternative Energy Sources

Seagulls Management could replace conventional electricity usage with alternative energy sources such as:

- Solar water heating
- Gas for cooking and area heating

SECTION B: SITE/AREA/PROPERTY DESCRIPTION

Important notes:

1. For linear activities (pipelines,etc.) as well as activities that cover very large sites, it may be necessary to complete this section for each part of the site that has a significantly different environment. In such cases please complete copies of Section C and indicate the area, which is covered by each copy No. on the Site Plan.

Section C Copy No. (e.g. A):	**A**

2. Paragraphs 1 - 6 below must be completed for each alternative.

3.	Has a specialist been consulted to assist with the completion of this section?	YES / NO √

If YES, please complete form XX for each specialist thus appointed:
All specialist reports must be contained in **Appendix D**.

1. GRADIENT OF THE SITE

Indicate the general gradient of the site.

Alternative S1:

Flat √	1:50 – 1:20√	1:20 – 1:15	1:15 – 1:10	1:10 – 1:7,5	1:7,5 – 1:5	Steeper than 1:5

Alternative S2 (if any):

[redacted]						

Alternative S3 (if any):

[redacted]						

2. LOCATION IN LANDSCAPE

Indicate the landform(s) that best describes the site:

2.1 Ridgeline
2.2 Plateau
2.3 Side slope of hill/mountain
2.4 Closed valley
2.5 Open valley
2.6 Plain
2.7 Undulating plain / low hills√
2.8 Dune√
2.9 Seafront√

3. GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE

Is the site(s) located on any of the following (tick the appropriate boxes)?

	Alternative S1:		**Alternative S2 (if any):**		**Alternative S3 (if any):**	
Shallow water table (less than 1.5m deep)	YES√	NO	[redacted]		[redacted]	
Dolomite, sinkhole or doline areas	YES	NO √	[redacted]		[redacted]	
Seasonally wet soils (often close to water bodies)	YES	NO √	[redacted]		[redacted]	
Unstable rocky slopes or steep slopes with loose soil	YES	NO √	[redacted]		[redacted]	

Dispersive soils (soils that dissolve in water)	YES	NO √					
Soils with high clay content (clay fraction more than 40%)	YES√	NO					
Any other unstable soil or geological feature	YES	NO √					
An area sensitive to erosion	YES	NO √					

If you are unsure about any of the above or if you are concerned that any of the above aspects may be an issue of concern in the application, an appropriate specialist should be appointed to assist in the completion of this section. (Information in respect of the above will often be available as part of the project information or at the planning sections of local authorities. Where it exists, the 1:50 000 scale Regional Geotechnical Maps prepared by the Council for Geo Science may also be consulted).

4. GROUNDCOVER

Indicate the types of groundcover present on the site:

4.1 Natural veld – good condition [E]
4.2 Natural veld – scattered aliens [E]
4.3 Natural veld with heavy alien infestation [E]
4.4 Veld dominated by alien species[E]
4.5 Gardens
4.6 Sport field
4.7 Cultivated land
4.8 Paved surface
4.9 Building or other structure
4.10 Bare soil

The location of all identified rare or endangered species or other elements should be accurately indicated on the site plan(s).

Natural veld - good condition[E]	Natural veld with scattered aliens[E]	Natural veld with heavy alien infestation[E]	Veld dominated by alien species[E]√	Gardens√
Sport field	Cultivated land	Paved surface√	Building or other structure√	Bare soil

If any of the boxes marked with an "[E] "is ticked, please consult an appropriate specialist to assist in the completion of this section if the environmental assessment practitioner doesn't have the necessary expertise. The EAP has the necessary expertise.

5. LAND USE CHARACTER OF SURROUNDING AREA

Indicate land uses and/or prominent features that currently occur within a 500m radius of the site and give description of how this influences the application or may be impacted upon by the application:

5.1 Natural area
5.2 Low density residential√
5.3 Medium density residential
5.4 High density residential
5.5 Informal residential
5.6 Retail commercial & warehousing
5.7 Light industrial
5.8 Medium industrial[AN]
5.9 Heavy industrial[AN]
5.10 Power station
5.11 Office/consulting room
5.12 Military or police base/station/compound
5.13 Spoil heap or slimes dam[A]
5.14 Quarry, sand or borrow pit
5.15 Dam or reservoir
5.16 Hospital/medical centre
5.17 School
5.18 Tertiary education facility
5.19 Church
5.20 Old age home
5.21 Sewage treatment plant[A]
5.22 Train station or shunting yard[N]
5.23 Railway line[N]
5.24 Major road (4 lanes or more)[N]
5.25 Airport[N]
5.26 Harbour
5.27 Sport facilities
5.28 Golf course
5.29 Polo fields
5.30 Filling station[H]
5.31 Landfill or waste treatment site
5.32 Plantation
5.33 Agriculture
5.34 River, stream or wetland√
5.35 Nature conservation area
5.36 Mountain, koppie or ridge
5.37 Museum
5.38 Historical building
5.39 Protected Area
5.40 Graveyard
5.41 Archaeological site
5.42 Other land uses (The existing site is used for tourism in the form of the Seagulls Beach Hotel and is located within close proximity to the Indian Ocean)
Caravan site, Estuary, beach

If any of the boxes marked with an "N "are ticked, how will this impact / be impacted upon by the proposed activity. **N/A**

If any of the boxes marked with an "An" are ticked, how will this impact / be impacted upon by the proposed activity.**N/A**

If YES, specify and explain: If YES, specify:	

If any of the boxes marked with an "H" are ticked, how will this impact / be impacted upon by the proposed activity. **N/A**

If YES, specify and explain: If YES, specify:	

6. CULTURAL/HISTORICAL FEATURES

Are there any signs of culturally or historically significant elements, as defined in section 2 of the National Heritage Resources Act, 1999, (Act No. 25 of 1999), including	YES	NO √
Archaeological or paleontological sites, on or close (within 20m) to the site?	NO √	
If YES, explain:		
If uncertain, conduct a specialist investigation by a recognised specialist in the field to establish whether there is such a feature(s) present on or close to the site.		
Briefly explain the findings of the specialist:		
Will any building or structure older than 60 years be affected in any way?	YES	NO √
Is it necessary to apply for a permit in terms of the National Heritage Resources Act, 1999 (Act 25 of 1999)?	YES	NO √

If yes, please submit or, make sure that the applicant or a specialist submits the necessary application to SAHRA or the relevant provincial heritage agency and attach proof thereof to this application if such application has been made.

SECTION C: PUBLIC PARTICIPATION

1. ADVERTISEMENT

See Appendix G for the methodology of public participation followed.

The person conducting a public participation process must take into account any guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties of the application which is subjected to public participation by—

(a) fixing a notice board (of a size at least 60cm by 42cm; and must display the required information in lettering and in a format as may be determined by the competent authority) at a place conspicuous to the public at the boundary or on the fence of—
  (i) the site where the activity to which the application relates is or is to be undertaken; and
  (ii) any alternative site mentioned in the application;

(b) giving written notice to—
  (i) the owner or person in control of that land if the applicant is not the owner or person in control of the land;
  (ii) the occupiers of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;
  (iii) owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;
  (iv) the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;
  (v) the municipality which has jurisdiction in the area;
  (vi) any organ of state having jurisdiction in respect of any aspect of the activity; and
  (vii) any other party as required by the competent authority;

(c) placing an advertisement in—
  (i) one local newspaper; or
  (ii) any official *Gazette* that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;

(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or local municipality in which it is or will be undertaken: Provided that this paragraph need not be complied with if an advertisement has been placed in an official *Gazette* referred to in subregulation54(c)(ii); and

(e) using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desiring of but unable to participate in the process due to—
  (i) illiteracy;
  (ii) disability; or
  (iii) any other disadvantage.

2. CONTENT OF ADVERTISEMENTS AND NOTICES

See Appendix G for a copy of the newspaper advert

A notice board, advertisement or notices must:

(a) indicate the details of the application which is subjected to public participation; and
(b) state—
(i) that the application has been submitted to the competent authority in terms of these Regulations, as the case may be;
(ii) Whether basic assessment or scoping procedures are being applied to the application, in the case of an application for environmental authorisation;
(iii) the nature and location of the activity to which the application relates;
(iv) where further information on the application or activity can be obtained; and
(iv) the manner in which and the person to whom representations in respect of the application may be made.

3. PLACEMENT OF ADVERTISEMENTS AND NOTICES

See Appendix G for a photo of the signboard

Where the proposed activity may have impacts that extend beyond the municipal area where it is located, a notice must be placed in at least one provincial newspaper or national newspaper, indicating that an application will be submitted to the competent authority in terms of these regulations, the nature and location of the activity, where further information on the proposed activity can be obtained and the manner in which representations in respect of the application can be made, unless a notice has been placed in any *Gazette* that is published specifically for the purpose of providing notice to the public of applications made in terms of the EIA regulations.

Advertisements and notices must make provision for all alternatives.

4. DETERMINATION OF APPROPRIATE MEASURES

See Appendix G

The practitioner must ensure that the public participation is adequate and must determine whether a public meeting or any other additional measure is appropriate or not based on the particular nature of each case. Special attention should be given to the involvement of local community structures such as Ward Committees, ratepayers associations and traditional authorities where appropriate. Please note that public concerns that emerge at a later stage that should have been addressed may cause the competent authority to withdraw any authorisation it may have issued if it becomes apparent that the public participation process was inadequate.

5. COMMENTS AND RESPONSE REPORT

See Appendix E for Comments and Response Report

The practitioner must record all comments and respond to each comment of the public before the application is submitted. The comments and responses must be captured in a comments and response report as prescribed in the EIA regulations and be attached to this application. The comments and response report must be attached under **Appendix E**.

6. AUTHORITY PARTICIPATION

Authorities are key interested and affected parties in each application and no decision on any application will be made before the relevant local authority is provided with the opportunity to give input. The planning and the environmental sections of the local authority must be informed of the application at least 30 (thirty) calendar days before the submission of the application.

List of authorities informed:

Amathole District Municipality – Senior Manager Local Economic Development
Amathole District Municipality – Director of Engineering Services
Mnquma Local Municipality - Municipal Manager
Ward Councillor Qolora District (Centane)
Department of Water Affairs (Water Quality Management)
Department of Environmental Affairs (Oceans and Coast)
East Cape Parks & Tourism Agency
Department of Economic Development and Environmental Affairs (Biodiversity and Coast)
South African Heritage Resources Agency
South African National Roads Agency
Department of Rural Development and Land Reform

List of authorities from whom comments have been received:

Department of Water Affairs (Water Quality Management)
South African National Roads Agency
Mnquma Local Municipality - Municipal Manager

7. CONSULTATION WITH OTHER STAKEHOLDERS

Note that, for linear activities, or where deviation from the public participation requirements may be appropriate, the person conducting the public participation process may deviate from the requirements of that sub regulation to the extent and in the manner as may be agreed to by the competent authority.

Any stakeholder that has a direct interest in the site or property, such as servitude holders and service providers, should be informed of the application at least 30 (thirty) calendar days before the submission of the application and be provided with the opportunity to comment.

Has any comment been received from stakeholders?	**YES**√	NO

If "YES", briefly describe the feedback below (also attach copies of any correspondence to and from the stakeholders to this application):

A comprehensive stakeholder engagement process was held from the 7th May 2012 until the 27 September 2012. Comments were received during the 30 day Basic Assessment advertising period as well as during the Pre-DFA Tribunal Hearing, first DFA Tribunal Hearing, second DFA Tribunal Hearing and the final DFA Tribunal Hearing. Throughout this process all comments received were comprehensively responded to. **See Appendix E for detailed Comments and Response Report.**

SECTION D: IMPACT ASSESSMENT

The assessment of impacts must adhere to the minimum requirements in the EIA Regulations, 2010, and should take applicable official guidelines into account. The issues raised by interested and affected parties should also be addressed in the assessment of impacts.

1. ISSUES RAISED BY INTERESTED AND AFFECTED PARTIES

List the main issues raised by interested and affected parties.

1. The proposed developments alignment with Wild Coast Spatial Planning Policy and Integrated Coastal Management Act 24 of 2008
2. The applicability of the Development Facilitation Act as a process for obtaining land development rights
3. The validity of the deed of grant for the property and the removal of related restrictions
4. The proposed size and scale of the planned development (density)
5. The loss of sense of place (At present, Qolora Mouth is a coastal village with a few private cottages and two resorts)
6. The visual impact of the proposed development to neighbouring cottages as well as its visibility from the beach
7. Some Qolora residents believe that the developers only motive is financial gain
8. The benefits of the proposed development to the local community
9. The availability of sufficient potable water for the proposed development
10. Backup facilities and location of pumping stations for proposed sewage works
11. The capacity of the electricity supply for the proposed development
12. The effects of storm water runoff from the main Qolora access road on the development
13. The lack of solid waste disposal facilities in Qolora area
14. The management of solid waste generated by the proposed development
15. The impact of increased traffic on neighbouring cottages
16. Dust pollution created through increased road traffic
17. The impact of the proposed development on the surrounding Biodiversity

18. The potential impact of treated effluent on the underground springs

19. The potential disturbance to the wetland from the positioning of units and parking areas

20. The impact on the on-site wetland if the spring water is extracted for the development

21. The increased pressure on marine resources due to increased tourism in the Qolora area

22. The impact of the proposed development on the proposed Abalone Farm

Issues raised by interested and affected parties after review of Draft Basic Assessment Report

1. The Department of Agriculture was not informed of the proposed development.

Response from the practitioner to the issues raised by the interested and affected parties (A full response must be given in the Comments and Response Report that must be attached to this report):
See Appendix E for detailed Comments and Response Report

1. Alignment with Wild Coast Spatial Planning Policy and Integrated Coastal Management Act 24 of 2008

In terms of DEDEAT's dual mandate of both economic development and environmental management within the coastal protection zone of the Wild Coast, they have compiled a number of spatial planning guideline and policy documents (i.e. 2001 Wild Coast Tourism Development Policy; 2005 Wild Coast Spatial Development Framework and the 2012 Draft Spatial and Environmental Management Guidelines for the Wild Coast).

These policy and guideline documents have been used as instruments to align coastal development on the Wild Coast with the principals and guidelines set out in Section 17 of the ICMA of 2008.

The proposed Seagulls Hotel and Lifestyle Estate Development is fully in line and compliant with DEDEAT's Wild Coast Policy and Guidelines which have been developed in cognisance of the Integrated Coastal Management Act.

2. The Applicability of the Development Facilitation Act as a Process for Obtaining Land Development Rights

The applicability of the DFA as a process for obtaining land development rights for this application is outside the immediate scope of this Basic Assessment Report and remains under the jurisdiction of the Department of Local Government and Traditional Affairs.

3. The Validity of the Deed of Grant and Removal of Related Restriction

The attorneys Rob Behr and Qina based in Umtata investigated the validity and Mr Qina personally spoke to the registrar of Deeds based in Umtata. The Registrar, Mr Mantanga,

stated that as far as he is concerned that the deed was valid and that they do not keep invalid deeds at the deeds office.

4. The Proposed Size and Scale of the Planned Development (Density)

From a Spatial Development Framework perspective, the Qolora Mouth First Order Node is the 4th most important node within Mnquma, after Butterworth, Namakwe and Centane. As such the site development plan has been based on best practice, norms and standards for the sites existing locality and its nodal status.

According to DEDEAT (2012), First Order Nodes are defined as *"areas that in terms of low environmental sensitivity and existing infrastructure and/or the feasibility of providing infrastructure can accommodate intensive development. Actual or proven potential supply of municipal services such as bulk water, sewerage and waste management is a basic condition for any area to have 1st Order Node status".*

The proposed density is below municipal land use regulations which guide developments of this nature and the actual extra development footprint is only on 1.5 hectares as the current hotel is on the other hectare.

The site development plan has been amended based on the comments made at the previous DFA hearings. After public comment, the density of new units for the estate section has been reduced and a larger open space system has been included **(See Appendix C).**

5. The Loss of Sense of Place

Some of the Qolora Mouth residents fear that the quiet seaside village atmosphere will be lost to the proposed development and that the sense of place will be altered.

The increase in accommodation opportunities offered by the upgrading and expansion of the proposed development will no doubt increase the number of visitors and tourists to Qolora Mouth and most affected will be those neighbouring cottage owners who will be impacted upon by increased noise levels, traffic, people on the beach, etc.

However, It is important to note that over the past 30 years, Seagulls Beach Hotel and Trennery's Holiday Resort have both contributed significantly to the Qolora Mouth Area as a tourist destination by catering for family orientated seaside holidays.

There will be no change in land use and the intention of the proposed expansion of Seagulls is not to destroy the surrounding ambiance of Qolora Mouth but rather to offer more people the same opportunity to enjoy this beautiful area.

The proposed development which is that of a family holiday resort and lifestyle estate is located on a 2.48 hectare footprint and will offer different forms of holiday accommodation and activities.

This type of land use and development falls directly in line with the intended Nodal Plan for Qolora Mouth (First Order Node).

Sense of place is a highly subjective issue. In fact, there is a perception that by upgrading the

current resort with the proposed uniform architectural style the sense of place will be improved.

6. Visual Impact

In order to minimize the visual impact, considerable planning has been taken into account regarding the height and aesthetic impact of the proposed new development on the surrounding area, in particular the neighbouring cottages. **See Appendix D for Architectural guidelines and line of sight.**

The proposed additions have been designed in accordance with an architectural code and style **(See Appendix D).** Site development planning has considered the height impact with elevations. Based on this, there will be a combination between single and double storey units with the top section of the estate being solely single storey. No triple storey units have been planned for.

It is important to note that there are existing double storey units which form part of the existing hotel.

With regard to planned building heights the Wild Coast Spatial Development Framework 2005 provides the guideline for First Order nodes as follows

"Developments should not disturb/break existing tree lines i.e. height restriction – 5 storey for hotels where the view shed is protected and 2 storeys for all other developments"

The architectural guidelines have been incorporated into the Homeowners Association Guidelines and will be enforced. All plans will be signed off by the architect to ensure that there is no deviation.

7. Developers Motive

The developer disagrees that he has no commitment to Qolora Mouth and is only interested in making a "quick buck".

The developer has made a significant investment in purchasing the rundown old Seagulls Hotel and he has already spent in excess of R2 million on the upgrading of the existing infrastructure.

In excess of 30 part time jobs have already been created during the refurbishment of the existing infrastructure and the future upgrading of the hotel will also create extra much needed jobs in this impoverished area.

The developer is of the opinion that as a consequence of the proposed new development and upgrades to existing tourist infrastructure, the increase in number and type of tourist visiting Seagulls could significantly contribute to the creation of long term stable employment opportunities as well as skills development and training opportunities in the tourism sector for members of the surrounding local communities.

8. The Benefits of the Proposed Development to the Local Community

The proposed upgrade and expansion of Seagulls Beach Hotel would provide stable employment opportunities as well as skills development and training opportunities to members

of the surrounding communities throughout the life of the activity i.e. jobs in the building sector during the upgrading and construction phase; jobs in the tourism sector during the operational phase of the activity.

During the operational phase, the proposed development would act as a catalyst for the provision of goods and services by surrounding communities i.e. guided walks; guided fishing trips and souvenirs etc. thus promoting SMME development in the Qolora Mouth Area.

9. The Availability of Sufficient Potable Water for the Proposed Development

Professional engineers (Camdekon) were appointed to assess the bulk service infrastructure requirements for the project in order to ensure that there is a sustainable water supply.

Municipal Water

At present, the Amathole District Municipality are the water services authority for the Qolora Mouth area.
This water supply has proved to be erratic and as such will only be used as a tertiary measure when the system is functioning. Close interaction between all water consumers and the Municipality will be required to maintain a sustainable water supply, and infrastructure.

The municipal supply to the development node is from a treatment plant and storage reservoir located some 2km from the site. The treatment works (Qolora) has a capacity to treat and produce water at 14m^3/hour (3.88l/s).

This plant supplies a community reservoir in the surrounding area at a rate of 2.22l/s for 5h every third day.

The storage reservoir has a capacity of some 250 cum (250 000 l) and is the primary water storage for the cottages and the hotel infrastructure along the coast.

The average consumption for the area along the coast has been recorded at 7298kl/month. The reservoir therefore has a 24 hour storage capacity. The treatment plant capacity therefore seems to cope with the demand.

Water from this reservoir is piped under gravity to the hotel complexes' and cottages via a 110mm PVC main that branches to the Seagulls storage reservoir which has a capacity of 75m^3 (75 000 litres) via a 50mm HDPE connector. The 110mm pipe capacity at a flow velocity of 1.5m/s and a peak demand of 6 will be adequate.

Spring Water

Springs do occur on the hotel site, these have been sampled and flows have been determined by SRK engineers, three springs were tested and found to have a combined delivery of 0.64l/s. The spring analysis also revealed high turbidity levels, and Faecal Coliforms.

General authorization to utilize water from these springs has been granted by the DWA. Water use from these springs is as per the study conducted by SRK and equate to 55.3 cum/day.

It is the intension of the developer to utilize these springs to supplement the water supply to the

Hotel. The water from these springs will be collected via filter drains and stored in ground tanks from where it will be pumped to the main supply reservoir and blended with water from the municipal supply.

Rain Water

The developer intends to further harvest rain water in the form of rainwater tanks positioned across the site to collect water from roof tops, similarly to the spring harvesting this water will be collected and pumped to the Hotel supply reservoir and blended with the municipal supply.

Each new cottage will have a minimum rainwater storage capacity of 10 000 litres which equates to an approximate additional 280 000 litres for the entire new development. The existing hotel also has 3000m^2 of roofing space which could be used for additional rain water harvesting.

On-Site Storage Capacity

Based on site visits, the engineer recorded that cottage owners and hotel complexes have provided on site water storage in addition to the Municipal supply.

The Seagulls Hotel has an on-site storage capacity in the form of a 75 cum reservoir. The water supply to the structure is metered and fitted with an isolation valve.

The engineers recommend that the storage reservoir be fitted with a roof structure in order to prevent water contamination and that all stored water be treated and disinfected prior to distribution to the hotel complex.

A further 20cum concrete water tank is located in the south western corner of the site, and also supplies storage for periods of interrupted municipal supply.

Annual Average Daily Demand

The engineers calculated the Annual Average Daily Demand for a 211 bed facility at a 100% occupancy rate using the upper limits of the SABS Code 0252-1:1994 to be 52 750 litres.

In summary :

1) Hotel demand per day : 52 750 litre
2) Existing Storage provided on Site : 95 000 litres
3) Future proposed storage: Spring 50 000litres, Rainwater tanks 280 000 litres.
4) Municipal Storage: 30 000 litres (based on current hotel facility).
5) Total storage provided: 455 000 litres, or 8 days storage.

Based on the information provided by the engineers it is assumed that there is a sustainable water supply for the proposed development.

10. Backup Facilities and Location of Pumping Stations for Proposed Sewage Works

The developer has appointed a respected sewerage specialist who has successfully designed

and implemented sewerage treatment package plants for similar developments on the Wild Coast (Umngazi River Bungalows).

The specialist has suggested that the out flows from the existing hotel septic tanks as well as from the proposed new sewer lines be piped to a pump station located on the eastern boundary along the lowest outline.
The effluent will then be pumped to the Clear Edge Technologies Sewerage Treatment Plant located on the golf course approximately 250 metres to the west of the site.

Once the effluent has been treated and disinfected it will be used to irrigate the golf course.

The proposed pump station will have a minimum of 12 hours retention time allowing for interrupted power supply and maintenance. Contingencies for the pump station will include a high level alarm light as well as a secondary standby pump. Both the primary and secondary pumps will also be linked to the Hotel standby generator.

The proposed treatment plant will be a minimum of 200 metres from the nearest dwelling and the irrigation of treated effluent shall be controlled in accordance with prescribed standards.

In order to address the possibility of the malfunction of the treatment plant an irrigation/emergency pond with a 14 day external storage capacity will be constructed at the plant.

11. Capacity of Electricity Supply for the Proposed Development

Eya Bantu Electrical Engineers have done a survey of the existing electrical infrastructure. They found that in order to cater for the proposed development an upgrade from 150 amps to 450 amps or 315kva would be necessary.

Eya Bantu have subsequently requested this upgrade and Eskom have confirmed that they have the capacity for the upgrade and will commence the process on submission of an application fee.

12. The Effects of Storm Water Runoff from the Main Qolora Road on the Development

This will be addressed via the normal stormwater management of the road adjacent the site via the side drains etc. This road is a municipal road and the maintenance thereof is their function, however they cannot just discharge stormwater onto the property freely.

13. The Lack of Solid Waste Disposal Facilities in Qolora Area

It is known that there are only 3 licensed waste sites on the entire Wild Coast and even the town of Kei Mouth has an un-licensed waste site and has continued development of residential units.

In terms of Seagulls Hotel, specifications for the management of solid waste have been included in the Environmental Management Programme which forms part of this Basic Assessment **(See Appendix F).**

The plan promotes waste minimisation strategies such as green purchasing, re-use, waste separation and recycling. All recyclables and solid waste will be stored in a waste storage area on site from where it will be removed to the new licensed landfill facility in Ibhika.

The waste will be transported out on a regular basis by private contract. No waste will be buried or burned on site or in the surrounding area.

In order to solve the on-going solid waste issue in Qolora Mouth, it is suggested that both Trennery's and Seagulls as well as all the cottage owners combine their efforts and appoint a private contractor to collect and transport solid waste to the Ibhika landfill facility.

14. The Management of Solid Waste Generated by the Proposed Development

Specifications for solid waste management have been included in the Environmental Management Plan **(See Appendix F).**

Solid waste generated during the operational phase at Seagulls will be dealt with in the following manner:

Because of its remote locality, emphasis will be placed on waste minimisation strategies such as green purchasing, re-use, waste separation and recycling i.e. recyclables such as glass bottles, cans, etc. will be returned to the source on supply trucks.

Inorganic and organic waste will be separated at source and stored in separate storage receptacles at a dedicated re-cycling area. The organic waste will be given to the surrounding communities for use as animal feed/ compost, etc.

Grease and old cooking oil generated from the kitchen will be stored separately and disposed of in an appropriate manner.

Non-recyclable or non-re-usable waste will be stored in scavenger proof wheelie bins in the dedicated waste storage area.

An independent contractor will be appointed to regularly collect and disposed of the recyclable and non-recyclable waste at the nearest registered landfill site (Ibhika).

No waste will be buried or burnt on site or within Qolora.

15. The Impact of Increased Traffic on Neighbouring Cottages

The road from Centane to Qolora Mouth is currently being upgraded independently by the Mnquma Local Municipality in planned phases from gravel to that of a black top surface.

The amount of extra traffic generated by tourists visiting Seagulls using this upgraded black top road is negligible and it is highly unlikely that extra passenger vehicles would damage the road.

In order to improve pedestrian safety in Qolora Mouth, traffic calming measures such as signage and speed bumps could be implemented as is the case in many similar seaside resort areas in south Africa.

16. Dust Pollution Through Increased Road Traffic

The main access road to Seagulls will be tarred thus reducing dust created by vehicles.

Dust created during the construction phase of the proposed development will be controlled through regular dust suppression, by dampening individual construction sites, access roads, topsoil stockpiles etc. Specifications for dust control are included in the Environmental Management Plan **(See Appendix F).**

17. The Impact of the Proposed Development on the Surrounding Biodiversity

Wild Coast strategic planning documentation has strived to achieve a balance between sustainable development and environmental preservation and accordingly the Wild Coast Spatial Planning Guidelines and Policies classify Qolora Mouth as a First Order Node (Primary Node). First Order Nodes are areas which have been identified by specialist as having low environmental sensitivity.

Although the Eastern Cape Biodiversity Conservation Plan (ECBCP) designates the site as falling within the Terrestrial Critical Biodiversity Area 1, Natural Landscapes, the land on which the existing Seagulls Hotel is located as well as the land on which the proposed development is to take place is highly disturbed and cannot be regarded as a natural landscape.

This disturbance takes the form of planted gardens, dense stands of alien vegetation interspersed amongst the indigenous vegetation, buildings and associated infrastructure as well as years of dumping and burning of solid waste on site.

The ECBCP category of the current site most likely falls within Category 3 Town and Settlements rather than within a Critical Biodiversity Area. The classification of this site is questionable and is probably due to the scale at which the ECBC plan was produced.

Proposed building footprints are sited in areas were stands of protected indigenous plant species notably Strelitzia nicolai could be disturbed.

Mitigation measures to either avoid or reduce the potential negative impacts on the surrounding biodiversity have been included in the EMP **(See Appendix F).**

18. The Potential Impact of Treated Effluent on the Underground Springs

The proposed treatment plant will be located approximately 250 metres west of Qolora Mouth on top of the hill at the existing golf course. The treated effluent will be released into the west facing catchment area and used for the irrigation of the greens and fairways of the golf course.

The nearest spring is located approximately 250 metres east of the proposed treatment plant in another catchment area.

The pipeline used to pump the sewage effluent from the pump station to the treatment works is Class 9 and the specialist is confident that it will not leak or burst.

The level of services for the disposal of treated effluent will be in accordance with prescribed standards.

On completion of the installation and training of the plant operator, the developer will enter into a service agreement whereby, Clearedge will do on site water quality monitoring and on-going operator training until the operator has demonstrated that he or she is competent and has a full understanding of the maintenance requirements.

19. The Potential Disturbance to the Wetland from the Positioning of Units and Parking Areas

The site development plan has been amended based on the comments made at the previous DFA Tribunal hearings. All of the proposed timber apartments and parking units have been excluded from the wetland area **(See Appendix C).** The wetland area has been zoned as open space and is a no-development area.

20. The Impact on the On-Site Wetland if the Spring Water is Extracted for the Development

The DWA issued a General Authorisation for extraction from the spring for a maximum amount of 20 184.5 cubic metres per annum. By taking water out this system, it will have an impact on the wetland which will in all likelihood reduce in extent. In order for the DWA to issue the General Authorisation, they would have had to have had a look at the downstream consequences in terms of the ecological reserve of the system.

In other words, the impact must have been taken into account with their assessment. The wetland is at the “end” of the system and there are no downstream users who will be adversely affected.

In its current state, the wetland has been subject to past disturbances i.e. dumping and burning of solid waste and the channelling of ground water away from the wetland area.

21. Increased Pressure on Marine Resources

The marine resources of the South African coast are under the management of the National Department of Environmental Affairs and restrictions and regulations are controlled through the Marine Living Resources Act.

The Department of Environmental Affairs – Oceans and Coast Directorate has been notified as an Interested and Affected Party in terms of the EIA stakeholder consultation process.

It is a principle of responsible tourism for the management and owners of Seagulls in conjunction with the local community and the cottage owners, to jointly form an Environmental Monitoring Committee to ensure that the coastal resources are not overexploited and to work hand in hand with the coastal management authorities.
Furthermore the potential job opportunities created by the proposed development and indirect SMME opportunities will further alleviate the subsistence dependency on the coastal resources.

22. Impact on Proposed Abalone Farm

The proposed abalone project has been mentioned, but there is no further information as to the status of this proposed project.

It must be borne in mind that the sustainability of an abalone project is questionable due to the fluctuating sea temperatures experienced in the Wild Coast.

Furthermore the Qolora area is to be developed as a First Order node and therefore the compatibility of an abalone farm within a first order node is further debatable due to stringent requirements on water quality, etc.

1.The Department of Agriculture was not informed of the proposed development

A notification letter was submitted on the 11th May 2012 to the National Department of Agriculture informing them of the application for the establishment of land development area in terms of Section 31 of the Development Facilitation Act 67 of 1995.

In response the Department of Agriculture informed the applicant that they had no objection to the development of the Seagulls Beach Hotel and Lifestyle Estate. Furthermore they recommended that the property be incorporated into the Mnquma Local Municipality. **(See Appendix J)**

2. IMPACTS THAT MAY RESULT FROM THE PLANNING AND DESIGN, CONSTRUCTION, OPERATIONAL, DECOMMISSIONING AND CLOSURE PHASES AS WELL AS PROPOSED MANAGEMENT OF IDENTIFIED IMPACTS AND PROPOSED MITIGATION MEASURES

List the potential direct, indirect and cumulative property/activity/design/technology/operational alternative related impacts (as appropriate) that are likely to occur as a result of the planning and design phase, construction phase, operational phase, decommissioning and closure phase, including impacts relating to the choice of site/activity/technology alternatives as well as the mitigation measures that may eliminate or reduce the potential impacts listed.

Alternative (preferred alternative)

(See Appendix H) for the methodology used to assess the potential impacts.

PLANNING & DESIGN PHASE	
ASPECT: Policy Compliance	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: Failure to consider relevant environmental policy; spatial guideline documents and applicable legislation.	
ASPECT: Visual Impact	**IMPACT TYPE: Indirect**
POTENTIAL IMPACT: An increase in the size of the development could visually impact on certain surrounding residents and impose on their sense of privacy. Failure to consider visual impacts when designing the dwellings could visually impact on the surrounding coastal aesthetic character of the area.	
CONSTRUCTION PHASE	

ASPECT: Ecological Disturbance	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: Loss of indigenous vegetation and damage to sensitive areas (i.e. coastal dunes; wetland area) through uncontrolled construction activities.	
ASPECT: Alien Plant Infestation	**IMPACT TYPE: Indirect**
POTENTIAL IMPACT: Site clearance for construction and associated disturbance to soils could promote the infestation of alien vegetation.	
ASPECT: Soil Erosion	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: Loss of top soil and the promotion of soil erosion through construction activities i.e. clearing of vegetation, stockpiling of top soil and channelling of storm water.	
ASPECT: Pollution of Ground Water	**IMPACT TYPE: Indirect**
POTENTIAL IMPACT: Contamination of the natural springs through construction activities (e.g. litter, spillages of hydrocarbons such as diesel and oil, as well as cement, paints and adhesives, etc.)	
ASPECT: Pollution of Topsoil	**IMPACT TYPE: Indirect**
POTENTIAL IMPACT: Contamination of top soil during construction activities i.e. builders rubble, cement, paint, diesel, oil, etc.	
ASPECT: Solid Waste Generation	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: Solid waste generation during construction activities i.e. builders rubble, cement, paint, etc.	
ASPECT: Noise Pollution	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: Noise pollution created by construction activities and associated machinery.	
ASPECT: Dust Pollution	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: Dust pollution created during construction activities	
ASPECT: Health & Safety	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: The health & safety of the surrounding residents and construction workers due to construction vehicles using internal road network and the presence of earth moving equipment on site as well as unsafe excavations and presence of hazardous materials.	
ASPECT: Cultural & Heritage	**IMPACT TYPE: Indirect**
POTENTIAL IMPACT: Cultural & Heritage artefacts could be unearthed during construction related activities.	
ASPECT: Employment Opportunities	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: The proposed project may create temporary employment during the construction phase	
OPERATIONAL PHASE	
ASPECT: Human Health	**IMPACT TYPE: Indirect**
POTENTIAL IMPACT: Failure to maintain and operate the sewage pump station and new WWTW correctly could result in potential health risks to surrounding Qolora residents through	

contamination of the groundwater via direct effluent spills from the pump station and the release of poor quality treated effluent from the WWTW.

ASPECT: Wetland Health	**IMPACT TYPE: Indirect**
POTENTIAL IMPACT: An excessive abstraction of water from the springs could result in the drying up of the wetland area.	

ASPECT: Available Potable Water Supply	**IMPACT TYPE: Direct & Indirect**
POTENTIAL IMPACT: An increased use of the available Municipal water supply by the proposed development could impact on the availability of potable water for the surrounding Qolora cottage owners.	

ASPECT: Electricity Supply	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: An increase in the size of the development could put a strain on the current available electricity supply to Qolora residents.	

ASPECT: Soil Erosion	**IMPACT TYPE: Indirect**
POTENTIAL IMPACT: Soil erosion created through the increased volume and channelling of storm water.	

ASPECT: Loss of Sense of Place	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: The Qolora cottage owners could feel that the development has imposed on their ambiance.	

ASPECT: Visual Impact	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: Lack of maintenance or deviation from Homeowners Association Guidelines could render the buildings obtrusive to surrounding residents.	

ASPECT: Light Pollution	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: The incorrect or excessive placement of outside lighting could create light pollution.	

ASPECT: Solid Waste Management	**IMPACT TYPE: Direct & Indirect**
POTENTIAL IMPACT: Failure to implement and maintain an Integrated Waste Management strategy could lead to the continuous dumping and burning of waste on site.	

ASPECT: Exploitation of Marine Resources	**IMPACT TYPE: Direct & Indirect**
POTENTIAL IMPACT: Increase in the number of tourists visiting Seagulls could lead to the exploitation of coastal resources	

ASPECT: Uncontrolled Access to Beach	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: Indiscriminate access to the beach could result in disturbance to the coastal dunes and associated vegetation.	

ASPECT: Climate Change and Rising Sea Level	**IMPACT TYPE: Indirect**
POTENTIAL IMPACT: Destruction of low lying infrastructure through increased storm surges and a rise in sea level.	

ASPECT: Pedestrian Safety	**IMPACT TYPE: Indirect**
POTENTIAL IMPACT: An increase in the number of vehicles carrying tourists to Seagulls could lead to an increase in the number of pedestrian safety incidents.	
ASPECT: Local Economic Development	**IMPACT TYPE: Indirect**
POTENTIAL IMPACT: The proposed development could promote the provision of goods and services by surrounding communities i.e. guided walks; guided fishing trips and souvenirs etc.	
ASPECT: Job Creation	**IMPACT TYPE: Direct**
POTENTIAL IMPACT: The proposed expansion of Seagulls Hotel could contribute to the creation of long term stable employment opportunities as well as skills development and training opportunities in the tourism sector for members of the surrounding local communities.	
DECOMMISSIONING AND CLOSURE PHASE	
No discernible impacts are envisaged as it is unlikely that any aspect of the project will be decommissioned or closed at this point in time.	

Table 1: Pre and Post Impact Significance Assessment for all phases of the proposed upgrade and expansion of the Seagulls Beach Hotel

PLANNING AND DESIGN PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Policy Compliance	Failure to consider relevant environmental policy; spatial guideline documents and applicable legislation	Direct	National	Long Term (More than 15 years)	Medium	Very High	Possible	Negative (-ve)	High (-ve)	Ensure that the proposed development is aligned with relevant environmental policy; spatial guideline documents and applicable legislation	Insignificant	Alternative A1 The proposed development falls in line with relevant environmental policy; spatial guideline documents and applicable legislation)
SCORE			3	3	2	8						

PLANNING AND DESIGN PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Visual Impact	**An increase in the size of the development could visually impact on certain surrounding residents and impose on their sense of privacy.** **Failure to consider visual impacts when designing the dwellings could visually impact on surrounding landowners and the coastal aesthetic character of the area.**	**Direct**	**Regional**	**Long Term (More than 15 years)**	**Medium**	**High**	**Possible**	**Negative (-ve)**	**Medium (-ve)**	**Buildings should be designed in accordance with an architectural code that would seek to minimise the aesthetic impacts and maintain the aesthetic character of the surrounding area** **Restrict the height of buildings and associated infrastructure to a combination between single and double storey units with the top section of the estate being solely single storey** **Ensure that architectural guidelines are enforced and included in Homeowners Association Agreement**	**Low (-ve)**	**Alternative A 1** **Site development planning has considered the height impact with elevations. Based on this, there will be a combination between single and double storey units with the top section of the estate being solely single storey. No triple storey units have been planned for.**
SCORE			**2**	**3**	**2**	**7**						

CONSTRUCTION PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Ecological Disturbance	**Loss of indigenous vegetation and damage to sensitive areas (i.e. coastal dunes; wetland area) through uncontrolled construction activities.**	**Direct**	**Local**	**Short Term (up to 2 years)**	**Medium**	**Low**	**Possible**	**Negative (-ve)**	**Very Low (-ve)**	**Areas of indigenous vegetation should be retained where practical within the development footprint.** **Limit extent of clearing to building footprints only. Extent of clearing to be demarcated prior to construction.** **All protected tree species to be marked and may only be disturbed with a permit.** **All disturbed areas to be rehabilitated and or landscaped with indigenous vegetation**	**Insignificant**	**Alternative A 1** **Site plan has excluded Wetland areas for development. These wetland areas have been zoned as private open space**
SCORE			**1**	**1**	**2**	**4**						

CONSTRUCTION PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Alien Plant Infestation	Site clearance for construction and associated disturbance to soils could promote the infestation of alien vegetation.	Indirect	Local	Short Term (up to 2 years)	Low	Very Low	Probable	Negative (-ve)	Very Low (-ve)	Alien vegetation established on site must be removed and the regrowth controlled	Insignificant	Alternative A 1 Site clearance and consequent disturbance would be less than in Alternative A 2
SCORE			1	1	1	3						
Soil Erosion	Loss of top soil and the promotion of soil erosion through construction activities i.e. clearing of vegetation, stockpiling of top soil and channelling of storm water.	Direct & Indirect	Local	Short Term (up to 2 years)	Low	Very Low	Possible	Negative (-ve)	Insignificant	Limit extent of vegetation clearing. No blanket clearing to take place. All topsoil removed should be stockpiled in a manner that would prevent soil erosion. Sufficient and effective storm water drainage should be installed. Eroded areas should be rehabilitated.	Insignificant	Alternative A 1
SCORE			1	1	1	3						

CONSTRUCTION PHASE												
ASPECT	NATURE OF IMPACT	TYPE OF IMPACT	EXTENT	DURATION	INTENSITY OR SEVERITY	CONSEQUENCE	PROBABILITY	STATUS OF IMPACT	SIGNIFICANCE PRE-MITIGATION	MITIGATION MEASURES	SIGNIFICANCE POST-MITIGATION	PREFERRED ALTERNATIVE
Pollution of Ground Water	Contamination of springs by construction activities (e.g. litter, spillages such as diesel and oil, as well as cement, paints and adhesives, etc.)	Indirect	Regional	Short Term (up to 2 years)	Medium	Medium	Possible	Negative	Low (-ve)	Implement EMP (Appendix F).	Insignificant	Alternative A 1 No construction work will take place in the Wetland areas.
SCORE			2	1	2	5						
Pollution of Topsoil	Contamination of top soil by construction activities i.e. builders rubble, cement, paint, diesel, oil, etc.	Indirect	Local	Short Term (up to 2 years)	Low	Very Low	Possible	Negative (-ve)	Insignificant	Implement EMP (Appendix F).	Insignificant	Alternative A 1 No construction work will take place in the Wetland areas.
SCORE			1	1	1	3						
Solid Waste Generation	Solid waste generation during construction activities i.e. builders rubble, cement, paint, etc.	Direct	Local	Short Term (up to 2 years)	Low	Very Low	Definite	Negative (-ve)	Very Low (-ve)	Implement EMP (Appendix F).	Insignificant	No Preference
SCORE			1	1	1	3						

CONSTRUCTION PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Noise Pollution	**Noise pollution created by construction activities and associated machinery.**	**Direct**	**Regional**	**Short Term (up to 2 years)**	**Low**	**Low**	**Probable**	**Negative (-ve)**	**Low (-ve)**	**Ensure construction occurs during regular working hours, during the week.** **Plant to be fitted with silencers to prevent excessive noise pollution**	**Insignificant**	**No Preference**
SCORE			**2**	**1**	**1**	**4**						
Dust Pollution	**Dust pollution created during construction activities**	**Direct**	**Local**	**Short Term (up to 2 years)**	**Low**	**Very Low**	**Possible**	**Negative (-ve)**	**Very Low (-ve)**	**Regular dust suppression, by dampening individual construction sites, access roads, topsoil stockpiles etc. must take place in order to minimise dust generation.**	**Insignificant**	**No Preference**
SCORE			**1**	**1**	**1**	**3**						

CONSTRUCTION PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Health & Safety	The health & safety of the surrounding residents and construction workers due to construction vehicles and the presence of earth moving equipment on site as well as unsafe excavations and presence of hazardous materials.	Direct	Regional	Short Term (up to 2 years)	High	Medium	Possible	Negative (-ve)	Low (-ve)	Ensure that the plant equipment is in good working order. Provide adequate safety warning signage on roads. Clearly demarcate construction areas and restrict hotel guests from such areas Contractor to conduct toolbox chats and site safety induction meetings.	Insignificant	No Preference
SCORE			2	1	3	6						
Cultural & Heritage	Cultural & Heritage artefacts could be unearthed during construction related activities.	Indirect	Local	Short Term	Low	Very Low	Improbable	Insignificant	Insignificant	Should any sites of heritage importance be discovered during the construction phase, the relevant authorities would be notified and appropriate action taken	Insignificant	No Preference
SCORE			1	1	1	3						

CONSTRUCTION PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Employment Opportunities	**The proposed project may create temporary employment during the construction phase**	**Direct & Indirect**	**Regional**	**Short Term (up to 2 years)**	**Medium**	**Medium**	**Definite**	**Positive (+ve)**	**Medium (+ve)**	**Utilise labour from surrounding communities where possible**	**Medium (+ve)**	**No Preference**
SCORE			**2**	**1**	**2**	**5**						

OPERATIONAL PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Human Health	**Failure of sewage pump station or WWTW could result in potential health risks to people through contamination of the groundwater via direct effluent spills or the release of poor quality treated effluent**	**Direct & Indirect**	**Regional**	**Long Term (More than 15 years)**	**Medium**	**High**	**Possible**	**Negative**	**Medium (-ve)**	**Pump station to have: A minimum of 12 hours retention time. A high level alarm light. A secondary standby pump. Both pumps must be linked to the Hotel standby generator.** **Package plant to be a minimum of 200 metres from the nearest dwelling.** **Package plant will have an irrigation/emergency pond with a 14 day external storage capacity.** **Clearedge will do on site water quality monitoring and on-going operator training until the operator is competent**	**Insignificant**	**Alternative A1** **Package plant will be located near the golf course and not within the hotel site**
SCORE			**2**	**3**	**2**	**7**						

OPERATIONAL PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Wetland Health	**An excessive abstraction of water from the springs could result in the drying up of the wetland area.**	**Indirect**	**Local**	**Long Term (More than 15 years)**	**High**	**High**	**Possible**	**Negative (-ve)**	**Medium (-ve)**	**Developer not to exceed daily water abstraction allowance from the springs as contained in General Authorisation issued by the DWA.** **Developer to promote the harvesting of as much rainwater as practically possible from all available roofing space in order to supplement available water supply**	**Low (-ve)**	**Alternative A1** **The density for this alternative is slightly lower than Alternative A2**
SCORE			**1**	**3**	**3**	**7**						

OPERATIONAL PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Available Potable Water Supply	**An increased use of the available Municipal water supply by the proposed development could impact on the availability of potable water for the surrounding Qolora cottage owners.**	**Direct**	**Regional**	**Medium Term (2 to 15 years)**	**High**	**High**	**Possible**	**Negative**	**Medium (-ve)**	**Developer to promote the harvesting and storage of rainwater from all available roofing space.** **During periods of interrupted Municipal water supply the developer will supplement this deficit with stored rainwater and abstraction from the on-site springs.** **Developer and Qolora residents to maintain close interaction with the Local Municipality in order ensure that the Qolora treatment works and associated water reticulation network is maintained and upgraded in the future.**	**Very Low (-ve)**	**Alternative A1** **The density for this alternative is slightly lower than Alternative A2**
SCORE			**2**	**2**	**3**	**7**						

OPERATIONAL PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Electricity Supply	**An increase in the size of the development could put a strain on the current available electricity supply to Qolora residents.**	**Direct**	**Regional**	**Medium Term (2-15 years)**	**High**	**High**	**Possible**	**Negative (-ve)**	**Medium (-ve)**	**In order to cater for the proposed development an upgrade from 150 amps to 450 amps or 315kva would be necessary.** **Eya Bantu have subsequently requested this upgrade and Eskom have confirmed that they have the capacity for the upgrade** **Energy saving measures will be incorporated into the building design as far as possible.**	**Insignificant**	**No Preference**
SCORE			**2**	**2**	**3**	**7**						

OPERATIONAL PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Soil Erosion	**Soil erosion created through the increased volume and channelling of storm water.**	**Indirect**	**Local**	**Long Term (More than 15 years)**	**Low**	**Medium**	**Possible**	**Negative (-ve)**	**Low (-ve)**	**Storm water infrastructure must be implemented according to engineering standards.** **The approved storm water management plan must be implemented.** **Stormwater could be harvested**	**Insignificant**	**No Preference**
SCORE			**1**	**3**	**1**	**5**						

OPERATIONAL PHASE												
ASPECT	NATURE OF IMPACT	TYPE OF IMPACT	EXTENT	DURATION	INTENSITY OR SEVERITY	CONSEQUENCE	PROBABILITY	STATUS OF IMPACT	SIGNIFICANCE PRE-MITIGATION	MITIGATION MEASURES	SIGNIFICANCE POST-MITIGATION	PREFERRED ALTERNATIVE
Loss of Sense of Place	The Qolora cottage owners could feel that the development has imposed on their ambiance	Direct	Local	Long Term (More than 15 years)	Low	Medium	Probable	Negative (-ve)	Medium (-ve)	There will be no change in land use and the intention of the proposed expansion of Seagulls is not to destroy the surrounding ambiance of Qolora Mouth but rather to offer more people the same opportunity to enjoy this beautiful area. The proposed development is that of a family holiday resort which is in keeping with the aesthetic character of Qolora Mouth.	Very Low (-ve)	Alternative A1 The density for this alternative is slightly lower than Alternative A2
SCORE			1	3	1	5						

OPERATIONAL PHASE												
ASPECT	NATURE OF IMPACT	TYPE OF IMPACT	EXTENT	DURATION	INTENSITY OR SEVERITY	CONSEQUENCE	PROBABILITY	STATUS OF IMPACT	SIGNIFICANCE PRE-MITIGATION	MITIGATION MEASURES	SIGNIFICANCE POST-MITIGATION	PREFERRED ALTERNATIVE
Visual Impact	Lack of maintenance or deviation from Homeowners Association Guidelines could render the buildings obtrusive to surrounding residents.	Direct	Local	Long Term (More than 15 years)	Medium	Medium	Possible	Negative (-ve)	Low (-ve)	Maintained buildings in accordance with the Homeowners Association agreement All renovations and additions must be approved by Architect	Insignificant	No Preference
SCORE			1	3	2	6						
Light Pollution	The incorrect or excessive placement of outside lighting could create light pollution	Direct	Local	Medium Term	Medium	Medium	Possible	Negative (-ve)	Low (-ve)	Flood lighting to be strategically placed. Low wattage/energy efficient light bulbs to be used	Very Low (-ve)	No Preference
SCORE			1	2	2	5						

OPERATIONAL PHASE												
ASPECT	NATURE OF IMPACT	TYPE OF IMPACT	EXTENT	DURATION	INTENSITY OR SEVERITY	CONSEQUENCE	PROBABILITY	STATUS OF IMPACT	SIGNIFICANCE PRE-MITIGATION	MITIGATION MEASURES	SIGNIFICANCE POST-MITIGATION	PREFERRED ALTERNATIVE
Solid Waste Management	Failure to implement waste management strategy could lead to the continuous dumping and burning of waste on site	Direct, Indirect & Cumulative	Regional	Long Term (More than 15 years)	Medium	High	Definite	Negative (-ve)	High (-ve)	Comply with solid waste management plan as prescribed in EMP	Very Low (-ve)	No Preference
SCORE			2	3	2	7						
Exploitation of Marine Resources	An increase in the number of tourists visiting Seagulls could lead to the exploitation of coastal resources	Indirect	Regional	Long Term (More than 15 years)	Medium	High	Possible	Negative (-ve)	Medium (-ve)	Encourage dissemination of information to holiday makers regarding the protection and conservation of coastal resources. Establish Qolora Mouth Environmental Monitoring Committee to help police the exploitation of marine resources.	Low (-ve)	Alternative A1 The density for this alternative is slightly lower than Alternative A2
SCORE			2	3	2	7						

OPERATIONAL PHASE												
ASPECT	NATURE OF IMPACT	TYPE OF IMPACT	EXTENT	DURATION	INTENSITY OR SEVERITY	CONSEQUENCE	PROBABILITY	STATUS OF IMPACT	SIGNIFICANCE PRE-MITIGATION	MITIGATION MEASURES	SIGNIFICANCE POST-MITIGATION	PREFERRED ALTERNATIVE
Uncontrolled Access to Beach	Indiscriminate access to the beach could result in disturbance to the coastal dunes and associated vegetation.	Direct	Local	Long Term (More than 15 years)	Medium	Medium	Probable	Negative (-ve)	Medium (-ve)	Restrict access to the beach by means of existing controlled footpaths	Low (-ve)	No Preference
SCORE			1	3	2	6						
Climate Change and Rising Sea Level	Destruction of low lying infrastructure through increased storm surges and a rise in sea level.	Indirect	Local	Long Term (More than 15 years)	Medium	Medium	Probable	Negative (-ve)	Medium (-ve)	Proposed new buildings and infrastructure must be set back from the high water mark and should be located on high ground where practical	Low(-ve)	No Preference
SCORE			1	3	2	6						

OPERATIONAL PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Pedestrian Safety	**An increase in the number of vehicles carrying tourists to Seagulls could lead to an increase in the number of pedestrian safety incidents.**	**Indirect**	**Local**	**Long Term (More than 15 years)**	**High**	**High**	**Possible**	**Negative (-ve)**	**Medium (-ve)**	**In order to improve pedestrian safety in Qolora Mouth, traffic calming measures such as signage and speed bumps could be implemented as is the case in many similar seaside resort areas in south Africa.**	**Low (-ve)**	**No Preference**
SCORE			**1**	**3**	**3**	**7**						
Local Economic Development	**The proposed development could promote the provision of goods and services by surrounding communities i.e. guided walks; guided fishing trips and souvenirs etc.**	**Indirect**	**Regional**	**Long Term(More than 15 years)**	**Medium**	**High**	**Possible**	**Positive (+ve)**	**Medium (+ve)**	**Seagulls Hotel should provide an enabling environment in order to promote SMME development**	**Medium (+ve)**	**No Preference**
SCORE			**2**	**3**	**2**	**7**						

OPERATIONAL PHASE												
ASPECT	**NATURE OF IMPACT**	**TYPE OF IMPACT**	**EXTENT**	**DURATION**	**INTENSITY OR SEVERITY**	**CONSEQUENCE**	**PROBABILITY**	**STATUS OF IMPACT**	**SIGNIFICANCE PRE-MITIGATION**	**MITIGATION MEASURES**	**SIGNIFICANCE POST-MITIGATION**	**PREFERRED ALTERNATIVE**
Job Creation	**The proposed project could contribute to the creation of long term stable employment opportunities as well as skills development and training in the tourism sector for surrounding local communities.**	**Direct**	**Regional**	**Long Term (More than 15 years)**	**Medium**	**High**	**Probable**	**Positive (+ve)**	**High (+ve)**	**Where possible, provide employment opportunities to surrounding community members**	**High (+ve)**	**No Preference**
SCORE			**2**	**3**	**2**	**7**						

3. ENVIRONMENTAL IMPACT STATEMENT

Taking the assessment of potential impacts into account, please provide an environmental impact statement that summarises the impact that the proposed activity and its alternatives may have on the environment after the management and mitigation of impacts have been taken into account, with specific reference to types of impact, duration of impacts, likelihood of potential impacts actually occurring and the significance of impacts.

Table 2: Summary of Impact Significance pre and post mitigation

	IMPACT SIGNIFICANCE									
	PRE-MITIGATION					POST MITIGATION				
	INSIGNIFICANT	VERY LOW	LOW	MEDIUM	HIGH	INSIGNIFICANT	VERY LOW	LOW	MEDIUM	HIGH
Planning & Design Phase				1(-ve)	1(-ve)	1		1(-ve)		
Construction Phase	3	4(-ve)	3(-ve)	1(+ve)		10			1(+ve)	
Operational Phase			3(-ve)	9(-ve) 1(+ve)	1(-ve) 1(+ve)	4	4(-ve)	5(-ve)	1(+ve)	1(+ve)
Decommissioning Phase										
TOTAL	3	4(-ve)	6(-ve)	10(-ve) 2(+ve)	2(-ve) 1(+ve)	15	4(-ve)	6(-ve)	2(+ve)	1(+ve)

Impact Assessment Statement

Based on the information contained in (Table 2) it is evident that prior to mitigation measures being implemented for the planning, construction and operational phases, only 2 out of the 25 potential negative impacts assessed scored high significance, 10 scored medium significance and the rest all scored low, very low or insignificant.

All of the potential negative impacts scored either low, very low or insignificant after mitigation.

Potential High Significance Negative Impacts

The potential failure to consider relevant environmental policy; spatial guideline documents and applicable legislation in the planning and design phase scored high negative significance, pre-mitigation. However these factors have been taken into consideration by the developer and consequently the proposed development conforms to relevant environmental policy; spatial guideline documents and applicable legislation and therefore the impact significance post-mitigation is insignificant.

The potential failure to implement, manage and maintain a waste management strategy during the operational phase of the project scored high negative significance. A waste management strategy has been compiled for the development and is included in the EMP **(See Appendix F).** Adherence to these guidelines would render this potential negative impact as very low.

In order to solve the long term on-going problem of solid waste disposal in Qolora Mouth it is suggested that these guidelines be adopted by all of the landowners and residents and that they in conjunction with Seagulls employ an independent contractor who would regularly collect and dispose of solid waste at the registered landfill site in Ibhika.

Potential Medium Significance Negative Impacts

10 potential negative impacts scored medium significance prior to mitigation. One of these occurred in the planning phase while 9 occurred in the operational phase.

Failure to consider the visual impact of the proposed development on certain surrounding residents and the coastal aesthetic character of the area in the planning and design phase scored medium negative significance, pre-mitigation.

In order to minimise the potential negative visual impact the developer has employed an architectural team who have designed the proposed additions in accordance with an architectural code and style **(See Appendix D).** Site development planning has also considered the height impacts with elevations and consequently there is a combination between single and double storey units with the top section of the estate being solely single storey.

Given that considerable planning has been taken into account; the developer has largely compromised on the design and layout of the proposed development in order to minimise the potential visual impact on certain surrounding residents and that the building heights for this type of development are in line with the guidelines for First Order Nodes as described in the Wild Coast Spatial Development Framework (2005), this potential negative impact scored low negative significance post-mitigation.

The nine operational phase potential negative impacts of medium significance prior to mitigation were identified as:

- The potential health risks to people through the contamination of groundwater via direct effluent spills from the sewage pump station or the release of poor quality treated effluent from the waste water treatment plant.
- The potential drying up of the wetland area due to excessive abstraction of water from the springs
- The electricity supply to Qolora Mouth could be put under strain by the proposed development
- The perceived loss of sense of place by certain Qolora Mouth cottage owners
- The potential increase in the exploitation of coastal resources by tourists visiting Seagulls
- The potential damage to coastal dunes and associated vegetation by Seagull tourists who gain indiscriminate access to the beach
- The potential increased threat to Qolora Mouth pedestrians from an increase in the number of vehicles carrying tourists to Seagulls
- The potential destruction of low lying infrastructure through increased storm surges and a rise in sea level.

All of the above pre-mitigation potential negative impacts can be adequately and practically managed through the implementation of the operational phase mitigation measures contained in the Environmental Management Plan and therefore they scored either very low negative or insignificant post-mitigation.

The issue of sufficient available water to sustainably supply the proposed development without negatively impacting on Qolora Mouth residents was also identified as a potential negative impact of medium significance prior to mitigation.

Based on the information supplied by the project engineers (Camdekon) in which they have concluded that there is a sufficient sustainable water supply and storage capacity to adequately service this development over the long term period this potential negative impact was ranked as very low post mitigation.

Potential Low Significance Negative Impacts

6 potential negative impacts scored low significance prior to mitigation. Three of these occurred in the construction phase while three occurred in the operational phase.

The three low significance negative impacts identified in the construction phase are typical of construction activities and as such can easily be managed through the implementation of the mitigation measures contained in the Environmental Management Plan and consequently scored insignificant post-mitigation.

The three low significance negative impacts identified in the operational phase can also be easily managed through the implementation of the mitigation measures contained in the Environmental Management Plan and therefore scored either very low negative or insignificant post-mitigation.

Potential High and Medium Significance Positive Impacts

One potential positive impact scored high significance in the operational phase and two potential positive impacts scored medium significance in both the construction and operational phases. These were identified as:

- The potential for temporary employment during the construction phase
- The potential of the proposed development to promote the provision of goods and services by surrounding communities i.e. guided walks; guided fishing trips and souvenirs etc. throughout the operational phase
- The potential of the proposed project to contribute to the creation of long term stable employment opportunities as well as skills development and training in the tourism sector for surrounding local communities throughout the operational phase.

Consideration of Alternatives

The following alternatives were assessed as part of the Basic Assessment:

- Alternative Site Layout Plans
- No-Go or No Development Option

Alternative Site Layout Plan

The design layout for the Preferred Alternative A1 differs from that of the Least Preferred Alternative A2 in that the number of new units for the estate section has been reduced; the position of the sewage treatment works has been moved from the south eastern boundary of the site to the golf course which is located approximately 250 metres west of the site and most importantly the wetland areas have been excluded from development which in turn allows for more open space areas.

No-Go Alternative

If the proposed upgrading and expansion of Seagulls Beach Hotel and Lifestyle Estate did not take place it could result in:

- The continued functioning of the existing Seagulls Beach Hotel in its current form with no available options for future economic growth. The Qolora Mouth area would continue to be inhabited by a few cottage owners and the existing Seagulls and Trennery's Hotels.

- The prevention of long-term economic growth for the Qolora Mouth First Order Node as envisaged in all of the Wild Coast spatial planning documents as well as the Mnquma Local Municipality Spatial Development Framework (2009).

- The proposed new waste water treatment works would not be implemented and the old rudimentary sewage system would continue to be utilised.

- The existing method of solid waste disposal in Qolora Mouth would continue (burning and burying).

- There would be no potential short term job creation in the construction phase and no long term permanent job creation in the tourism sector for surrounding local community members in the operational phase.

Conclusion

Based on the information contained in (Table 2) it is evident that there are no potentially high negative impacts post mitigation which should warrant the project from not proceeding or should warrant further specialist investigation.

The continued use of this site as a family holiday destination albeit at a higher density post development, compliments the surrounding aesthetic nature of Qolora Mouth and falls well within the nodal development plans envisaged for the Wild Coast.

SECTION E. RECOMMENDATIONS OF PRACTITIONER

Is the information contained in this report and the documentation attached hereto sufficient to make a decision in respect of the activity applied for (in the view of the environmental assessment practitioner)?	YES √	NO
Is an EMPr attached?	YES √	NO

The EMPr must be attached as **Appendix F.**

If "NO", indicate the aspects that should be assessed further as part of a Scoping and EIA process before a decision can be made (list the aspects that require further assessment):

If "YES", please list any recommended conditions, including mitigation measures that should be considered for inclusion in any authorisation that may be granted by the competent authority in respect of the application:

Based on the information provided it is the opinion of Indwe Environmental Consulting that no fatal flaws have been identified for the proposed upgrade and expansion of the Seagulls Beach Hotel and Lifestyle Estate and that the information contained within this report is sufficient enough to allow DEDEAT to make an informed decision.

Indwe Environmental Consulting therefore recommends that Environmental Authorisation be granted for the proposed projects based on the following recommendations.

- That strict adherence to the relevant mitigation measures described above and compliance with the attached EMP **(Appendix F)** be adhered to throughout all phases of the proposed project in order to reduce the risk or significance of impacts to an acceptable level.
- The validity period of the environmental authorisation should be for three years in which time construction should commence.
- It is recommended that a monitoring and maintenance regime for the proposed waste water treatment works and associated waste water irrigation be implemented and maintained by the developer.
- It is recommended that the Department of Water Affairs undertake routine inspections to ensure compliance with the amount of water abstracted from the on-site springs as contained in the General Authorisation as well as the quality of treated effluent released from the treatment works.
- It is recommended that the architectural guidelines for the proposed development be submitted to DEDEAT for their approval prior to any construction taking place.
- It is further recommended that a Qolora Mouth Environmental Monitoring Committee should be established which should comprise of members of the surrounding local communities, Qolora residents association, Seagulls Hotel, Trennery's Hotel as well as stakeholders including the Mnquma Local Municipality, East Cape Parks and Tourism Agency and the Department of Economic Development and Environmental Affairs.

The objective of which should focus on issues such as correct solid waste disposal, sustainable Municipal water provision, monitoring and policing of illegal exploitation of marine resources as well as other illegal practices i.e. sand and shell winning etc.

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Draft Spatial and Environmental Management Guidelines for the Wild Coast, 2012. Department of Economic Affairs, Environment and Tourism, Eastern Cape Province

SECTION F: APPENDICES

The following appendixes must be attached as appropriate:

Appendix A: Site Plan(s)

Appendix B: Photographs

Appendix C: Facility Illustration(s)

Appendix D: Specialist Reports

Appendix E: Comments and Responses Report

Appendix F: Environmental Management Programme (EMPr)

Appendix G:Public Participation

Appendix H: Impact Significance Methodology

Appendix J: IAP Correspondence

Appendix K: IAP Register

2 APPENDIX A: SITE PLAN

3 APPENDIX B: PHOTOS

4 APPENDIX C: FACILITY ILLUSTRATIONS

5 APPENDIX D: SPECIALIST REPORTS

D1 – Architectural Guidelines and Visual Perceptions
D2 – DFA Submission Report
D3 – Engineering Report
D4 – Eskom Information
D5 – Geotechnical Information
D6 – Sewage Plant Information
D7 – Water Information
D8 – Draft Home Owners Association

5.1 D1 – Architectural Guidelines and Visual Perceptions

5.2 D2 – DFA Submission Report

5.3 D3 – Engineering Report

5.4 D4 – Eskom Information

5.5 D5 – Geotechnical Information

5.6 D6 – Sewage Plant Information

5.7 D7 – Water Information

5.8 D8 – Draft Home Owners Association

6 APPENDIX E: COMMENTS AND RESPONSE

7 APPENDIX F: ENVIRONMENTAL MANAGEMENT PROGRAMME

8 APPENDIX G: PUBLIC PARTICIPATION

9 APPENDIX H: IMPACT SIGNIFICANCE TABLE

10 APPENDIX J: IAP CORRESPONDENCE

11 APPENDIX K: IAP REGISTER