Province of the
EASTERN CAPE
ECONOMIC DEVELOPMENT,
ENVIRONMENTAL AFFAIRS & TOURISM

FINAL BASIC ASSESSMENT REPORT

Proposed refurbishment and construction of coastal infrastructure within the King Sabata Dalindyebo Local Municipality, Hole in the Wall, Eastern Cape (BA2)

(For official use only)

File Reference Number:	EC157/ORT/LN1LN3/M/22-24
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Basic assessment report in terms of the Environmental Impact Assessment Regulations, 2014 as amended, 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, 2014 as amended 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 **unless indicated otherwise by the Department**.
7. No faxed or e-mailed reports will be accepted **unless indicated otherwise by the Department**.
8. The report must be compiled by an independent environmental assessment practitioner (EAP).
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
	X	

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

The proposed developments at Hole in the Wall will involve the refurbishment and construction of coastal infrastructure adjacent to the Hole in the Wall Hotel and near the Hole in the Wall feature. The overall study area encompasses the flood pan of the Mpako Estuary, and the sand bypass system associated with the estuary (Sustainable Development Projects Ecological and Environmental Services (SDP), 2021).

The position of the infrastructure components has been identified based on a combination of engineering, environmental and economic factors and will include the following infrastructure components.

1.1. Provision of two dedicated parking areas

Currently, the Hole in the Wall development node does not have any dedicated parking areas. Therefore, tourists, hikers and beach goers are required to park their vehicles along the existing gravel access road which is unsafe in terms of passing vehicles and often results in theft and/or damage to vehicles.

The proposed development will include the establishment of two dedicated parking areas at Hole in the Wall. The first parking area will be located directly adjacent to the existing ablution facilities. This parking area will offer tourists and beach goers with a safe and convenient space to park their vehicles whilst they navigate through the hiking trail and existing footpaths through the forest habitat. The first parking area will include:

- The introduction of a grass block parking area (approximately 1,300 m^2).
- The allowance for accessible parking bays.
- The provision of waste receptacles.

The second dedicated parking area will be located further up the access road (inland of the road), closer to the new turning circle on the hill overlooking Hole in the Wall. This parking area will offer tourists and beach goers with a view of the Hole in the Wall feature and will include:

- The introduction of a grass block parking area (approximately 1,600 m^2).
- The allowance for accessible parking bays.
- The identification of parking area signage.
- The formalization and provision of new braai facilities.
- Picnic benches to encourage picnic activity.
- The introduction of grass block platforms and landscaping for picnic facilities.
- The provision of waste receptacles.
- Bench seating to take full advantage of the view

The dedicated parking areas at Hole in the Wall will make use of the following materials:

- Terracrete blocks/ concrete grass blocks.
  - Terracrete Grass Blocks are a versatile eco-surface hard lawn paving block that was introduced by Terraforce into the South African market in 2002.
  - They may be used for the lining of riverbanks, or areas that are subject to erosion as it promotes the growth and re-growth of grass. This provides an alternative to impermeable urban surfaces.

- These surfaces provide a park-like or pastoral feel to areas which require hard paving (www.remacon.co.za)

- Brick and concrete braai stands.
- Poly-timber waste receptacles.
  - These proposed waste receptacles are made from a poly-timber material. Poly-timber promotes reduces the consumption of raw materials and also reduces water and air pollution associated with landfilling.
  - The designs are functional with or without a lid. It will have the option of a flat lid, or lids with innovative access which will keep rain out.
- Poly-timber benches.
  - The thick manufactured planks provide incredible strength and is both comfortable and long lasting (www.greenplasticwood.co.za)

Refer to Appendix C for the facility illustrations and Appendix G (Annexure 1) for an example of the infrastructure proposed within the parking areas.

1.2. Dedicated picnic and braai areas

This component will include the provision of picnic and braai areas at six dedicated areas, ranging from the entrance of the hiking trail to spots located adjacent to the Mpako River/ Estuary and along the coastline. The purpose of the dedicated picnic and braai areas are:

- To replace the existing, broken braai and picnic infrastructure.
- To formalize picnic and braai areas along the coastline. This intends to reduce the number of informal braai and picnic areas, informal fires and pollution within the forest habitat.
- To provide beach goers and tourists safe and clean eating areas at strategic locations along the existing footpaths and/or hiking trails

The proposed picnic and braai areas will include:

- The removal of damaged and broken facilities.
- The removal of damaged and broken seating.
- The formalization and provision of new braai facilities.
- Provision of picnic benches to encourage picnic activity.
- The introduction of grass block platforms and landscaping for the new picnic facilities.
- Provision of waste receptacles.
- Bench seating to take full advantage of the view.

The proposed picnic and braai areas will make use of the following materials (Plate 11):

- Concrete grass blocks.
- Brick and concrete braai stands.
- Poly-timber picnic benches.
- Poly-timber waste receptacles.

Refer to Appendix C for the facility illustrations and Appendix G (Annexure 1) for an example of the infrastructure proposed within the picnic and braai areas.

1.3. Viewing deck

A viewing deck, observation deck or observation platform refers to an elevated sightseeing structure (our.wollongong.nsw.gov.au). The viewing deck will be provided at Hole in the Wall on the pathway up to the new parking area and turning circle. The viewing deck will afford pedestrians and beach goers a place to rest and to take in scenic views of the Hole in the Wall and coastal forest. The viewing platform will include:

- A formalized walkway to access the viewing decks.
- The introduction of a new viewing deck (the viewing deck will have a footprint of approximately 12 m^2)
- Provision of waste receptacles.

- Provision of seating (benches) and picnic facilities (picnic sets).

The proposed viewing deck will make use of the following materials:

- Poly-timber viewing deck.
- Poly-timber benches and picnic sets.
- Poly-timber waste receptacles.
- Poly-timber walkway to access the viewing deck.

Refer to Appendix C for the facility illustrations and Appendix G (Annexure 1) for an example of the infrastructure proposed for the viewing deck.

1.4. Existing tracks and footpaths

Existing tracks, footpaths and hiking trails will be used to access the Hole in the Wall and no formalised pathways will be constructed. A large portion of these existing tracks, footpaths and hiking trails occur within the Riverine vegetation community which includes low tree cover and a high density of shrubs. The use of existing tracks and footpaths will not only maintain the "sense of place", but also minimise disturbance within the coastal forest.

To promote and maintain the "sense of place" of the area, the existing footpaths and hiking trails will be provided with the following:

- The introduction of benches and waste receptacles at strategic locations along the existing footpaths.
- The provision of bench seating for resting and enjoyment of the surrounding habitat.
- Demarcation along certain portions using rope and post barriers (or anything similar).

Refer to Appendix C for the facility illustrations and Appendix G (Annexure 1) for an example of the infrastructure proposed along the existing tracks and footpaths.

1.5. Formalised access to the fishing spot

During the PPP announcement period, I&APs helped identify an existing fishing spot along Men's Beach that is used by both local and recreational fishermen. Currently, there is no formal access across the rocks to this fishing spot which often results in injury to those wishing to access to the area. The formalised access will allow for the safe and equitable access to the coastline and identified fishing spots. The formalised fishing access will include:

- The introduction of steps to access the fishing spot.

The proposed fishing access will make use of the following materials:

- Rocks and boulders from the surrounding environment to create steps.
- Concrete and/or cement to reinforce the steps.

Refer to Appendix C for the facility illustrations and Appendix G (Annexure 1) for an example of the infrastructure proposed for the local fishing spot.

1.6. Refurbishment of existing road adjacent to the Hole in the Wall Hotel

This component will involve the refurbishment of the existing access road directly adjacent to the Hole in the Wall Hotel. This existing road is used by tourists and other locals in the area to access the existing boat launch site. After rainfall events, the road is susceptible to high levels of erosion, making it inaccessible. This refurbishment of the existing road will include:

- The refurbishment (grass block resurfacing) of the existing access road (approximately 100 m in length).
- Minor landscaping to compliment the receiving environment

The proposed road refurbishment will include:

- A grass block access road

1.7. Formalisation of the existing access point at the boat launch site

The existing boat launch site is located adjacent to the Hole in the Wall and requires formalisation. After rainfall events, the site is susceptible to erosion which often results in vehicles getting stuck at the launch site. The formalisation of the boat launch will include:

- The introduction of a new stabilised grass block access ramp/ slipway.
- Introduction of gabion structures and/ or reno mattresses to reinforce and stabilise the access ramp.
- The refurbishment of the existing access road (from the Hole in the Wall Hotel to the launch site).
- Minor landscaping to compliment the receiving environment.
- Boat launch signage.
- Provision of picnic benches near the new launch site.
- The introduction of grass block platforms and minor landscaping for picnic facilities

The proposed boat launch will make use of the following materials:

- Poly-timber picnic benches.
- Poly-timber benches.
- Poly-timber waste receptacles.

1.8. Streetlights

Currently, there are no streetlights at the Hole in the Wall community. This creates unsafe driving conditions, endangering pedestrians, animals and drivers. Streetlights will be erected around the development node to improve driving conditions and improve the overall safety for both pedestrians and drivers.

The proposed streetlight installation will make use of the following materials:

- Wooden light poles (including low and medium voltage distribution).

1.9. Welcome signage

Welcome signage will be erected at the entrance to the Hole in the Wall development node. The purpose of the signage is to welcome visitors and/or tourists and provide an overview of the area.

The proposed welcome signage will make use of the following materials:

- Poly-timber sign boards.
- Wood and mortar.

Refer to Figure 1 below showing the locality map for Hole in the Wall and Figure 2 showing the proposed infrastructure layout.

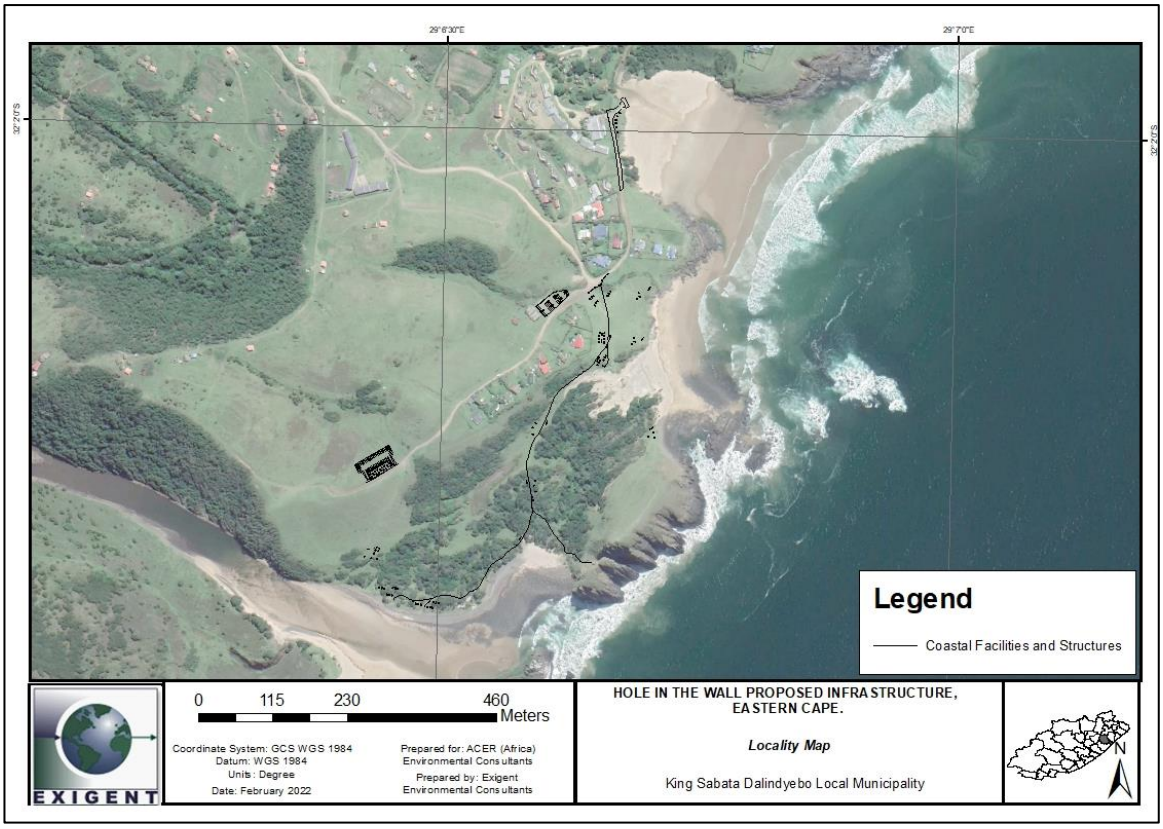


Figure 1: Hole in the Wall locality map

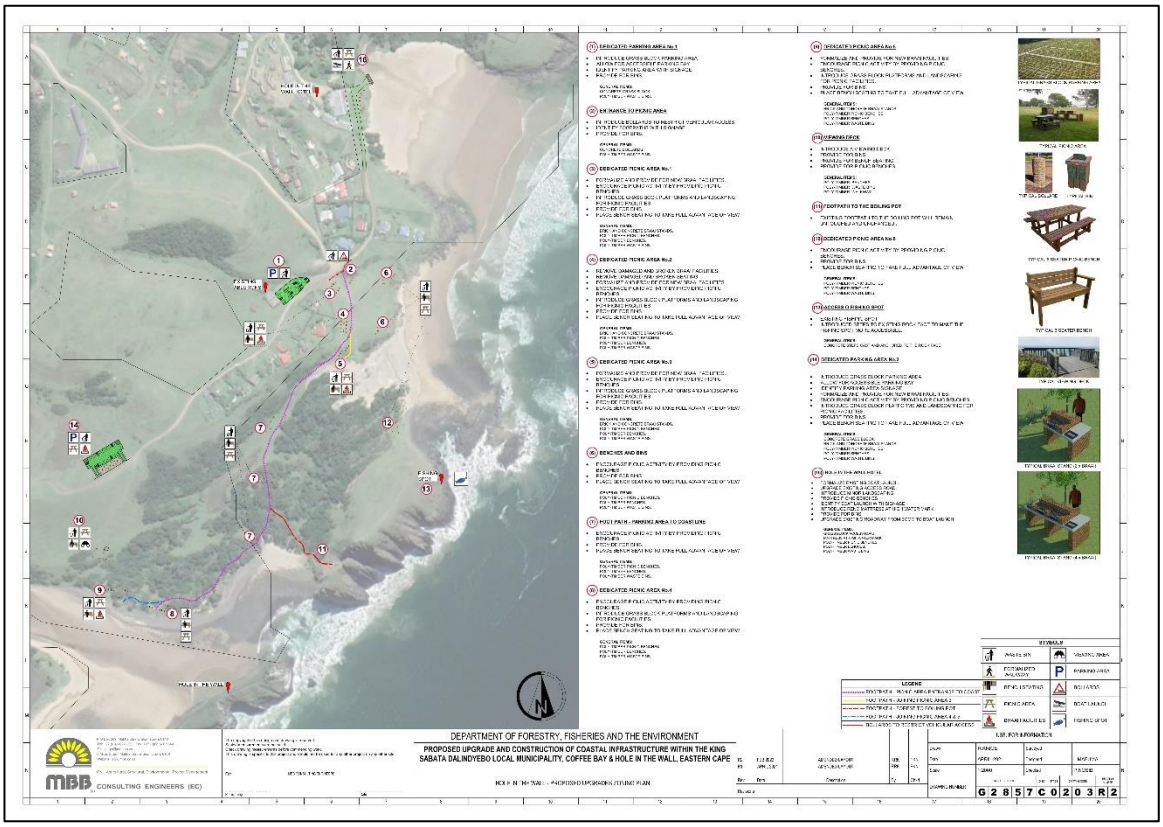


Figure 2: Hole in the Wall infrastructure layout map

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; and
(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.

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.

3.1. Parking area no. 01

Alternative:	**Latitude (S):**			**Longitude (E):**		
Alternative S1[1] (preferred or only site alternative)	32º	02‘	8.99‘’	29º	06‘	35.68’’
Alternative S2 (if any)	º	‘		º	‘	
Alternative S3 (if any)	º	‘		º	‘	

3.2. Parking area no. 02

Alternative:	**Latitude (S):**			**Longitude (E):**		
Alternative S1 (preferred or only site alternative)	32º	02‘	17.18‘’	29º	06‘	26.10’’
Alternative S2 (if any)	º	‘		º	‘	
Alternative S3 (if any)	º	‘		º	‘	

3.3. Picnic area no. 01

Alternative:	**Latitude (S):**			**Longitude (E):**		
Alternative S1 (preferred or only site alternative)	32º	02‘	08.91‘’	29º	06‘	38.73’’
Alternative S2 (if any)	º	‘		º	‘	
Alternative S3 (if any)	º	‘		º	‘	

3.4. Picnic area no. 02

Alternative:	**Latitude (S):**			**Longitude (E):**		
Alternative S1 (preferred or only site alternative)	32º	02‘	10.71‘’	29º	06‘	39.20’’
Alternative S2 (if any)	º	‘		º	‘	
Alternative S3 (if any)	º	‘		º	‘	

[1] “Alternative S..” refer to site alternatives.

3.5. Picnic area no. 03

Alternative:	Latitude (S):			Longitude (E):		
Alternative S1 (preferred or only site alternative)	32º	02‘	11.75‘’	29º	06‘	39.19’’
Alternative S2 (if any)	º	‘		º	‘	
Alternative S3 (if any)	º	‘		º	‘	

3.6. Picnic area no. 04

Alternative:	Latitude (S):			Longitude (E):		
Alternative S1 (preferred or only site alternative)	32º	02‘	24.14‘’	29º	06‘	29.09’’
Alternative S2 (if any)	º	‘		º	‘	
Alternative S3 (if any)	º	‘		º	‘	

3.7. Picnic area no. 05

Alternative:	Latitude (S):			Longitude (E):		
Alternative S1 (preferred or only site alternative)	32º	02‘	23.60‘’	29º	06‘	27.07’’
Alternative S2 (if any)	º	‘		º	‘	
Alternative S3 (if any)	º	‘		º	‘	

3.7. Picnic area no. 06

Alternative:	Latitude (S):			Longitude (E):		
Alternative S1 (preferred or only site alternative)	32º	02‘	15.59‘’	29º	06‘	42.07’’
Alternative S2 (if any)	º	‘		º	‘	
Alternative S3 (if any)	º	‘		º	‘	

3.8. Viewing deck

Alternative:	Latitude (S):			Longitude (E):		
Alternative S1 (preferred or only site alternative)	32º	02‘	21.27‘’	29º	06‘	26.19’’
Alternative S2 (if any)	º	‘		º	‘	
Alternative S3 (if any)	º	‘		º	‘	

3.9. Fishing spot

Alternative:	**Latitude (S):**			**Longitude (E):**		
Alternative S1 (preferred or only site alternative)	32º	02‘	13.93‘’	29º	06‘	47.24‘’
Alternative S2 (if any)	º	‘		º	‘	
Alternative S3 (if any)	º	‘		º	‘	

3.9. Boat launch site

Alternative:	**Latitude (S):**			**Longitude (E):**		
Alternative S1 (preferred or only site alternative)	32º	01‘	59.20‘’	29º	06‘	39.82‘’
Alternative S2 (if any)	º	‘		º	‘	
Alternative S3 (if any)	º	‘		º	‘	

In the case of linear activities:

3.10. Refurbishment of existing track opposite Hole in the Wall Hotel

Alternative:	**Latitude (S):**			**Longitude (E):**		
Alternative S1 (preferred or only route alternative)						
• Starting point of the activity	32º	02‘	03.19¨	29º	06‘	40.16‘’
• Middle point of the activity	32º	02‘	01.72¨	29º	06‘	39.97‘’
• End point of the activity	32º	01‘	59.64¨	29º	06‘	39.32‘’
Alternative S2 (if any)						
• Starting point of the activity	º	‘		º	‘	
• Middle point of the activity	º	‘		º	‘	
• End point of the activity	º	‘		º	‘	
Alternative S3 (if any)						
• Starting point of the activity	º	‘		º	‘	
• Middle point of the activity	º	‘		º	‘	
• End point of the activity	º	‘		º	‘	

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):

4.1. Parking area no. 01

Alternative:	**Size of the activity:**
Alternative A1[2] (preferred activity alternative)	1300 m^2
Alternative A2 (if any)	m^2
Alternative A3 (if any)	m^2

4.2. Parking area no. 02

Alternative:	**Size of the activity:**
Alternative A1 (preferred activity alternative)	1600 m^2
Alternative A2 (if any)	m^2
Alternative A3 (if any)	m^2

4.3. Picnic areas

4.3.1. Bench seats

Alternative:	**Size of the activity:**
Alternative A1 (preferred activity alternative)	3.3 m^2 x 20 units = 66 m^2
Alternative A2 (if any)	m^2
Alternative A3 (if any)	m^2

4.3.2. Picnic benches

Alternative:	**Size of the activity:**
Alternative A1 (preferred activity alternative)	5 m^2 x 75 units = 375 m^2
Alternative A2 (if any)	m^2
Alternative A3 (if any)	m^2

4.3.3. 2x braai stands

Alternative:	**Size of the activity:**
Alternative A1 (preferred activity alternative)	2 m^2 x 15 units = 30 m^2
Alternative A2 (if any)	m^2
Alternative A3 (if any)	m^2

4.3.4. 4x braai stands

Alternative:	**Size of the activity:**
Alternative A1 (preferred activity alternative)	3.5 m^2 x 8 units = 28 m^2
Alternative A2 (if any)	m^2
Alternative A3 (if any)	m^2

4.4. Viewing deck

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

Alternative:	**Size of the activity:**
Alternative A1 (preferred activity alternative)	12 m^2
Alternative A2 (if any)	m^2
Alternative A3 (if any)	m^2

4.5. Boat launch site

Alternative:	**Size of the activity:**
Alternative A1 (preferred activity alternative)	80 m^2 reno mattress
Alternative A2 (if any)	m^2
Alternative A3 (if any)	m^2

or, for linear activities:

4.6. Refurbishment of existing track opposite Hole in the Wall Hotel

Alternative:	**Length of the activity:**
Alternative A1 (preferred activity alternative)	125 m
Alternative A2 (if any)	m
Alternative A3 (if any)	m

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

4.6.1. Refurbishment of existing track opposite Hole in the Wall Hotel

Alternative:	**Size of the site/servitude:**
Alternative A1 (preferred activity alternative)	825 m^2
Alternative A2 (if any)	m^2
Alternative A3 (if any)	m^2

5. SITE ACCESS

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

Describe the type of access road planned:

N/A – The proposed development will not construct any new access roads.

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.

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 50 metres 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 1.8 metres;
6.7 walls and fencing including details of the height and construction material;
6.8 servitudes indicating the purpose of the servitude;
6.9 sensitive environmental elements within 100 metres 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 1 metre 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. 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?	R 19,200,000.00	
What is the expected yearly income that will be generated by or as a result of the activity?	R, 2,000,000.00	
Will the activity contribute to service infrastructure?	YES x	NO
Is the activity a public amenity?	YES x	NO
How many new employment opportunities will be created in the development phase of the activity?	50	
What is the expected value of the employment opportunities during the development phase?	R 800,000.00	
What percentage of this will accrue to previously disadvantaged individuals?	30 %	
How many permanent new employment opportunities will be created during the operational phase of the activity?	20	
What is the expected current value of the employment opportunities during the first 10 years?	R 10,000,000.00	
What percentage of this will accrue to previously disadvantaged individuals?	30 %	

9(b) Need and desirability of the activity

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

The proposed development involves the refurbishment and construction of coastal infrastructure near Hole in the Wall, with the key objective being the promotion and development of sustainable coastal infrastructure. The proposed development will formalise coastal accessibility and coastal access whilst promoting and preserving the ecological integrity of the receiving environment.

The proposed development aims to:

- ❑ Create and implement programmes to ensure sustainable and equitable maintenance of the coastal environment.
- ❑ Minimize the adverse impacts on the environment and promote public safety.
- ❑ Provide facilities that promote access to the coastal public property.
- ❑ Improve coastal infrastructure to enhance equitable and fair access to the coast.

DECLARATION OF HOLE IN THE WALL AS A RESORT TOWN

The Hole in the Wall is located along the Eastern Cape coastline, between East London and Port Edward and forms part of the Wild Coast. In terms of the Wild Coast Environmental Management Plan, (2013) which aims to establish a planning instrument to guide and facilitate development and promote the sustainable use of the Wild Coast the management plan states that the Hole-in the Wall and Coffee Bay areas may be considered for formal town establishment. This is subject to infrastructure development of the required scale and standard. For this to be realised, there must be tangible, credible infrastructure development plans in place before investment is invited. The proposed developments planned for Hole in the Wall aims to initiate infrastructure development in the area and to act as a catalytic development in terms of future investment to Hole in the Wall. The proposed infrastructure and capacity upgrades included in this development supports the vision of the Eastern Cape Provincial Development Plan where the main objectives of the Spatial Development Initiative (SDI) are:

- ❑ To generate sustainable economic growth and development in the Wild Coast area.
- ❑ To generate long-term and sustainable employment for local inhabitants.
- ❑ To maximize the mobilization of private investment, especially in the context of community development and to lessen demands on government funds for development projects.

- To exploit spin-off opportunities from tourism investments for the development of Small, Medium and Micro Enterprises (SMME's) and for the development of local communities

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

PROMOTION OF SUSTAINABLE COASTAL ACCESS

DFFE, through their Environmental Protection and Infrastructure Programmes (EPIP) Working for the Coast (Eastern Cape), is the project funder on behalf of the KSDLM (the applicant for this EA process and associated license and permit applications). Currently, DFFE is running the Working for the Coast Programme which was established with the aim of implementing various projects to promote access and accessibility to the coastline while ensuring South Africa's coastlines are conserved and protected. The proposed development aligns with the objectives of DFFE's programme of ensuring sustainable and equitable maintenance of coastline environments whilst improving socio-economic conditions of communities in coastal towns such as Hole in the Wall.

The coast is a special national asset which requires the planning and management for the long-term public interest. These management measures include the right to secure ecological sustainable development. In response to these planning and management initiatives, the DFFE tasked the National Coastal Access Strategy (NCAS, 2014) with the following goals, aims, and objectives to address key coastal issues:

- Improve pedestrian access above the high-water mark.
- Improve infrastructure for access.
- Prevent exclusive use.
- Address conflicting rights between public interest, private property owners and communal and traditional users.
- Minimise adverse impacts on the environment.
- Opportunities for public access must be provided at appropriate coastal locations in context of the environmental, financial, and social opportunities and constraints.
- Public access must be maintained, managed, and monitored to minimise adverse impacts on the environment and public safety and to resolve incompatible uses.

The NCAS (2014) has three key messages to coastal stakeholders in the three spheres of government which address key coastal issues in South Africa:

1. The designation and management of coastal access is locally contextual and most appropriately assigned to municipalities which can effectively respond to the complexity of providing and maintaining access.
2. Providing coastal access is a management issue that influences the state of the natural environment on the coast and concomitantly enables many of the potential social and economic benefits offered by the coast and its resources.
3. The social and economic value of appropriate coastal access makes it imperative that both national and provincial governments, as co-beneficiaries, also contribute to the sustainable provision of coastal access. Provinces, have an important role to play by undertaking or facilitating (by coordinating municipal action) a provincial scale assessment of existing coastal access.

As per the NCAS, (2014), the status quo for the Eastern Cape coastline is:

- There is low accessibility with limited coastal access.
- In addition to the lack of infrastructure, the Eastern Cape geographical landscape is characterized by hills and steep cliffs along the coast. This will require the need for design engineers to design a suitable access that is safe to be used by the public.
- Physical access to parts of the coastline is difficult.

The proposed refurbishment and construction of coastal infrastructure proposed by the KSDLM aims to fulfil the goals, aims and objectives of the IDP, NCAS and the Wild Coast Environmental Management Plan.

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

LOCAL ECONOMIC DEVELOPMENT (LED) AND TOURISM

According to the King Sabata Local Municipality IDP (2020-2021), one of the key development strategies identified is improving access to tourist areas and upgrading coastal infrastructure within the municipality, as an effort to bring about economic empowerment. This is obtained through:

- Increased tourist activity.
- Creation of employment opportunities.
- The promotion of community-based initiatives.

The proposed refurbishment and construction of coastal infrastructure at Hole in the Wall will assist in promoting tourism and economic growth and allow for the provision of adequate and accessible infrastructure within the area.

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:
Constitution of the Republic of South Africa	Republic of South Africa	1996
National Environmental Management Act (NEMA)	Republic of South Africa	1998
Environmental Impact Assessment Regulations	Republic of South Africa	2014, as amended
National Environmental Management Act: Wild Coast Environmental Management Plan	Republic of South Africa	1998
Integrated Coastal Management Act	Republic of South Africa	2008
National Environmental Management: Biodiversity Act	Republic of South Africa	2004
National Environmental Management: Protected Areas Act	Republic of South Africa	2003
National Water Act	Department of Human Settlements, Water and Sanitation	1998
National Heritage Resources Act	South African Heritage Resource Agency	1999
National Environmental Management: Waste Act	Republic of South Africa	2008
Eastern Cape Biodiversity Conservation Plan	Eastern Cape Provincial Government	-
Draft Eastern Cape Environmental Management Bill	Eastern Cape Provincial Government	2019
Transkei Environmental Conservation Decree	Eastern Cape Provincial Government	1992
Ciskei Nature Conservation	Eastern Cape Provincial Government	1987
Land Use and Planning Ordinance	Eastern Cape Provincial Government	1985
National Environmental Management: Wild Coast Environmental Management Plan (Provincial Gazette 3210 OF 2014)	Eastern Cape Department of Economic Development, Environmental Affairs and Tourism	2014
Environment Conservation Act, 1989 (Act No 73 of 1989)	Department of Environmental Affairs	1989
National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004)	District and local municipalities	2004
National Roads Traffic Act, 1996 (Act No 93 of 1996)	South African National Roads Agency Limited (national roads); Provincial Department of Transport	1996
Promotion of Access to Information Act, 2000 (Act No 2 of 2000)	Department of Justice and Constitutional Development	2000
Promotion of Administration Justice Act, 2000 (Act No 3 of 2000)	Department of Justice and Constitutional Development	2000
Infrastructure Development Act, 2014 (Act No. 23 of 2014)	Presidential Infrastructure Coordinating Commission	2014
Public Participation Guideline in Terms of the National Environmental Management Act, 1998 and Environmental Impact Assessment Regulations	Eastern Cape Economic Development, Environmental Affairs and Tourism	2017
Occupational Health and Safety Act (Act 85 of 1993)	Department of Labour	2003
The Spatial Planning and Land Use Management Act 16 of 2013 (SPLUMA)	District and local municipalities	2013
National Forest Act, 1998 (Act 84 of 1998)	Eastern Cape Department of Environment, Forestry and Fisheries	1998
Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983)	Department of Agriculture (Department of Agriculture, Land Reform and Rural Development)	1983
Hazardous Substance Act (No 15 of 1973) and Regulations	Department of Health	1973
Occupational Health and Safety Act (Act 85 of 1993)	Department of Labour	1993

11. WASTE, EFFLUENT, EMISSION AND NOISE MANAGEMENT

11(a) Solid waste management

	YES	NO
Will the activity produce solid construction waste during the construction/initiation phase?	x	
If yes, what estimated quantity will be produced per month?	5-10 m^3	

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

The construction waste (rubble, construction material etc.) will be collected and temporarily stored on site in dedicated areas until final disposal at the Mqanduli Landfill Site.

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

The construction waste (rubble, construction material etc.) will be collected and temporarily stored on site in dedicated areas until final disposal at the Mqanduli Landfill Site.

	YES	NO
Will the activity produce solid waste during its operational phase?	x	
If yes, what estimated quantity will be produced per month?	2-5 m^3	

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

The King Sabata Local Municipality will be responsible for regular, routine maintenance of the various waste receptacles installed on site (within the various picnic areas, the dedicated parking areas and along the existing footpaths). The Municipality will be responsible for the collection and disposal of all waste generated during the operational phase (waste will either be disposed at the Buy Back Centre in Coffee Bay or at the Mqanduli Landfill Site)

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

Either the Buy Back Centre in Coffee Bay or the Mqanduli Landfill Site

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.

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

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

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

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 x**
If yes, what estimated quantity will be produced per month?	m^3	
Will the activity produce any effluent that will be treated and/or disposed of on site?	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.

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:

11(c) Emissions into the atmosphere

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

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

During construction phase, the following air emissions may be expected:

- For the clearing of vegetation (brush cutters, construction vehicles);
- For the construction of dedicated parking areas (construction equipment, vehicles and plant);
- For the construction of the road upgrade, boat launch site (construction equipment, vehicles and plant).

During the operational phase, the following air emissions may be expected:

- The use of picnic/ braai areas (smoke from fires/ braais).

11(d) Generation of noise

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

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

During construction, the following activities may result in the generation of some noise:

- ❑ Removal of existing infrastructure (broken braai facilities, picnic tables, benches etc.);
- ❑ Construction of the new parking areas;
- ❑ Construction/ erection of the new infrastructure (broken braai facilities, picnic tables, benches, viewing deck);
- ❑ Construction/ upgrade of the road opposite Hole in the Wall Hotel;
- ❑ Construction at the boat launch site.

12. WATER USE

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

Municipal x	water board	groundwater	river, stream, dam or lake	**Other X (commercial source)**	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: litres

Does the activity require a water use permit from the Department of Water Affairs?

YES	NO
x	

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.

13. ENERGY EFFICIENCY

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

The proposed development (including the various components) aims at maintaining the “sense of place” of the area. Hole in the Wall is known for its amazing views and breathtaking scenery and ss such, it was imperative that this be maintained. Therefore, the amount of hardened surfaces and infrastructure was minimized to reduce the total development footprint. Further, poly-timber will be the main material that will be used during the construction phase of the development. This material is energy efficient (does not require a lot of maintenance, cleaning etc.) and is also able to withstand the receiving environmental conditions and effects of climate change. Furthermore, by reducing the total development footprint, the project will significantly reduce the amount of energy required for completion.

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

N/A – due to the location of the proposed development and the availability of resources, energy will be obtained conventionally (i.e. municipal sources or portably, using generators).

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):	

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
x	

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
x	**x**	**x**				

Alternative S2 (if any):

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 S3 (if any):

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

2. LOCATION IN LANDSCAPE

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

No.	Description	YES	NO
2.1	Ridgeline		
2.2	Plateau		
2.3	Side slope of hill/mountain	**x**	
2.4	Closed valley		
2.5	Open valley		
2.6	Plain	**x**	
2.7	Undulating plain / low hills	**x**	
2.8	Dune		
2.9	Seafront	**x**	

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 x**	YES	NO	YES	NO
Dolomite, sinkhole or doline areas	YES	**NO x**	YES	NO	YES	NO
Seasonally wet soils (often close to water bodies)	**YES x**	NO	YES	NO	YES	NO
Unstable rocky slopes or steep slopes with loose soil	YES	**NO x**	YES	NO	YES	NO
Dispersive soils (soils that dissolve in water)	YES	**NO x**	YES	NO	YES	NO
Soils with high clay content (clay fraction more than 40%)	YES	**NO x**	YES	NO	YES	NO
Any other unstable soil or geological feature	YES	**NO x**	YES	NO	YES	NO
An area sensitive to erosion	YES	**NO x**	YES	NO	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:

No.	Description	YES	NO
4.1	Natural veld – good condition [E]	X	
4.2	Natural veld – scattered aliens [E]	x	
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	x	

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.

NB: Please refer to the sub-sections below, which were obtained and compiled in conjunction with appointed specialists.

4.1. Terrestrial ecology

4.1.1. Protected areas

In South Africa, the National Protected Area Expansion Strategy (NPAES) presents a 20-year plan for the expansion of protected areas. Based on the NPAES database, no areas have been identified as part of the NPAES within (or in proximity) to the study area at Hole in the Wall (Exigent, 2021).

4.1.2. Biodiversity sector plans

Critical Biodiversity Areas

The Eastern Cape Biodiversity Conservation Plan (ECBCP) provides areas of priority and conservation in the province. Priority areas are identified in terms of their biodiversity and are referred to as CBAs. According to Berliner et al (2007), a CBA is defined as "terrestrial and aquatic features in the landscape that are critical for conserving biodiversity and maintaining ecosystem functioning".

In terms of the planning units at Hole in the Wall, the study area falls within the settlement, oldfield and coastal planning units. These units are located within portions of terrestrial CBA1 (Figure 12) (Exigent, 2021).

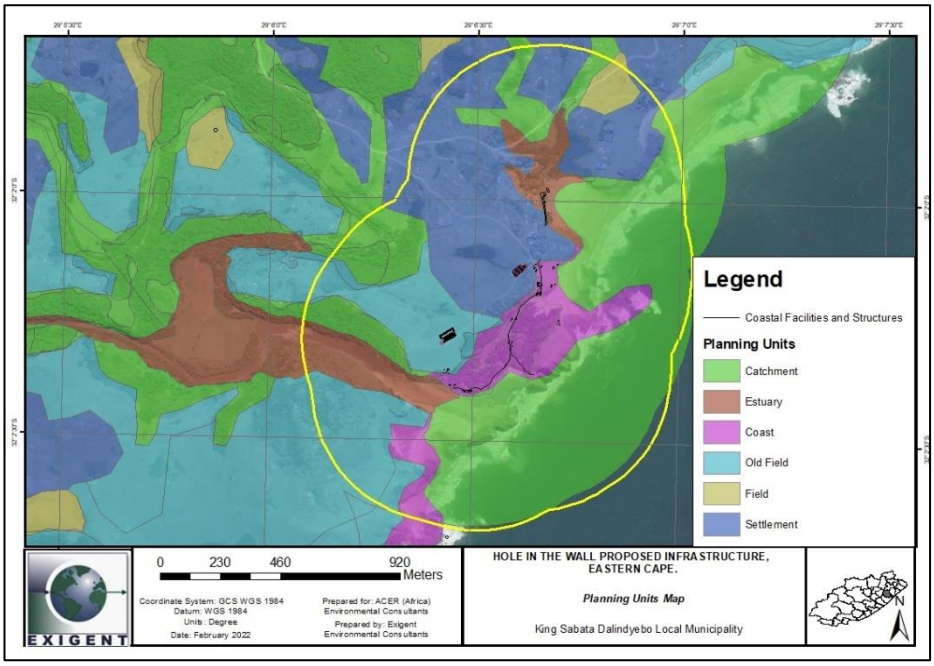
Ecological Support Areas

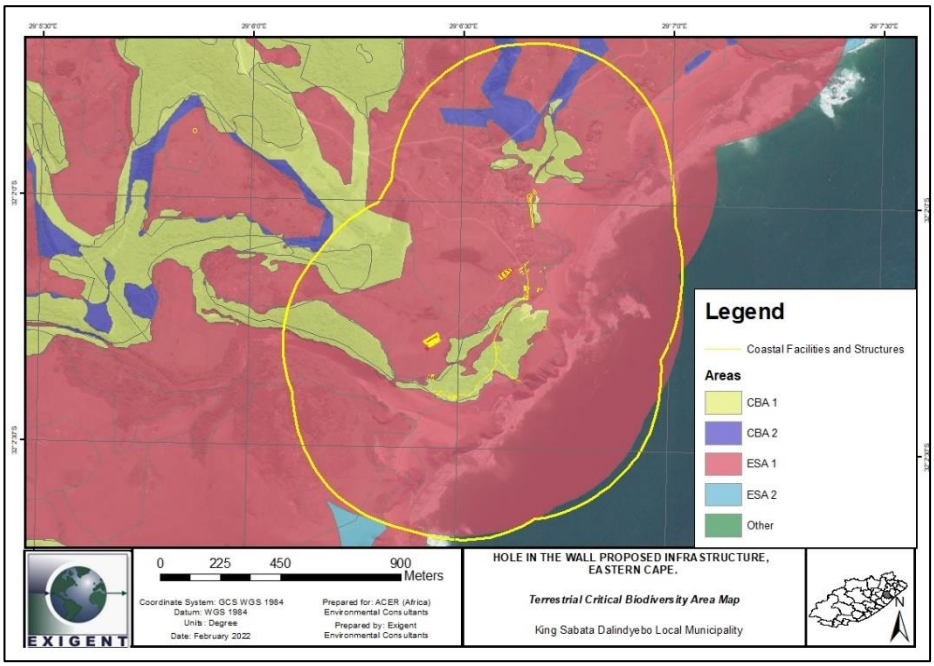
The ECBCP also outlines areas in terms of its ability to support life. These areas are referred to as ESAs and are important in protecting the critical conservation areas from edge effects. ESAs also provide ecological support through the presence of forage areas and movement corridors. Certain infrastructure components at Hole in the Wall fall within ESA1 (Table 1).

Table 1: Description for CBAs and ESAs

Category	Criteria	Criteria description
TERRESTRIAL CBAs and ESAs		
CBA1	Critical Patches	Critically Endangered and Endangered ecosystems (SA VEG MAPs), Remaining extent of Listed Threatened Ecosystems, National Forest Inventory including critically endangered/high priority forest patches and priority forest clusters
	Irreplaceable Sites	Irreplaceable Sites (selection frequency>80%) – planning units were selected to meet targets for: (1) vegetation types, (2) species points and (3) expert areas
	Special habitats	Bat roost sites and 500m radius
		Cape Vulture breeding colonies (1000m buffer) and roost sites (500m buffer).
		Bearded Vulture nests (500m buffer).
		Critical pinch-points in corridor network.
CBA2	Forest	All other forests.
	MARXAN analysis	Best Design Sites (selection frequency<80%) - Planning Units selected to meet targets for: (1) vegetation types, (2) species points, (3) expert areas
	Special habitats	Selected cliffs buffered by 100m.
		Cape Vulture immediate home range (5km buffer around nest and roost sites).
		Bearded Vulture home range (10km buffer).
ESA1	Forest	CBA1 forest patch 500m buffer.
	Special habitats	Cliff buffers 500m.
	Ecological corridor	Other sites required to complete the ecological corridor network.
	Eastern Cape corridors	Best Design Corridor Sites - Planning units selected to meet 60% targets for vegetation types.
		Nodes used for corridor network analysis.
	Ecological infrastructure	Climate change refugia.
		Coastal functional zone.
		Climate change resilience.
ESA2	Where there is no natural habitat remaining in an area that would have been designated as a CBA 1, CBA 2 or ESA1, it is designated as an ESA 2	

Database	Importance	Criteria	Comment
National vegetation types	Forests	Least concern	Not in study area
	Azonal vegetation	Least concern	Not in study area
	Indian Ocean Coastal Belt	Least concern	Majority of the study area
Provincial vegetation types	Scarp Forest	Least concern	Not in study area
	Subtropical Dune Thicket	Least concern	Not in study area
	Transkei Coastal Belt	Least concern	Majority of the study area
	Subtropical Seashore vegetation	Least concern	Not in study area
Provincial CBA	Vegetation types and protection of species	CBA 1	Most of the proposed area is considered CBA 1
Provincial ESA	Vegetation types and protection of species	ESA 1	Majority of the study area is considered ESA 1.





4.1.3. Vegetation types

According to the National vegetation data (NBA. 2018), there are four vegetation types present within the study area at Hole in the Wall (Figure 3):

- Transkei Coastal Belt.
- Subtropical Seashore Vegetation.
- Scarp Forest
- Non-terrestrial (Estuarine Functional Zone).

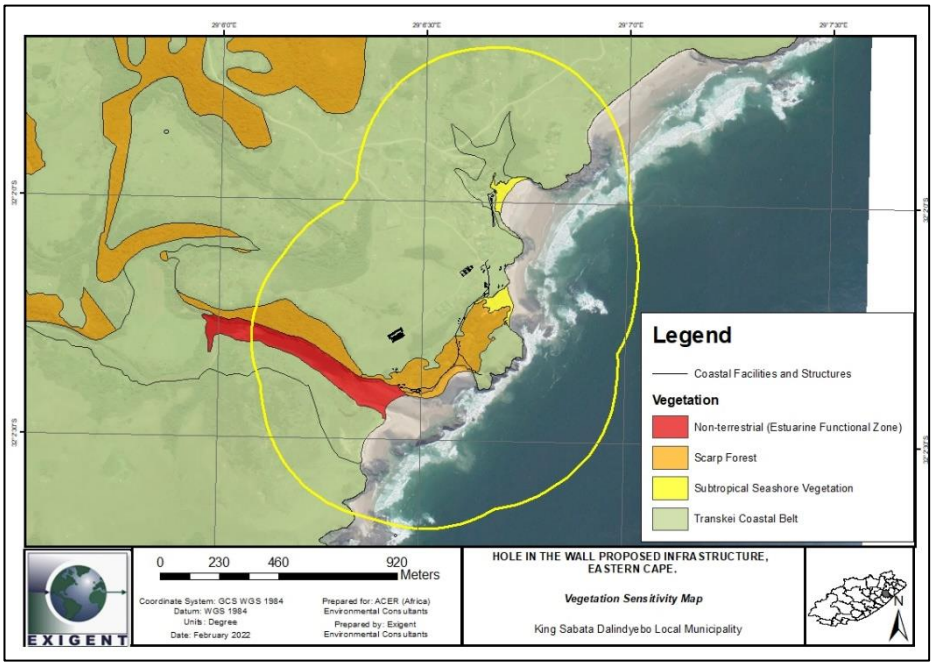


Figure 3: Showing the vegetation types present at Hole in the Wall

4.1.4. Terrestrial vegetation on site

According to the Terrestrial Biodiversity Impact Assessment (Exigent, 2021), the study area at Hole in the Wall has been divided into four terrestrial vegetation communities, namely (Figure 4):

- Coastal grasslands
- Coastal Dune Forest.
- Riverine Forest.
- Scarp Forest.

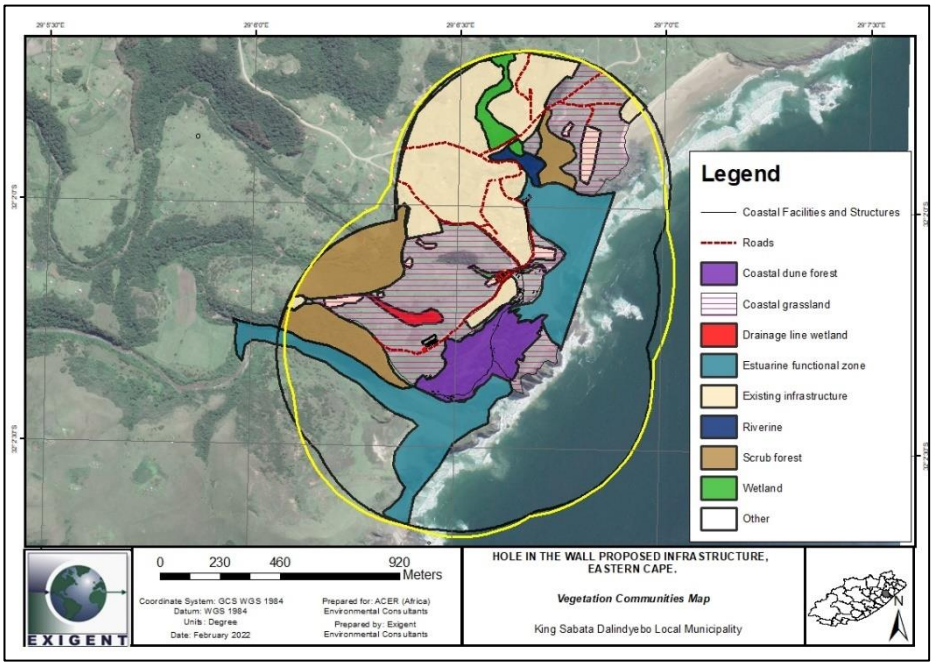


Figure 4: Vegetation communities at Hole in the Wall

Coastal Grasslands

Coastal grasslands form the largest portion of the study area at the Hole in the Wall. The main species occurring within the Coastal Grassland include *Stenotaphrum secundatum Eragrostis plana, Centella asiatica, Cynodon dactylon, Centella asiatica, Monopsis decipiens, Helictotrichon turgidulum* and *Hypochoeris radicata*. Other commonly occurring species include *Kyllinga alata, Desmodium incanum, Cyperus esculentus, Aloe thraskii, Themeda triandra* and *Aristida junciformis* (Exigent, 2021). Due to the disturbance experienced on site (high cattle stocking and shifting cultivation), cosmopolitan and exotic weed species also occur within the study area (Plate 1).

Plate 1: Vegetation associated with the Coastal Grassland

Coastal Dune Forest

The Coastal Dune Forest occurs in the area between the beach and the Coastal Grassland and is also associated with varying disturbances. This vegetation community is dominated by *Mimusops caffra* and *Sideroxylon inerme* (Plate 2). Due to the varying disturbances within the area, there are both low density and thick patches of forest. The dune habitat is dominated by White Milkwood (*Sideroxylon inerme*), Red Milkwood (*Mimusops caffra*), graminoids (*Stenotaphrum secundatum* and *Setaria nemfluensis*) and shrubs (*Chrysanthemoides monilifera*) (Exigent, 2021).

Plate 2: Vegetation associated with the Coastal Dune Forest

Riverine Forest

This community does not constitute a large portion of the study area and is confined to the riverine area adjacent to the Hole in the Wall Hotel. Dominant species within the area include *Rauvolfia caffra, Phoenix eclinate* and *Stenotaphrum secundatum* with low tree cover and a high density of shrubs (Plate 3). Alien vegetation (*Solanum spp* and *Lantana camara*) are also present in isolated patches within the area (Exigent, 2021).

Plate 3: Vegetation associated with the Riverine Forest

Scarp Forest

The Scarp Forest observed within the study area at Hole in the Wall is similar to that observed at Coffee Bay, however, the extent of the forest is limited. Vegetation within the Scarp Forest is mixed with the Riverine Forest and includes *Euphorbia triangularis* and *Milletia grandis* (Plate 21) (Exigent, 2021).

Plate 4: Vegetation associated with the Scarp Forest

Vegetation associated with the existing infrastructure

Vegetation associated with the existing infrastructure include houses, tourism accommodation, restaurants, roads, informal parking areas and areas disturbed by grazing. This area also contains hardened surfaces, with natural vegetation occurring within open spaces and adjacent houses. The vegetation within this area is dominated by exotic weed species and graminoid species (such as Coastal Buffalo grass (*Stenotaphrum secundatum)* (Plate 4) (Exigent, 2021).

Plate 5: Vegetation associated with the disturbed, existing infrastructure

Species of concern

Species of special concern were identified by the National DFFE Web Based Environmental Screening Tool. Exigent (2021) looked at the habitat requirements of these species against the available habitat within the study area as well as the positioning of the proposed infrastructure on site. The species were categorised in terms of the following:

- Threatened or Protected status (TOPS).
- The International Union for Conservation of Nature (IUCN, 2015). The IUCN is responsible for detecting the risk of possible extinction of species. The IUCN developed a red list system that is designed to detect the risk of extinction and includes the following categories:
  - Critically Endangered (CR) - A species is Critically Endangered when the best available evidence indicates that it meets at least one of the five IUCN criteria for Critically Endangered, indicating that the species is facing an extremely high risk of extinction (IUCN, 2015).
  - Endangered (EN) - A species is Endangered when the best available evidence indicates that it meets at least one of the five IUCN criteria for Endangered, indicating that the species is facing a very high risk of extinction (IUCN, 2015).
  - Vulnerable (VU) - A species is Vulnerable when the best available evidence indicates that it meets at least one of the five IUCN criteria for Vulnerable, indicating that the species is facing a high risk of extinction (IUCN, 2015).
  - Near Threatened (NT) - A species is Near Threatened when available evidence indicates that it nearly meets any of the IUCN criteria for Vulnerable and is therefore likely to become at risk of extinction in the near future (IUCN, 2015).
  - Least Concern (LC). A species is Least Concern when it has been evaluated against the IUCN criteria and does not qualify for any of the above categories. Species classified as Least Concern are considered at low risk of extinction. Widespread and abundant species are typically classified in this category (IUCN, 2015).
  - Data Deficient: Insufficient Information (DD): A species is DD when there is inadequate information to make an assessment of its risk of extinction, but the species is well defined. Listing of species in this category indicates that more information is required, and that future research could show that a threatened classification is appropriate (IUCN, 2015).
  - Data Deficient: Taxonomically Problematic (DDT) - A species is DDT when taxonomic problems hinder the distribution range and habitat from being well defined, so that an assessment of risk of extinction is not possible (IUCN, 2015).

During the field survey, protected plant species were encountered within the Coastal Dune Forest, viz. White Milkwood (*Sideroxylon inerme*), Coastal Red Milkwood (*Minusops caffra*) and are protected under the National Forest Act (Act No. 84 of 1998). Therefore, the developer will need to apply for a permit to cut, relocate or trim the species from the relevant competent authority. In order to maintain the presence of this species within the Coastal Dune Forest, it is important that younger individuals be identified and delineated for conservation. The following critically endangered and/or endangered species also occur within the study area:

- *Colubrina nicholsonii*
- *Diaphananthe millarii*

To minimise disturbance within the Coastal Dune Forest, the proposed development will not include the placement of formalised walkways through the area. Instead, the use of the existing footpaths, tracks and hiking trails will be promoted. The proposed viewing deck and braai area adjacent to the Mpako Estuary will be positioned away from large trees and will be positioned to ensure the least possible disturbance to the receiving environment.

4.2. Aquatic ecology

4.2.1. Biodiversity sector plans

Critical Biodiversity Areas

The ECBCP provides areas of priority and conservation in the province. In terms of aquatic features, the study area at Hole in the Wall does not fall within a CBA zone (Figure 17) (Exigent, 2021).

Ecological Support Areas

The study area at Hole in the Wall is classified as an ESA1 (Table 2).

Table 2: Aquatic CBAs and ESAs at Hole in the Wall

Category	Criteria	Criteria description
AQUATIC CBAs and ESAs		
CBA1	Critical Rivers (mainstream)	Main stem rivers of high irreplaceability plus a 32-metre buffer. This includes fish sanctuaries and free flowing / flagship rivers.
	Critical Wetlands	Umzimvubu Wetland Complex, Karst/Limestone wetlands, additional oxbow wetlands, dune and dune bypass wetlands
	Critical Estuaries	Estuaries with a National Biodiversity Assessment (2011) ranking field "core = 1".
CBA2	Important Rivers (DWA main stem)	Main stem river lines plus 32 metre buffer that fall within fish corridors and other selected catchments (wetland clusters) to achieve connectivity, best design sites.
	Wetlands	All remaining wetlands.
	Estuaries	CBA 1 estuary buffer 100m.
		CBA 2 estuaries (all other estuaries).
ESA1	Rivers and River buffer	CBA1 rivers 1000m buffer.
		All other rivers plus 32m buffer.
	Catchments	All catchments that drain into CBA 1 and CBA 2 rivers.
	Wetland buffers	100m buffer around all wetlands.
		Wetland clusters that overlap given 500m buffer.
	Modelled wetlands	Modelled stream channel and valley bottoms plus a 32m buffer.
	Estuary buffers	CBA 2 estuary buffer 100m.
		ESA estuary buffer 100m.
	Strategic Water Source Areas	Strategic surface water source areas based on the CSIR national MAR calculation. Identified at the level of sub-SQ4
	Ground water source areas	Karst-Limestone landscape.

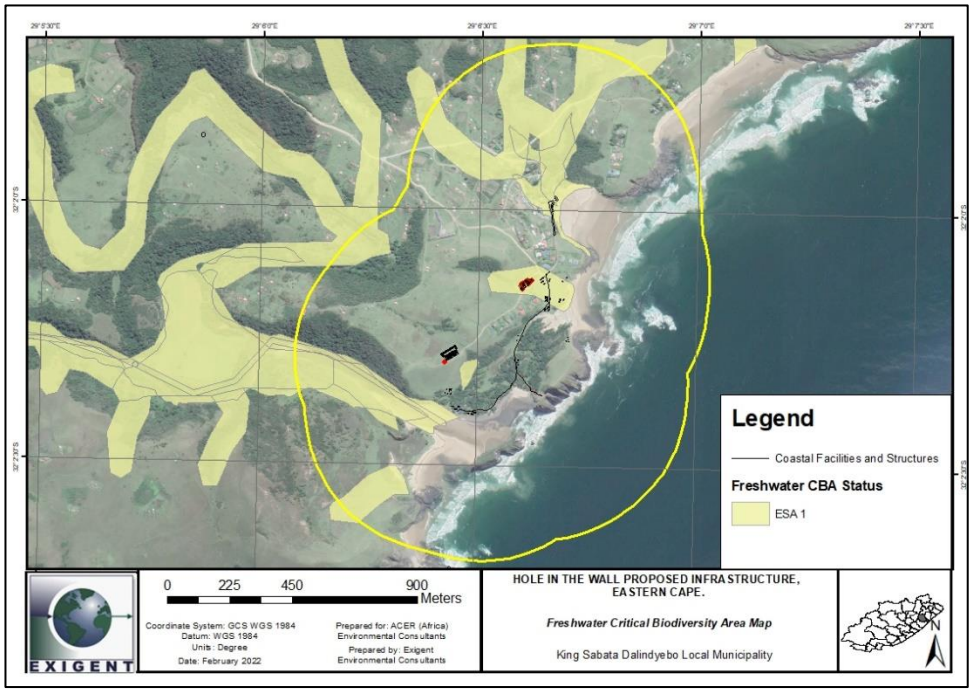


Figure 5: Freshwater/ aquatic CBAs at Hole in the Wall

4.2.2. Vegetation types

There are four vegetation types present within the study area at Hole in the Wall (Figure 4 above):

- Transkei Coastal Belt.
- Subtropical Seashore Vegetation.
- Scarp Forest
- Non-terrestrial (Estuarine Functional Zone).

4.2.2. Aquatic vegetation on site

According to the Aquatic Biodiversity Impact Assessment (Exigent, 2021), the Hole in the Wall study area has been divided into five aquatic vegetation communities namely:

- *Stenotaphrum secundatum - Phoenix reclinata* coastal grasslands/wetlands.
- Mpako Estuary and floodplain grassland.
- Dune wetland.
- Riverine Forest.
- Existing infrastructure

These vegetation communities are interlinked to the terrestrial vegetation communities.

Stenotaphrum secundatum - Phoenix reclinata coastal grasslands/wetlands.

The largest portion of the study area consists of coastal grasslands, with varying species diversity. The wetland species are confined within narrow drainage lines which extend from the hills towards the lower lying areas along the beach (Exigent, 2021). In areas closer to the grassland wetland communities, the density of terrestrial species change to wetland species. The species richness of wetland areas within the coastal grasslands are confined to three or four species (Exigent, 2021).

The wetland areas were dominated by *Stenotaphrum secundatum* and *Cynodon dactylon* accompanied by *Centella asiatica, Eragrostis plana, Phoenix reclinata, Mariscus congestus* and, occasionally, *Miscanthus capensis* (Plate 6).

Plate 6: Vegetation associated with the *Stenotaphrum secundatum - Phoenix reclinata* coastal grasslands/wetlands

Mpako Estuary and floodplain grassland

According to Exigent (2021), the Mpako estuary is described as a temporarily opened/ closed estuary near pristine condition due to the limited anthropogenic impacts occurring within the estuary. On the national ranking system, the estuary is classified as 182/275 and it is recommended that 75 % of the estuary remains undeveloped (Exigent, 2021).

“Sediment transport along the beach environment is significant and this has given rise to ephemeral dune forms and the presence of cover dependent plant species, in particular Passerina rigida. Much of the closed canopy environment comprises of Sideroxylon inerme and Mimusops caffra, which are associated with coastal dune forests” (Exigent, 2021).

Dune wetland

This dune wetland is located between two dunes, with the eastern dune being a low dune with coastal dune forest trees, and the western dune high slope. The wetland contains standing water with several individuals of Phoenix reclinata observed on the outer edges of the dune wetland (Plate 7) (Exigent, 2021). There is an existing footpath that meanders to the eastern side of the dune wetland, before entering the Coastal Dune Forest and heading towards the beach.

Plate 7: Vegetation associated with the *Dune wetland*

Species of concern

Species of special concern was identified by the National DFFE Web Based Environmental Screening Tool. Exigent (2021) looked at the habitat requirements of these species against the available habitat within the study area and the positioning of the proposed infrastructure. The summary of the specialist findings is presented in Table 3.

Table 3: Hole in the Wall floral species of special concern

Sensitivity	Taxon	Feature (s)	Potential of occurring within the study footprint
AQUATIC THEME			
Very high	Aquatic	Wetlands and Estuaries	The proposed construction activities will mostly occur within a disturbed footprint, with limited impact on the natural habitat.
Very high	Aquatic	Freshwater ecosystem priority area and quaternary catchments	

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

Natural veld - good conditionE	Natural veld with scattered aliensE	Natural veld with heavy alien infestationE	Veld dominated by alien speciesE	Gardens
Sport field	Cultivated land	Paved surface	Building or other structure	Bare soil

Refer to Appendix A for the detailed specialist maps, showing the location of sensitive species and Appendix D for the specialist studies.

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:

No.	Description	YES	NO
5.1	Natural area	x	
5.2	Low density residential		
5.3	Medium density residential		
5.4	High density residential		
5.5	Informal residential	x	
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 (describe)	x	

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

N/A

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 Archaeological or palaeontological sites, on or close (within 20m) to the site?	YES	**NO x**
	Uncertain	

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:	Active Heritage was appointed to undertake a Heritage Impact Assessment of the project areas and surrounds. The findings from the specialist study concluded that there were no heritage and cultural resources identified within the Hole in the Wall development node. However, the Hole in the Wall landmark was identified as a "living heritage site" with a high heritage rating. Therefore, no impacts on cultural natural heritage resources are expected. However, the potential does exist for heritage resources to be unearthed during construction activities in the placement of the walkways and viewing decks.

Will any building or structure older than 60 years be affected in any way?	YES	**NO x**
Is it necessary to apply for a permit in terms of the National Heritage Resources Act, 1999 (Act 25 of 1999)?	YES	**NO x**

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

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;

Onsite notices in English and Xhosa (Appendix E) was erected on site near entrance to the Hole in the Wall hiking trail on the 25 March 2021.

(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;

Directly affected property owners have been notified of the proposed development (Appendix E).
- ❑ Where property owners could not be physically contacted, additional copies of all notifications were circulated at popular accommodations in Coffee Bay and Hole in the Wall.

(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 subregulation 54(c)(ii); and

Advertisements (Appendix E) were placed on the 23 March 2021 in a local newspaper providing project and contact details of where to register as an I&AP and obtain further information. Advertisements were placed in the following newspaper:
- ❑ Daily Dispatch (English and Xhosa).

(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.

Compilation of a database of I&APs (Appendix E) identified as being potentially interested and/or affected, including authorities, municipalities, organs of state, councillors, conservation bodies, non-government organisations, landowners, local residents, etc.

- Personalised letters and electronic mail, including a Background Information Document containing relevant details of the project and environmental application process (Appendix E):
- Personalised letters were placed at popular local accommodations including the Nenga River Lodge, Coffee Shack and the Hole in the Wall Hotel. Accommodation managers were requested and encouraged to display the letters on their notice boards and to inform tourists and community members of the proposed development.
- Additional comment sheets were circulated at various accommodations for community members to access and provide their comments.
- BIDs were electronically circulated to all I&APs on the database. A comment sheet was provided for I&APs to update their contact details, register themselves on the database, to record issues and to send back by fax or email. Contact telephone numbers of the project public participation office were provided to enable direct telephonic liaison with the project team, if required.
- A project website containing relevant documentation was set up www.acerafrica.co.za under the current projects link.

During the project announcement period between March 2021 and April 2021, ACER obtained comments from I&APs outlining their concerns associated with the proposed development and the placement of certain infrastructure. ACER reviewed the concerns, conducted an additional site visit to meet with I&APs and requested that MBB amend certain infrastructure components to address I&AP concerns.

Receipt of comments from I&APs and acknowledgement of comments has been ongoing since project announcement in March 2021. Responses to these comments are in the Comments and Responses Report (Appendix E).

Refer below for a table showing a summary of adverts, meetings and project notifications to the public and key stakeholders.

Table 4: Summary of adverts, meetings and project notifications to the public and key stakeholders

Publication/ event	Type	Placement date
Pre-application meeting with DFFE, DEDEAT, KSDLM and MBB	▪ The EAP and project proponent (KSDLM) outlined the proposed development to the competent authority (Eastern Cape DEDEAT). ▪ The Eastern Cape DEDEAT approved the project description, the motivation for the project, the listed triggered activities and the public participation plan.	Conducted on 3 March 2021
Daily Dispatch	▪ English Advertisement	23 March 2021
Daily Dispatch	▪ Xhosa Advertisement	23 March 2021
A2 on-site notice boards	▪ 1 x English and Xhosa Advertisement	25 March 2021
Email and post to database	▪ Notification letter (English & Xhosa) ▪ Background Information Document (BID) (English & Xhosa) ▪ Comment Sheet (English & Xhosa)	Posted on 24 March 2021 and emailed throughout the notification period.
ACER project website	▪ Notification letter (English & Xhosa) ▪ Background Information Document (BID) (English & Xhosa) ▪ Comment Sheet (English & Xhosa ▪ Newspaper Advertisement (English & Xhosa). ▪ Proof of on-site notice boards	Posted 29 March 2021
Site visit with I&APs	▪ Following numerous concerns by I&AP's, ACER undertook a site visit to discuss these concerns. The I&APs provided alternative locations for infrastructure components.	21 April 2021
Meeting with MBB	▪ After the I&AP site visit, ACER conducted a meeting with MBB to discuss the proposed amendments to the initial layout. ▪ MBB acknowledged the proposed amendments and requested the approval from the DFFE.	28 April 2021
Distribution of Draft BARs to the public for 30-day comment	▪ The Draft BARs were initially circulated for a period of 30 days (from 16 November 2021 – 07 January 2022). ▪ The comments raised during this period required the project team to revise the project layout at Coffee Bay and Hole in the Wall. ▪ At the site visit undertaken on 27 January 2022, DEDEAT advised that the project undergo another 30-day comment period following the significant project changes.	16 November 2021 – 07 January 2022

2. CONTENT OF ADVERTISEMENTS AND NOTICES

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

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

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.

Following the comments raised at the public meeting, the project team (members from MBB, DFFE, KSDLM, Eastern Cape DEDEAT, ACER and the appointed specialists) undertook a site inspection to discuss the main issues and provide recommendations.

The meeting took place on Thursday, 27 January 2022 and involved visits to both Coffee Bay and Hole in the Wall and covered the main issues described in the sections below.

Circulation of the Draft BAR for public review

- ❑ As advised by the Eastern Cape DEDEAT, the Draft BAR was circulated again for review for a period of 30 days.
- ❑ Stakeholders on the project database (registered stakeholders) were notified of the availability of the draft BAR & EMPr for comment, for a period of 30 days (all I&APs including authorities). Notification was done via email.
- ❑ Hard copies of the Draft BAR and EMPr will be made available at the Hole in the Wall Hotel for public review.
- ❑ Electronic of the draft BAR & EMPr were provided to all key commenting authorities and organs of state.
- ❑ Electronic copies of the BAR and EMPr were also made available on the ACER website www.acerafrica.co.za under the current projects link for I&APs to access and download.
- ❑ Comments submitted on the draft BAR will be recorded and responded to in the FBAR and in the Comments and Responses Report.

5. 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.

The following comments and responses report are provided in Appendix E:

- ❑ Project Announcement Period.
- ❑ Initial 30-day comment period (16 November 2021 – 07 January 2022).
- ❑ Second round of public comment (10 March 2022 – 11 April 2022).

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:

- ❑ Eastern Cape Department of Human Settlements, Water and Sanitation (DHSWS)
- ❑ Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT)
- ❑ King Sabata Dalindyebo Local Municipality
- ❑ OR Thambo District Municipality
- ❑ National Department of Forestry, Fisheries and Environment (DFFE)
- ❑ South African Heritage Resources Agency (SAHRA)
- ❑ Eastern Cape Provincial Heritage Resources Authority (ECHRA)
- ❑ National Department of Tourism

List of authorities from whom comments have been received:

- ❑ Eastern Cape Department of Human Settlements, Water and Sanitation (DHSWS)
- ❑ Eastern Cape Department of Economic Development, Environmental Affairs and Tourism (DEDEAT)
- ❑ King Sabata Dalindyebo Local Municipality
- ❑ OR Thambo District Municipality
- ❑ National Department of Forestry, Fisheries and Environment (DFFE)
- ❑ South African Heritage Resources Agency (SAHRA)
- ❑ Eastern Cape Provincial Heritage Resources Authority (ECHRA)
- ❑ National Department of Tourism

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 subregulation 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 x**

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

[redacted]

SECTION D: IMPACT ASSESSMENT

The assessment of impacts must adhere to the minimum requirements in the EIA Regulations, 2014 as amended, 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.

- ❑ Sense of place within the area (introduction of infrastructure (viewing decks) within key areas at Hole in the Wall (Whales Back/ Boiling Pot).
- ❑ Biodiversity and sensitivity (loss of habitat within the Coastal Forest – introduction of formalised walkways within portions of the Coastal Forest).
- ❑ Placement of braai/picnic areas within the Coastal Forest.
- ❑ Proposed streetlights (impact on "sense of place")/
- ❑ Dune disturbance and parking.
- ❑ Safety and security (harassment, informal carguards & tour guides, muggings and robberies)

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):

- ❑ Sense of place within the area (introduction of infrastructure (viewing decks) within key areas at Hole in the Wall (Whales Back/ Boiling Pot).
  - The viewing deck that was initially proposed to overlook the Boiling Pot/ Whales Back has since been removed from the proposed development. The impact on the "sense of place"/ visual was noted and the component has since been removed.
  - The viewing deck has been repositioned to a location that will cause the least possible ecological/ visual disturbance and is hidden/ screened by the surrounding vegetation.
- ❑ Biodiversity and sensitivity (loss of habitat within the Coastal Forest – introduction of formalised walkways within portions of the Coastal Forest).
  - The dedicated walkways that were initially proposed along certain portions within the Coastal Forest has since been removed from the proposed development.
  - The proposed development will now involve the utilization of existing tracks, footpaths and hiking trails to navigate through the Coastal Forest. This will minimise potential physical disturbance, whilst maintaining the sense of place within the area.
- ❑ Placement of braai/picnic areas within the Coastal Forest.
  - The purpose for the dedicated braai/ picnic areas was to provide isolated areas, to minimise the number of informal fires and firewood within the Coastal Forest. The placement of these braai/ picnic areas was revised and removed from areas within the Forest, instead, they will be positioned in open, previously disturbed spaces closer towards the coastline.
  - Braai/ picnic areas will be fitted with waste receptacles for the storage of general waste.
- ❑ Proposed streetlights (impact on "sense of place").
  - The positioning of the streetlights has been revised and will not involve the erection of streetlights along the access road from Coffee Bay to Hole in the Wall.
  - Streetlights will only be erected within he Hole in the Wall development node.
- ❑ Dune disturbance and parking.
  - Presently, there is inadequate parking at Hole in the Wall. Tourists/ beach goers are forced to park their vehicles along portions of the sensitive dune environment.

- The proposed development will involve the placement of two dedicated parking areas at Hole in the Wall. The first parking area will be located at the existing ablution facilities and the second parking area is located near the turning circle overlooking the Hole in the Wall feature.

❑ Safety and security (harassment, informal carguards & tour guides, muggings and robberies).

- The King Sabata Dalindyebo Local Municipality will be responsible for the operational phase of the development. The Municipality has been requested to provide comment/ insight into the ongoing issues being experienced at Hole in the Wall. Together with the National Department of Forestry, Fisheries and the Environment (DFFE – project funders), the Municipality intends to address this issue.

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.

2.1. Direct and Indirect Impacts (Preferred alternative)

2.1.1 Impacts on the socio-economic environment

During the planning, design and construction phases, economic and socio-economic benefits will accrue locally, regionally, and nationally through project spend. There will be increased opportunities for temporary employment (albeit largely unskilled and semi-skilled positions) and capacity building for individuals, local contractors, SMMEs and service providers.

The proposed refurbishment and construction of coastal infrastructure at Hole in the Wall aims to unlock future development opportunities within the area. The Municipality is working towards establishing Coffee Bay and Hole in the Wall as a coastal town in the Eastern Cape. The formalisation of coastal access will encourage safe, sustainable tourism and attract both local and international investors.

The proposed refurbishment and construction activities will provide the following opportunities to the Hole in the Wall community:

- ❑ Skills development.
- ❑ General employment opportunities.
- ❑ Increased revenue into the Hole in the Wall community.
- ❑ Unlock future development within the area.

ASSESSMENT OF SIGNIFICANCE

The proposed refurbishment and construction of coastal infrastructure at Hole in the Wall may be considered a relatively small development, however, it will provide employment opportunities to members of the community (during the construction and operation phases). During construction, employment opportunities will be limited in duration and skill set (unskilled labour – bush clearing, infilling, establishment of walkways etc.). However, given the economic characteristics of the area, employment opportunities will be welcomed.

During the operational phase of the development, tourism within the area is expected to increase. The formalization of beach and coastal access will promote tourism and local investment within the area. It is predicated that the refurbishment of infrastructure and the provision of formalized parking areas will initiate future development within the area and unlock more economic opportunities and promote and/or stimulate the local community.

It is the EAP's opinion that the proposed refurbishment and construction of coastal infrastructure at Hole in the Wall will have a positive impact on the socio-economic environment through employment creation and skills development within the Hole in the Wall community, where such opportunities are scarce. Informal traders (who sell locally produced curios and traditional wares (carvings, reed mats and bags, etc.)) may also have an opportunity to generate additional income.

2.1.2 Impacts to the biophysical environment and biodiversity (water, soils, wetland, terrestrial/ aquatic natural habitat and fauna).

Impacts on the biophysical environment are often caused by factors which are interrelated and often have common triggers which can impact on several biophysical parameters. Consequently, many of the proposed mitigation measures to limit impacts on the biophysical environment may be applicable to more than one impact. Due to the limited footprint, the habitat disturbance within the study area is likely to be limited. The design will not include the establishment of poly-timber walkways in the lower-lying coastal forest.

The description of impacts and their assessment of significance which follows takes note of this and specific mitigation measures are not repeated. All proposed mitigation measures are included in the EMPr provided in Appendix F and must be implemented on site. For further detail, refer to the ecological impact assessment (terrestrial and aquatic), beach and coastal impact assessment and the heritage impact assessment in Appendix D.

Impact on CBAs

CBAs are considered important in achieving biodiversity targets and thresholds. These helps ensure the promotion of populations and functionality of ecosystems. The Eastern Cape Biodiversity Conservation Plan (2019) highlights the important vegetation types and species that require protection in the area.

Terrestrial CBA
Hole in the Wall falls within terrestrial CBA 1; however, portions of the CBA include disturbed habitats which include the presence of rural households, informal parking areas, disturbed areas along the coastline associated with informal braai and picnic spots and other existing infrastructure. The largest portion of the proposed development is within the Coastal Dune Forest; however, poly-timber walkways will not be established within this area. At the Hole in the Wall Hotel, the CBA1 area is located adjacent to the Hotel and the existing access road. The road refurbishment will take place within the existing disturbed footprint and will make use of grass blocks to reduce hardened surfaces.

Aquatic CBA
Hole in the Wall does not fall within an aquatic CBA unit.

ASSESSMENT OF SIGNIFICANCE
Although potential impacts on the CBAs within the proposed footprint are unavoidable, they can be largely mitigated and are not considered significant for the proposed development given the following factors considered in the design.

- The design proposal has been amended to exclude the construction of walkways through coastal forests.
- The design proposal has been amended to exclude the construction of a viewing deck and walkway at the Boiling Pot/ Whales Back
- The dedicated parking areas have been positioned away from protected, threatened or endangered vegetation species.
- The material of the dedicated parking areas has been revised to now include grass blocks. The grass blocks reduce hardened surfaces and will promote vegetation growth and allow water to seep into

the ground which is an important water source for vegetation. In addition to the above, the grass blocks at parking area 02 will direct storm water flow to the existing storm water infrastructure.

Key mitigation measures which will be implemented on site to reduce the impacts CBAs include:

- The footprint of the proposed infrastructure components must be managed and kept to a minimal.
- No vegetation in areas outside of the development footprint may be cleared and/or removed.
- Construction activities must take place in designated areas, outside the CBA and ESA zones.
- All disturbed areas (surrounding the viewing deck, walkway accessing the viewing deck, parking areas and braai and picnic areas) must be landscaped to near-natural profiles and revegetated after construction.
- Soil from excavated areas (for landscaping purposes) must be reinstated as quick as possible to minimize the possible disturbance to receiving environment.
- Soils must be monitored for signs of erosion at regular intervals. Upon identification of a potential erosion problem, measures must be put in place to prevent further soil loss.
- All topsoil must be stored within designated stockpile areas.
- Topsoil must not be buried, mixed with spoil (excavated subsoil), rubble or building material, or subjected to compaction or contamination by vehicles or machinery. This will render the topsoil unsuitable for use during rehabilitation.
- The Contractor will be held liable for the replacement of any topsoil rendered unsuitable for use during rehabilitation, for reasons due to his negligence or mismanagement on site.
- The Environmental Control Officer (ECO) and Contractor must ensure that all wetlands and CBA units likely to be affected by the project have been identified, delineated, photographed and clearly marked by the ECO prior to any construction work commencing.

If the proposed mitigation measures are implemented and enforced on site, it is the EAP's opinion that the impact on CBAs are anticipated to be negligible both during construction and operations.

Impact on ESAs

For the most part, the proposed infrastructure will traverse disturbed and/or modified habitats, which have low conservation statuses attached to its flora and fauna. Infrastructure within the Coastal Dune Forest will be reduced, with only one braai and picnic area being established in a previously disturbed area. During construction, the movement of people and machinery, vegetation clearance and earthworks associated with the establishment of parking areas and the viewing deck will cause minor disturbance to flora and fauna. These disturbances can either be direct physical disturbances (clearing of vegetation) or indirect (noise and vibrations) which will impact on ecosystem functioning. No significant impact is anticipated on ESAs as the project infrastructure has been placed taking biophysical conditions into account and every effort has been made to protect the coastal dune forest at Hole in the Wall.

Terrestrial ESA

According to Exigent (2021), the grassland area is classified an ESA1 area. There is potential for faunal species movement through these areas from the surrounding Coastal Dune Forest which provides protection from anthropogenic activities, such as hunting. The proposed infrastructure (dedicated parking areas, braai and picnic areas and the road refurbishment at the Hole in the Wall Hotel) will be located within this ESA1 zone. The specific location of various infrastructure will be proposed in the open areas and/or existing disturbed footprints where localised impacts have caused the vegetation to be disturbed.

Aquatic ESA

According to Exigent (2021), selected areas of the grassland are classified as an ESA1 area. Both parking areas are located within ESA1 areas, however, parking area no.02 is located upstream of the drainage line wetland and should therefore not be formalised with hardened surfaces.

ASSESSMENT OF SIGNIFICANCE

Impacts on the ESAs although unavoidable within the construction footprint, can be largely mitigated and are not considered significant for the proposed development given the following factors considered in the design:

- The development footprint has maximized the use of areas previously disturbed by anthropogenic factors.
- The placement of the viewing deck and short section of walkway being used to access the viewing deck have taken into consideration the prevailing vegetation.
- The construction footprint of the viewing deck will be selected to fit into existing disturbed patches of coastal vegetation and will be placed to avoid the need to remove large trees on the coastal dune.
- Due to the sensitivity of the Coastal Dune Forest, the installation of formalized poly-timber walkways through this area has not been included in the final design layout.
- Braai and picnic areas will be positioned within previously disturbed areas and large trees will be maintained to provide natural shade.
- Formalised walkways and viewing decks at the Boiling Pot/ Whales Back have been removed from the initial design proposal.
- Braai and picnic areas have been strategically positioned along the coastline and in disturbed areas and will not be positioned within the Coastal Dune Forest.

The Coastal Dune Forest provides refuge for faunal species from anthropogenic activities and the protection of this habitat should be maintained to provide refuge for faunal species. The development footprint has been amended to remove the installation of formalized walkways and the placement of braai and picnic areas within this forest. Given the small development footprint within this area and materials to be used for the construction of the parking areas, braai and picnic areas and the road refurbishment adjacent to the Hole in the Wall Hotel, the impact on fauna within the area is not considered to be significant. Faunal species within the area are anticipated to move away from the construction areas during construction due to noise and vibrations associated with construction. This will be for a limited period and once construction has been completed fauna is expected to move back into the surrounding habitats. Consequently, impacts on fauna are not anticipated to be significant; however, the contractor should brief staff to be vigilant for smaller species.

Key mitigation measures which will be implemented on site to reduce the impacts on ESAs include:

- Prior to construction commencing, the project area must be inspected by the ECO to identify the following:
  - Protected trees (which should be avoided as far as possible).
  - If a protected tree species needs to be removed, the contractor must obtain the agreement of the ECO and the necessary license from the DFFE.
  - Indigenous trees that should not be removed (these must be marked by the ECO using barrier tape).
  - Suitable sites for the relocation of sensitive plant material must be identified in the surrounding scarp Forest.
- The removal of indigenous vegetation must be kept to a minimum by reducing the construction footprint and by confining areas for structures to existing disturbed areas.
- The footprint of the proposed infrastructure components must be managed and kept to a minimal.
- No vegetation in areas outside of the development footprint may be cleared and/or removed.
- Construction activities must take place in designated areas, outside the CBA and ESA zones.
- Prior to any disturbance/stockpiling and clearing of natural vegetation and soil (either within the construction servitude, working footprint or at designated stockpile area outside of the construction footprint), the Contractor must submit a method statement to the Project Engineer for approval.
- The Contractor must ensure that the necessary rescue and translocation of plants and animals be undertaken prior to the commencement of construction.

- ❑ Wild animals must not be fed, handled, removed, hunted, snared, captured, injured, or killed or otherwise interfered with.
- ❑ Prior to the clearance of any vegetation the ECO and Contractor must check that no bird nests will be disturbed by the proposed vegetation clearing.
- ❑ Fauna and flora within the surrounding environment must not be disturbed.
- ❑ Intentional killing of any faunal species should be avoided by means of awareness programs and toolbox talks presented to construction labourers. Any person found deliberately harassing any animal in any way must face disciplinary measures.
- ❑ If any faunal species is recovered during the construction phase, this species must be relocated to the nearest natural open space with suitable habitat for the particular species to survive.
- ❑ Where excavations pose a safety risk to animals, the Contractor must ensure that they are adequately cordoned off.
- ❑ Strict management during construction phase to limit the extent of the footprint of the impact.
- ❑ No areas outside the final footprint may be cleared.
- ❑ Management of construction related impacts such as eating areas, concrete mixing areas, storage yard should only be allowed in designated areas.

If the proposed mitigation measures are implemented and enforced on site, it is the EAP's opinion that impacts on ESAs although unavoidable, are anticipated to be negligible both during construction and operations.

Impact on protected and expansion areas

Based on the NPAES database (South African National Biodiversity Institute (SANBI), 2010) no protected and expansion areas occur within the study area.

ASSESSMENT OF SIGNIFICANCE
The impacts on protected of expansion areas during construction and operation is not considered significant for the following reasons:

- ❑ There were no protected or expansion areas observed within the proposed development footprint.

Impact on strategic water source areas

Most of the study area occurs within the sub-nationally important surface water Pondoland Coast Strategic Water Source area, which extends for an area of 13,461 km2 along the Transkei coast (Exigent,2021). The proposed coastal infrastructure components will not impact on the water source and surrounding wetland vegetation units as there will be limited infrastructure components. However, there is the risk of pollution of the water source area from the leaking of fuels and hydrocarbons from construction machinery and equipment, and from solid waste pollution and sewerage leaks or spills. The Mtonjane estuary (adjacent to the Hole in the Wall Hotel) is located within 50 m from the proposed boat launch and road rehabilitation and care must be taken when conducting construction activities.

ASSESSMENT OF SIGNIFICANCE
Impacts on water source areas, wetlands and stream crossings can be largely mitigated and are not considered significant given the following design considerations:

- ❑ Where possible, the placement of braai and picnic facilities will be located within the existing, disturbed, informal picnic areas adjacent Mpako estuary and Mtonjane estuary.
- ❑ The dedicated parking areas will not be located close to or within any NFEPA wetlands or identified estuaries.
- ❑ The dedicated parking areas will be constructed using grass blocks to minimize hardened surfaces and to allow water to seep into the receiving environment.
- ❑ The material for the road refurbishment will include grass blocks.

- ❑ The formalization of the boat launch site will take place within the disturbed footprint of the existing boat launch site.
- ❑ In the event that wetland and/or vegetation units are affected, the appropriate mitigation measures must be adopted to avoid or reduce any significant impacts.

Key mitigation measures which will be implemented on site to reduce the impacts strategic water source areas include:

- ❑ The contractor must not cause any physical damage to any aspect of a watercourse, other than that necessary to complete the works as specified and in accordance with the accepted method statement.
- ❑ The appointed ECO and contractor must ensure that all wetlands and rivers/streams likely to be affected by the project have been identified, delineated, photographed, and clearly marked by the ECO prior to any construction work occurring.
- ❑ Where possible, the timing of trenching and pipe laying through the artificial system should be during the low flow season to minimise increased sedimentation and turbidity.
- ❑ The contractor must avoid unnecessary compaction on sensitive wetland and riparian soils.
- ❑ No construction materials may be stockpiled in any wetland and riparian areas.
- ❑ Replanting of wetland and riparian vegetation must be undertaken immediately after surface reinstatement is complete.
- ❑ The use and handling of all chemicals and potentially hazardous substances must take place on an impermeable surface and bunded areas to prevent chemicals and potentially hazardous substances from infiltrating the soil.
- ❑ Contingency plans must be compiled for possible spillages of dangerous goods and include details for decontamination and process to be followed.
- ❑ A spill kit must be available in the event of a hydrocarbon or chemical spill.
- ❑ The ECO and contractor must ensure that all wetlands and rivers (estuarine habitats) likely to be affected by the project have been identified, delineated, photographed and clearly marked by the ECO prior to any construction work occurring.
- ❑ The culvert crossings should be designed to ensure that flow patterns along the wetland is not altered or diverted potentially resulting in stream bed and bank erosion and instability.
- ❑ Engineering designs should cater for current wetland conditions to ensure limited impaction on the function of wetlands.
- ❑ Construction activities and lay down activities should be located outside the wetland buffer zones.
- ❑ No construction in wetlands may take place until such time as approval has been obtained from DHSWS.

2.1.3 Impact on the coastal and dune habitat

According to the Beach and Coastal Impact Assessment specialist report (Appendix D), the infrastructure proposed for the Hole in the Wall site may be generally considered to be of low impact. Although the proposed layout was updated to accommodate the initial findings of the specialist and I&AP comments, some impacts are still anticipated. A cautious approach should be taken when planning and establishing the proposed features.

Disruption to geomorphological drivers and features within he supra tidal zone

The beach formation around the estuaries comprises of medium grained sands and shingle. Sediment transport along the beach environment has given rise to the ephemeral dune forms and the presence of cover dependant species such as Passerina rigida. The banks of the Mpako estuary are exposed to flood events as was observed by the placement of large rocks, boulders and other material closure to the shore.

The wetland habitat within the Coastal Dune Forest is also a driver within the study area and, as such, any formalised walkways should give due consideration to the avoidance of the wetland environment.

ASSESSMENT OF SIGNIFICANCE
Impacts on the geomorphological drivers and features associated with the supratidal zone although unavoidable within the construction footprint, can be largely mitigated and are not considered significant for the proposed development given the following factors considered in the design:

- The proposed development does not include the establishment of formalized poly-timber walkways through the Coastal Dune Forest, wetland environments or areas near the Mpako and Mtonjane Estuaries.
- There will be no infrastructure positioned within the lower flood terrace of the Mpako Estuary.

Key mitigation measures which will be implemented on site to reduce the impacts associated with the disruption to geomorphological drivers:

- The informal pathways to access Hole in the Wall should be maintained as informal structures.

Disruption of the sane sharing system associated with the Hole in the Wall coastline

To the immediate north of the Mpako Estuary, there is a "drowned sand bypass system". The SANBI vegetation dataset incorrectly describes this as a "scarp forest", however, much of the vegetation within the area is associated with dune forest habitat forms (S. inerme and M. caffra, which are associated with dune forest habitat forms. According to SDP (2021), "there are a number of psammoseral or dune species, including *Eugenia capensis* and *Chrysanthemoides monilifera*, within this forest form and these are testimony to the former state of this area, namely as a transgressive sand bypass system".

More recently, the bypass system has become more stabilised by the establishment of vegetation however there are signs that the bypass system has undergone mobilisation and shifting (which could be linked to the prevailing north easterly winds).

ASSESSMENT OF SIGNIFICANCE
Impacts on the sand sharing system although unavoidable within the construction footprint, can be largely mitigated and are not considered significant for the proposed development given the following factors considered in the design:

- The proposed development will not include formalized walkways near the sand bypass system. Instead, the use of existing footpaths, tracks and hiking trails will be promoted.
- Where possible, the dedicated braai and picnic areas will replace the old, damaged infrastructure.

Key mitigation measures which will be implemented on site to reduce the impacts associated with the disruption of the sand sharing system:

- Formalised infrastructure components may affect sediment transport within the area. As such, infrastructure should not be placed within the sand bypass system.
- Avoidance of the beach environment near the Mpako Estuary is required to maintain ephemeral dune structures.

Disturbance affecting the prevailing habitats

The proposed development at Hole in the Wall will result in the following impacts arising:

- Possible changes to the sand sharing system and sediment transport, particularly around the identified dunes and the sand bypass system.
- Clearance and/or disturbance to the lower dune forest and/or flood plain habitat.

ASSESSMENT OF SIGNIFICANCE

Impacts on the prevailing habitats although unavoidable within the construction footprint, can be largely mitigated and are not considered significant for the proposed development given the following factors considered in the design:

- There are no viewing decks, formalized walkways, or braai/picnic/resting areas in proximity to the sand bypass system.
- The position of braai and picnic areas have been strategically located away from the coastal dune forest.

Key mitigation measures which will be implemented on site to reduce the impacts associated with the disruption of prevailing habitats:

- Disturbance along the dune formations, sand bypass system and estuaries must not be kept to a minimum.

2.1.4 Impact on Cultural Heritage resources

Active Heritage was appointed to undertake a Heritage Impact Assessment of the project areas and surrounds. The findings from the specialist study concluded that there were no heritage and cultural resources identified within the Hole in the Wall development node. However, the Hole in the Wall landmark was identified as a “living heritage site” with a high heritage rating.

Therefore, no impacts on cultural natural heritage resources are expected. However, the potential does exist for heritage resources to be unearthed during construction activities in the placement of the walkways and viewing decks.

ASSESSMENT OF SIGNIFICANCE

It is possible that sub-surface heritage resources could be encountered during construction. The ECO and all other persons responsible for site management and excavation should be aware that indicators of sub-surface sites could include:

- Bone concentrations, either animal or human.
- Fossilized remains of fauna and flora, including trees.
- Shell middens along the dune formations and beach area.

Key mitigation measures which will be implemented on site to protect cultural heritage:

- The local indigenous beliefs and the associated “underwater symbolic complex” must be respected.
- A buffer zone of 50 m must be maintained around the Hole in the Wall feature. The feature must not be changed or damaged.
- The National Heritage Act (1999) requires that if any graves older than 60 years, or any archaeological and historical residues are encountered, activities must cease immediately pending an evaluation by the respective heritage authority.
- Should the project extend beyond the current footprint (which may involve vegetation removal and/or clearance), a prior assessment by a qualified heritage practitioner must be undertaken.
- The chance finds procedure incorporated in the EMPr must be abided by if heritage resources are uncovered on site.

If the proposed mitigation measures are enforced, it is the EAP's opinion that little to no impact on heritage resources will occur during construction and operation.

2.1.5 Impact on health, safety, security and other nuisance impacts

The construction team's activities within the construction footprint may generate nuisance impacts such as:

- Increased noise level.
- Increased dust emissions.
- Temporary disruption of access.
- Increase in criminal activity and possible theft.
- Spread of diseases (COVID 19).
- Disturbance of peace and privacy.

The most severe impacts will most likely be experienced by:

- Residents along Hole in the Wall Cottage Drive and Hole in the Wall View Drive (situated opposite the proposed construction activities associated with the dedicated parking area).
- Hole in the Wall Hotel staff, management and guests (the proposed road refurbishment and boat launch site is located adjacent to the hotel).

ASSESSMENT OF SIGNIFICANCE
The significance of nuisance related impacts largely depends on the planning measures and management interventions taken by the project proponent in scheduling construction works and the daily management of construction staff.

To limit possible nuisance impacts on different user groups, the project proponent must engage with the municipality to agree on a construction schedule and ensure that all user groups and/or I&APs are notified well in advance of construction commencing. If the project proponent adopts an active role during the construction and operation phase of the development, it is the EAP's opinion that nuisance related impacts can be largely mitigated.

Key mitigation measures which will be implemented on site to reduce nuisance impacts include:

- Contractors must abide by Construction Regulations and Health and Safety Regulations.
- The contractor and staff are required to attend an environmental awareness training/ induction course prior to construction commencing and keep attendance registers.
- Cordon off construction sites and maintain boundary walls/fences/ boards in proximity to residential homes, lodges etc.
- Provide safe areas for pedestrian access.
- Surrounding communities must be informed about the project and asked to brief their children about the dangers of entering construction sites.
- Private property, access roads and other existing services on and in the vicinity of the construction site must be treated with respect and protected against damage. The contractor must bear the cost to repair damages as a result of the contractor's operations on site.
- Inform staff of the risk of contraction, the symptoms thereof, and the steps for prevention and treatment of the following:
- HIV/AIDS.
- Tick bite fever.
- Heat stroke.
- COVID-19.
- Dust control management practices and procedures must be defined during the design phase to ensure the effective suppression of dust during construction. The construction of the proposed

viewing deck adjacent to the coastal dune forest is not expected to generate noise and dust, however, the contractor must compile method statements for conducting work within these environments.

- ❑ Dust control management practices and procedures must be implemented during the construction of the proposed parking areas.
- ❑ Dust-suppression techniques (e.g., the use of water spray vehicles) must be employed on all exposed surfaces during periods of high wind. Additional dust suppressing activities include:
- ❑ Remove only limited vegetation to accommodate construction activities.
- ❑ Spray unpaved roads and construction areas, including stockpiles and spoil, with water routinely throughout construction to contain dust.
- ❑ No construction activities should be undertaken outside of standard business hours (06h00 – 17h00 Monday to Friday and 07h00 – 13h00 on Saturdays). There should be no construction activities on Sundays and public holidays.

2.1.6 Impact on existing infrastructure, services and land use

The construction team's activities within the construction footprint may generate the following impacts on existing infrastructure, services and/ or land use:

- ❑ Temporary traffic disruptions.
- ❑ During construction, the movement of traffic such as heavy machinery, delivery vehicles and construction activities may pose a risk to people and domestic animals.
- ❑ Construction related delays to vehicles (stop-go's and temporary road closures) utilising the existing roads which access the site will take place during construction, however these impacts will be limited to the construction phase which is expected to take a few months to complete.
- ❑ Nuisance related impacts associated with the proposed refurbishment and construction of coastal infrastructure at Hole in the Wall is not expected to be significant and the improved facilities and infrastructure within the development node are expected to reduce nuisance related impacts during operation
- ❑ Disturbance to existing infrastructure, services, and properties.
- ❑ During the construction phase, the adjacent businesses (especially the Hole in the Wall Hotel) and homeowners may be affected by increased noise levels, traffic, and other nuisance impacts.

ASSESSMENT OF SIGNIFICANCE

The proposed refurbishment and construction of coastal infrastructure at Hole in the Wall will result in some disturbances to services, access, and land use; however, these impacts are not considered significant if the proposed mitigation measures are implemented and the conditions outlined in the EMPr are enforced.

Access to the site (and the Hole in the Wall Hotel) is gained through existing access roads. During the construction period, increased traffic volumes are expected because of increased construction plant on site. However, if the proposed mitigation measures are implemented, disturbances associated with access, sense of place, material deliveries and movement of staff will be significantly reduced.

The surrounding communities should be made aware of the proposed development prior to construction commencing. The developer and/or contractor should outline the work schedule and explain the working areas and the associated no-go areas.

Key mitigation measures which will be implemented on site to minimise impacts on existing infrastructure, services and land use include:

- ❑ Appropriate temporary traffic control and warning signage must be erected and implemented on all affected roads in the vicinity.
- ❑ Construction workers and construction vehicles must take heed of normal road safety regulations (all personnel must obey and respect the law of the road).

- Adequate signage and traffic control measures such as traffic lights, manned stop-go and traffic calming devices should be in place to ensure both driver and pedestrian safety.
- Ensure that all construction staff and workers sourced from the surrounding community undergo road safety training.
- Ensure that all staff members and people on site have suitable Personal Protective Equipment (PPE).
- Ensure there is suitable signage informing road users of construction activities. During the operational phase, clear signage must be erected to indicate the dedicated parking areas and/or parking bays
- Implement measures to reduce traffic speed.
- Ensure measures are put in place to prevent unauthorised people from accessing the areas where construction is taking place.
- As far as possible, existing roads must be used for access purposes, as per the construction site layout plan.
- Community complaints with regards to noise must be responded to, taking reasonable action to ameliorate the impact.

2.1.7 Pollution and waste related impacts

During the construction phase of the proposed development at Hole in the Wall, there is a risk of pollution and waste related impacts which could, if not managed correctly, cause significant impacts on the receiving environment. At the Hole in the Wall Hotel, the refurbishment of the access road and the construction of the boat launch has the potential to pollute the receiving environment and water bodies (Mtonjane Estuary) (if not managed correctly). The storage of materials required for the construction of the dedicated parking areas, braai and picnic areas and the viewing deck (and short walkway accessing the viewing deck) may also have the potential to pollute the environment if materials are not stored correctly. Surface runoff from the construction footprints of the dedicated parking areas and boat launch site have the potential to pollute the receiving environment if runoff is not contained and managed correctly.

Surface runoff, sewerage, wastewater and the pollution of stormwater/ watercourses

- Sewage and wastewater will be generated at the construction site (which will be equipped with portable toilets). Wastewater may potentially pollute soils, and underground and surface water.
- Concrete mixing may cause pollution if not responsibly managed. Topsoil that is contaminated by concrete wash hardens and becomes unusable by plants.
- Potential pollution of water resources and soils can occur from spillages and leakages of fuels and other chemicals used during construction, thus, negatively affecting the biophysical environment and/or surrounding land users.
- The construction of hardened surfaces (viewing deck, parking areas and the formalized boat launch ramp onto the beach) has the potential to accelerate surface runoff into the receiving environment.

ASSESSMENT OF IMPACTS

Surface water resources (Mpako Estuary, Mtonjane Estuary, and other associated wetland units) close to the proposed development may become contaminated because of contaminated runoff. This could be a result of spillages and mismanagement of petrochemical substances on site where stormwater transfers these pollutants into the receiving environment. The risks for polluting of the receiving environment are particularly pertinent to the proposed construction of the boat launch adjacent to the Mtonjane Estuary.

Key mitigation measures which will be implemented on site to reduce the impacts on surface runoff and pollution include:

- Appropriate drainage measures must be installed to ensure that excessive run-off, and as a result, soil erosion, does not occur from the construction site.
- Storm water diversions must be constructed above the construction footprint to direct runoff away from the construction footprint.

- Stormwater control measures must be implemented where required, with all storm water generated from exposed areas channeled to temporary settling ponds which will allow the water to naturally filter back to the watercourse after settling out the solids.
- All areas impacted by earth-moving activities to be re-shaped to ensure natural flow of runoff and to prevent ponding.
- Landscaping and the planting of indigenous vegetation must be undertaken within the picnic and braai areas to ensure the stabilisation of the soil.
- Concrete may only be mixed in an area of low environmental sensitivity to be identified and approved by the ECO.
- Cement may not be mixed directly on the ground, but rather on a protective sheet or board.
- During construction, portable toilets are to be provided and regularly serviced by a suitably qualified service provider. Sewage must be disposed at a licensed wastewater treatment works and under no circumstances may it be dumped in the bush or buried. Proof of disposal by the appointed service provider must be kept in the environmental file on site.

If the proposed mitigation measures and those contained in the EMPr are enforced on site during the construction and operation of the proposed development, it is the EAP's opinion that the impacts associated with wastewater, surface water and other pollutants affecting water resources will be significantly reduced and are not considered to be significant.

Solid waste

Solid waste will be generated during construction and operation of the proposed development. General waste from construction activities will be collected for disposal. During construction, all construction material and/or waste must be disposed of at the Mqanduli Landfill Site. During operations, all general waste must be disposed of at the multipurpose buy back centre and waste transfer facility in Coffee Bay. Excess spoil material generated for the infilling and shaping of the proposed parking areas, braai and picnic areas and road refurbishment will be reinstated and backfilled to reduce possible sediment deposition and runoff into the receiving environment.

ASSESSMENT OF SIGNIFICANCE
During construction, solid waste will be collected and disposed of at the landfill site in Mqanduli. Waste recycling is encouraged and where possible, general waste items must be separated for recycling. Recyclable material may be given to local community members to either recycle on their own, used for the production and manufacturing of products (chains, bracelets, toys etc.), or dropped off at the multipurpose buyback centre in Coffee Bay. The existing infrastructure components (old picnic benches, etc.) will be demolished and disposed of at the Mqanduli Landfill Site.

During operation, the proposed facilities will promote access to tourists, community members and beach goers. The provision of the dedicated braai and picnic areas along the coastline has the potential to increase waste generation (general waste items, plastics etc.). However, all new infrastructure components (braai and picnic areas, dedicated parking areas and the viewing deck) will include the provision of waste receptacles for the collection of waste.

Key mitigation measures which will be implemented on site to reduce pollution impacts from solid waste include:

- Solid waste is to be stored onsite in an appropriate manner until it can be disposed at the nearest identified, licensed waste fill site (Mqanduli Landfill Site).
- The contractor is to exercise strict care in the disposal of construction waste, with proof of disposal at an approved site provided after off-loading each waste load and this is to be logged/registered within the Environmental File that must be maintained at the contractor's camp for duration of construction.
- The Contractor's method statement for waste management and waste minimisation must be implemented at the outset of the contract and approved by the Project Engineer.
- The Contractor must ensure that personnel make use of the litter bins provided and that the construction site and the construction camp are always kept tidy and litter free.

- ❑ All domestic waste must be collected in litter bins.
- ❑ Litter bins must be equipped with a closing mechanism to prevent their contents from blowing out and scavengers from getting in.
- ❑ Litter bins must be emptied weekly (or as required before they reach capacity).
- ❑ Where necessary, a storage area must be dedicated on site for the collection of construction waste.
- ❑ No solid waste may be burned or buried on site.

If the management of solid waste during construction and operation is undertaken as specified in the mitigation measures outlined in the EMPr and recycling is promoted wherever possible, the proposed development will have little impact in terms of solid waste. It is the EAP's opinion that solid waste will have a negligible impact within the development footprint and immediate surrounds.

2.2. Cumulative impacts

A cumulative impact is an incremental impact on the environment that results from the impact of a proposed action when added to existing and reasonably foreseeable future actions. Cumulative effects can be both positive and negative. Also, the nature of cumulative impacts can be both temporary in nature (i.e., impacts that are restricted to the construction phase) and permanent (i.e., impacts that occur in both the construction and operation phases).

To enhance the positive impacts of the proposed refurbishment and construction of coastal infrastructure at Hole in the Wall and, thus, enhance positive cumulative effects, the project should be implemented efficiently according to best environmental practice and once constructed, a budget should be provided for regular maintenance.

To minimise negative impacts of the proposed refurbishment and construction of coastal infrastructure at Hole in the Wall and, thus, its negative contributions towards cumulative effects on the environment, the project should be implemented with the recommended mitigation measures outlined in the EMPr.

Potential cumulative impacts from the proposed refurbishment and construction of coastal infrastructure on the environment, as related to the key identified issues and impacts, are described below.

Cumulative local, regional and national economic and social benefits arising from the proposed development

The proposed refurbishment and construction of coastal infrastructure at Hole in the Wall is considered a catalytic project that will promote sustainable beach and coastal access, increase tourism, and will improve infrastructure facilities within the Hole in the Wall community. According to the Hole in the Wall Special Management Area Proposal (KSDLM, 2021), the Hole in the Wall study area is a second order node and therefore, will attract development within its range. There are a multitude of tourism attractions in the area, ranging from hiking and bird watching to dolphin and whale watching. Most of the attractions in the area are nature based and are best experienced with the accommodation of locals in the area (KSDLM, 2021). Increased tourism will contribute to the local economy and allow for increased income generation opportunities for the surrounding communities.

Cumulative health, safety, security and nuisance impacts

All or most of the health, safety, security, and nuisance impacts discussed in above have the potential to be compounded if other developments in proximity occur simultaneously in the area. Possible cumulative impacts may include increased traffic and possible public dissatisfaction. In terms of the health, safety, security, and nuisance cumulative impacts, it is the EAPs opinion that with the implantation of the proposed mitigation measures put forward in the EMPr most of the negative impacts can be mitigated to acceptable levels.

Cumulative impacts on the biophysical environment

Human development needs continually place pressure on land and result in increasing levels of vegetation removal for both domestic and commercial needs. There is future potential for development within the Hole

in the Wall development node. Together with other developments taking place, the proposed project will contribute cumulatively to the possible loss of natural habitat and biodiversity in the study area and may accelerate degradation of adjacent areas through soil erosion, edge effects, spread of alien invasive plants, decrease in water quality, etc. In terms of the cumulative impacts on the biophysical environment it is the EAPs opinion that with the implantation of the proposed mitigation measures put forward in the EMPr most of the negative impacts can be mitigated to a large degree.

With the formalisation of the proposed infrastructure, it is the EAPs opinion that the cumulative impact on the receiving environment will be improved over time as visitors to the area will be confined to formalised parking areas near the Hole in the Wall feature which will reduce impacts on the receiving environment and visitors will be provided with recreational facilities to improve their experience when visiting the area. The provision of braai and picnic areas along the coastline will also reduce the number of temporary braai areas created by beach goers thus reducing the potential to negatively impact on the receiving environment. Overall, the proposed new coastal infrastructure at Hole in the Wall is aimed at catering to the needs of the growing tourism interest in the area.

Due to the ecological sensitivity of the Coastal Dune Forest and the transgressive soil conditions of the sand bypass, the proposed development will not include formalised walkways. In using the existing footpaths, tracks and hiking trails, the proposed development aims to reduce impacts on the biophysical environment. This also extends to the impacts associated with disturbing the faunal and avifaunal habitats within the study area.

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.

3.1. What effects will the proposed refurbishment and construction of coastal infrastructure at Hole in the Wall have on the socio-economic environment, at a local, regional and national scale?

The proposed refurbishment and construction of coastal infrastructure at Hole in the Wall may be considered a relatively small development, however, it will provide employment opportunities to members of the community (during the construction and operation phases). During construction, employment opportunities will be limited in duration and primarily focused on unskilled labour. Although job opportunities will be limited, job opportunities within this rural poverty-stricken area will be welcomed and provide much needed income to local households.

The formalisation of beach and coastal access at Hole in the Wall also intends to promote tourism and local investment within the area. It is predicated that the proposed development will serve as a catalyst to promote future development within the area and unlock more economic opportunities and promote and/or stimulate the local community.

It is the EAP's opinion that the proposed refurbishment and construction of coastal infrastructure at Hole in the Wall will have a positive impact on the socio-economic environment through employment creation and skills development within the community, where such opportunities are scarce. Furthermore, tourists and beach goers will now be able to use the boat launch site

3.2. What effects will the proposed refurbishment and construction of coastal infrastructure at Hole in the Wall have on the biophysical environment and biodiversity (water, soils, wetland, terrestrial/ aquatic natural habitat, and fauna)?

Most of the impacts on the biophysical environment associated with the proposed development can be mitigated resulting in minimal impacts on the biophysical environment following construction and rehabilitation. The most significant impacts associated with the proposed development will occur during the construction of the dedicated parking areas and the construction of the boat launch site adjacent to the Hole in the Wall Hotel. These impacts are generally associated with the removal and/or disturbance of vegetation and nearby watercourses related to construction activities.

The initial design has been amended and will no longer include the installation of formalised walkways through the Coastal Dune Forest near the Hole in the Wall feature. The design has also removed the viewing deck overlooking the Boiling Pot/ Whales Back and it is now positioned away from all sensitive fauna and flora species.

With the implementation of mitigation measures outlined in the EMPr, the impacts on the following biophysical components are not expected to be of any significance:

- Impact on CBAs, ESAs, protected and/or expansion areas and strategic water source areas
  - The infilling, removal and compaction of soil.
  - Erosion.
  - Storm water related impacts.
  - Pollution (solid and liquid waste).
  - Disturbance to surrounding areas (primary – removal of vegetation, secondary – vibrations and increased noise levels).

The disturbance of surrounding habitats through possible vegetation clearance is considered the most significant impact. This impact is however not considered to be significant as infrastructure has been placed to limit impacts on surrounding natural vegetation and after mitigation the impact on vegetation is expected

to be minimal (furthermore, the establishment of poly-timber infrastructure within the Coastal Dune Forest will be minimised).

3.3. What effects will the proposed refurbishment and construction of coastal infrastructure at Hole in the Wall have on the coastal and dune habitat during construction, operation, and rehabilitation?

The Coastal and Dune Impact Assessment identified the presence of a transgressive sand bypass system north of the Mpako Estuary. Due to the shift in the bypass (near Men's beach), the specialist recommended that infrastructure not be established near the area. MBB, in consultation with the DFFE, I&APs and the EAP have amended the initial design and it will now use the existing footpaths, tracks and hiking trails to traverse throughout the viewing points and tourist hot spots within the area.

The specialist also identified dune vegetation associated with a nearby wetland environment. The existing footpaths, tracks and hiking trails avoid the sensitive conditions associated with this environment.

3.4. What effects will the proposed refurbishment and construction of coastal infrastructure at Hole in the Wall have on the cultural heritage resources?

A site visit conducted by the appointed heritage practitioner identified no heritage resources within the Hole in the Wall development node. A such, it is unlikely that any archaeological heritage resources will be impacted by the proposed development. However, the heritage practitioner did confirm that the Hole in the Wall feature is a "living heritage resource" and the beliefs of the community must be respected.

3.5. What potential health, safety, security, and other nuisance impacts may be experienced as a result of the proposed refurbishment and construction of coastal infrastructure at Hole in the Wall?

No significant nuisance related impacts have been identified during this assessment which precludes the development from being implemented. Nuisance related impacts in terms of the proposed refurbishment and construction of coastal infrastructure relates mainly to impacts associated with noise, dust, disruption to traffic, visual impacts associated with the placement of infrastructure components and increased crime levels. With the mitigation measures included in the EMPr it is the EAPs opinion that the significance of all nuisance related impacts can be classed as low.

3.6. What effects will the proposed refurbishment and construction of coastal infrastructure at Hole in the Wall have on the existing infrastructure, services, and land use?

The existing infrastructure at Hole in the Wall will either be refurbished and/or removed to accommodate new infrastructure components. The addition of new infrastructure can accommodate larger volumes of pedestrians, beach goers and tourists. With the formalisation of the parking areas, braai and picnic areas and boat launch, the impacts on surrounding property owners are anticipated to be reduced as visitors will be making use of formalised infrastructure which has been positioned taking both environmental and social considerations into account.

The proposed refurbishment also includes the provision of bollards to prevent the access of vehicles onto certain portions of the Coastal Grassland and the provision of refuse bins for visitors to dispose of their waste in. If maintained and managed, the proposed infrastructure at Hole in the Wall is anticipated to significantly reduce impacts on the receiving environment and maximise the tourism related land use of this beach node.

3.7. What potential pollution and waste related impacts may be experienced as a result of the proposed refurbishment and construction of coastal infrastructure at Hole in the Wall?

Water resources (Mpako Estuary and Mtonjane Estuary) close to the proposed development have the potential to become contaminated because of contaminated surface and subsurface runoff associated with

the construction of the dedicated braai and picnic areas and formalisation of the boat launch site. This may also be a result of spillages and mismanagement of petrochemical substances on site where stormwater transfers these pollutants into the receiving environment. If the mitigation measures outlined in the EMPr are adopted, the impacts related to the pollution of water resources and the terrestrial habitat will be significantly reduced, with little impact on the environment.

The introduction of a braai and picnic area within the Coastal Dune Forest and at each parking area has the potential to produce general waste. However, these braai and picnic areas will be suited with waste receptacles for the collection/storage of waste.

3.8. What are the impacts of the no-development alternative (not upgrading and constructing coastal infrastructure at Hole in the Wall)?

The no-development alternative would imply that the proposed refurbishment and construction of coastal infrastructure at Hole in the Wall will not occur. This would avoid the negative impacts associated with the construction activities described in this report.

It is the EAPs opinion that if the proposed refurbishment and construction does not take place, the existing infrastructure will continue to deteriorate and the status quo of unregulated access of people and vehicles within the area will continue. The access road and existing boat launch site adjacent to the Hole in the Wall Hotel will continue to erode, making the launch site unusable. Furthermore, the number of informal braai areas within the Coastal Dune Forest will continue to be a problem. This will result in the following:

- Continued disturbance along the access road and boat launch adjacent to the Hole in the Wall Hotel which will promote erosion and transgression.
- Continued disturbance through the creation of informal parking areas at various locations within the Hole in the Wall development node.
- Uncontrolled and/or unmonitored disturbance within the Coastal Dune Forest (this includes the illegal collection of firewood, destruction of sensitive Milkwood species and the destruction of the coastal habitat through unregulated access and illegal fires).
- The no development alternative would mean that the tourist and income revenue targets set by the Municipality will not be met. Tourism plays an important role in the overall development and growth of the local economy. Over time, this would prevent economic stimulus to the area through short term employment and long-term investment.

It is the EAP's opinion that the no-development alternative is not a viable alternative for this development as it will potentially have several negative social, economic, and environmental impacts which may not be mitigated. For the above reasons, the no-development alternative is not recommended.

SECTION E. RECOMMENDATIONS OF PRACTITIONER

	YES	NO
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)?	x	
Is an EMPr attached?	x	

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):

N/A

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:

- ❑ No areas outside the development footprint may be cleared of natural vegetation.
- ❑ The ECO must ensure that all staff and plant remain within the demarcated development footprint during construction.
- ❑ The dedicated parking areas must be constructed using grass blocks which reduces hardened surfaces on site and promotes the infiltration of water.
- ❑ The refurbishment of the road adjacent to the Hole in the Wall Hotel must be constructed using grass blocks, which promotes water infiltration to the nearby CBA1 area and reduces stormwater runoff.
- ❑ The ECO must monitor all sites disturbed by construction activities for colonisation by alien invasive plants.
- ❑ Construction and operational management of the development must ensure that as far as possible, all protected trees are not impacted by proposed construction activities at all development stages.
- ❑ Access to sensitive areas outside the developmental footprint must be controlled using signage during construction. The appointed Environmental Control Officer must ensure that all No-Go areas are demarcated.
- ❑ The proposed walkways should be maintained as informal footpaths.
- ❑ Formalised walkways must not be implemented near the sand bypass system. The design proposal has been amended to make use of existing footpaths, tracks, and hiking trails.
- ❑ Local indigenous beliefs relating to the Hole in the Wall feature and the associated 'Underwater Symbolic Complex' must be respected.
- ❑ A buffer zone of 50m must be maintained around this site. The Site (Hole in the Wall) may not be changed or damaged under any circumstances. The buffer zone must be maintained.
- ❑ If heritage resources are identified on site, the chance finds protocol as outlined in the EMPr must be implemented on site.
- ❑ While most of these impacts are unavoidable, the onus lies with the applicant to ensure that the construction activities result in a minimal disturbance to neighbouring areas.
- ❑ Construction work should be restricted to weekday working hours between 08h00- and 17h00.
- ❑ The construction and operational plan should not clash with the residential land use of this neighbourhood. The construction schedule/operational plan/ times be communicated and, if possible, avoid holiday periods. As far as possible, the construction schedule should be available to neighbour properties to ensure that they are aware of the proposed activities and that they can make adequate means to mitigate noise and impacts.
- ❑ The project applicant must ensure that sufficient budget is available to regularly service, maintain and dispose all waste to the multipurpose buy back center in Coffee Bay.
- ❑ No wastewater containing harmful chemicals should be released on-site, to avoid contamination of the sand/soil.

- ❑ Ensure drainage and runoff are controlled to prevent erosion and soil loss. Install contour berms where erosion has occurred to ensure that no new erosion pathways are formed.

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	Other information

IMPORTANT NOTE:

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