



23 July 2012

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Dear Mike

RE: PROPOSED SMALL BOAT HARBOUR AND COMMERCIAL AND RESIDENTIAL NODE DEVELOPMENT, BACKGROUND INFORMATION DOCUMENT, PLETTENBERG BAY.

Thank you for the opportunity to submit comments in response to the above mentioned BID.

The PBCEF hereby submits their strongest possible **objection** to this proposal for the following reasons:

Issues of concern:

- Central Beach is the central hub for tourism in Plettenberg Bay and possibly the most photographed area (this can be seen in most postcards) of Plettenberg Bay. This development proposes to change the face of Plett through the urbanisation of the seafront which will result in a completely changed “Sense of Place” to an area which is a key tourist attraction. In addition to impacting tourism, this could have many repercussions, including the decrease in value of coastal property in the surrounding area due to the aesthetic impact which this development will have.
- It will destroy the safest swimming beach in Plettenberg Bay, with obvious impacts to tourism. The Piesang River Estuary is used by many local people and visitors as a safe swimming location, particularly for children, with access to the existing amenities.

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- The Garden Route Integrated Marine Management Plan recommends:
  - *Ensure SDF and IDP documents promote planning and land-use that benefits the environment, avoids damage to or loss of sensitive areas and preserves aesthetic appeal of Garden Route for tourists.*

This proposed development will have enormous impact on the current planning structure of Plettenberg Bay, particularly on the existing CBD and tourism hub where restaurants and shops rely on tourists. The development will also have detrimental environmental and aesthetic impacts. In short, if one applies the principles of Triple Bottom/Top Line to this proposal, it fails on all counts.

- Socio economic studies are essential to consider the impact on the current CBD. It needs to benefit ALL in Plett, especially the year round locals (i.e. what will the impacts be on local businesses such as the Beacon Isle Hotel? What will the impact be on property owners, restaurants, shops, regular visitors and other contributors to the town's economy?). Developments of this nature carry very high financial risk and a failed development will not be good for Plettenberg Bay. Plett is known for its natural beauty and not for its shopping, high impact sports or commercial entertainment. Knysna is known for its estuary and the Knysna Waterfront provides a tourism venue at the estuary. Plettenberg Bay has its beautiful bays and a 'waterfront/harbour' is not needed to attract tourists to its beaches.
- Climate Change impacts need to be seriously considered and cognizance must be taken of the Western Cape Strategy Document for Climate Change, the Eden Sea Level Rise document, Provincial Spatial Development Framework (WCSDF) and Integrated Coastal Management Plan (ICMP). In the Provincial Government of the Western Cape (PGWC) Climate Change Guidelines collated by the African Centre for Cities (ACC) it states:

*“The coastal zone is particularly vulnerable to climate change because of predicted sea level rise and increase in frequency and intensity of extreme weather events leading to intensive storms, increased wind and wave action and higher tidal range. Lowlands, floodplains and estuaries will be impacted by the predicted extreme weather conditions that may increase the incidence of flash flooding. It is also predicted that estuaries will be impacted by salt-water intrusion and raised water levels resulting from sea level rise, or mouth closure due to decreased river flows.”*

General guidelines are also given to EIA practitioners and developers:

- *Developments within the coastal zone must be set back.*
- *All developments should be set back from water courses to make provision for a vegetated buffer*
- *A buffer strip should be maintained above the 1:100year flood line*
- *NO hard development or fixed structures on the banks of estuaries*
- *No development on the foredunes and in the “littoral active zone”.*
- *Development must be set back behind active dune areas with an adequate vegetation buffer strip, separating development from the dunes*
- *Avoid large scale buildings in the coastal zone*
- *Avoid all development in areas below the 5 m contour*

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*No development should take place within 100m of the high water mark.*

Several of the proposed properties to be utilized are under the 1:50 year flood line and in the Marine and Coastal protection zone which are vulnerable to floods and sea level rise and will require special dispensation. Who will be the liable party if damage to property, infrastructure or persons result from the affects of climate change which have not been given consideration?

- It is also important that the developer consider the DEA&DP report “Development of a Methodology for Defining and Adopting Coastal Development Setback Lines” which recommends that set back lines should be set in order to maintain:
  - *Adequate setback to maintain aesthetic features, such as rock formations, and sense of place.*
  - *Adequate setback to minimise shading of beaches by **tall structures**;*

The key findings in this report found that development setback should consider the following issues:

- a) *Coastal hazards (very high-water levels and co-incident storms);*
- b) *Conservation/biodiversity;*
- c) *Heritage;*
- d) *Public access and amenity;*
- e) *Landscape value (sense of place).*

This report also refers to a study done by Roets & Duffell-Canham (2009) who have, identified three main areas undesirable for development defined as:

1. *Below the 1 in 100 year flood line*
2. *Below the 5 m contour (with reference to estuarine systems)*
3. *Primary and secondary dunes*

All of the above points referred to in the DEA&DP report are applicable to this proposed development and show that the development is undesirable and highly inappropriate.

- The development proposes to rezone the public open spaces, frontal dune area and conservation areas around the Piesang River and on the beach for residential and commercial use. The WCSDF (2009) recognises that densification is not appropriate in historical parts of town or areas of environmental constraints (such as wetlands, flood lines and areas of high biodiversity). This is the case for Central Beach which is prone to floods and vulnerable to climate change. The scale of this development where the height restrictions will have to be changed and areas of protection are rezoned will also change the historical character of the area. The river edge should remain protected to protect the sensitive ecosystem (e.g. Erf 4371 and 2132 which are green belts) as well as coastal properties from climate change. The Integrated Coastal Management (ICM) Plan, has recommended that no development should take place under the 100 m high water mark or 5 m contour line. This is for a very specific reason. Also, the WCSDF guidelines state that no business development should take place under the 1:50 year flood line and that the height and scale of the building should tie in with the character of the surrounding area.

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- No mention is made of the recently constructed desalination plant in the Piesang River Estuary. What will happen with the plant considering that millions of Rands of ratepayers' money has gone into the planning and construction of it?
- What agreements are in place regarding state owned land - i.e. how can the developers submit an application for state owned land? Where do the owners of this state land sit in regard to this application? Is there not conflict of interest?
- Is there proof of Landowner Consent in respect of all relevant landowners?
- The following in depth studies need to be conducted:
  - Marine studies - i.e. impact on marine mammals, fish and avian life - due to increase in boat traffic and pollution; and beach, dune and wave dynamics – due to solid permanent structures.
  - Studies to determine the impact on the whales in the bay during the breeding season, as well as the dolphins and other marine mammals.
  - The impact of the proposed development on fish species using the Piesang Estuary as a nursery.
  - Studies on existing birdlife in the estuary and the impact of the proposed development to this.
  - The impact on the beaches, as the ocean currents will be affected by the proposed development/
  - Biodiversity and ecological studies - i.e. impact on the dynamics of the estuary; impact on fauna and flora in the estuary; flood risks etc.
- Anchor Environmental were tasked with assessing potential impacts associated with a reverse osmosis desalination plant in Plettenberg Bay. The memorandum on preliminary findings and recommendations – collated by Barry Clarke in September 2010– had the following findings:

*“The Piesang Estuary is considered to be an important estuary from a conservation perspective, and was included as part of a core set of estuaries to be prioritized for estuarine protected area status in the recent national conservation planning exercise entitled “South African National Priority Estuaries for Biodiversity Conservation and Ecological Sustainability” (part of the National Biodiversity Assessment 2010) (Turpie et al. 2012). Data collected during the recent field survey confirm and strongly support the perceived high importance of the system from a conservation perspective. The estuary supports a high diversity of abundance of fish and birds, and is clearly an important nursery, feeding, breeding and roosting area for many species.”*

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- It is presumed that the estuary will need to be dredged to allow for boats to enter and exit the 'harbour'. The environmental impacts of this will be enormous.
- The existing sewerage infrastructure and general services in Plettenberg Bay are at a maximum capacity:
  - Waste management – The landfill site is over its legal safe limit and will shortly be decommissioned. An EIA is under way to develop a waste transfer station, but this is not a long term solution that will allow for a large amount of economic growth to happen in Plett as the transportation of waste will be very expensive and the site in Mosselbay will not be able to handle the increase in waste for very long.
  - Energy Conservation – Plettenberg has regular blackouts.
  - Water Resources in Bitou Municipal Area – They have recently (using emergency funds) constructed a desalination plant to supply Plett with fresh water during the peak periods. The desalination plant has cost the municipality and ratepayers a lot of money and it may still not be enough. The proposed harbour is to be built where the desalination plant already stands and as a result will cause a further loss of money to the ratepayers in Plett. In addition the water requirements for the development need to be determined. Plett already faces water shortages and a further development of the size proposed will simply exacerbate this. The rivers in Plett are very sensitive and further extraction cannot be considered before a **full ecological reserve study** is under taken that will ensure a healthy ecosystem as well as a secure water supply for Plett.
  - Parking and Traffic – Infrastructure is not in place to handle the large amount of traffic and parking needed for a development that suggests a massive increase in numbers of people in that area and a much higher business density. The development would require the removal of existing parking spaces.

Thank you for your consideration. We reserve the right to submit further comments in future if so needed.

Yours sincerely

OBO Plettenberg Bay Community Environment Forum

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