



'A FORUM SUPPORTING SUSTAINABLE DEVELOPMENT'

POSTNET SUITE #38, PRIVATE BAG X1006, PLETTENBERG BAY 6600

TEL: 044 533 5824 CELL: 082 064 6645

E-MAIL: eforum@mweb.co.za WEBSITE: www.plettenvironmentalforum.co.za

PROPOSED SMALL BOAT HARBOUR DEVELOPMENT:

WHAT ARE THE IMPLICATIONS?

1. How it started

The Forum was notified earlier this year of the Municipality's decision to allow the developers to commence with the EIA process for the proposed Small Boat Harbour development which has to be concluded within the statutory timeframe. There was consensus amongst the Forum members that, while the existing facilities on Central Beach are in need of an upgrade, the nature and scale of this development is completely inappropriate.

2. What is proposed (see draft below)

- Harbour: recreational and commercial (fishing, chokka)
- Large tracts of estuary reclaimed on both sides
- Multi-storey car park at existing car park providing 1 500 parking bays
- Substantial multi-storey (up to 7 storey) residential and commercial buildings:
 - Wrapped around the harbour
 - Next to the BI Hotel on Robberg side
 - Along Central Beach in front of and replacing existing development
- Two substantial breakwaters: one leading from Central Beach and the other from Beacon Isle rocks
- High-rise, dense, urban environment with no more wave action due to breakwaters on Central Beach
- Desalination plant to be moved: cost of establishment and cost of moving

GF COMPLEX PLAN - Rev 03 (2012/08/31)

DEVELOPMENT DATA

	Level	Area m ²	No of Units	Development Area
SOUTH RESIDENCES				
Average Unit Size @ 130m ²				
	GF	5 510		
	1ST	5 610		
	2ND	5 610		
	3RD	4 261		
	4TH	2 026		
	5TH	1600		
			189	24 617
NORTHERN DEVELOPMENT				
- Retail				
	GF	2 237		
- NSRI				
	GF	240		
	1ST	240		
- Residences				
Average Unit Size @ 130m ²				
	GF	2 156		
	1ST	4 928		
	2ND	4 928		
	3RD	4 928		
	4TH	4 158		
	5TH	3 322		
	6TH	1 375		
			198	25 775
HOTEL				
	GF - 6TH	5 500		5 500
YACHT CLUB				
	1ST	485		
	2ND	485		
				970
CENTRAL HUB				
- Retail				
	GF	6 463		
- @ Hotel				
	GF	1 000		
	1ST	220		
- Informal Piazza				
	GF	400		8 083
- Offices				
	1ST	898		898
- Residential				
Average Unit Size @ 130m ²				
	1ST	3 247		
	2ND	4 248		
	3RD	4 248		
	4TH	1 221		
	5TH	693	105	13 657
BUNGALOWS				
	GF	4 050	26	4050
COMMERCIAL HARBOUR				
	GF	750		750
				87 017

PARKING

	Ratio	Required	Provided	Total
PUBLIC PARKING				
- South			17	
- Central			52	
				69
SOUTH RESIDENCES				
189 units				
@ 1:3 / unit				
- Basement			117	
- On Surface			128	
				245
NORTH RESIDENCES				
198 units		257		
@ 1:3 / unit				
- Basement			206	
- On Surface			48	
				254
NSRI				
480m ²		19	19	19
CENTRAL HUB				
- Residential				
105 units		137	137	137
@ 1:3 / unit				
10 100m ² @		606	606	606
6 / 100m ²				
- Hotel				
80% occupancy		76	76	76
of 95 rooms				
- Offices				
898m ² @		36	36	36
4/100m ²				

SUMMARY

	Area m ²	No of Units	Ratio	Required	Provided
1 Retail	10 320		1 : 6	606	606
2 Hotel	5 500	95	1 : 1.3	76	76
3 Residences	64 049				
- North	25 775	198	1 : 3	257	254
- Central	13 657	105	1 : 3	137	137
- South	24 617	189	1 : 3	245	245
4 Bungalows	4 050	26	1 : 1.5	39	39
5 Commercial					
Harbour	750				
6 Offices	898		1 : 4	36	36
7 Yacht Club	970		1 : 6	58	58
8 NSRI	480		1 : 4	19	19
	87 017 m ²			1 473	1470

TOTAL PARKING

- South public			17	
- Central public parking beach			52	
- Central Basement public parking			25	
				1 564

BOAT MOORINGS

- Yachts & motor boats			330	
- Catamarans			23	
- Chokka boats			4	
				357



**DRAFT Concept diagram
(please note that this is
NOT the final version)**

2. Negative Environmental Impacts

- Estuary: reclamation, dredging, pollution, water quality
- Sense of place fundamentally lost
- Blinders reef: impact on reef species, scuba diving
- Change in sand and beach dynamics
- Dolphin and whale movements disturbed due to harbour traffic and breakwaters
- Sea level rise resulting in damage to infrastructure: Piesang River up to Lookout rocks identified as being highly vulnerable (Sea Level Rise and Flood Risk Assessment for Plettenberg Bay).

Phase 2: Eden DM Sea Level Rise and Flood Risk Modelling 2010



2.5 mamsl (red), 4.5 mamsl (orange) and 6.5 mamsl (blue) swash and flood contour lines for Piesang and Keurbooms-Bitou Estuaries (from SW to NE in a)). b) shows the current protective effect of undeveloped portions of the vegetated foredune at Plettenberg Bay.

3. Socio-Economic Issues

- High maintenance and dredging costs (long-term)
- Disaster management costs including high insurance due to development proposed being in a floodplain
- Desalination plant: costs of relocation and wasted costs
- Massive decreased property values resulting in less income for the town from rates from high end properties (loss of views)
- Loss of Central Beach as a clean, safe, recreational swimming beach
- Unnecessary detraction from existing CBD as shopping/commercial center of town
- Need?

4. Legal Issues

Legal conclusions reached by the Plettenberg Bay Community Environment Forum legal team:

- (a) the very appointment of the preferred bidder needs to be re-visited;
- (b) the Municipality took certain decisions and entered into agreements pertaining to the proposed development arbitrarily and capriciously;
- (c) the Municipality failed to measure the proposed development against its own strategic documents at each interval;
- (d) the Municipality erred and did not apply its mind to the matter when it resolved to allow the developer to proceed with an EIA, on its behalf;
- (e) the Municipality failed to apply various laws and policies that have bearing on tender procedures and/or alienation of municipally owned immovable property;
- (f) the processes followed to date are procedurally, substantially and fundamentally flawed in many respects;
- (g) the agreements between the parties are invalid and void;
- (h) the Municipality must, in view of the above, urgently revisit and rescind its decision to allow the EIA currently in progress to continue and/or take whatever steps are reasonably possible to terminate its relationship with the developer.

5. What the Forum has done thus far

- The Forum registered as an Interested and Affected Party and forwarded the Background Information Document to all members.
- The Forum compiled an objection to the development and submitted this to the consultants on the 23rd July 2012.
- The Forum published several articles in local and national newspapers during the course of the process and will continue to do so.
- The Forum established a SBH (Small Boat Harbour) sub-committee with the mandate to protect Central Beach from unsustainable development and environmental degradation. The committee commenced with:
 - a) an investigation into the process that was followed by the developers and municipality from a legal perspective
 - b) fundraising for the special cause in order to employ specialists which will include Environmental and Planning Lawyers, Advocates, Environmental Scientists, Coastal Engineers and Economic Feasibility experts.
- At the October 2012 Forum meeting it was officially announced that that Elbie Burger will act as the legal advisor to investigate and provide a legal opinion of the development application and processes.
- The Forum also received valuable assistance from Advocate De Vos (Senior Counsel).

- On 23 October the Forum sent a submission compiled by Elbie Burger to the Municipality, the developer and the consultants.
- The Forum attended several meetings including:
 - a) the focus group meetings with the engineer, architect and consultant working on the project;
 - b) a meeting with the Mayor and municipal officials to discuss the submission and address any queries in this regard.
 - c) a meeting with the Socio-economic consultant on 29 November 2012.
- The Forum has distributed the various documents and submissions to keep its members and interested and affected parties updated on developments.
- The Forum continues to investigate the matter, environmentally and legally.

6. Way forward

- Fundraise to challenge legalities
- Environmental Impact Assessment: participation
- Awareness raising among public of actual impacts