



# SINGITA SWENI LODGE EXPANSION: SUMMARY REPORT - BAR

*Singita*  
LEBOMBO & SWENI LODGES  
Kruger National Park • South Africa

## **PROJECT:**

Basic Environmental Assessment for Lodge expansion and Refurbishment of the Singita Sweni Lodge, within the Singita Private Concession in the Kruger National Park.

## **REPORT DATE:**

Final Basic Assessment Report as Submitted 12 December 2016

## **CONSULTANT:**

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## **RESPONSIBLE ENVIRONMENTAL ASSESSMENT PRACTITIONER:**

Mette Stavnsbo Rossaak



## 1 INTRODUCTION

Emross Consulting was appointed by Singita Lebombo (Pty) Ltd. to undertake the required actions to apply for environmental authorisation from National Department of Environment (DEA: the decision-making authority) for the proposed expansion of and changes to the existing Sweni Lodge, in the N'wanetsi Concession, in the Kruger National Park.

The specific activities involve the expansion of the existing unit one of the lodge from a two person room to a four person, exclusive use unit, henceforward referred to as 'villa' and the relocation of the existing communal swimming pool, from its current location, to the front of the lodge. This location is within 32m of a watercourse.

These actions are identified as activities with potential detrimental effect on the environment; GN Regulation 985 of 4 December 2014 issued in terms of sections 24(2) and 24D of the National Environmental Management Act (NEMA, Act 107 of 1998) as **activity 17: “The expansion of a resort, lodge, hotel and tourism or hospitality facilities where the development footprint will be expanded, in Mpumalanga, outside urban areas, in a protected area identified in terms of NEMPAA, ...”** and

“Activity 14(xii)-(a)ii(aa):The development of infrastructure or structures with a physical footprint of 10m<sup>2</sup> or more; in Mpumalanga, outside urban areas, in a protected area identified in terms of NEMPAA, ...”:

The Singita Lebombo Lodges are situated in an unfenced camp area of approximately one hectare at the confluence between the Nwanedzi and Sweni Rivers. The lodge relevant to this application is the Sweni Lodge built in 2003 under environmental authorisation A24/16/3/82/16/2. The Sweni lodge is located along the Sweni River shortly before the confluence on the remainder portion of the farm Merton 193KU, SG21code TOKU00000000019300000.

## 2 DESCRIPTION OF PROPOSED ACTIVITY

As the Singita Sweni Lodge has been operational since November 2003, and Singita has secured a renewal of the concession lease with Kruger National Park, the lodge is now due for refurbishment. The refurbishment includes refreshing the interior and sanitary ware and some changes to decking and arrival area. These activities do not require environmental authorisation in terms of the EIA Regulations, but do require approval by KNP Technical Services. Also part of the refurbishment is a proposal to add two beds to the lodge, to fully utilise the Concession bed allowance (48 beds), as part of the development of an exclusive use villa, a very popular product offering available at other Singita Lodges. It is also proposed that the existing communal swimming pool, located next to the main lodge area, be removed and rehabilitated and a new pool constructed at the front of the lodge.

Sweni Villa:

The proposed expansions to unit one are comprised of an additional two bed unit, similar to the existing unit one and a communal area with eating area, lounge, deck and pool (fig 1). The footprint of the villa (including existing unit) will be approximately 435m<sup>2</sup>.

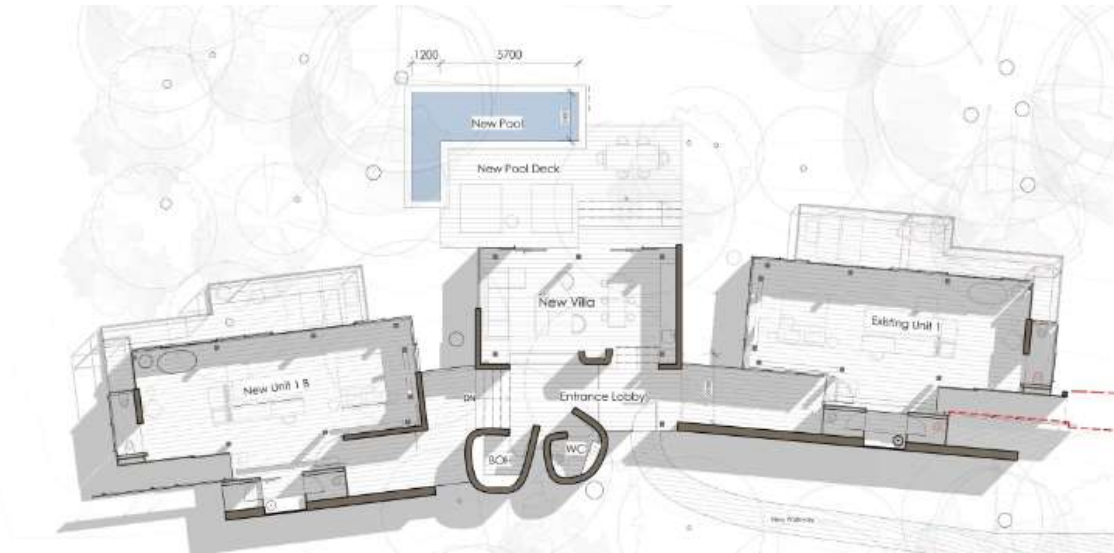


Figure 1: Proposed layout of Sweni Villa.

Swimming Pool:

It is proposed to demolish the existing pool (fig 2) and rehabilitate that site and instead install an above ground hanging pool at the front of the lodge (fig 3).

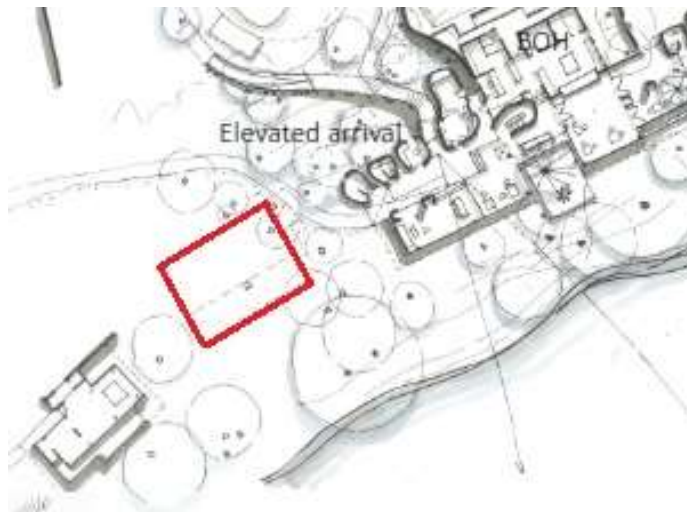


Figure 2: Section of lodge layout indicating the location (red square) of the existing pool.

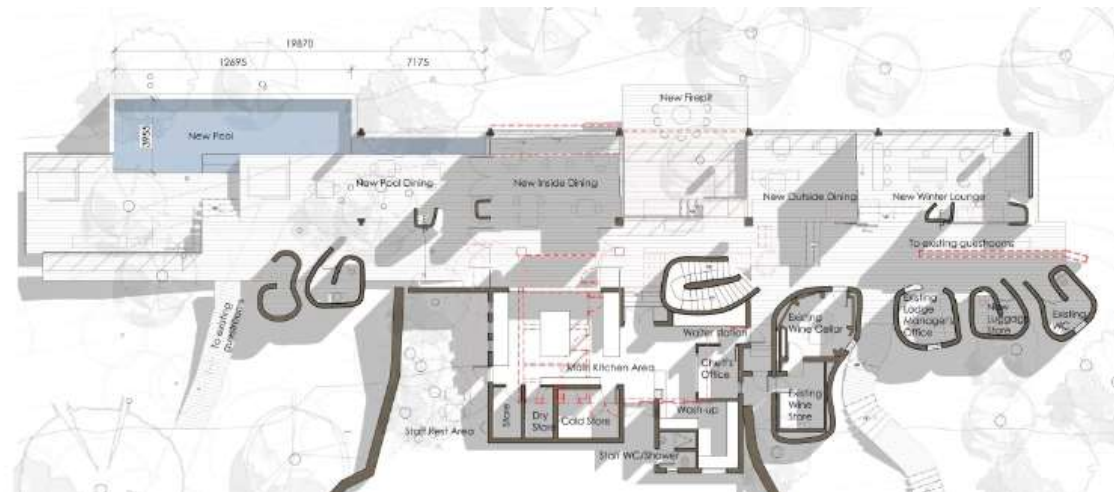


Figure 3: Proposed location of new pool in front of the lodge.

The combined volume of the proposed two new pools are equal to the volume of the existing pool, proposed removed and as such the water consumption for the pools should not increase. A proposed mitigation is also to store the water from the existing pool for filling the new pools on completion. The new pools are envisioned to have a lesser impact to the current pool as they will be above ground hanging pools fitted with the best technology in electricity and water saving.

Singita are committed to the 'One Planet' global initiative. They practice sustainable eco-tourism and their facilities are all highly respectful of their environment. This has been endorsed by developing a Sustainable Strategies 'manifesto' that sets out all items that need to be addressed during the design phase on a new development to ensure environmentally sensitive solutions of enduring value.

### **3 PUBLIC PARTICIPATION PROCESS**

The application process has been subjected to public participation as per chapter 6 of the EIA regulations GN R 982 of 4 December 2014. The project as put forward in the final report is not significantly different to the initial proposal.

As there are no neighbouring private land owners, the identified parties are organs of state as follows:

- Kruger National Park (KNP);
- Mpumalanga Tourism and Parks Agency (MTPA);
- Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (MDARDLEA),
- The Inkomati Usuthu Catchment Management Agency (IUCMA), and
- Ehlanzeni District Municipality (EDM).

#### **3.1 SUMMARY OF COMMENTS AND RESPONSES**

No response was received from the public in response to on site or newspaper advertising.

No response was received by EDM, MTPA or IUCMA at the close of the comment period.

The MDARDLE commented that water consumption, by the concession, should no increase.

- The aim of the refurbishment is to ensure, the most appropriate water saving measures are implemented in the lodge. It is not envisaged that the expansion of the lodge will increase the overall water consumption by the lodge.

The KNP and SAN Parks raised concern that the development may impact on mature trees and sought clarification regarding potential flood damage due to lodge being located near the river.

- During the design phase, all mature trees on the proposed site were surveyed and identified. As many of the mature trees, as possible, have been incorporated in the design and only a few species have been identified as needing to be removed or pruned back.
- The entire Sweni Lodge is located within the 1:100 year flood line and most infrastructure is located within 32m of the river. Engineering advice has been sought to ensure that the proposed additions will not be damaged by flood waters. To date the lodge has not been damaged during floods, in spite of the last few years of major floods. This is a good

indication that the lodge design is appropriate for the site and that there is limited reason to expect future damage by floods.

All concerns raised has been accommodated in the design and planning of the development.

Documentation of public participation undertaken and copies of correspondence with I&AP's are included in Appendix E.

## 4 NEED AND DESIRABILITY

The Singita Lodges are very highly rated luxury lodges and as such regular refurbishments are necessary to maintain the high end product offered.

The exclusive use mini lodge offering is a very popular product with guests travelling in small groups, such as families, but also to celebrities looking to be out of the public eye. Singita offers this product at several of their other lodges, including the Lebombo lodge and the level of bookings are a good indication of the need for this type facility.

The proposed tourism activity is in line with the recommended activities for the area according to the Mpumalanga Biodiversity Conservation Plan (Lotter, M.C. & Ferrar, A.A. 2006. Mpumalanga Biodiversity Conservation Plan, MTPA, Nelspruit).

The relocation of the pool was identified as a way of integrating the pool in the lodge in a better way than the pool in its current location. The redevelopment of the pool is also seen as the best opportunity to reduce the volume and improving the resource consumption by incorporating more recent water and power consuming technology.

## 5 ALTERNATIVE ACTIVITY AND SITES

### **Sweni Villa:**

Two potential viable site alternatives were assessed for the villa. Due to the activities being related to existing infrastructure, the number of viable alternatives is limited. The identified sites are;

1. Expand the existing unit one; and
2. Expand the existing unit three.

Expanding unit one was selected as the preferred villa site, due to the site being more exclusive and away from the main lodge. The design of the unit reduces impact to vegetation and soils and as such it was assessed that this site will not have a significant higher impact to the receiving environment.

Expanding unit three was desirable as it would extend into the old pool site and as such part of the development footprint would be on impacted ground. The location at the centre of the lodge is however less desirable as the exclusive feel would be more difficult to establish without screening vegetation.

### **The No-Go Alternative – Villa:**

The no-go alternative is the option of not undertaking the proposed activity or any of its alternatives. The no-go alternative also provides the baseline against which the impacts of other alternatives should be compared.

Should the proposed building activity not go ahead, any potential environmental impacts, associated with building and operating the villa, would be avoided.

The proposed preferred site has been previously impacted but is in an established natural condition. The proposed villa will cause some unavoidable impact to the site. With the proposed design and construction methods, it is however assessed that much of this impact can be mitigated. The vegetation type on site, although in a protected area, is not locally threatened and no irreplaceable habitat will be damaged by the footprint of the proposed development. The desirability of the villa is established and it is proposed that the no-go alternative is not recommended.

#### **Communal Swimming Pool:**

No alternative site has been assessed for the relocation of the pool. The proposed new site would allow for the pool to be more integral in the main building, this will not be achieved anywhere else as the main building is existing. The only alternative to the pool site is the no-go alternative.

Even though the potential impact associated with the pool construction is the location within 32m of the watercourse, it should be noted that the existing pool is also located within 32m of the water course and the proposed new design of the aboveground hanging pool is more resistant to flooding than the old, in ground type pool.

#### **No-Go Alternative - Pool:**

Should the proposed relocation of the pool not be undertaken, it will not be possible to reduce the volume of the pool. It is also more difficult to refit water and electricity saving technology. It is thus proposed that the no-go alternative is not desirable in terms of relocating the pool.

#### **Activity Alternative:**

No alternative activity has been assessed due to the proposed activities being associated with the existing lodge activities.

## **6 ASSUMPTIONS AND LIMITATIONS**

The Basic Assessment Report has been prepared on the strengths of the information available, from our field surveys and that provided by the applicant at the time of the assessment. The assessment was conducted as a desktop and field survey. Topographical and Ecological maps were used. The assumptions made and constraints that were prevalent did not obviously have any restrictive or negative implications on the study.

In undertaking this investigation and compiling the Basic Assessment Report, the following has been assumed:

- The information provided by the client is accurate;
- The scope of this investigation is limited to assessing the environmental impacts associated with the construction of the proposed Sweni Villa and Relocating the pool.
- Should the project be authorised, the applicant will implement any layout changes, recommendations and mitigation measures outlined in the BA and authorisation into the detailed design and construction contract specifications of the proposed project.

## 7 EAP RECOMMENDATIONS

All environmental impacts may be mitigated.

Impact wise, the two villa sites are similar and there is not a great deal to choose between them. Based on the assessment and information gathered, the EAP recommends that the villa is authorised on the preferred site 1 and that the relocation of the pool to the site proposed is approved.

### 7.1 PREFERRED ALTERNATIVES

The Sweni Villa should be constructed at the preferred site, site 1.

The pool should be relocated to the proposed site at the front of the lodge.

No-go alternative

This is not recommended as the assessed impacts are minimal and potential impacts may be mitigated. The need for the villa is established and as such should be allowed to proceed.

### 7.2 ADDITIONAL MITIGATION MEASURES

The environmental management programme (EMPr) should form part of the contract between the construction company and the client. This will help ensure that the EMPr is adhered to.

An Environmental Control Officer (ECO) should be appointed for the construction, as this will assist the contractor overcoming any unforeseen issues at the time of construction and be able to provide a level of assurance and oversight to stakeholders that the site is being well managed.

## 8 CONCLUSION

Based on the information contained in this report, it is the opinion of the environmental assessment practitioner that, provided the negative aspects of the proposed developments are mitigated in accordance with the mitigation measures proposed, and as reflected in the environmental management programme, the potential impact of the proposed developments at Singita Sweni lodge are limited.

The choice of site for the villa and swimming pool has been carefully planned, with environmental considerations at the forefront. Every effort has been made to protect and maintain the existing vegetation. The sites are impacted with the presence of past activities (prior to the concession). The overall loss of habitat will be very small.

The No-Go option would deny the opportunity to further develop the lodge for access by a more diverse market, and specifically families. It would also prevent the concessionaire from developing the lodge to the full extent of the public private partnership agreement, allowing for the additional two beds. Bearing in mind that all significant negative impacts can be mitigated and managed is therefore recommended that the No-Go Alternative not be supported.

It is therefore the opinion of the EAP, based on the evidence provided, that there is no reason not to develop the villa and the pool on the preferred sites.