

APPENDIX F: PUBLIC PARTICIPATION PROCESS

STEPS TAKEN AND TO BE TAKEN NOTIFY POTENTIALLY INTERESTED AND AFFECTED PARTIES

This section of the report is included in compliance with the Regulations. Potential I&APs were/will be notified about the project by:

1. Giving notice to all potential interested and affected parties (Reg 41(2) EIA Regulations, 2014 as amended)

The Park has a functioning Park Forum which consists of and acts on behalf of the neighbouring landowners, municipality and communities.

- Members of the Park Forum were notified of the development and Draft BAR for comments via email notification and internal meetings held.
- Hard copies of notices indicating the availability of the Draft BAR for comments were placed at the Park Reception building, local municipality offices, library and Die Stroom picnic site. The notice included a summary comprehensive enough to make it possible for the Interested and Affected Parties to form a fair idea of the project proposed for commenting purposes.
- The Draft Basic Assessment Report was internally uploaded onto the SANParks website and uploaded to the EAPs website for a 30 day commenting period.
- The following key departments and organs of state were also informed via email notification of the availability of the Draft Basic Assessment Report for a 30 day commenting period.
 - Heritage Western Cape
 - Swellendam Local Municipality
 - Overberg District Municipality
 - Breede Olifants Catchment Management Agency
 - Cape Nature
 - DEA&DP: Development Management
 - DEA&DP: Pollution & Chemicals Management
 - DEA&DP: Waste Management
 - DEA&DP: Biodiversity and Coastal Management
 - DFFE: Biodiversity and Conservation
 - DFFE: Protected Areas Multilateral Programmes
 - DFFE: Protected Areas Planning and Management Effectiveness
 - South African Heritage Resources Agency
 - SANParks Cultural Heritage Management
 - IUCN World Heritage Committee

2. Register of interested and affected parties (Reg 42 EIA Regulations, 2014 as amended)

Details of all registered I&APs, organs of state and key departments as set out in the Regulations will be provided in the PPP document to be submitted with the Final BAR.

In accordance with Sections 11 and 18 of POPI Act, 2013 (Act No.14 of 2013): The personal information and comments provided will be included in Final Basic Assessment report to be submitted to the Competent Authority to enable informed decision-making. Also, if and I&AP choose to register as an I&AP their personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report. This information may be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

3. Giving written notice to owners and occupiers of the land and adjacent to the site where the activity is to be undertaken, the municipal councillor of the ward within which the site is located, the local municipality and those organs of state having jurisdiction in respect of any aspect of the project as required by the Regulations.

The Park has a functioning Park Forum which consists of and acts on behalf of the neighbouring landowners, municipality and communities through which notifications were sent to all parties as part of the Park Forum.

4. Placing an advertisement in a local and national newspaper in compliance with the Regulations.

Advertisements of opportunity to register as interested and affected party and provide comments on the Draft BAR were placed in one local paper and one national paper.

5. Registered interested and affected parties entitled to comment on reports and plans (Reg 43 EIA Regulations, 2014 as amended)

All registered interested and affected parties will be provided with the opportunity to comment on the draft basic assessment report and revised draft basic assessment report.

The Park has a functioning Park Forum which consists of and acts on behalf of the neighbouring landowners, municipality and communities.

- Members of the Park Forum will be notified of the development and Draft BAR for comments via email notification and internal meetings held.
- Hard copies of notices indicating the availability of the Draft BAR for comments will be placed at the Park Reception building and local municipality offices. The notice will include a summary comprehensive enough to make it possible for the Interested and Affected Parties to form a fair idea of the project proposed for commenting purposes.
- The Draft Basic Assessment Report will be internally uploaded onto the SANParks website and will also be uploaded to the EAPs website for a 30 day commenting period.

The following key departments and organs of state will also be informed via email notification of the availability of the Draft Basic Assessment Report for a 30 day commenting period.

- Heritage Western Cape
- Swellendam Local Municipality
- Overberg District Municipality
- Breede Olifants Catchment Management Agency
- Cape Nature
- DEA&DP: Development Management
- DEA&DP: Pollution & Chemicals Management
- DEA&DP: Waste Management
- DEA&DP: Biodiversity and Coastal Management
- DFFE: Biodiversity and Conservation
- DFFE: Protected Areas Multilateral Programmes
- DFFE: Protected Areas Planning and Management Effectiveness
- South African Heritage Resources Agency
- SANParks Cultural Heritage Management
- IUCN World Heritage Committee

Methods used to notify each organ of state, key department and registered I&AP as well as proof thereof will be recorded and included as part of the Final BAR submitted for decision.

6. Comments of interested and affected parties to be recorded in reports and plans (Reg 44 EIA Regulations, 2014 as amended)

All the comments received from I&APs on the draft BAR will be recorded, responded to and included in the Comments and Responses Report to be provided with the Final BAR to the decision-making authority.

7. Workshop with Key Role players

No public participation meetings have been held nor has been requested to date and none is expected to be required. Only meetings held to date was project team meetings on site between park management and appointed specialists, planners and consultants and pre-application meeting with DFFE.

8. Submission of the report to the decision-making authority case officer

Reports will be submitted via email to the case officer, with attached pdf versions of the report or, if too large to attach to an email, to be made available via an electronic link provided in the email that is accessible by the Directorate. The Directorate may require that a hard copy of the reports also be submitted to the Department by a certain date, but this will be confirmed by the Department accordingly.

All proof of having conducted the Public Participation Process in terms of Chapter 6 of the Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) will be supplied to the decision making authority (the Department) as part of the Final Basic Assessment Report.

TABLE 1: LIST OF IDENTIFIED KEY DEPARTMENTS, ORGANS OF STATE, PARK FORUM MEMBERS AND REGISTERED I&APs

Note: In accordance with the POPI Act, 2013 (Act No.14 of 2013) the personal details of park forum members and registered interested and affected parties other than the Key departments and Organs of State cannot be provided in the Draft Basic Assessment Report to be made available to the public. Therefore, these details will only be included in the Final Basic Assessment Report to be submitted to the Decision-making Authority.

STAKEHOLDER	CONTACT PERSON	TELEPHONE	FAX NUMBER	EMAIL ADDRESS
Heritage Western Cape	Stephanie Barnardt Ref: HM/OVERBERG/ SWELLENDAM/ RE OF ERF 5338 Case No: HWC24022107SB0222	021 829 3315	-	hwc.hwc@westerncape.gov.za Ceoheritage@westerncape.gov.za Stephanie.Barnardt@westerncape.gov.za
Swellendam Municipality	Municipal Manager	028 514 8500	028 514 2694	info@swellenmun.co.za mm@swellendam.gov.za jvanniekerk@swellendam.gov.za rbrunings@swellenam.go.za zkwatshana@swellendam.gov.za wschutte@swellendam.gov.za
Overberg District Municipality	Municipal Manager Mr Patrick Oliver	028 425 1157	028 425 1014	info@odm.org.za fkotze@odm.org.za
Breede Olifants Catchment Management Agency	VHENGANI LIGUDU REF: 4/10/2/H70B/DIE STROOM, SWELLENDAM	023 346 8000		vligudu@bocma.co.za
Western Cape Department of Environmental Affairs and Development Planning DEA&DP: Development Management	Mr Ntanganedzeni Mabasa Ref: 16/3/3/6/4/1/2/E3/ 10/1078/25	021 483 2803		Ntanganedzeni.Mabasa@westerncape.gov.za
DEA&DP: Development Facilitation	Mrs Adri La Meyer Ref: 18/2/3/2025-2026	021 483 2887		Adri.lameyer@westerncape.gov.za
DEA&DP: Pollution & Chemicals Management	Mr Gunther Frantz Ref: 19/3/2/4/E3/10/ DDF007/25	021 483 2975		Gunther.Frantz@westerncape.gov.za
DEA&DP: Waste Management	Mr. Lance McBain	021 483 2728	021 483 4425	Lance.McBain-Charles@westerncape.gov.za

	Charles			Land.Anders@westerncape.gov.za Eugene.Pienaar@westerncape.gov.za Shaun.Arendse@westerncape.gov.za Abdullah.Suliman@westerncape.gov.za Saliem.haider@westerncape.gov.za
DEA&DP: Biodiversity and Coastal Management	Ms. Marlene Laros	-	-	Marlene.Laros@westerncape.gov.za Masnoona.Jongie@westerncape.gov.za
CapeNature	Rhett Smart Ref: LS14/2/6/1/7/3/5338 _recreation_Swellendam	087 087 8017	086 529 4900	rsmart@capenature.co.za
DFFE: Protected Areas Multilateral Programmes	Ms Thumeka Ntloko	-	-	TNTLOKO@dffe.gov.za FTshamano@dffe.gov.za xmabunzi@dffe.gov.za KMonyela@dffe.gov.za Ndukuyakhe.Ndlovu@sanparks.org
DFFE: Protected Areas Planning and Management Effectiveness	Mr. Thivhulawi Nethononda Ref: 14/12/16/3/3/1/3107 Ms. Mashudu Mudau	012 399 9945	-	tnethononda@dffe.gov.za mamudau@dffe.gov.za NMTshali@dffe.gov.za
DFFE: Biodiversity Mainstreaming and EIA/Conservation	Mr Seoka Lekota	-	-	FMokgohloa@dffe.gov.za shnkosi@dffe.gov tkgaphola1@dffe.gov.za PMakitla@dffe.gov.za NLekalakala@dffe.gov.za SLEKOTA@dffe.gov.za BCAdmin@environment.gov.za
DFFE: Chief Directorate : Integrated Environmental Authorisations	Ms Julliet Mahlangu			lkutu@dffe.gov.za JMMahlangu@dffe.gov.za EIAadmin@dffe.gov.za SMAMBANE@dffe.gov.za
South African Heritage	-	021 462 4502	021 462 4509	info@sahra.org.za

Resources Agency				nkhumalo@sahra.org.za
SANParks Cultural Heritage Management	Thabo Kgomommu Ndukuyakhe Ndlovu	082 929 4335 082 297 5928	-	Thabo.Kgomommu@sanparks.org Ndukuyakhe.Ndlovu@sanparks.org
IUCN World Heritage Committee	-	-	-	WorldHeritageConservation@iucn.org . wh-info@unesco.org dharmon@georgewright.org

PROOF OF DRAFT BASIC ASSESSMENT REPORT DISTRIBUTED AND MADE AVAILABLE FOR 30 DAY COMMENTING PERIOD

E-mail Notifications sent

From: Johmandie Pienaar <johmandie@enviro-eap.co.za>

Sent: Tuesday, 18 February 2025 10:00

To: HWC HWC <HWC.HWC@westerncape.gov.za>; 'Ceoheritage' <ceoheritage@westerncape.gov.za>; Stephanie Barnardt <Stephanie.Barnardt@westerncape.gov.za>; info@swellenmun.co.za; mm@swellenmun.co.za; jvanniekerk@swellendam.gov.za; Ron Brunings <rbrunings@swellendam.gov.za>; info@odm.org.za; poliver@odm.org.za; fkotze@odm.org.za; Fabion Smith <fsmith@bgcma.co.za>; 'Elkerine Rossouw' <erossouw@bgcma.co.za>; Zaahir Z. Toefy <Zaahir.toefy@westerncape.gov.za>; DEADPEIAAdmin@westerncape.gov.za; Wilna.kloppers@westerncape.gov.za; RABIA REYNOLDS <Rabia.Reynolds@westerncape.gov.za>; Arabel McClelland <Arabel.McClelland@westerncape.gov.za>; Lance.McBain-Charles@westerncape.gov.za; Lance Anders <Lance.Anders@westerncape.gov.za>; Eugene Pienaar <Eugene.Pienaar@westerncape.gov.za>; Shaun Arendse <Shaun.Arendse@westerncape.gov.za>; Abdullah Suliman <Abdullah.Suliman@westerncape.gov.za>; Saliem Haider <Saliem.Haider@westerncape.gov.za>; marlene.laros@westerncape.gov.za; masnoona.jongie@westerncape.gov.za; Rhett Smart <rsmart@capenature.co.za>; tnethononda@dffe.gov.za; mamudau@dffe.gov.za; fmokgohloa@dffe.gov.za; shnkosi@dffe.gov.za; info@sahra.org.za; thabo.kgomommu@sanparks.org; ndukuyakhe.ndlovu@sanparks.org; worldheritageconservation@iucn.org; Annelie.FINCKE@iucn.org; david.sheppard@iucn.org; pedro.rosabal@iucn.org; wh-info@unesco.org; f.letullier@unesco.org; dharmon@georgewright.org; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

Cc: Admin <admin@enviro-eap.co.za>; Esther Howard <esther.howard@sanparks.org>

Subject: NOTIFICATION OF COMMENTING PERIOD COMMENCEMENT: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM WC

NOTIFICATION OF AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT FOR 30 DAYS
PROJECT TITLE: PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM MUNICIPALITY– WESTERN CAPE
DFFE REF: 14/12/16/3/3/1/3107

Dear Stakeholder

Notice of a Public Participation Process (PPP) commenced by the South African National Parks to apply for an Environmental Authorization and Water Use License Application are hereby given in terms the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended) and National Water Act. 36 of 1998. You have received this email as a registered interested and affected party, organ of state, and/ or key department for the **PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM MUNICIPALITY– WESTERN CAPE.**

This email serves as a written notification of the availability of the **Draft Basic Assessment Report** for **30-day commenting period (excluding public holidays)**.

(1) AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT:

The Draft Basic Assessment Report and appendices are accessible via: -

(i) electronic download on our website at <https://enviro-eap.co.za/public-participation/> (**available for download for the entire commenting period**). Please scroll down the public participation web

page until you find the relevant project title and reference number as per the project details provided above.

(ii) hardcopies and/or cd copies will only be sent via SAPO – registered mail service **on request** or where a postal address is the only means of contact provided.

(2) COMMENTING PERIOD OF THE DRAFT BASIC ASSESSMENT REPORT AND DEADLINE FOR COMMENTS SUBMISSION

The commenting period of the Draft Basic Assessment Report is **30 days (excluding public holidays)**, starting from the **20 February 2025** and ending on **24 March 2025**. Your comments on the Draft Basic Assessment Report must be provided within the regulatory 30-day commenting period or by no later than the **24 March 2025**.

(3) SUBMISSION OF COMMENTS

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

Responsible EAP: Johmandie Pienaar

Email: johmandie@enviro-eap.co.za or admin@enviro-eap.co.za

Direct #: 072 240 3092 (contact methods: Calls, sms or whatsapp)

Fax: 086 435 4691

CONSULTATION WITH ORGANS OF STATE / KEY DEPARTMENTS [NEMA S240]

To facilitate adequate consultation with State Departments that administers laws relating to a matter affecting the environment in accordance with the requirements of Section 240 of NEMA, please be advised that all registered interested and affected parties, organs of state, key departments, and/or stakeholders were [in receipt of this email] notified electronically of the availability of the Draft Basic Assessment Report on this day **18 March 2025**. As such all RI&APs and Stakeholders are considered to be “in possession” of the Draft Basic Assessment Report and appendices from the date of electronic notification. A list of RI&APs and Stakeholders consulted, and their respective contact information to be included in **Appendix F of the Final Basic Assessment Report to be submitted to the Department**.

SECTIONS 11 AND 18 OF POPI ACT, 2013 (Act No.14 of 2013):

The personal information and comments provided will be included in reports to be submitted to the Competent Authority to enable informed decision-making. Also, if you choose to register as an I&AP your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report. This information may be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

Kind regards/Vriendelike groete

Johmandie Pienaar

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



Email: johmandie@enviro-eap.co.za

Cell: 072 240 3092

Fax: 086 435 4691

Web: www.enviro-eap.co.za

Postal Address: Enviro-EAP

PO Box 205

Agulhas

7287

From: Johmandie Pienaar

Sent: Thursday, 20 February 2025 15:41

To: jvanniekerk@swellendam.gov.za; Ron Brunings <rbrunings@swellendam.gov.za>; 'csaaiman@swellendam.gov.za' <csaaiman@swellendam.gov.za>; 'Joanile.Pitserse@westerncape.gov.za' <Joanile.Pitserse@westerncape.gov.za>; 'RicardoC@elsenburg.com' <RicardoC@elsenburg.com>; 'SwellendamSAPS@saps.gov.za' <SwellendamSAPS@saps.gov.za>; 'given.mfuku@dcs.gov.za' <given.mfuku@dcs.gov.za>; 'udube@mac.com' <udube@mac.com>; 'mh@hyneman.co.za' <mh@hyneman.co.za>; 'swellenkon@gmail.com' <swellenkon@gmail.com>; 'infohessequa@gmail.com' <infohessequa@gmail.com>; 'hampie.lourens@gmail.com' <hampie.lourens@gmail.com>; 'marquit.snyman@gmail.com' <marquit.snyman@gmail.com>; 'lindonwitbooi@gmail.com' <lindonwitbooi@gmail.com>; 'miolangenhoven080@gmail.com' <miolangenhoven080@gmail.com>; 'alpha@railtonfoundation.co.za' <alpha@railtonfoundation.co.za>; 'acvvsdam@telkomsa.net' <acvvsdam@telkomsa.net>; 'henrymatthysen@gmail.com' <henrymatthysen@gmail.com>; 'herman@capnpc.co.za' <herman@capnpc.co.za>; 'hiltonhartnick@gmail.com' <hiltonhartnick@gmail.com>; 'Jrmattysen4@gmail.com' <Jrmattysen4@gmail.com>; 'nevsef@gmail.com' <nevsef@gmail.com>; 'info@vrpitt.org.za' <info@vrpitt.org.za>; 'Mullersrusprimary@gmail.com' <Mullersrusprimary@gmail.com>; 'anel@capenature.co.za' <anel@capenature.co.za>; 'john@procoaching.co.za' <john@procoaching.co.za>; 'manager@drostdymuseum.com' <manager@drostdymuseum.com>; 'chairman@swellendamconsercancy.or.za' <chairman@swellendamconsercancy.or.za>; 'rohan@petrichoradventures.co.za' <rohan@petrichoradventures.co.za>; 'william@elliots.co.za' <william@elliots.co.za>

Cc: Bulelwa Msengi <Bulelwa.Msengi@sanparks.org>; Esther Howard <esther.howard@sanparks.org>

Subject: FW: NOTIFICATION OF COMMENTING PERIOD COMMENCEMENT: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM WC

**NOTIFICATION OF AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT FOR 30 DAYS
PROJECT TITLE: PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND
ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK
NATIONAL PARK, SWELLENDAM MUNICIPALITY– WESTERN CAPE
DFFE REF: 14/12/16/3/3/1/3107**

Dear Stakeholder

Notice of a Public Participation Process (PPP) commenced by the South African National Parks to apply for an Environmental Authorization and Water Use License Application are hereby given in terms the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended) and National Water Act. 36 of 1998. You have received this email as a Park Forum member for the ***PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM MUNICIPALITY– WESTERN CAPE.***

This email serves as a written notification of the availability of the ***Draft Basic Assessment Report for 30-day commenting period (excluding public holidays).***

(1) AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT:

The Draft Basic Assessment Report and appendices are accessible via: -

(i) electronic download on our website at <https://enviro-eap.co.za/public-participation/> (***available for download for the entire commenting period***). Please scroll down the public participation web

page until you find the relevant project title and reference number as per the project details provided above.

(ii) a hard copy of the report is also available at the Bontebok National Parks reception building

(2) COMMENTING PERIOD OF THE DRAFT BASIC ASSESSMENT REPORT AND DEADLINE FOR COMMENTS SUBMISSION

The commenting period of the Draft Basic Assessment Report is **30 days (excluding public holidays)**, starting from the **20 February 2025** and ending on **24 March 2025**. Your comments on the Draft Basic Assessment Report must be provided within the regulatory 30-day commenting period or by no later than the **24 March 2025**.

(3) SUBMISSION OF COMMENTS

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

Responsible EAP: Johmandie Pienaar

Email: johmandie@enviro-eap.co.za or admin@enviro-eap.co.za

Direct #: 072 240 3092 (*contact methods: Calls, sms or whatsapp*)

Fax: 086 435 4691

CONSULTATION WITH ORGANS OF STATE / KEY DEPARTMENTS [NEMA S240]

To facilitate adequate consultation with State Departments that administers laws relating to a matter affecting the environment in accordance with the requirements of Section 240 of NEMA, please be advised that all registered interested and affected parties, organs of state, key departments, and/or stakeholders were [in receipt of this email] notified electronically of the availability of the Draft Basic Assessment Report on this day **20 February 2025**. As such all RI&APs and Stakeholders are considered to be "in possession" of the Draft Basic Assessment Report and appendices from the date of electronic notification. A list of RI&APs and Stakeholders consulted, and their respective contact information to be included in **Appendix F of the Final Basic Assessment Report to be submitted to the Department**.

SECTIONS 11 AND 18 OF POPI ACT, 2013 (Act No.14 of 2013):

The personal information and comments provided will be included in reports to be submitted to the Competent Authority to enable informed decision-making. Also, if you choose to register as an I&AP your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report. This information may be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

Kind regards/Vriendelike groete

Johmandie Pienaar

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



Email: johmandie@enviro-eap.co.za

Cell: 072 240 3092

Fax: 086 435 4691

Web: www.enviro-eap.co.za

Postal Address: Enviro-EAP

PO Box 205

Agulhas

7287

From: Johmandie Pienaar

Sent: Thursday, 10 April 2025 08:39

To: tntloko@dffe.gov.za

Cc: Esther Howard <esther.howard@sanparks.org>; Ndukuyakhe Ndlovu

<Ndukuyakhe.Ndlovu@sanparks.org>; Thabo Kgomommu <Thabo.Kgomommu@sanparks.org>

Subject: RE: NOTIFICATION OF COMMENTING PERIOD : DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM WC

Good day Thumeka

The below email train refers. Please take note that the Department's World Heritage Management directorate was notified of the Draft BAR's for the **PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM MUNICIPALITY- WESTERN CAPE** availability for comment on 17 March 2025.

Should you wish to comment **please provide comments by no later than 17 April 2025** (30 day commenting period as calculated from notification sent on 17 March 2025).

Kind regards/Vriendelike groete

Johmandie Pienaar

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



Email: johmandie@enviro-eap.co.za

Cell: 072 240 3092

Fax: 086 435 4691

Web: www.enviro-eap.co.za

Postal Address: Enviro-EAP

PO Box 205

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7287

From: Grace Nomkhoze Mayile <gmayile@dffe.gov.za>

Sent: Thursday, 27 March 2025 07:30

To: Fhumulani Tshamano <FTshamano@dffe.gov.za>; Xola Mabunzi <xmabunzi@dffe.gov.za>;

Nandipha Bhengu <NBHENGU@dffe.gov.za>

Cc: Esther Howard <esther.howard@sanparks.org>; Ndukuyakhe Ndlovu

<Ndukuyakhe.Ndlovu@sanparks.org>; Thabo Kgomommu <Thabo.Kgomommu@sanparks.org>;

Thumeka Ntloko <TNTLOKO@dffe.gov.za>

Subject: RE: NOTIFICATION OF COMMENTING PERIOD : DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM WC

Dear Compliance Team

Please consider the enquiry below and advise.

Regards

From: Thabo Kgomommu <Thabo.Kgomommu@sanparks.org>

Sent: Wednesday, 26 March 2025 11:04

To: Thumeka Ntloko <TNTLOKO@dffe.gov.za>; Grace Nomkhoze Mayile <gmayile@dffe.gov.za>

Cc: Esther Howard <esther.howard@sanparks.org>; Ndukuyakhe Ndlovu <Ndukuyakhe.Ndlovu@sanparks.org>

Subject: RE: NOTIFICATION OF COMMENTING PERIOD : DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM WC

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Good day Thumeka,

Our EIA colleagues would like to know if the World Heritage Unit have any comments on the BAR referred to in this email trail. This is for a swimming pool at an existing recreational area at Bontebok National Park which is part of the CFR. A letter indicating support or non objection will assist in getting the EIA section of the DFFE to finalize the application.

Regards,

Thabo

From: Johmandie Pienaar <johmandie@enviro-eap.co.za>

Sent: 17 March 2025 10:43

To: tntloko@dffe.gov.za

Cc: Esther Howard <esther.howard@sanparks.org>; Thabo Kgomommu <Thabo.Kgomommu@sanparks.org>; Ndukuyakhe Ndlovu <Ndukuyakhe.Ndlovu@sanparks.org>

Subject: NOTIFICATION OF COMMENTING PERIOD : DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM WC

**NOTIFICATION OF AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT
PROJECT TITLE: PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND
ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK
NATIONAL PARK, SWELLENDAM MUNICIPALITY– WESTERN CAPE
DFFE REF: 14/12/16/3/3/1/3107**

Good day

For attention Ms Tumeka Ntloko

As per the 1st DFFE commenting letter received on 14/03/2025 on the Draft Basic Assessment Report from Ms Juliet Mhalangu, it was requested that the Department's World Heritage Management be consulted with regard to the proposed development. Please take note that the current ongoing 30 day commenting period for the Draft BAR ends on 24 March 2025, to prevent any delays in the application process please confirm whether or not you would be able to provide comments within the current 30 day commenting period ending on 24 March 2025.

Notice of a Public Participation Process (PPP) commenced by the South African National Parks to apply for an Environmental Authorization and Water Use License Application are hereby given in terms the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended) and National Water Act. 36 of 1998. You have received this email as a registered interested and affected party, organ of state, and/ or key department for the **PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED**

**INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK,
SWELLENDAM MUNICIPALITY- WESTERN CAPE.**

This email serves as a written notification of the availability of the **Draft Basic Assessment Report** for **30-day commenting period (excluding public holidays)**.

(1) AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT:

The Draft Basic Assessment Report and appendices are accessible via: -

(i) electronic download on our website at <https://enviro-eap.co.za/public-participation/> (**available for download for the entire commenting period**). Please scroll down the public participation web page until you find the relevant project title and reference number as per the project details provided above.

(ii) hardcopies and/or cd copies will only be sent via SAPO – registered mail service **on request** or where a postal address is the only means of contact provided.

(2) COMMENTING PERIOD OF THE DRAFT BASIC ASSESSMENT REPORT AND DEADLINE FOR COMMENTS SUBMISSION

The commenting period of the Draft Basic Assessment Report is **30 days (excluding public holidays)**, starting from the **20 February 2025** and ending on **24 March 2025**. Your comments on the Draft Basic Assessment Report must be provided within the regulatory 30-day commenting period or by no later than the **24 March 2025**.

(3) SUBMISSION OF COMMENTS

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

Responsible EAP: Johmandie Pienaar

Email: johmandie@enviro-eap.co.za or admin@enviro-eap.co.za

Direct #: 072 240 3092 (*contact methods: Calls, sms or whatsapp*)

Fax: 086 435 4691

SECTIONS 11 AND 18 OF POPI ACT, 2013 (Act No.14 of 2013):

The personal information and comments provided will be included in reports to be submitted to the Competent Authority to enable informed decision-making. Also, if you choose to register as an I&AP your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report. This information may be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

Kind regards/Vriendelike groete

Johmandie Pienaar

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



Email: johmandie@enviro-eap.co.za

Cell: 072 240 3092

Fax: 086 435 4691

Web: www.enviro-eap.co.za

Postal Address: Enviro-EAP

PO Box 205

Agulhas

7287

Advertisement Placed in Newspapers

PUBLIC PARTICIPATION PROCESS

**PROJECT TITLE: PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED
INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM
MUNICIPALITY– WESTERN CAPE
DFFE REF: 14/12/16/3/3/1/3107**

Notice of a Public Participation Process (PPP) commenced by the **South African National Parks** to apply for an Environmental Authorization and Water Use License Application are hereby given in terms the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended) and National Water Act. 36 of 1998. This notice also serves to inform the public that the **draft Basic Assessment Report and its Appendices are available for public comment on our website: <https://enviro-eap.co.za/public-participation/>**. When landing on the Public Participation Page on the website please scroll down until you locate the project title as indicated above (valid for full duration of 30 day commenting period). A hard copy of the draft Basic Assessment Report will also be available at the Bontebok National Park reception building for review.

Proposed Project Description: The following new recreational developments are proposed at Die Stroom Picnic Site in the Bontebok National Park, Swellendam – a swimming pool with associated pump and backwash tank, ablution facilities with associated septic tank and pump chamber, additional parking areas and associated services infrastructure i.e. soak-away, pipelines, underground electrical cable and fencing.

Location: From direction Cape Town the entrance to the Bontebok National Park is located on your right-hand side off the N2 just before you enter the town of Swellendam. Directions to Die Stroom Picnic site located next to the Breede River tributary can be obtained at the park reception desk.

Listed Activities: Listing Notice 1 - Listed Activity: 12; and Listing Notice 3 – Listed Activities: 12, 14.

Exemption: No application for any exemption is sought.

Opportunity to participate: Interested and Affected Parties are invited to provide written comments on the Draft Basic Assessment Report to Enviro-EAP [Johmandie Pienaar (EAP)] within **30 days** of this notice excluding public holidays, **last day for comments 24 March 2025**. The project title, your full name, contact details, plus indication of any direct business, financial, personal, or other interest you may have in this application must please be provided and fully described. The personal information and comments provided will be included in reports to be circulated and submitted to the Competent Authority to enable informed decision-making. Also, if you choose to comment as an I&AP your personal information will be made available for purposes of being informed and given access to reports and comments received. This information will be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

Contact: Johmandie Pienaar

Enviro-EAP, PO Box 205, Agulhas 7287

Tel/Cell: 072 240 3092

Fax: 086 435 4691

Email: admin@enviro-eap.co.za

'Elsiesrivier in greep van wetteloosheid'

Megan Adendorff

Inwoners van Elsiesrivier leef al die lank in vrees soos 'n bende-oorlog na bewering die nawaak in die gebied uitgebreek het. Die bende-oorlog was so erg dat inwoners te bang was om hul huis te verlaat en kinders het nie skool toe gegaan nie, se Hamish Arries, hoof van die Elsiesrivier-waaiersvereniging, by navraag. "Elsiesrivier bevind hom in 'n greep van wetteloosheid," se Arries. "Ous tel die moorde af met 'n normaal is, maar ons moet begin besef dat dit glad nie normaal is nie."

vooral Maandag naby die Heath Estate in die Clarke Estate plaasgewind. "In 'n 60-jarige man is op die tuisdood, en in 'n 15-jarige seun oorkom na 'n nabygeleë hospitaalgebied, se kap. Frederik van Gyberg, polisiewoordvoerder. Die kinders het verligting. Beldmatiaal na nog 'n skietvoorslag wat glo die nawaak in Eureka Estate, Ravensmeed, plaasgevoel het, wys twee vier mans wat vermoedelik deel uitmaak van dieselfde bende, in 'n greep betrokke maak met 'n skietvoorslag wat nie op kamera sigbaar is nie. Volgens Ibrahim Mukidum, voormalige lid van die Elsiesrivier-gemeenskapspolisieringsgroep (GPF), het die voornal nie vergebend in die Clarke Estate plaasgewind. In kommentaar op die video wat op die Facebook-groep Elsies River - My Home-town geplaas is, ges wou ons hulle misdoe te kenne. "Ons mens en onskuldige kinders sterf doodelik. Wanneer gaan dit ophou," wil 'n beseerde inwoner wet. Nog iemand skryf: "Hierdie bendelede skiet moet dit 'n speletjie is. Mag God die hulle afreken. Dis nie normaal of 'n grap om onskuldige mense dood te maak nie. Hulle gee nie om vir die kinders en mense wat in die straat loop nie. Ek bid vir die beskerming van onskuldige mense." Van Wyk het gister gesê die

Uitspraak later teen 3 oor R100 m. se perlemoen



Kal Ou Yang (links), Chu-Kai Peter Chang (middel) en Hsien-Chu Yu (regs) voor die hof. Foto: ARGIEF/LULLAMA ZENZILE

Die Chinese burgers wie se maatskappy in Kaapstad na bewering met sowat R100 miljoen se smokkelperlemoen verband hou sal nog langer moet wag om hul lot te hoor. Die hooggeregshof in Gebeha sou gister uitspraak lewer in die saak, maar die vertoers het 'n hofaanklagstel. Na verneem word, het die regter in die saak meer tyd geva om die uitspraak voor te berei. Kal Ou Yang, Chu-Kai Peter Chang en die maatskappy Blue Fin Marine (BFM) Trading, wat deur Hsien-Chu Yu Yang verteenwoordig word, wat saam teregstaan op 'n aanklagte van wanrekening, geldwassery en bedrog, was nie gister in die hof teenwoordig nie. Daar is glo vooraf

as standaardprosedure laat oortaan tot die volgende hofverskyning. Die staat het in die verhoor aangevoer dat die beskuldigdes die inhoud van die uitspraak nie wettig gebruik om perlemoen as vleisprodukte van die land se hawens uit te voer. Die staat beweer perlemoen is in drie vragtogte - insaamle van die beskuldigdes - vervoer as vleisprodukte verklaar is - aangereet. Die ondersoek het in Januarie 2018 begin toe die Vaalke op nage trou smokkelperlemoen, wat saam met vleisprodukte vertoer is, in 'n vraghuur van die Port Elizabeth-hawe in Gebeha beslag besit het. Die beskuldigdes het skuld op al die aanklagte ontken. - Cara-Lee Dorking - caralescheum@24.com

PARKER IN 2020 GESKORS

Regter 'redien' miljoene rande tuis

Aanrand-bewerings teen Hlopho bekyk

Marelize Barnard

'n Regter van die hooggeregshof in Kaapstad, wat nou reeds langer met betaling geskors is as wat hy aktief as regter gewerk het, al het sowat R8 miljoen verdien deur by die huis by

DE BURGER Snuffgids

PERSONOLIEKE DIENSTE, KRUIKENNER, PRINCESS JAMILA EXPERT, JEWELERSWARE & BYKOMSTIGE, VOLWASSENS, PRIVAAT

WERK, ALGEMEEN, Adviseurs, Stuur CV's aan Lianz by

THE KOOP, DEAMANTE GOED, BESTE PRIJS, VOLWASSENS, PRIVAAT

WERK, ALGEMEEN, Adviseurs, Stuur CV's aan Lianz by

VERLORE DOCUMENTE, VERLORE DE WETTELIGE TITELWYS

WERK, ALGEMEEN, Adviseurs, Stuur CV's aan Lianz by

VERLORE DOCUMENTE, VERLORE DE WETTELIGE TITELWYS

WERK, ALGEMEEN, Adviseurs, Stuur CV's aan Lianz by

gedrag. Met die tribunaal se laaste sitting om oor Parker se saak te besin, op 18 November 2024 deur pres. Cyril Ramaphosa geskors is, se verhoor voor 'n tribunaal van die Regterlike Dienstkommis (RDK) behoort moet word. Gedaglik, het Nqose gesê, is dit die finale uitslating van 'n saak wat destyds die klag by die tribunaal ingesê was. Die oorspronklike groep regters wat destyds die klag by die tribunaal ingesê was, was regters Siraj Desai (intussen afgetree), Lee Bozalek (intussen afgetree), Robert Henney, Elize Steyn (intussen afgetree), Ashley Burns-Ward (intussen afgetree), Owen Rogers, Pat van der Merwe (intussen afgetree), Sharnaaz Meer en Mike Sher. Die Kaapse Baroond het ook destyds 'n klag by die RDK teen Parker ingedien wat verband het met die beweerde wanbestuur van sowat R1 miljoen van die trustgeld van die prokureursfirma Parker & Khan Ingely. Parker was vantevore 'n vennoot verbonde aan die regs-firma. Daar is vrae gevra oor hok uitgewys het toe hy as kandidaat vir 'n permanente regtersposysie voorgeleg aan die RDK gedoen het nie. Mchokazi Benjamin, navesster wat 'n valkook of Suid-Afrika se regstelsel hou, se die impak van Parker se tribunaalverhoor is van groot belang vir die regsomstand. Hier vir die toekoms ook 'n aansluiting gegos sal word van hoe die RDK 'n klag van beweerde oneerlikheid teen 'n regter hanteer. Die impak wat Parker se skorsing op die werking van die hooggeregshof in Kaapstad het, is ook groot, volgens Benjamin. Hy se die hooggeregshof het 'n groot lading van sake en wanneer 'n regter vir jare geskors is, beteken dit dat die pos nie gevul kan word. - mbarnard@24.com

Regter Musthak Parker in Oktober 2017 tydens sy onderhoor met die Regterlike Dienstkommis vir die pos van regter in die hooggeregshof. Foto: SKERMGREEP

DRAKENSTEIN MUNICIPALITY - UMAMPALA, PUBLIEKE KENNINGSWING VIR DIE INSKRYF VAN DIE ALGEMENE WAARDESKOOL 2024 EN INDIENING VAN BESWARE

STELLENBOSCH MUNICIPALITY - FRANSCHHEK, PUBLIC NOTICE CALLING FOR INSPECTION OF THE SUPPLEMENTARY MALLIATION ROLL 2024/2025

PUBLIC PARTICIPATION PROCESS PROJECT TITLE: PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT THE STROOM PISCINE SITE IN THE BONTHEK NATIONAL PARK, SWELLENDAM MUNICIPALITY - WESTERN CAPE

Die Burger-intekenaar kan ons by die volgende besonderheidskontak met enige navraag. Intekenaar@media24.com, SMS "diens" na 31069, 087 353 1300

DE BURGER, Hoe kan ons help? Die Burger-intekenaar kan ons by die volgende besonderheidskontak met enige navraag. Intekenaar@media24.com, SMS "diens" na 31069, 087 353 1300

DRAKENSTEIN MUNICIPALITY - UMAMPALA, UITNOODING OM TE TENDER

Table with 4 columns: TENDER NUMMER EN BESKRYWING, VOORLEEF PUNTSTELLE, INLIETINGS-VERGADERING, SLUITINGSOMSTANDIGHEID EN TYD

Notice of a Public Participation Process (PPP) commenced by the South African National Parks to apply for an Environmental Authorisation and Water Use Licence Application are hereby given in terms of the Environmental Impact Assessment (EIA) Regulations (2014), as amended by under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended) and National Water Act, 36 of 1956. This notice also serves to inform the public that the draft Basic Assessment Report and the Applications are available for public comment on our website: https://www.ecpa.co.za/2024/02/19/2024-02-19-01/



SWELLENDAM MUNICIPALITY

QUOTATION NOTICE QUOTATION NO: SMQ32/24/25 PROVISION OF SUPPLY AND DELIVERY OF SPIGOTS FOR LED STREETLIGHTS

Official quotation documents and specifications are obtainable from Mr. K. Juries (Supply Chain Management Unit, 11 Lind Street, Swellendam) on tel: 028-5148500 or email scm@swellendam.gov.za from **20 February 2025**.

Any technical enquiries can be made to Mr. S. Herbst at tel. no. 028-5148500 or e-mail: s Herbst@swellendam.gov.za

Quotations must be submitted in a sealed envelope and must be clearly marked with the respective number and description. Quotations must be placed in the Municipal Quotation Box before **11h00 on 28 February 2025**, situated at the **Supply Chain Management Offices**, 11 Lind Street, Swellendam. Quotations may only be submitted on the prescribed documents and must include a valid Tax Compliance Status **PIN** as issued by **SARS**.

Late quotations and quotations received by E-Mail or Facsimile will not be considered. Quotations will be evaluated and adjudicated in accordance with the Swellendam Municipality's Preferential Procurement Policy and its Supply Chain Management Policy. The **80/20**-point system will be applicable. The Council does not bind itself to accept the lowest or any quotation and reserves the right to accept a quotation in full or a part thereof.

Please Note:

- Quotation / Quotation box is open 24/7. Standard size of opening is: 10cm high and 33cm wide;
- All Technical inquiries **MUST** be in writing to the responsible official on this advert;
- No inquiries will be handled on the last **Two (2)** days before closing.

Bids shall remain valid for a sixty (60) day period calculated from the bid closing date.

A. VORSTER/MUNICIPAL MANAGER
Notice no.: T22/2025

PO. BOX 20, SWELLENDAM
6740

**VIVA
TAALWENK**

stert

By die stert af.
Naelskraap.

As dassie stert kry.
Nooit.

Dassie het 'n stert gekry.
Hy/Sy het besonder hoogmoedig geword.
'n Dassie aan sy stert optel.

Die onmoontlike probeer doen.
Jou stert teen iemand/iets op lig/optel.
Aanstellerig/hoogmoedig/parmantig
wees teenoor iemand/iets

**Bron(ne): Spreekwoorde en ander segswyse;
HAT; WAT; Wat praat jy!**

PUBLIC PARTICIPATION PROCESS PROJECT TITLE: PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM MUNICIPALITY- WESTERN CAPE DFFE REF:

14/12/16/3/3/1/3107

Notice of a Public Participation Process (PPP) commenced by the **South African National Parks** to apply for an Environmental Authorization and Water Use License Application are hereby given in terms of the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended) and National Water Act, 36 of 1998. This notice also serves to inform the public that the **draft Basic Assessment Report and its Appendices are available for public comment on our website:** <http://enviro-eap.co.za/public-participation/>. When landing on the Public Participation Page on the website please scroll down until you locate the project title as indicated above (valid for full duration of 30 day commenting period). A hard copy of the draft Basic Assessment Report will also be available at the Bontebok National Park reception building for review.

Proposed Project Description: The following new recreational developments are proposed at Die Stroom Picnic Site in the Bontebok National Park, Swellendam – a swimming pool with associated pump and backwash tank, ablation facilities with associated septic tank and pump chamber, additional parking areas and associated services infrastructure i.e. soak-away, pipelines, underground electrical cable and fencing.
Location: From direction Cape Town the entrance to the Bontebok National Park is located on your right-hand side off the N2 just before you enter the town of Swellendam. Directions to Die Stroom Picnic site located next to the Breede River tributary can be obtained at the park reception desk.

Listed Activities: Listing Notice 1 - Listed Activity: 12; and Listing Notice 3 – Listed Activities: 12, 14.

Exemption: No application for any exemption is sought.

Opportunity to participate: Interested and Affected Parties are invited to provide written comments on the Draft Basic Assessment Report to Enviro-EAP [Johmandie Pienaar (EAP)] within **30 days** of this notice excluding public holidays, **last day for comments 24 March 2025**. The project title, your full name, contact details, plus indication of any direct business, financial, personal, or other interest you may have in this application must please be provided and fully described. The personal information and comments provided will be included in reports to be circulated and submitted to the Competent Authority to enable informed decision-making. Also, if you choose to comment as an I&AP your personal information will be made available for purposes of being informed and given access to reports and comments received. This information will be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

Contact: Johmandie Pienaar
Enviro-EAP, PO Box 205, Agulhas 7287
Tel/Cell: 072 240 3092
Fax: 086 435 4691
Email: admin@enviro-eap.co.za



PUBLIC PARTICIPATION PROCESS

PROJECT TITLE: PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM MUNICIPALITY– WESTERN CAPE

DFFE REF: 14/12/16/3/3/1/3107

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Proposed Project Description: The proposed swimming pool, recreational facilities and associated infrastructure at Die Stroom Picnic Site in the Bontebok National Park, Swellendam will include the following:

- Pool Backwash tank slab = 15m² for 5000liter JoJo
- Septic tank and Pump chamber = 40m²
- Pool pump room = 40m²
- Ablutions/Shower/Change Area = 105m²
- Swimming Pool = 315m²
- Terrace less Pool = 1115m²
- Fence = 210m long and 1.5m high
- Physically Disabled Ramp = 80m²
- Parking = 240m²
- Underground electrical cable = 110m long (Area measured in sewer trench calculation)
- Sewer line /Soak-away = 260m long (Area = 390m²)
- Pool back-wash and soak-away = 260m long (Area measured in sewer trench calculation)
- Water supply line = 25m long (Area 25m²) (Balance of area measured in sewer trench calculation)
- Soak-away = 150m² (15m x 10m)
- 2 x Biofilters = 64m² (4m x 8m each)

Construction footprint = 0.44ha. Proposed development will lead to the permanent clearance of ±0.2ha of indigenous vegetation. The final development footprint for the developments as described above = ± 0.28Ha.

Location: From direction Cape Town the entrance to the Bontebok National Park is located on your right-hand site off the N2 just before you enter the town of Swellendam. Directions to Die Stroom Picnic site located next to the Breede River tributary can be obtained at the park reception desk.



Listed Activities:

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 1	Describe the portion of the proposed project to which the applicable listed activity relates.
12	The development of— (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs— (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse—	Development of 240m ² proposed parking areas within 32m of a non-perennial drainage line
Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 3	Describe the portion of the proposed project to which the applicable listed activity relates.
12	The clearance of an area of 300 square metres or more of indigenous vegetation (i) Western Cape (i) Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004	Clearance of 0.2ha of indigenous vegetation of Endangered – Swellendam Silcrete Fynbos
14	The development of— (ii) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs— (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse; (i) Western Cape (i) Outside urban areas: (cc) World Heritage Sites	Development of 240m ² proposed parking areas within 32m of a non-perennial drainage line.

Procedure: A basis assessment process will be applied to the application.

Exemption: No application for any exemption is sought.

Opportunity to participate: Interested and Affected Parties are invited to provide written comments on the Draft Basic Assessment Report to Enviro-EAP [Johmandie Pienaar (EAP)] within **30 days** of this notice. The project title, your full name, contact details, plus indication of any direct business, financial, personal, or other interest you may have in this application must please be provided and fully described. The personal information and comments provided will be included in reports to be circulated and submitted to the Competent Authority to enable informed decision-making. Also, if you choose to comment as an I&AP your personal information will be made available for purposes of being informed and given access to reports and comments received. This information will be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

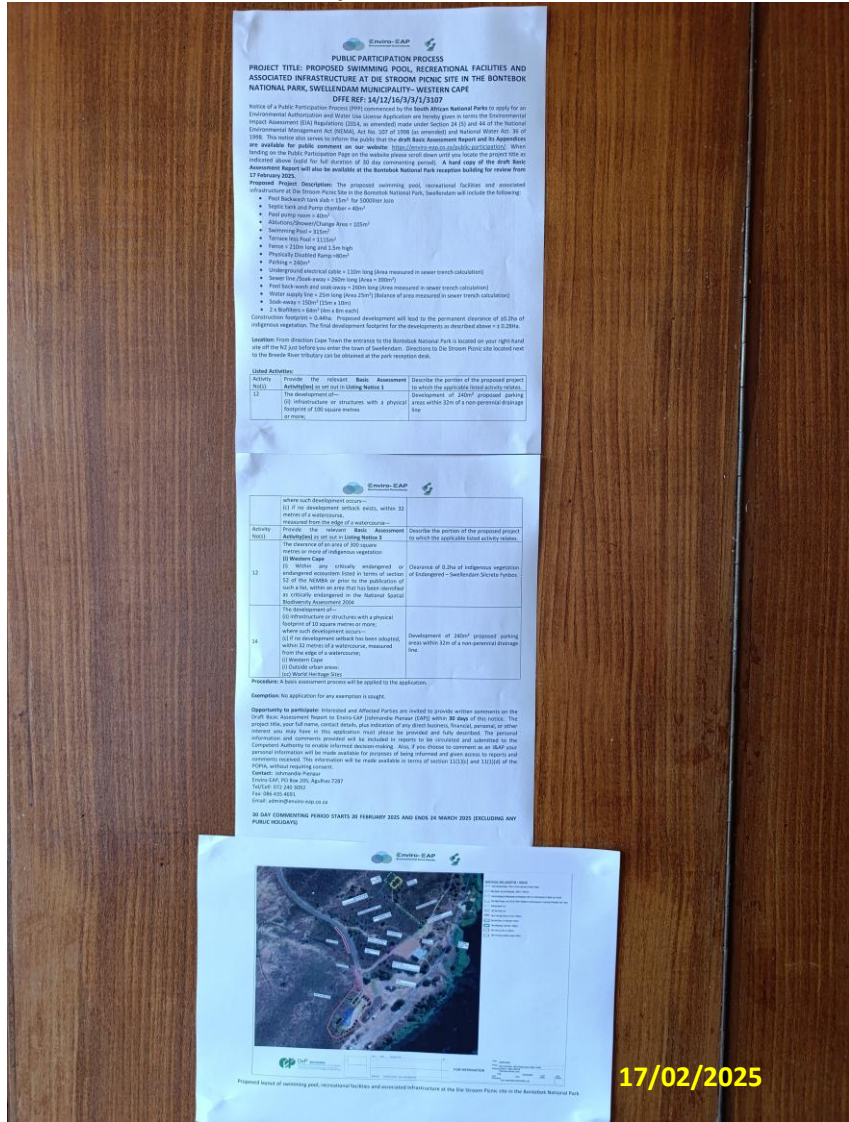


Contact: Johmandie Pienaar
Enviro-EAP, PO Box 205, Agulhas 7287
Tel/Cell: 072 240 3092
Fax: 086 435 4691
Email: admin@enviro-eap.co.za

30 DAY COMMENTING PERIOD STARTS 20 FEBRUARY 2025 AND ENDS 24 MARCH 2025 (EXCLUDING ANY PUBLIC HOLIDAYS)

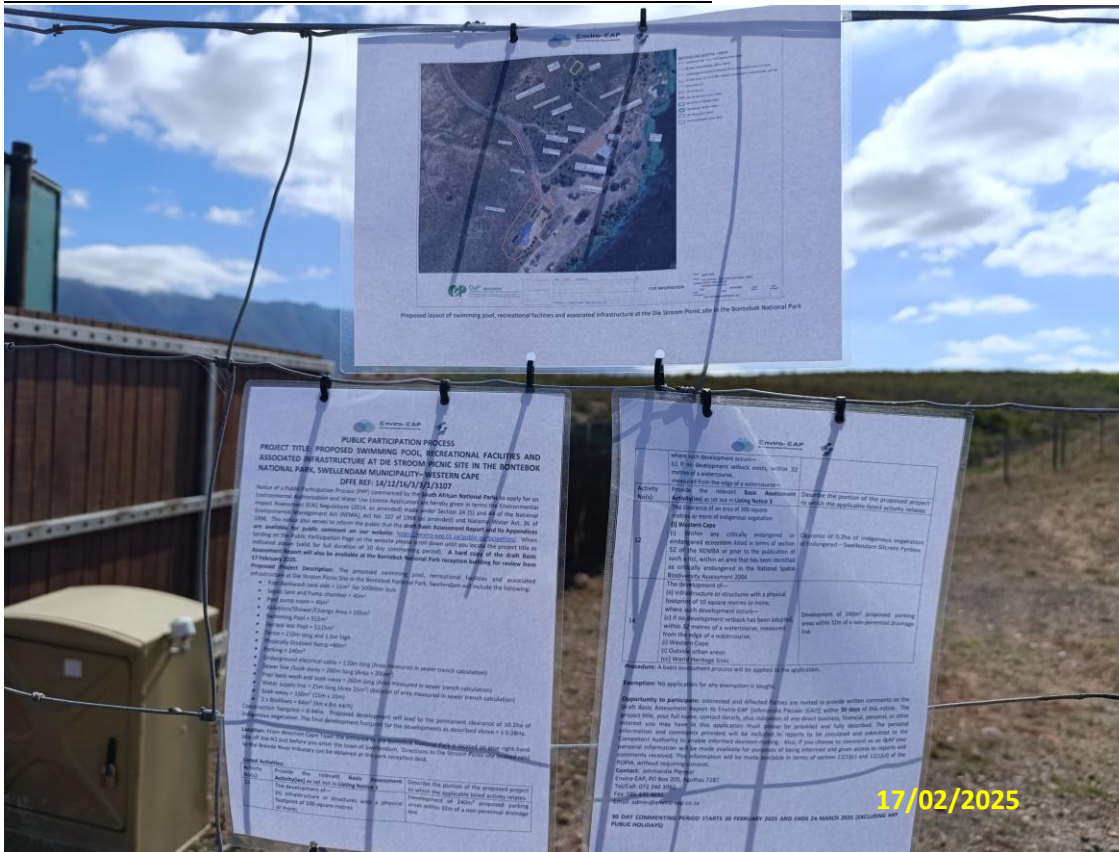


Notification Placed at Swellendam Municipal Offices





Notification Placed at Entrance to Bontebok National Park





17/02/2025

Proof
2

DRAFT BASIC ASSESSMENT REPORT

in support of an

ENVIRONMENTAL AUTHORIZATION

**IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998
(ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT
REGULATIONS, 2014 AS AMENDED**

for

**PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND
ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE
BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENDAM
MUNICIPALITY, WESTERN CAPE**

DFFE Ref: 14/12/16/3/3/1/3107

13 FEBRUARY 2025

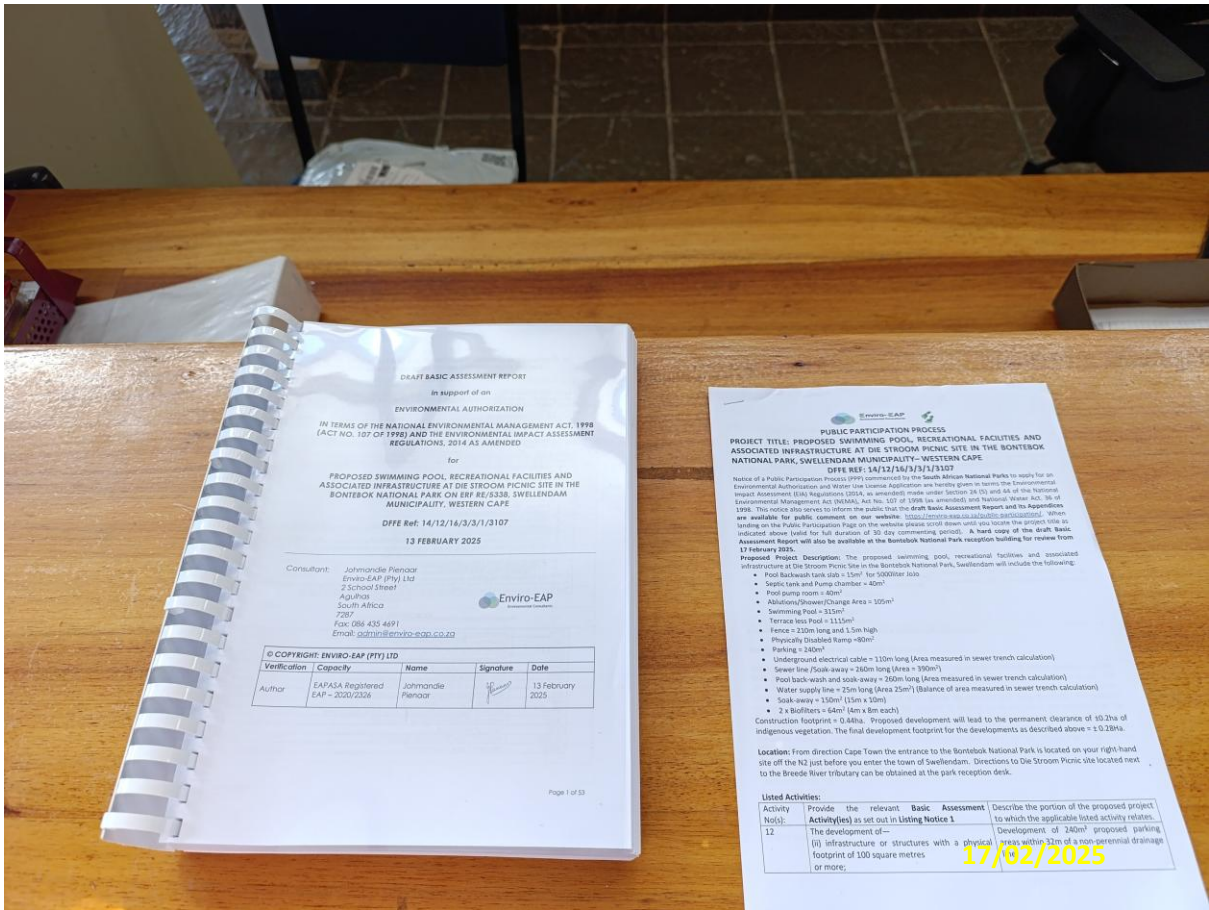
Consultant: Johmandie Pienaar
Enviro-EAP (Pty) Ltd
2 School Street
Agulhas
South Africa
7287
Fax: 086 435 4691
Email: admin@enviro-eap.co.za



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Verification	Capacity	Name	Signature	Date
Author	EAPASA Registered EAP - 2020/2326	Johmandie Pienaar		13 February 2025

~~AAU~~ 17/02/2024

BONTEBOK National Park



Notification Placed at Die Stroom Picnic Site in Bontebok National Park

Enviro-EAP

PUBLIC PARTICIPATION PROCESS

PROJECT TITLE: PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTBOK NATIONAL PARK, SWELLENDAM MUNICIPALITY- WESTERN CAPE

DIFFE REF: 14/12/16/3/1/3107

Notice of a Public Participation Process (PPP) commenced by the South African National Parks to supply for an Environmental Authorization and Water Use License Application are hereby given in terms of the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (3) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended) and National Water Act 36 of 1998. This notice also serves to inform the public that the draft Basic Assessment Report and its Appendices are available for public comment on our website: <https://www.sanparks.org/public-participation/>. When indicated above build for full duration of 30 day commenting period). A hard copy of the draft Basic Assessment Report will also be available at the Bontebok National Park reception building for review from 17 February 2025.

Proposed Project Description: The proposed swimming pool, recreational facilities and associated infrastructure at Die Stroom Picnic Site in the Bontebok National Park, Swellendam will include the following:

- Pool Backwash tank 60m x 15m for 50000liter Judo
- Septic tank and Pump chamber = 40m²
- Pool pump room = 40m²
- Additional/Showers/Change Area = 305m²
- Swimming Pool = 315m²
- Terrace less Pool = 1115m²
- Fence = 2.20m long and 1.5m high
- Physically Disabled Ramp = 80m²
- Paving = 240m²
- Underground electrical cable = 110m long (Area measured in sewer trench calculation)
- Sewer line /Soak-away = 260m long (Area = 390m²)
- Pool back wash and soak-away = 200m long (Area measured in sewer trench calculation)
- Water supply line = 25m long (Area 25m²) (Balance of area measured in sewer trench calculation)
- Soak-away = 150m² (15m x 10m)
- 2 x Biofilters = 64m² (4m x 8m each)

Construction footprint = 0.48ha. Proposed development will lead to the permanent clearance of (0.2)ha of indigenous vegetation. The final Development footprint for the developments as described above is 0.22ha.

Location: From direction Cape Town the entrance to the Bontebok National Park is located on your right-hand side off the N2 just before you enter the town of Swellendam. Directions to Die Stroom Picnic site located next to the Breede River tributary can be obtained at the park reception desk.

Listed Activities:

Activity	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 3	Describe the portion of the proposed project to which the applicable listed activity relates.
12	The development of— (i) infrastructure or structures with a physical footprint of 100 square metres or more;	Development of 240m ² proposed parking area within 22m of a non-perennial drainage line

Enviro-EAP

	where such development occur— (c) if no development setback exists, within 32 metres of a watercourse measured from the edge of a watercourse—	Describe the portion of the proposed project to which the applicable listed activity relates.
Activity 12	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 3 The clearance of an area of 300 square metres or more of indigenous vegetation (i) Western Cape (ii) Within any critically endangered or endangered ecosystem listed in terms of section 22 of the NEMA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004	Clearance of 0.2ha of indigenous vegetation of Endangered – Swellendam Siterete Fynbos
Activity 14	The development of— (i) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occur— (c) if no development setback has been adopted, within 22 metres of a watercourse, measured from the edge of a watercourse; (i) Western Cape (ii) Outside urban areas; (iii) World Heritage Sites	Development of 240m ² proposed parking area within 22m of a non-perennial drainage line.

Procedure: A basic assessment process will be applied to the application.

Exemption: No application for any exemption is sought.

Opportunity to participate: Interested and Affected Parties are invited to provide written comments on the Draft Basic Assessment Report to Enviro-EAP (Johnanda Pinaraz (EAP)) within 30 days of this notice. The project title, your full name, contact details, plus indication of any direct business, financial, personal, or other interest you may have in this application must please be provided and fully described. The personal information and comments provided will be included in reports to be circulated and submitted to the Competent Authority to enable informed decision-making. Also, if you choose to comment as an I&AP your personal information will be made available for purposes of being informed and given access to reports and comments received. This information will be made available in terms of section 111(3) and 112(3) of the POPIA, without requiring consent.

Contact: Johnanda Pinaraz
Enviro-EAP, P.O. Box 205, Agulhas 7287
Tel/Cell: 072 248 3092
Fax: 088 435 4031
Email: johnanda@enviro-eap.co.za

30 DAY COMMENTING PERIOD STARTS 20 FEBRUARY 2025 AND ENDS 24 MARCH 2025 (EXCLUDING ANY PUBLIC HOLIDAYS)



17/02/2025



**PROOF OF MEETING HELD AND COMMENTS RECEIVED DURING DRAFT BASIC ASSESSMENT
REPORT COMMENTING PERIOD**

South African Heritage Resource Agency (SAHRA)

Received the below email on 18/02/2025 confirming that SAHRA received the notification of the Draft BAR availability for comments. Received no comments from SAHRA to date.

From: SAHRA General <info@sahra.org.za>

Sent: Tuesday, 18 February 2025 10:26

To: Nokukhanya Khumalo <nkhumalo@sahra.org.za>

Cc: Johmandie Pienaar <johmandie@enviro-eap.co.za>

Subject: FW: NOTIFICATION OF COMMENTING PERIOD COMMENCEMENT: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM WC

Dear Khanyo

I trust you are well.

Please receive the email and attachment.

Kind regards,

Swellendam Municipality

From: Ron Brunings <rbrunings@swellendam.gov.za>

Sent: Friday, 21 February 2025 09:40

To: Johmandie Pienaar <johmandie@enviro-eap.co.za>

Subject: RE: NOTIFICATION OF COMMENTING PERIOD COMMENCEMENT: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM WC

Dear Johmandie

Thank you.

It is hereby suggested that the new parking is clustered, as apposed to being located alongside the sections of the roadway, unless there is a tangible reason for this approach.



Ron Brunings *Pr.Pln (A/794/1994)*

Senior Manager : Town Planning,
Building Control & Environment
(Directorate Planning & Infrastructure Services)

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Swellendam Municipality

P.O Box 20, Swellendam, 6740, Western
Cape,

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From: Johmandie Pienaar <johmandie@enviro-eap.co.za>

Sent: Friday, 21 February 2025 11:33

To: Ron Brunings <rbrunings@swellendam.gov.za>

Subject: RE: NOTIFICATION OF COMMENTING PERIOD COMMENCEMENT: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM WC

Good day Mr Brunings

In reply to your suggestion provided, there are already two cluster parking areas at Die Stroom and the parking proposed alongside the road is for overflow parking and therefore to remain as proposed.

Also please take note for your consideration that although municipal recommendations/suggestions will be taken into consideration SANParks are only obliged to inform the municipalities of developments within national parks. The municipality is not required to sign off on the proposed building plans and cannot insist on changes to be made to the development based on municipal by-laws. By-laws do not apply to national parks as the boundary falls outside of the municipal boundary and jurisdiction.

Kind regards/Vriendelike groete

Johmandie Pienaar

Environmental Assessment Practitioner
EAPASA Registration Nr. 2020/2326



Email: johmandie@enviro-eap.co.za

Cell: 072 240 3092

Fax: 086 435 4691

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Postal Address: Enviro-EAP
PO Box 205
Agulhas
7287

From: Ron Brunings <rbrunings@swellendam.gov.za>

Sent: Friday, 21 February 2025 12:27

To: Johmandie Pienaar <johmandie@enviro-eap.co.za>

Cc: Zukiswa Kwatshana <zkwatshana@swellendam.gov.za>; Wilhelm Schutte <wschutte@swellendam.gov.za>

Subject: RE: NOTIFICATION OF COMMENTING PERIOD COMMENCEMENT: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM WC

Dear Johmandie

To be perfectly clear, ALL building plans are to be lodged with the Municipality for consideration and approval – this follows the constitution. low. all are equal before the law. It is for that reason too that the Constitutional Court building was lodged with the applicable municipality for approval at the time. Building plans relate to the National Building Regulations and Building Standards Act, not a municipal bylaw. Said plans will therefore need to be lodged. There is no such thing as "information" plans etc. It is for that same reason that all schools and provincial / national dept structures formally lodge with the Municipality ito. the NBR's. Please ensure that SANParks is appraised of this.

Further, my recommendations relating to the location of the streetside parking is made ito. land use planning principles, and is made in the overall best interest of the park, and also to avoid the unnecessary removal of vegetation. It is therefore suggested that the existed clustered parking is expanded, rather than creating disparate parking along the road, which impacts safety. Moreover, on what basis were the number of parking spaces determined etc?

Kindest Regards



Ron Brunings *Pr.Pln (A/794/1994)*

Senior Manager : Town Planning,
Building Control & Environment
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From: Esther Howard <esther.howard@sanparks.org>

Sent: Tuesday, 25 March 2025 09:55

To: Ron Brunings <rbrunings@swellendam.gov.za>

Cc: kwatshana@swellendam.gov.za; wschutte@swellendam.gov.za; Cornie Jonker <Cornie.Jonker@sanparks.org>; Antionet Van Wyk <antionet.vanwyk@sanparks.org>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Richard Williams <Richard.Williams@sanparks.org>; Joep Jacobs <Joep.Jacobs@sanparks.org>

Subject: FW: Proposed Bontebok Swimming Pool development

<

Dear Ron

Further to your correspondence with the SANParks appointed EAP for proposed development in Bontebok National Park.

In terms of the Constitution, the management of national parks is a national competency. While national parks are situated in municipal areas, the responsibilities and application of some legislation had to be clarified. One of these responsibilities was the approval of building plans, and to get clarity on the matter due to previous similar situations arising, SANParks obtained a legal opinion – a copy of which is included. As a State Entity acting on behalf of the State, SANParks is not bound by the act. SANParks has the capacity and expertise to approve building plans. Therefore, SANParks is not required to submit building plans to a municipality for approval. SANParks is not bound to the Building and Standards Act in respect to Local Authority approval, as SANParks acts on behalf of the State and the State administrates/ implements the Act themselves.

SANParks has always and will continue to inform municipalities of its intended construction projects and provide the building plans for information and comment.

Currently, day visitors “illegally” park along the road due to insufficient parking. The expansion of the existing cluster parking areas was considered, however from an operational point of view the additional streetside bays are preferable and would be to formalise the current parking.

The number of bays was calculated on the average number of visitors as well as the available budget for the proposed development.

For further queries, you are welcome to contact SANParks’ Parks Technical Services which is headed by Cornie Jonker (Pr.Eng). He is copied in this email.

Kind regards
Esther

Esther Howard
Co-ordinator: Environmental Impact Assessments (Acting SCM Practitioner)
EMI Grade 2
BSc. HONS (Zoology)
IAIA Member: 5753
Tel: 021-741 2569
Cell: 083 791 4911
E-mail: esther.howard@sanparks.org
Website: www.sanparks.org



From: Ron Brunings <rbrunings@swellendam.gov.za>
Sent: 25 March 2025 10:52
To: Esther Howard <esther.howard@sanparks.org>
Cc: zkwatshana@swellendam.gov.za; wschutte@swellendam.gov.za; Cornie Jonker <Cornie.Jonker@sanparks.org>; Antionet Van Wyk <antionet.vanwyk@sanparks.org>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Richard Williams <Richard.Williams@sanparks.org>; Joep Jacobs <Joep.Jacobs@sanparks.org>
Subject: RE: Proposed Bontebok Swimming Pool development

Dear Ms Howard

Thank you. I agree that the management of National Parks is national competency. No copy of the legal opinion is attached – the date of that legal opinion would be seminal. Notwithstanding, it is this municipality's position that the approval of building plans ito. the NBR's vests with it as a sphere of government, not a tier of government. A sphere of government is autonomous and has been allocated executive authority in respect of various matters, which includes, inter alia Building Regulations, as well as Municipal Planning. Although we (currently) act in terms of the NBR's, the municipality is fully entitled to adopt its own By-law in relation to said building regulations, in terms of which all building plans in its area will be evaluated. Given the complexity of such a process, ito. standardisation across the country etc, LG continues to apply the NBR's, whilst such matters are being operationalised. However, the principle irt. Building Regulations applies.

The same applies to municipal planning; one sphere of government can not simply instruct another sphere of government what it intends to do within its Administrative area. There are arguably tangible implications on our roads, and on other our bulk and bulk-link services which must be taken into account, and planned / paid for etc.

when introducing increased numbers of people / vehicles into the Municipality.
Whilst this is but a very small initiative, the principle remains – LG must consider and accordingly approve all new / expanded land uses.

I trust that the above is clear. We hereby expect SANParks to lodge the requisite plans for consideration as is applicable to all others. It is worth noting that even the building plans for the Constitutional Court were lodged with the applicable municipality for consideration and approval.

Kindest regards



Ron Brunings *Pr.Pln (A/794/1994)*

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From: Esther Howard <esther.howard@sanparks.org>

Sent: Tuesday, 25 March 2025 11:27

To: Ron Brunings <rbrunings@swellendam.gov.za>

Cc: zkwatshana@swellendam.gov.za; wschutte@swellendam.gov.za; Cornie Jonker <Cornie.Jonker@sanparks.org>; Antionet Van Wyk <antionet.vanwyk@sanparks.org>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Richard Williams <Richard.Williams@sanparks.org>; Joep Jacobs <Joep.Jacobs@sanparks.org>

Subject: RE: Proposed Bontebok Swimming Pool development

<

Dear Mr Brunings

My apologies, please find the legal opinion attached.

As mentioned, SANParks has dealt with a similar stance from another municipality and thus sought legal counsel. Your query has been forwarded to SANParks Legal Services to provide you with a formal response.

Kind regards
Esther

Esther Howard
Co-ordinator: Environmental Impact Assessments (Acting SCM Practitioner)
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BSc. HONS (Zoology)
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Tel: 021-741 2569
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E-mail: esther.howard@sanparks.org
Website: www.sanparks.org



From: Ron Brunings <rbrunings@swellendam.gov.za>
Sent: 25 March 2025 12:43
To: Esther Howard <esther.howard@sanparks.org>
Cc: zkwatshana@swellendam.gov.za; wschutte@swellendam.gov.za; Cornie Jonker <Cornie.Jonker@sanparks.org>; Antionet Van Wyk <antionet.vanwyk@sanparks.org>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Richard Williams <Richard.Williams@sanparks.org>; Joep Jacobs <Joep.Jacobs@sanparks.org>
Subject: RE: Proposed Bontebok Swimming Pool development

Dear Ms Howard

Thank you. The legal opinion (only an opinion) dates back to 2015. The suite of land use legislation applicable to local government changed entirely in 2015 / 2016. Moreover, society has been subject to a further 10 years of jurisprudence since then, whilst local government itself has also matured significantly in that time. Importantly the introduction of cost reflective DC's have made all Councils far more aware of the impact of new development on their municipality's, and who is responsible for what. It would therefore be interesting to hear what your legal services' position is. It is noted that we have had similar discussions with the Department of Education (some 2 year back), which now formally lodges building plans with our office.

Kindest Regards



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From: Esther Howard <esther.howard@sanparks.org>

Sent: Tuesday, 25 March 2025 12:49

To: Ron Brunings <rbrunings@swellendam.gov.za>

Cc: zkwatshana@swellendam.gov.za; wschutte@swellendam.gov.za; Cornie Jonker <Cornie.Jonker@sanparks.org>; Antionet Van Wyk <antionet.vanwyk@sanparks.org>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Richard Williams <Richard.Williams@sanparks.org>; Joep Jacobs <Joep.Jacobs@sanparks.org>

Subject: RE: Proposed Bontebok Swimming Pool development

<

Dear Mr Brunings

Your comments are noted.

Kind regards

Esther

Esther Howard

Co-ordinator: Environmental Impact Assessments (Acting SCM Practitioner)

EMI Grade 2

BSc. HONS (Zoology)

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From: Antionet Van Wyk <antionet.vanwyk@sanparks.org>

Sent: Tuesday, 25 March 2025 13:10

To: Ron Brunings <rbrunings@swellendam.gov.za>

Cc: zkwatshana@swellendam.gov.za; wschutte@swellendam.gov.za; Cornie Jonker <Cornie.Jonker@sanparks.org>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Richard Williams <Richard.Williams@sanparks.org>; Joep Jacobs <Joep.Jacobs@sanparks.org>; Esther Howard <esther.howard@sanparks.org>

Subject: RE: Proposed Bontebok Swimming Pool development

<

Hi Ron

SANParks as Government Entity does not work in isolation and is aware of the changes in local government, as we need to be able to respond these changes being a national competency, and national parks situated in Local and District Municipalities.

Government spheres must cooperate to resolve issues, and this will certainly be the case in this instance. Situations and responsibilities differ and thus our intention to find a way forward in this matter, without impacting on development.

Will get back to you hopefully soon.

Regards

Antionet

General Manager: Infrastructure & Special Projects

Parks Division

E-mail: antionet.vanwyk@sanparks.org

Cell: 082 905 4644

Phone: 012 – 426 5126



**forestry, fisheries
& the environment**

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA · 0001· Environment House ·473 Steve Biko Road, Arcadia, · PRETORIA

DFFE Reference: 14/12/16/3/3/1/3107

Enquiries: Ms Julliet Mahlangu

Telephone: (012) 399 9320 **E-mail:** JMMahlangu@dffe.gov.za

Johmandie Pienaar
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L'AGULHAS
7287

Telephone Number: 072 240 3092
Email Address: johmandie@enviro-eap.co.za

PER MAIL / E-MAIL

Dear Sir/Madam

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLEN DAM WESTERN CAPE.

The Application Form and draft Basic Assessment Report (BAR) dated 14 January 2025 and received by this Department on 12 February 2025, refer.

This letter serves to inform you that the following information must be included in the final BAR:

(a) Application Form

- (i) Kindly submit the unprotected version of the application form with the final BAR.

(b) Coordinates

- (i) Please ensure that the coordinates of the proposed site including all infrastructures associated with the project are included in the final report.

(c) Layout & Sensitivity Maps

- (i) The Sensitivity Map attached under Appendix B2 must be revised to overlay the Site Development Plan attached under Appendix B1. The final Site Development Plan should be overlaid onto the sensitivity map, clearly indicating the following elements:
- All supporting on-site infrastructure, including both existing and proposed roads.



Batho Pele, putting people first

The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.



N.N

- The location of sensitive environmental features on-site, such as Critical Biodiversity Areas (CBAs), heritage sites, wetlands, drainage lines, and any other features that may be impacted by the development.
 - Buffer areas around sensitive environmental features, ensuring adequate protection.
 - All “no-go” areas where development or disturbance is prohibited due to environmental sensitivities.
- (ii) This overlay should provide a clear visual representation of how the proposed development interacts with the surrounding environment, ensuring that all sensitive areas are appropriately accounted for in the final design and planning.

(d) Applicable legislation

- (i) Section 3 of the BAR (Basic Assessment Report) must be revised to include the applicability of *The National Environmental Management: Protected Areas Act, 2003* (Act No. 57 of 2003) (“NEMPAA”). This is crucial as the proposed project is situated within a National Park that is designated as a World Heritage site. The BAR should explicitly outline the relevance of NEMPAA to the proposed development, the proposed development aligns with or may impact the objectives of NEMPAA, including any necessary authorizations, assessments, or mitigation measures required under the Act. Please ensure that the Department’s World Heritage Management is consulted with regard to the proposed development and the contact person is Ms Tumeke Ntloko (Email: tntloko@dffe.gov.za).

(e) Specialist Assessments

- (i) Please ensure that specialist studies conducted provide a detailed description of their methodology, as well as all other associated infrastructures that they have assessed and are recommending for the authorization.
- (ii) The specialist studies must also provide a detailed description of all limitations to their studies.
- (iii) If the specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.
- (iv) Should the specialist definition of ‘no-go’ area differ from the Department’s definition; this must be clearly indicated. The specialist must also indicate the ‘no-go’ area’s buffer if applicable.
- (v) All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.
- (vi) Regarding cumulative impacts:
- Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.
 - A detailed process flow to indicate how the specialist’s recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process.
 - The significance rating must also inform the need and desirability of the proposed development.
 - A cumulative impact environmental statement on whether the proposed development must proceed.
- (vii) It is brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please ensure that the specialist assessments conducted comply with these protocols.
- (viii) The screening tool output:

Batho pele - putting people first

DDFE Reference: 14/12/16/3/3/1/3107

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENDEAM WESTERN CAPE.

- Table 2 of the Site Verification Report must be revised to reflect the level of sensitivity identified by the screening tool. Additionally, the motivation provided currently states that specialist studies will be conducted. This needs to be amended, as the relevant specialist studies have already been completed. The BAR should reference the specific sections where these completed specialist studies have been attached for review.
 - In addition, the BAR must include a similar table summarising the specialist studies required by the Screening Tool and the sensitivity rating of the Screening Tool (very high, high, medium, low), another column indicating the sensitivity of the site after the EAP/Specialist conducted the Site Verification Assessment and a column indicating whether these studies have been conducted or that compliance statement is submitted. Since you utilised the Western Cape Province BAR template, this must be indicated under Section 4 of the BAR (Protocols).
- (ix) Additionally, the protocols specify that an assessment must be prepared by a specialist who is an expert in the field and is SACNASP registered for e.g. an aquatic assessment must be prepared by a specialist registered with SACNASP, with expertise in the field of aquatic sciences.
- (x) Please ensure that the specialist declaration of interest and proof of registration with SACNAP, must be submitted with the BAR.
- (xi) Please be reminded that section 2(3) of NEMA requires developments to be socially, environmentally and economically sustainable, while section 2(4)(i) of NEMA requires the social, economic and environmental impacts of activities, including disadvantages and benefits, to be considered, assessed and evaluated.
- (xii) Summary and recommendations of all specialist studies conducted must be included in the BAR and EMPr.
- (xiii) Please ensure that the BAR indicate any recommendations of the EAP or specialists, which are to be included as conditions of authorisation, per Appendix 1(3)(1)(n).

(f) Cumulative Assessment

- (i) Should there be any other similar projects within a 30km radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:
- (a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.
 - (b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.
 - (c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.
 - (d) A cumulative impact environmental statement on whether the proposed development must proceed.

(g) Public Participation Process

- (i) The following information must be submitted with the final BAR:
- A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended.
 - Copies of all comments received during the draft BAR comment period; and
 - A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the draft BAR. Please note that comments received from this Department must also form part of the comment and response report. Structure the comment and response report in a table format as per template

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COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENDEAM WESTERN CAPE.

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under annexure 1, with separate columns, so that the response can be viewed alongside the comments, the date they were received, and the parties from whom they were received.

- (ii) Please ensure that all issues raised, and comments received during the circulation of the draft BAR from registered I&APs and organs of the state that have jurisdiction (including this Department's Biodiversity Section: BCAdmin@environment.gov.za, Protected Areas Management Section and World Heritage Management Section) in respect of the proposed activity are adequately addressed in the final BAR.
- (iii) Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- (iv) The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.

(h) Environmental Management Programme

- (i) Kindly ensure that the EMPr complies with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.
- (ii) Please ensure that any specific mitigation measures identified in the BAR and specialist reports are incorporated into the EMPr.
- (iii) Please also include in the EMPr, a recommended frequency for the auditing of compliance with the conditions of the EA and EMPr (for the construction and post-construction monitoring phases), and the submission of such compliance reports to the competent authority.

General

Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: *"Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority- (a) a basic assessment report, inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority."*

Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: "the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the documents contemplated in subregulation 1(a) will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised documents will be subjected to another public participation process of at least 30 days."

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

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DFFE Reference: 14/12/16/3/3/1/3107

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENHAM WESTERN CAPE.

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You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence before an Environmental Authorisation is granted by the Department.

Yours sincerely



Dr Sabelo Malaza
Chief Director: Integrated Environmental Authorisations
Department of Forestry, Fisheries, and the Environment
Letter signed by: Ms Nyiko Nkosi
Designation: Control Environmental Officer: National Integrated Authorisation Projects
Date: 14/03/2025

cc:	Ms Antionet van Wyk	South African National Parks	E-mail: esther.howard@sanparks.org
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COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENLHAM WESTERN CAPE.

Annexure 1

1. Format for Comments and Response Report:

Date of comment, format of comment name of organisation/ & AP,	Comment	Response from EAP/Applicant/Specialist
27/03/2021 Email Department of Forestry, Fisheries and the Environment: National Infrastructure Projects (Joe Soap)	Please record C&R trail report in this format Please update the contact details of the provincial environmental authority	EAP: (Noted) The C&R trail report has been updated into the desired format, see Appendix K EAP: Details of provincial authority have been updated, see page 16 of the Application form

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COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENDAM WESTERN CAPE.

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CONSERVATION INTELLIGENCE: SOUTH

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email rsmart@capenature.co.za
reference LS14/2/6/1/7/3/5338_recreation_Swellendam
date 24 March 2025

Enviro-EAP (Pty) Ltd
P.O. Box 205
Agulhas
7287

Attention: Johmandie Pienaar
By email: johmandie@enviro-eap.co.za

Dear Ms Pienaar

Draft Basic Assessment Report for the Proposed Swimming Pool, Recreational Facilities and Associated Infrastructure at Die Stroom Picnic Site, Remainder of Erf 5338, Bontebok National Park, Swellendam (DFFE ref. no.: 14/12/16/3/3/1/3107)

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.

Desktop Information

The footprint of the proposed development is mapped as Protected Area in the Western Cape Biodiversity Spatial Plan, as it is located within the Bontebok National Park (and should be reflected as such in Appendix D). The picnic site is located on the banks of the Breede River with a minor non-perennial tributary traversing the proposed development area. The vegetation type mapped for the site is Swellendam Silcrete Fynbos, with Cape Lowland Alluvial Vegetation mapped adjacent along the banks of the Breede River, both of which are listed as endangered.

Bontebok National Park Management Plan

The Western Cape Biodiversity Spatial Plan and Guidelines state that the desired management objective for Protected Areas is: "Must be kept in a natural state, with a management plan focused on maintaining or improving the state of biodiversity. A benchmark for biodiversity" (CapeNature 2024) The general guidelines for Protected Areas include *inter alia*:

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Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Mr Mervyn Burton, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Mr Paul Slack

- The management plan must identify allowable activities, which should be consistent at least with the CBA I category; the location of these allowable activities should be captured in a zonation plan in the management plan.
- Activities relating to the construction of roads, administrative or tourism infrastructure and services (such as water reticulation systems, power lines, etc.) that are required to support the primary function of the protected area and its allowable activities, are subject to NEMA authorisation and the protected area management plan.

The specific guidelines state “implementation of the protected area management plan”.

As is evident from the above, the management plan of a protected area is the guideline which informs permissible development within a National Environmental Management: Protected Areas Act (NEM:PAA) protected area. The Department of Forestry, Fisheries and the Environment (DFFE) has informed CapeNature that decision making on National Environmental Management Act (NEMA) applications are guided by the management plan. Section 19(1)(a) of the Regulations for the Proper Administration of Special Nature Reserves, National Parks and World Heritage Sites states that no development contemplated in section 50(5) of the Act shall be implemented in any area other than an area specifically designated for such development in a management plan.

The Bontebok National Park Management Plan (2013 – 2023) refers to a day visitor facility and picnic area in the concept development plan for development within the timeframes of the plan and is included in the associated map (SANParks 2013). The location is within the low intensity leisure zone. The development proposal can therefore be considered to be aligned to the management plan at a broad scale. According to the SANParks website the management plan is under review for the 2023/24 period. There are localities of high sensitivity near to the development according to the sensitivity map, however SANParks will need to provide information regarding the relevant sensitivity criteria which resulted in the rating.

Screening and Site Sensitivity Verification

The results from the screening tool indicate very high sensitivity for terrestrial biodiversity, high sensitivity for animal species, medium sensitivity for plant species and low sensitivity for aquatic biodiversity (although there is very high sensitivity for the latter directly adjacent associated with the Breede River). The site sensitivity verification recommends a medium sensitivity for terrestrial biodiversity and plant species and a low sensitivity for animal species and aquatic biodiversity, with impact assessments for the medium sensitivity themes and compliance statements for the low sensitivity themes.

Terrestrial Biodiversity and Plant Species Impact Assessments

The vegetation occurring at the locality is reported in accordance with the National Vegetation Map i.e. Swellendam Silcrete Fynbos. We do however wish to query the accuracy of the National Vegetation Map at a fine scale as Cape Lowland Alluvial Vegetation would be expected to occur on both sides of the river as it is a vegetation type associated with rivers, although it would have been impacted by the existing facilities at the picnic site.

The condition of the vegetation outside of existing disturbance footprints is described to be in good condition. The sensitivity map indicates a uniform medium sensitivity across the full extent of the proposed development footprint, however it is noted that this encompasses transformed areas which would presumably be of a lower sensitivity. The description also does not indicate any differentiation across the extent of the footprint.

A list of plant species is included, none of which are Species of Conservation Concern (SCCs). It is noted that some taxa could not be identified to species level. In terms of the methodology, it is noted that transects were undertaken at sites of geomorphic or topographic variance as identified on aerial imagery. Clarification is therefore required regarding the area which was surveyed. The Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes (March & October 2020 – referred to as “the protocols”) state that the assessment must be undertaken within the proposed development footprint.

The plant species assessment includes a list of rare plant species recorded within the Bontebok National Park and a map of the localities. This information should be accurately referenced. There are two endangered plant species which have been recorded in the vicinity of the picnic site according to this data. We wish to note that there is other scientific literature which can be referenced regarding the flora of the Bontebok National Park with the records indicating a total of 650 species, of which 52 are SCCs and 3 species are fully endemic to the national park (Kraaij 2010). The management plan indicates that a phytosociological study was in progress for Die Stroom which resulted in the above publication. As the site is located within a public access area within a national park there are numerous iNaturalist records for the locality, of which one is of one of the endangered species endemic to the national park as listed above (*Aspalathus burchelliana*) and the locality is within the proposed development footprint. We further wish to note that there are many species included in the project species list which are not included in the species list for the national park. We recommend that the plant species impact assessment is reviewed by the SANParks Scientific Services.

The impact assessment indicates that the impact associated with the loss of Swellendam Silcrete Fynbos and faunal habitat is medium negative before mitigation and low negative after mitigation. The impacts on plant SCCs and animal SCCs are rated a low negative both before and after mitigation. However, we wish to raise concern whether there are in fact any plant

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SCCs within the footprint based on the available information. Confirmation is required whether there are any specimens within the footprint and the preferred mitigation is avoidance rather than translocation.

The proposed mitigation measures are supported. However, we wish to query the recommendation of the use of *Panicum maximum* as this is a tall, tufted grass which is not suitable for lawns, but could be a feature plant. Search and rescue is often not successful however it can be undertaken as best practice. More important for the earthworks associated with the laying of the pipelines is the proper management of topsoil which should be separated from the subsoil and returned to the surface as soon as possible to allow for successful rehabilitation.

Animal Species Compliance Statement

With regards to the site sensitivity verification for animal species of low sensitivity, we wish to note that the protocols provide a guideline for the sensitivity rating, whereby confirmed habitat for an SCC results in a high sensitivity rating and a low sensitivity rating is where no natural habitat remains or natural habitat where there is no suspected occurrence of SCCs.

The compliance statement indicates that no SCCs were recorded within the footprint, however there are fauna SCC present within the national park such as bontebok (*Damaliscus pygargus pygargus*), listed as vulnerable (both nationally & internationally). It states that bontebok in addition to bird SCCs may utilize the site. There are recent records of bontebok within the Die Stroom picnic site. Based on the available information, the proposed footprint is within confirmed habitat for an SCC and the sensitivity should therefore be rated as high in accordance with the protocols and an impact assessment should be undertaken. The protocols further state that the assessment must be undertaken in accordance with the Species Environmental Assessment Guideline which would require that the site ecological importance (SEI) should be calculated for each of the SCCs in accordance with the guideline (SANBI 2020). The latter also applies to plant species.

It is worth noting that bontebok weren't one of the species flagged in the screening tool as high or medium sensitivity despite the very well-known occurrence of this subspecies at this location. Two of the five bird species which were flagged as high sensitivity are considered likely to be present, although there may be more than this. We note that the management plan states that Cape vulture (listed as endangered nationally and vulnerable internationally) and black storks (listed as vulnerable nationally and least concern internationally) have been recorded in the park.

Aquatic Biodiversity Compliance Statement

As indicated in the desktop information review, there is a non-perennial river mapped traversing the development footprint according to the National Geospatial Information (NGI)

spatial data, however it was not included within the screening tool resulting in a low sensitivity. The aquatic biodiversity compliance statement however verifies the presence of a non-perennial river as indicated in Map 5. The alignment however differs from the NGI mapping. There is however no text included regarding the verification of the presence of the non-perennial river.

The methodology for the aquatic biodiversity compliance statement states that following the desktop review, the field investigation consisted of: identifying sites of geomorphological or topographic variance (if present) and subjected to an evaluation of species present within transects established across the selected site; aquatic fauna and flora species were identified and collated (if present); and additional random sample points were selected from similar aquatic sites surrounding the proposed impacted areas for comparative purposes (if present). However, there is no text in the compliance statement indicating the outcomes of the field investigation. In this regard we wish to note that 3.3.4 of the protocols for aquatic biodiversity indicate that an aquatic biodiversity compliance statement must include a baseline profile description of biodiversity and ecosystems of the site.

As Listing Notice 1 Activity 12 is applied for, it is interpreted that the non-perennial river meets the NEMA and National Water Act definition of a watercourse, which includes both a "river" and a "natural channel in which water flows regularly or intermittently". We wish to query the field investigation methodology as this seems to be a duplication for the terrestrial biodiversity and plant species, and recommend that the Updated Manual for the Identification and Delineation of Wetlands and Riparian Areas should instead be used to inform the methodology (DWAF 2008). In this regard rivers are considered to consist of the channel and the riparian zone. The best practice Department of Water and Sanitation methodology should be used to determine the ecological state of the watercourses and accordingly inform the potential impacts. It is essential that comment is received from the Breede Olifants Catchment Management Agency (BOCMA). The site is additionally outside of the 1 in 100 year floodline of the Breede River and the riparian habitat has been modified by the existing picnic site.

The non-perennial river is traversed by the existing access roads at two locations. The electrical cable and potable water and wastewater pipelines will be located within the disturbance footprint of the access road which traverses the non-perennial river. Based on the photographs, there are existing culverts under the roads which presumably adequately permit flow of water under the roads. Further information should however be provided in this regard. Based on the site development layout (Appendix B1), it appears that the one parking area may encroach upon the non-perennial river and riparian area. Further confirmation is required whether the parking lot avoids the watercourse and an appropriate buffer.

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Neither of these two potential impacts were identified in the compliance statement nor were mitigation measures recommended. We therefore wish to query the site sensitivity verification of low sensitivity as it is interpreted from the protocols that if there is a watercourse present which could be impacted upon, the sensitivity is rated as very high, as the only two options are very high and low sensitivity.

Project Proposal and Associated Impacts

The primary component of the development proposal is a new public swimming pool. The development components are listed, however the operation of the swimming pool is not described. Chlorine is most commonly used for keeping swimming pools clean, however chlorine has a negative impact on the environment, particularly if it enters freshwater systems such as the adjacent Breede River. Management of the backwash is critical in this regard. We therefore recommend that an alternative system should be used for maintaining the swimming pool which does not require the use of chlorine in a sensitive location such as this within a national park in close proximity to a major river system.

The existing picnic and recreational facility makes use of a soakaway system with a tank located a short distance away from the river. The proposal for the additional facilities is for a new soakaway tank located adjacent to the existing tank with associated pipelines. In general, CapeNature does not support the use of soakaway systems, particularly in sensitive locations near to major river systems, and also applies to private properties with no conservation status. It is our understanding that the Swellendam Municipality has a similar approach and comment must be obtained from them in this regard. The sewage system should either be a small-scale self-contained sewage treatment plant which produces effluent of an acceptable quality or a conservancy tank which is regularly serviced. Ideally the existing sewage system should be removed and upgraded to a new system as well.

With regards to the above, the Environmental Impact Assessment Regulations refer to five types of alternatives which need to be investigated for a proposed project, one of which is technology alternatives. The best practice technology for the swimming pool maintenance and sewage provision as described above are technology alternatives, and therefore alternatives have not been adequately investigated.

Conclusion

In conclusion, CapeNature does not support a chlorine-based swimming pool and soakaway sewage system. We recommend that the project design needs conform to a best practice design which minimizes ecological impacts, particularly taking into consideration the location within a national park in close proximity to a major river. Sufficient detail should be provided in this regard.

With regards to the specialist studies the following needs to be addressed:

- Confirmation must be provided regarding the presence of plant SCCs within the footprint in accordance with the available information as described above. Avoidance of plant SCCs should be practiced as far as possible, otherwise appropriate mitigation must be recommended.
- The Plant Species Impact Assessment should be reviewed by SANParks Scientific Services in respect of existing data.
- The specialist studies must be updated to ensure full compliance with the protocols, including impact assessments where required.
- The delineation of the aquatic features should be informed by the DWAF Manual.
- Confirmation must be provided that the proposed parking area will not encroach within the riparian area of the non-perennial river and appropriate buffer and that the flow of the river will not be impacted, including by construction activities.
- The Bontebok National Park Management Plan should be appropriately referenced as discussed.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Regards

RSmart

Rhett Smart

For: Manager: Landscape Conservation Intelligence South

References:

CapeNature. 2024. *2023 Western Cape Biodiversity Spatial Plan and Guidelines*, CapeNature. ISBN: 978-1-77997-380-1

DWAF 2008. *Updated Manual for the Identification and Delineation of Wetlands and Riparian Areas*, prepared by Rountree, M., Batchelor, A.L., MacKenzie, J. and Hoare, D. Report no. XXXXXXXXX. Stream Flow Reduction Activities, Department of Water Affairs and Forestry, Pretoria, South Africa.

Kraaij, T. 2011. *The flora of the Bontebok National Park in regional perspective*, South African Journal of Botany, doi:10.1016/j.sajb.2010.09.013

South African National Biodiversity Institute (SANBI). 2020. *Species Environmental Assessment Guideline. Guidelines for the Implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for Environmental Impact Assessments in South Africa*. South African National Biodiversity Institute, Pretoria. Version 3.1. 2022.

South African National Parks (SANParks) 2013. *Bontebok National Park Management Plan for the period 2013 – 2023*.

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ENQUIRIES: VHENGANI LIGUDU
REF: 4/10/2/H70B/DIE STROOM, SWELLENDAM
DATE: 24/03/2025

Enviro-EAP Environmental Consultants
P. O. Box 205
Aguilhas
7287

Attention: Johmandie Pienaar

RE: PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM MUNICIPALITY- WESTERN CAPE

With reference to the above-mentioned document received by this office with DFFE reference 14/12/16/3/3/1/3107 on the 18/02/2025 requesting comments.

This office has reviewed the above-mentioned report and has the following comments:

1. All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered.
2. Please note that the proposed activities require authorisation in terms of the National Water Act, 1998 (Act 36 of 1998) before commencement of the water use activities:

The following water uses are triggered:

Section 21 (c) - impeding or diverting the flow of water in a watercourse
Section 21 (l) - altering the bed, banks, course or characteristics of a watercourse

3. The proponent, DEPARTMENT OF AGRICULTURE, FORESTRY AND FISHERIES - BONTEBOK NATIONAL PARK has started the Water Use Authorisation process application with reference WU38499. All water use related issues will be addressed in the authorisation process.
4. Kindly note that an application for a Water Use Licence is not a guarantee that a Water Use Licence will be issued. The license application will be assessed in terms of Section 41 of the National Water Act, 1998 (Act 36 of 1998) and all other applicable criteria including an assessment of the impacts of the activities and the adequacy of the suggested mitigation measures.
5. Please note that engaging in activity that triggers the National Water Act without authorisation is an offence and will result in the BOCMA taking legal action against the proponent in terms of Section 151 of the National Water Act, 1998 (Act 36 of 1998).



This office reserves the right to amend and revise its comments as well as to request any further information.

The onus remains on the registered property owner to confirm adherence to any relevant legislation concerning the activities that might trigger and/or need authorization.

Please do not hesitate to contact the above official should there be any queries.

Yours faithfully

Liguduwc
MR JAN VAN STADEN
CHIEF EXECUTIVE OFFICER (Acting)

From: Ewulaas_Do_Not_Reply@dws.gov.za <Ewulaas_Do_Not_Reply@dws.gov.za>

Sent: Wednesday, 14 May 2025 12:53

To: Johmandie Pienaar <johmandie@enviro-eap.co.za>

Cc: crautenbach@bocma.co.za; cabrahams@bocma.co.za

Subject: Application has been returned to you (WU38499)

Dear Mrs Johmandie Pienaar,

The following application has been returned to you :

Bontebok National Park Die Stroom Picnic Site Swimming Pool and Associated Recreational Facilities (WU38499)

The reason for the return is as follows :

APPLICATION FOR REGISTRATION OF WATER USE(S) WITHIN THE AMBIT OF A GENERAL AUTHORISATION IN TERMS OF SECTION 40 OF THE NATIONAL WATER ACT, 1998 (ACT 36 OF 1998)

The Department of Water and Sanitation has assessed your Pre Water Use Licence application enquiry. Please continue to apply for registration of water uses(s) authorized in terms of General Authorization.

You received this email from :

Name : Ms Vhengani Ligudu (Assessor)

e-Mail : vligudu@bgcma.co.za

Tel : 0233468047

[Click Here to access the Application](#)

Kind Regards,

e-WULAAS on Behalf of **Department of Water and Sanitation**

Private Bag X313, Pretoria, 0001

Sedibeng Building, 185 Francis Baard Street, Pretoria, 0001

Tel: (012) 336 7500

Fax: (012) 323-4472

Website: www.dws.gov.za

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water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA



e-WULAAS



**forestry, fisheries
& the environment**

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 825 1042

Reference: 14/12/16/3/3/1/3107

Enquiries: Tebego Kgaphola / Portia Makitla

Telephone: 012 399 9411 **E-mail:** pmakitla@dfpe.gov.za

Attn.: Johmandie Pienaar
Enviro-EAP Environmental Consultant

Tel: 072 240 3092
Email Address: johmandie@enviro-eap.co.za

PER E-MAIL

Dear Johmandie

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENLHAM MUNICIPALITY, WESTERN CAPE PROVINCE

Site inspection conducted on the 26th of March 2025 refers,

The proposed development area has been mapped as part of a larger Other Natural Area. The development will not lead to high biodiversity impact and will not prevent ongoing ecosystem functionality of surrounding similar undeveloped natural areas provided that the proposed specialist recommendations are implemented. In accordance with the parks management plan the proposed development site is located within an area mapped as Medium to Low sensitivity within the Low Intensity Leisure park use zone.

Based on the site inspection findings and information provided in the report the Directorate: Biodiversity Conservation does not have any objections to the proposed developments; however, the following must be taken in consideration in order to minimise further loss to biodiversity:

- Avoid land use that will result in vegetation loss in important biodiversity areas.
- Maintain large intact natural patches – try to minimise habitat fragmentation in a highly sensitive area.
- Maintain landscape connections (ecological corridors) that connect important biodiversity areas.
- Maintain ecological processes at all scales and avoid or compensate for any effects of land uses on ecological processes.
- Care must be taken to avoid the introduction and spread of non-native species.
- Minimise land use types that reduce ecological resilience (ability to adapt to change), particularly at the level of water catchments.



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COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENDAM MUNICIPALITY, WESTERN CAPE PROVINCE

- Implement land use and land management practices that are compatible with the natural potential of the area.
- Balance opportunity for human and economic development with the requirements for biodiversity persistence.
- An environmental sensitivity map indicating environmental sensitive areas and features identified during the EIA process.
- A map combining the final layout map superimposed (overlain) on the environmental sensitivity map. This map must reflect the proposed infrastructure location as stated in the EIA report.

In conclusion, all Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@environment.gov.za for the attention of Mr. Seoka Lekota.

Yours faithfully



Mr. Seoka Lekota
Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Forestry, Fisheries & the Environment
Date: 31/03/2025

References:

- 16/3/3/6/4/1/2/E3/10/1078/25 (Development Management)
- 19/3/2/4/E3/10/DDF007/25 (Pollution and Chemicals Management)
- 18/2/3/2025-2026 (Development Facilitation)

Attention: Ms Johmandie Pienaar

Enviro-EAP (Pty) Ltd
2 School Street

AGULHAS
7287

johmandie@enviro-eap.co.za

Dear Madam

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF FACILITIES AND ASSOCIATED INFRASTRUCTURE WITHIN 32M OF A WATERCOURSE AT DIE STROOM PICNIC SITE ON THE REMAINDER OF ERF 5338 AT THE BONTEBOK NATIONAL PARK, SWELLENDAM (DFFE REF: 14/12/16/3/3/1/3107)

1. The notification of a public participation process ("PPP") in terms the Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) and the availability of a Draft Basic Assessment Report ("BAR"), as received via email on 18 February 2025, refers.
2. Thank you for the opportunity to provide comments on the Draft BAR. The Department further expresses its appreciation for your willingness to allow the submission of comments on the Draft BAR after the commenting period has ended.
3. Please find comments from various directorates within the Department on the Draft BAR dated 13 February 2025 that was available for download from the website of the environmental assessment practitioner. Kindly note that the Department will provide comments on the water use licence ("WUL") application (if required) upon notification of the availability of the WUL Motivation Report and associated documentation for review and comments.

Directorate: Development Management (Region 1) – Mr Ntanganedzeni Mabasa (Email: Ntanganedzeni.Mabasa@westerncape.gov.za; Tel.: (021) 483 2803):

4. Based on the specialists' findings, the proposed development will result in impacts with a low negative significance rating provided that the mitigation measures are implemented. It must be ensured that the development footprint and any no-go areas are clearly demarcated prior to commencement of construction activities.
5. The Environmental Management Programme ("EMPr") must be strictly implemented and adhered to during all the phases of the development.
6. Comments from all relevant organs of state should be obtained, included, and adequately addressed in the Final BAR.
7. Proof of the PPP undertaken must be included in the final report to be submitted to the competent authority for decision-making.
8. The Final BAR and EMPr must meet all the regulatory information requirements as outlined in Appendices 1 and 4 of EIA Regulations, 2014 (as amended), respectively.

Directorate: Pollution and Chemicals Management – Mr Gunther Frantz (Email: Gunther.Frantz@westerncape.gov.za; Tel.: (021) 483 2975):

9. This Directorate is not in favour of soakaway systems; however, it is acknowledged that a soakaway system is most likely the most feasible option for wastewater management at the site, due to the lack of bulk sewage infrastructure. It is understood that a mixed stream of sewage and swimming pool backwash water will be discharged via the new soakaway. It is recommended that monitoring of the soakaway discharge area takes place, for the build-up of chlorine or sodium enrichment in soils or groundwater, in the case of chlorinated or salt pool water, respectively. Such monitoring must be included in an operational and maintenance plan for the recreational facility.
10. It is unclear from the Draft BAR what the capacity of the septic tank is and if it will be adequate to accommodate effluent inflows from the adjacent ablution facilities, especially during peak holiday periods.
11. It is not clear from the Draft BAR if the pump room has a sump or lined retention dam to contain any sewage/wastewater that may build up during extended power outages (loadshedding) or malfunctioning pump equipment.
12. Further to the above, it is recommended that backup power (portable or fixed) is available in the event of extended power outages in the area, to pump wastewater to the soakaway, especially during peak holiday seasons.

13. Given the sensitive nature of the surrounding terrain, the following general recommendations for incorporation into the EMPr are provided to prevent and manage the potential contamination emanating from the facility during the construction, operational and decommissioning phases:
 - 13.1. The responsible management of hazardous chemicals should always be practised, and the storage or handling of chemicals must not take place near any watercourses.
 - 13.2. All heavy earthmoving and transport vehicles must be in good working condition with no leaking hydrocarbon fuel, fluids or lubricant emanating from these vehicles.
 - 13.3. This Directorate acknowledges Chapter 8 of the EMPr regarding the control of incidents in terms of section 30 the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"). Please be reminded that the reporting of an incident during the construction or operational phase must also be reported to this Directorate.

Directorate: Development Facilitation – Ms Adri La Meyer (Adri.LaMeyer@westerncape.gov.za; Tel.: (021) 483 2887):

14. Please also include Activity 14(iii)(c)(ii)(aa) of Listing Notice 3 of the EIA Regulations, 2014 (as amended) in the section dealing with the listed activities (section D of the BAR), as the Bontebok National Park is a protected area. Only subsection i(cc) was listed. The application form should also be amended accordingly to list the additional listed activity.
15. It is noted that sewage effluent and backwash water from the swimming pool will be pumped to the proposed new septic tank with soakaway to be situated adjacent to the existing soakaway system. Considering the concerns raised by the Department's Directorate: Pollution and Chemicals Management as indicated above, and by CapeNature in their comments on the Draft BAR dated 24 March 2025 (their reference LS14/2/6/1/7/3/5338_recreation_Swellendam) regarding the soakaway system, has the construction of a conservancy tank as opposed to a septic tank been considered? Effluent from the conservancy tank would then be transported via a honeysucker for treatment and disposal at the Swellendam wastewater treatment works ("WWTW"), if the WWTW has the capacity to accept the additional wastewater load. The use of a conservancy tank would avoid or minimise any potential pollution to soil or groundwater.
16. It is noted that all negative impacts associated with the proposed development can be reduced to an impact significance of low negative with the implantation of mitigation measures. Only the socio-economic impact associated with the additional load on services infrastructure would result in an impact significance of medium negative with mitigation.
17. Please note that the Screening Tool Report (Appendix 16A) generated on 15 March 2023 is unsigned. Further, Table 3 of the Site Sensitivity Verification Report must be amended to indicate the specialists' findings, as these assessments have been undertaken.
18. Final comments from Heritage Western Cape on the Notification of Intent to Develop must be included in the submission of the Final BAR to the competent authority.

19. Please note that the abovementioned comments and recommendations do not pre-empt the outcome of the application. No information provided, views expressed and/or comments made by officials should in any way be regarded as an indication or confirmation that additional information or documents will not be requested; or of the outcome of any application submitted to the competent authority.
20. The applicant is reminded of its "general duty of care towards the environment" as prescribed in section 28 of the NEMA, 1998 which states that "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment."

The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely

 Digitally signed by Thea Jordan
Date: 2025.04.02 16:51:10 +02'00'

Thea Jordan
pp **HEAD OF DEPARTMENT**
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Letter signed by:
THEA JORDAN
Director: Development Facilitation

Date: 2 April 2025



**forestry, fisheries
& the environment**

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

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Ref: 14/12/16/3/3/1/3107

Enquiries: Mr Thivhulawi Nethononda

Tel: 0123999553/9945 Fax: (012) 359 3636

E-mail: tnethononda@dfpe.gov.za

Ms. Johmandie Pienaar
Enviro-EAP
PO Box 205
Agulhas
7287
johmandie@enviro-eap.co.za

Dear Ms. Pienaar

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENDAM MUNICIPALITY, WESTERN CAPE

Background and Discussion

The Directorate: Protected Areas Planning and Management Effectiveness would like to thank you for the opportunity to review the Draft Basic Assessment report and Environmental Programme report for the aforementioned project. The proposed project will entail the development of a swimming pool, recreational facilities and associated infrastructures which will be located at the Die Stroom Site.

Communal land from Swellendam Municipality and privately owned farms, including "Die Stroom", was acquired thus formally proclaiming the Bontebok National Park in 1961. The mission of the park is not only to conserve rare and threatened species found in the park but also to provide tourism and recreational opportunities and facilitate socio-economic benefits to surrounding communities. Local communities frequent Die Stroom Picnic Site for recreational purposes, including swimming in the perennial Breede River which borders the site.

As per the agreement between the Municipality and SANParks, the local community would still have access to Die Stroom for recreational purposes. After the proclamation of the Consumer Protection Act (CPA), SANParks Risk Management deemed the Breede River to be unsafe for various reasons, including **water quality, clarity, depth and hazardous rubble found on the riverbed, the lack of lifeguards on duty and possible attacks by Zambezi (bull) sharks**, which have been documented as dwellers of the Breede River.



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SANParks has therefore cited “swim at own risk” for the afore-mentioned reasons at the relevant picnic site. As the Breede River is traditionally utilized by the local communities for swimming, SANParks would like to provide visitors with a safe swimming environment. The proposed development will offer day visitors an enclosed swimming pool with dedicated ablutions including male and female shower facilities and toilets.

The proposed swimming pool, recreational facilities and associated infrastructure at Die Stroom. The Picnic Site in the Bontebok National Park, Swellendam will include the following:

- Pool Backwash tank slab = 15m² for 5000liter JoJo
- Septic tank and Pump chamber = 40m²
- Pool pump room = 40m²
- Ablutions/Shower/Change Area = 105m²
- Swimming Pool = 315m²
- Terrace less Pool = 1115m²
- Fence = 210m long and 1.5m high
- Physically Disabled Ramp = 80m²
- Parking = 240m²
- Underground electrical cable = 110m long (Area measured in sewer trench calculation)
- Sewer line /Soak-away = 260m long (Area = 390m²)
- Pool backwash and soak-away = 260m long (Area measured in sewer trench calculation)
- Water supply line = 25m long (Area 25m²) (Balance of area measured in sewer trench calculation)
- Soak-away = 150m² (15m x 10m)
- 2 x Biofilters = 64m² (4m x 8m each)

Construction footprint = 0.44ha

Proposed development will lead to the permanent clearance of ±0.2ha of indigenous vegetation.

The final development footprint for the developments as described above = ± 0.28Ha

Commercial and community activities in national park, nature reserve and world heritage site

- The application for Environmental Authorization (EA) is for the development of a swimming and associated infrastructure will be undertaken within the Bontebok National Park. The area is listed as a national park in terms of the protected area register and is managed by SANParks. The applicant is required to note section 50 (5) of the National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003) (NEMPAA); that provides as follows:
 - *No development, construction or farming may be permitted in a **national park**, nature reserve or world heritage site without the prior written approval of the management authority.*
- The Minister has, under Section 86 of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003), made the Regulations in the schedule on the 28th of October



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2005, including Section 19(1)(a) under Regulations for the Proper Administration of Special Nature Reserves, **National Parks**, and World Heritage Sites stipulates:

- (1) *No development contemplated in section 50(5) of the Act shall be implemented—*
 - (a) *in any area other than an area specifically designated for such development in a management plan; and*
 - (b) *before a management authority has indicated in writing the nature and extent of the strategic or environmental impact assessment required for the development.*
- (2) *No commercial activity or activity contemplated in section 50 of the Act, which requires an environmental impact assessment to be undertaken, either in terms of sub-regulation (1)(b) or under any other law, may be implemented before a management authority has approved, with or without conditions, the environmental impact assessment before it is submitted to the relevant authority for approval.*
- It must be noted that the approval from the management authority as per the NEMPA Act Section 50 subsection 5, must be obtained and attached to the final report.

Compliance with the approved Bontebok National Park Management plan

- According to the Bontebok National Park Management Plan the proposed development is within the Low-Intensive Leisure zones.
- Therefore, the proposed development is consistent with the Management Plan for the Bontebok National Park (BNP).

Comments on the Draft Basic Assessment Report for the Proposed Swimming Pool, Recreational Facilities and Associated Infrastructure at Die Stroom Picnic Site in the Bontebok National Park on Erf Re/5338, Swellendam Municipality, Western Cape

After thorough review of the reports submitted and the site visit conducted on the 26th of March 2025, the directorate has the following comments:

- From the reports submitted, there is no indication of the laydown area:
 - As per the confirmation from the site visit, it was indicated that the laydown area will be located within the already disturbed area behind the existing ablutions. It is recommended that the laydown area must be indicated in all maps and be included in the layout as part of the developmental area.
- None of the proposed developments has been placed on or will have any physical impacts on existing watercourses on/near the site such as the Breerivier tributary (development will be outside of the 1:100-year floodline area) and the main course and hydrological functioning of the non-perennial drainage line crossing the picnic site is to remain as is.
 - As per the site visit conducted, it was noted that the development will indeed not affect the non-perennial drainage line crossing through the developmental area, however it is recommended that the area be fenced off to avoid any possible contact with the construction workers.



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- It was confirmed during the site visit that the proposed development is outside the floodline, however, due to the steep topography of the developmental area towards the river, a proper stormwater management plan must be developed and adhered to.
- In terms of sewage management, a closed septic tank with pump is proposed at the new ablution facilities and swimming pool site. Sewage and all pool backwash water are to be pumped to the proposed additional soak away which is to be placed adjacent to the existing soak away currently used at the picnic site. Water and sewer pipelines and electrical cables are all proposed underground to be placed along existing routes and roads crossing the non-perennial drainage lines to ensure minimal impact on the environment.
 - It is recommended that a culvert be installed where the pipelines and the road cross the non-perennial drainage lines, to avoid further disturbance of the drainage line during future possible maintenance.
- It is not expected that the proposed expansion will have any significant negative impacts on people's health in terms of noise, odours or visual characteristics. The site is located within the Bontebok National Park at an existing picnic area which is already managed by the park management to minimize noise, odours and visual impacts. Construction and operational phases will be managed in line with the requirements of the environmental management plan which contains mitigation measures to manage potential noise, odours and visual impacts of the development.
 - There is currently one access gate and road in the park, overnight visitors may be affected by traffic, noise and visually, it is recommended that the construction vehicle and machinery must be fitted with silencers to dampen noise.
 - Construction activities must only take place during normal working hours on weekdays.
 - The construction vehicles must be limited to the developmental area as much as possible.
 - Dust suppression must be practiced throughout all the roads that will be accessed by the construction vehicle.
 - It is recommended that washing and maintenance of construction vehicles or machinery must be done outside the park to avoid oil spillage and chemicals washing off to the river.
- No other reasonable or feasible activity alternatives exist as the reason for the proposed development is to expand the existing picnic facilities in accordance with the recreational needs that exist at the specific site as identified by park management.
 - The above is noted; however, destruction of vegetation must be strictly limited to the developmental area.
- All areas falling outside of the proposed 0.44ha development area must be considered as no-go areas and proposed developments must be clearly demarcated before construction starts and remain demarcated throughout the construction phase. These requirements have been included in the EMP.
 - The directorate is in support of the demarcation of the no-go areas, we further recommend that these areas must be fenced off with construction nets, to avoid any access by the construction workers.

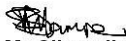


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- It is further recommended that the trenches and the swimming pool hole are also fenced off at night to avoid any fauna falling in. Before closure/filling in of the trenches, they must be checked for any possible fauna that could be trapped.
- Planted grass such as for the proposed picnic area must be prevented from encroaching further into the remaining and rehabilitating indigenous vegetation landscaped and undeveloped areas.
 - The applicant must fully adhere to the recommended vegetation for landscaping, i.e. *Cynodon dactylon* (kweekgras) or *Panicum maximum* (buffelsgras).
- A zonation plan that forms part of the protected area management plan must be adhered to, as it indicates activities that may take place in different sections of the protected area, and the conservation objectives of those sections. Consequently, it is recommended for the development to be undertaken within the appropriate zones of the national park.

The EAP/Applicant must fully address the concerns/comments raised by the Directorate: Protected Areas Planning and Management Effectiveness and provide clarity where needed, as well as considered comments from all other stakeholders, interested and affected parties



Ms Sibongile Mampe

Designation: Director: Protected Areas Planning and Management Effectiveness (Acting)

Date: 2 April 2025



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COMMENTS ON THE BASIC ASSESSMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENDAM MUNICIPALITY, WESTERN CAPE

The Directorate: Protected Areas Multilateral Programmes within the Department of Forestry, Fisheries and the Environment (DFFE) would like to thank you for an opportunity to participate and comment of the on the Draft Basic Assessment Report (DBAR) and the Environmental Management Programme (EMPr) for the swimming pool, recreational facilities and associated infrastructure at Die Stroom picnic site in the Bontebok National Park on ERF RE/5338, Swellendam Municipality, Western Cape.

The DBAR, the EMPr (dated 13 February 2025 and 14 January 2025 respectively) and the various specialist assessments reports for the proposed swimming pool, recreational facilities and associated infrastructure within Bontebok National Park have been reviewed and carefully considered by the Directorate staff. The Directorate would like to make the following comments on the DBAR:

(a) Consideration of Cape Floral Region Protected Area World Heritage Site Values and Attributes.

The proposed development is located in Bontebok National Park which is part of the Langeberg Complex of the Cape Floral Region Protected Area World Heritage Site. As such the potential impacts of the development on the attributes which conveys the Outstanding Universal Values (OUV) for which the Cape Floral Region Protected Areas was inscribed on the UNESCO World Heritage list should be investigated. The DBAR would benefit significantly from a dedicated section that explicitly incorporates the criteria and methodologies outlined in the UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context. It is therefore recommended that the report assess both direct and cumulative impacts on values and attributes of the Cape Floral Region Protected Areas World Heritage Site.

(b) Aquatic Impact Assessment

The DBAR lacks a detailed assessment of the potential impacts of the proposed development on aquatic ecosystems, aside from a brief compliance statement. Given the site's proximity to a Breede river and the proposal to discharge sewage and pool backwash water into a soakaway system (as outlined in Sections 1.4 and 11 of the DBAR), a comprehensive aquatic impact assessment may be warranted. There is a risk that nutrients such as nitrates and phosphates, as well as chlorine from the pool backwash, could seep into the groundwater or the Breede River. An assessment of soil permeability and groundwater flow direction is essential to evaluate the potential for contamination and to inform appropriate mitigation measures.

(c) Specialist Studies

It is noted that specialist studies submitted with the Draft Basic Assessment Report (namely the Plant Impact Assessment, the Aquatic and Animal Species Compliance Statement, and the Terrestrial Biodiversity Impact Assessment) all rely on the same two site visit dates (16 January 2019 and 17 August 2022). Additionally, these studies appear to have been conducted by a single specialist. While it is accepted that the development footprint is small in size, the scope and methodological requirements of these studies vary considerably. It has been noted that

there is a significant overlap in the structure, language, and source material in the specialist reports, thus raising concerns regarding the independence, depth, and robustness of these assessments. In addition, the specialist studies lack adequate detail on survey methodologies undertaken including the duration, sampling transects, making it difficult to determine whether the assessments were undertaken with the necessary rigour and methodological distinction appropriate for their respective themes.

It would be beneficial for the DBAR to provide clarification on how the fieldwork for all specialist assessments was conducted concurrently, and whether the level of effort was sufficient to meet the standards expected of an environmental impact study.

Noting the above, the Directorate: Protected Areas Multilateral Programmes is of the view that there are critical issues in the DBAR that should be addressed before finalizing the assessment and proceeding with the environmental authorization process.

Should you wish to correspond further on this matter, please quote Ms Thumeka Ntloko at tntloko@environment.gov.za and 012 3999531



SITE MEETING HELD FOR PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENDAM - WESTERN CAPE

DFFE Reference: 14/12/16/3/31/3107

Meeting held at: Bontebok National Park

Meeting held on: 26 March 2025

Meeting time: 9:00am – 11:00am

Meeting attendance register:

Name	Company/Department/Organ of State	E-mail	Telephone	Signature
Johanna Pieterse	Enviro-EAP	johannapie@enviro-eap.co.za	0722405092	
Heinrich Snyman	Bonteboek Park	heinrich.snyman@sanpark.gov.za	0722243254	
Juilet Khlung	DFFE - PEO	juilet.khlung@dffe.gov.za	0644808760	
Chiko Nkosi	DFFE	nkosi@dffe.gov.za	07914935672	
Esther Howard	SANParks	esther.howard@sanparks.org	083 791 4911	
Monique SHAM	SANPARKS	monique.sham@sanparks.org	072 989 5719	
Tebogo Kgopholo	DFFE: BIC EIA	tkgpholo@dffe.gov.za	0608408195	
Rabe Mlaxita	DFFE: BIC EIA	rmlaxita@dffe.gov.za	064810087	
Mashudu Madau	DFFE: RAPME	mmdau@dffe.gov.za	066 487 6975	



SITE MEETING MINUTES

SITE MEETING HELD FOR PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENDAM - WESTERN CAPE DFFE Reference: 14/12/16/3/3/1/3107

Meeting held at: Bontebok National Park

Meeting held on: 26 March 2025

Meeting time: 9:30am – 12:00am

Site Meeting Attendance:

Johmandie Pienaar (JP) - Enviro-EAP
Heinrich Snyman (HS) - Bontebok National Park
Juliet Mahlangu (JM) – DFFE: PEO
Nyiko Nkosi (NN) - DFFE
Esther Howard (EH) – SANParks
Monique Sham (MS)- SANParks
Tebego Kgaphola (TK) – DFFE: B&C EIA
Portia Makitta (PM) – DFFE: B&C EIA
Mashuda Mudau (MM) DFFE: PAPME

1. Welcome:

Esther Howard (EH) welcome everyone present and provide opportunity for introductions. Johmandie Piennar (JP) provide summary of proposed project and progress in application process to date.

2. Items to be Discussed:

2.1 Proposed project description

The proposed swimming pool, recreational facilities and associated infrastructure at Die Stroom Picnic Site in the Bontebok National Park, Swellendam will include the following:

- Pool Backwash tank slab = 15m² for 5000liter JoJo
 - Septic tank and Pump chamber = 40m²
 - Pool pump room = 40m²
 - Ablutions/Shower/Change Area = 105m²
 - Swimming Pool = 315m²
 - Terrace less Pool = 1115m²
 - Fence = 210m long and 1.5m high
 - Physically Disabled Ramp = 80m²
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 - Pool back-wash and soak-away = 260m long (Area measured in sewer trench calculation)
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 - Soak-away = 150m² (15m x 10m)
 - 2 x Biofilters = 64m² (4m x 8m each)
-



Construction footprint = 0.44ha
Proposed development will lead to the permanent clearance of ± 0.2 ha of indigenous vegetation.
The final development footprint for the developments as described above = ± 0.28 Ha

2.2 Application Process Conducted to Date

EA Application together with the Draft BAR submitted to the Department on 12 February 2024.

Public participation conducted to date – notification of availability of Draft BAR for comments provided to all identified organs of state and interested and affected parties as per the PPP approved during the pre-application meeting. Including notifications to the park forum member and placement of the notice in two newspapers and at the local municipal offices, library and park reception building. 30 Day commenting period ended 24 March 2025.

2.3 Comments on the Draft BAR as received from DFFE on 14/03/2025

Parties to discuss any matters which is unclear in terms of comments provided by the Department on the Draft BAR to date.

2.4 Opportunity for additional questions and discussions.

Notes and Action Items:

- Q: Need & Desirability- Why is the facilities being proposed?
A: Following health and safety audits it was determined that swimming within the Breede River is unsafe and alternative swimming facilities needs to be provided at the Die Stroom picnic site available to the local community.
 - Q: How will swimming be prevented in the Breede Rivier?
A: No swimming signs will be posted as well as swimming at own risk signs indicating the danger posed when swimming in the Breede Rivier i.e. bull sharks.
 - Q: What water source will be used for the swimming pool facilities?
A: Municipal water supply as per existing water supply to the Die Stroom picnic site.
 - Q: What technology alternatives were considered for the swimming pool water supply i.e. recycling system to re-use swimming pool water in ablution facilities?
A: This was considered, but the installation of the recycling system as well as the management and maintenance of such a system is not within the budget allocated to the proposal and the staff at the park is also not qualified to manager such a system. The Bontebok National Park is not a high-income park and therefore does not have the budget for a recycling system.
 - Q: What technology alternatives were considered for the disposal of wastewater generated by the swimming pool and proposed additional ablution facilities as soakaway is usually not considered as the best environmental option?
A: The Bontebok National Park is not a high-income park and therefore does not have the budget for a recycling system. The staff at the park is also not qualified to manager such a system. A conservancy tank for waste water to be collected by the municipality and disposed of at the municipal waste water treatment works is also costly and poses high risk of environmental pollution due to overflow if not property managed.
 - Q: In terms of the proposed additional soakaway next to the existing soakaway, what measures will be put in place to improve the quality of the soakaway waste water before it soaks into the ground?
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A: The current soakaway has no pre-treatment of wastewater before it is disposed of into the existing soakaway, as part of the development proposal a biofilter system is also proposed to be installed to improve/treat the waste water to a certain extent to improve the quality of the waste water to be discharged into the soakaway.

- Q: Does the development proposal require Water Use application?

A: Yes, water use application is underway and BOCMA has confirmed General Authorisation to be applied for.

Recommendations:

- The proposed development map must be overlayed with the environmental sensitivity map and environmental constraints i.e. drainage line, flood line, no-go areas must be indicated.
 - Alien and erosion management must be addressed in the EMP.
 - Construction camp and laydown area placement must be included in the project description.
 - Clear GPS co-ordinates of the development proposal must be provided.
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Table 2:

Name of Organisation/I&AP	Date and Format	Comments	Response from EAP/Applicant/ Specialist
SAHRA	18/02/2025 Email	Confirm receipt of notice.	No comments provided to date
Swellendam Municipality Ron Brunings Senior Manager: Town Planning, Building Control & Environment	21/02/2025 Email	<p>It is hereby suggested that the new parking is clustered, as apposed to being located alongside the sections of the roadway, unless there is a tangible reason for this approach.</p> <p><i>Reply email sent by Ron Brunings (21/02/2025)</i> To be perfectly clear, ALL building plans are to be lodged with the Municipality for consideration and approval – this follows the constitution. low. all are equal before the law. It is for that reason too that the Constitutional Court building was lodged with the applicable municipality for approval at the time. Building plans relate to the National Building Regulations and Building Standards Act, not a municipal bylaw. Said plans will therefore need to be lodged. There is no such thing as “information” plans etc. It is for that same reason that all schools and provincial / national dept structures formally lodge with the Municipality ito. the NBR’s. Please ensure that SANParks is appraised of this.</p> <p>Further, my recommendations relating to the location of the streetside parking is made ito. land use planning principles, and is made in the overall best interest of the park, and also to avoid the unnecessary removal of vegetation. It is therefore suggested that the existed clustered parking is expanded, rather than creating disparate parking along the road, which impacts safety. Moreover, on what basis were the number of parking spaces determined etc?</p>	<p>There are already two cluster parking areas at Die Stroom and the parking proposed alongside the road is for overflow parking and therefore to remain as proposed.</p> <p>Municipal recommendations/suggestions will be taken into consideration however SANParks are only obliged to inform the municipalities of developments within national parks. The municipality is not required to sign off on the proposed building plans and cannot insist on changes to be made to the development based on municipal by-laws. By-laws do not apply to national parks as the boundary falls outside of the municipal boundary and jurisdiction.</p> <p><i>Email reply sent by Esther Howard (SANParks Co-ordinator: Environmental Impact Assessments) on 25/03/2025</i> Further to your correspondence with the SANParks appointed EAP for proposed development in Bontebok National Park.</p> <p>In terms of the Constitution, the management of national parks is a national competency. While national parks are situated in municipal areas, the responsibilities and application of some legislation had to be clarified. One of these responsibilities was the approval of building plans, and to get clarity on the matter due to previous similar situations arising, SANParks obtained a legal opinion – a copy of which is included. As a State Entity acting on behalf of the State, SANParks is not bound by the act. SANParks has the capacity and expertise to approve building plans. Therefore, SANParks is not required to submit building plans to a municipality for approval. SANParks is not bound to the Building and Standards Act in respect to Local Authority approval, as SANParks acts on behalf of the State and the State administrates/ implements the Act themselves.</p> <p>SANParks has always and will continue to inform municipalities of its intended construction projects and provide the building plans for information and comment.</p> <p>Currently, day visitors “illegally” park along the road due to insufficient parking. The expansion of the existing cluster parking areas was considered, however from an operational point of view the additional streetside bays are preferable and would be to formalise the current parking.</p> <p>The number of bays was calculated on the average number of visitors as well as the available budget for the proposed development.</p>

		<p><i>Reply email sent by Ron Brunings (25/03/2025)</i> Thank you. I agree that the management of National Parks is national competency. No copy of the legal opinion is attached – the date of that legal opinion would be seminal. Notwithstanding, it is this municipality’s position that the approval of building plans ito. the NBR’s vests with it as a sphere of government, not a tier of government. A sphere of government is autonomous and has been allocated executive authority in respect of various matters, which includes, inter alia Building Regulations, as well as Municipal Planning. Although we (currently) act in terms of the NBR’s, the municipality is fully entitled to adopt its own By-law in relation to said building regulations, in terms of which all building plans in its area will be evaluated. Given the complexity of such a process, ito. standardisation across the country etc, LG continues to apply the NBR’s, whilst such matters are being operationalised. However, the principle irt. Building Regulations applies.</p> <p>The same applies to municipal planning; one sphere of government can not simply instruct another sphere of government what it intends to do within its Administrative area. There are arguably tangible implications on our roads, and on other our bulk and bulk-link services which must be taken into account, and planned / paid for etc. when introducing increased numbers of people / vehicles into the Municipality. Whilst this is but a very small initiative, the principle remains – LG must consider and accordingly approve all new / expanded land uses.</p> <p>I trust that the above is clear. We hereby expect SANParks to lodge the requisite plans for consideration as is applicable to all others. It is worth noting that even the building plans for the Constitutional Court were lodged with the applicable municipality for consideration and approval.</p> <p><i>Reply email sent by Ron Brunings (25/03/2025)</i> Thank you. The legal opinion (only an opinion) dates back to 2015. The suite of land use legislation applicable to local</p>	<p>For further queries, you are welcome to contact SANParks’ Parks Technical Services which is headed by Cornie Jonker (Pr.Eng). He is copied in this email.</p> <p><i>Reply email sent by Esther Howard (SANParks) 25/03/2025</i> My apologies, please find the legal opinion attached.</p> <p>As mentioned, SANParks has dealt with a similar stance from another municipality and thus sought legal counsel. Your query has been forwarded to SANParks Legal Services to provide you with a formal response.</p> <p><i>(The legal opinion as referred to above can be provided to the Decision Making Authority upon request, if required)</i></p> <p><i>Final reply email sent by Esther Howard (SANParks) 25/03/2025</i> Your comments are noted.</p>
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		<p>government changed entirely in 2015 / 2016. Moreover, society has been subject to a further 10 years of jurisprudence since then, whilst local government itself has also matured significantly in that time. Importantly the introduction of cost reflective DC's have made all Councils far more aware of the impact of new development on their municipality's, and who is responsible for what. It would therefore be interesting to hear what your legal services' position is. It is noted that we have had similar discussions with the Department of Education (some 2 year back), which now formally lodges building plans with our office.</p>	<p><i>Email reply sent by Antionet van Wyk (SANParks General Manager: Infrastructure and Specials Projects) 25/03/2025</i></p> <p>SANParks as Government Entity does not work in isolation and is aware of the changes in local government, as we need to be able to respond these changes being a national competency, and national parks situated in Local and District Municipalities.</p> <p>Government spheres must cooperate to resolve issues, and this will certainly be the case in this instance. Situations and responsibilities differ and thus our intention to find a way forward in this matter, without impacting on development.</p> <p>Will get back to you hopefully soon.</p>
<p>DFFE Ms Juliet Mahlangu</p>	<p>Commenting letter sent via email 17/03/2025</p>	<p>COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENDAM WESTERN CAPE.</p> <p>The Application Form and draft Basic Assessment Report (BAR) dated 14 January 2025 and received by this Department on 12 February 2025, refer.</p> <p>This letter serves to inform you that the following information must be included in the final BAR:</p> <p>(a) Application Form</p> <p>(i) Kindly submit the unprotected version of the application form with the final BAR.</p> <p>(b) Coordinates</p> <p>(i) Please ensure that the coordinates of the proposed site including all infrastructures associated with the project are included in the final report.</p> <p>(c) Layout & Sensitivity Maps</p> <p>(i) The Sensitivity Map attached under Appendix B2 must be revised to overlay the Site Development Plan attached under Appendix B1. The final Site Development Plan should be overlaid onto the sensitivity map, clearly indicating the following elements:</p> <ul style="list-style-type: none"> • All supporting on-site infrastructure, including both existing and proposed roads. 	<p>(a)(i) Unprotected version of application to be included with Final BAR.</p> <p>(b)(i) To be included with Final BAR</p> <p>(c)(i)-(ii) Refer to amended Environmental Sensitivity Map under Appendix B2 as attached to the BAR.</p>

	<ul style="list-style-type: none"> • The location of sensitive environmental features on-site, such as Critical Biodiversity Areas (CBAs), heritage sites, wetlands, drainage lines, and any other features that may be impacted by the development. • Buffer areas around sensitive environmental features, ensuring adequate protection. • All “no-go” areas where development or disturbance is prohibited due to environmental sensitivities. <p>(ii) This overlay should provide a clear visual representation of how the proposed development interacts with the surrounding environment, ensuring that all sensitive areas are appropriately accounted for in the final design and planning.</p> <p>(d) Applicable legislation</p> <p>(i) Section 3 of the BAR (Basic Assessment Report) must be revised to include the applicability of The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA"). This is crucial as the proposed project is situated within a National Park that is designated as a World Heritage site. The BAR should explicitly outline the relevance of NEMPAA to the proposed development, the proposed development aligns with or may impact the objectives of NEMPAA, including any necessary authorizations, assessments, or mitigation measures required under the Act. Please ensure that the Department’s World Heritage Management is consulted with regard to the proposed development and the contact person is Ms Tumeka Ntloko (Email: tntloko@dffe.gov.za).</p> <p>(e) Specialist Assessments</p> <p>(i) Please ensure that specialist studies conducted provide a detailed description of their methodology, as well as all other associated infrastructures that they have assessed and are recommending for the authorization.</p> <p>(ii) The specialist studies must also provide a detailed description of all limitations to their studies.</p> <p>(iii) If the specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible</p>	<p>(d)(i) Section C of the BAR does refer to the applicability of The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) (“NEMPAA”). The potential impacts of the proposed development on indigenous fauna and avifauna habitat associated with Endangered – Swellendam Silcrete Fynbos as part of a mapped Protected Area and potential impact of the proposed development on the Outstanding Universal Value of a World Heritage Site have been assessed in the BAR, also refer to Section H of the BAR for impact assessment results.</p> <p>The Departments World Heritage Management was notified of the opportunity to comment on the Draft BAR on 17/03/2025 therefore providing until 17/04/2025 for comments. Comments was obtained on 15/04/2025</p> <p>(e)(i) Specialist methodology used described in specialist reports under Terms of Reference and associated development assessed described under baseline profile description.</p> <p>(ii) Limitations described in specialist studies.</p> <p>(iii) No contradicting recommendations provided in specialist studies.</p>
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		<p>reasons; and were necessary, include further expertise advice.</p> <p>(iv) Should the specialist definition of ‘no-go’ area differ from the Departments definition; this must be clearly indicated. The specialist must also indicate the ‘no-go’ area’s buffer if applicable.</p> <p>(v) All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post EA.</p> <p>(vi) Regarding cumulative impacts:</p> <ul style="list-style-type: none"> • Clearly defined cumulative impacts and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land. • A detailed process flow to indicate how the specialist’s recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project. • Identified cumulative impacts associated with the proposed development must be rated with the significance rating methodology used in the process. • The significance rating must also inform the need and desirability of the proposed development. • A cumulative impact environmental statement on whether the proposed development must proceed. <p>(vii) It is brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), have come into effect. Please ensure that the specialist assessments conducted comply with these protocols.</p> <p>(viii) The screening tool output:</p> <ul style="list-style-type: none"> • Table 2 of the Site Verification Report must be revised to 	<p>(iv) No-go area definition used by specialists is the same as the Departments, meaning no activities i.e. temporary or permanent may occur within any identified no-go areas.</p> <p>(v) No further studies recommended by any of the specialist studies. All mitigation measures as proposed by specialist have been incorporated into the EMP requirements.</p> <p>(vi) Cumulative impacts are described, assessed and mitigated as part of impact assessment under Appendix J: Impact Assessment of the BAR and associated specialist mitigation measures are included in the EMP requirements.</p> <p>Environmental Impact Statement provided under Section J: General of the BAR.</p> <p>(vii) According to specialist assessment terms of reference as found in the specialists reports the specialist assessment complies with these protocols.</p> <p>(viii) Screening tool level of sensitivity is reflected in Table 1, however Table 2 has been amended to reflect it as well. The site Verification Report has also been</p>
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	<p>reflect the level of sensitivity identified by the screening tool. Additionally, the motivation provided currently states that specialist studies will be conducted. This needs to be amended, as the relevant specialist studies have already been completed. The BAR should reference the specific sections where these completed specialist studies have been attached for review.</p> <ul style="list-style-type: none"> • In addition, the BAR must include a similar table summarising the specialist studies required by the Screening Tool and the sensitivity rating of the Screening Tool (very high, high, medium, low), another column indicating the sensitivity of the site after the EAP/Specialist conducted the Site Verification Assessment and a column indicating whether these studies have been conducted or that compliance statement is submitted. Since you utilised the Western Cape Province BAR template, this must be indicated under Section 4 of the BAR (Protocols). <p>(ix) Additionally, the protocols specify that an assessment must be prepared by a specialist who is an expert in the field and is SACNASP registered for e.g.an aquatic assessment must be prepared by a specialist registered with SACNASP, with expertise in the field of aquatics sciences.</p> <p>(x) Please ensure that the specialist declaration of interest and proof of registration with SACNAP, must be submitted with the BAR.</p> <p>(xi) Please be reminded that section 2(3) of NEMA requires developments to be socially, environmentally and economically sustainable, while section 2(4)(i) of NEMA requires the social, economic and environmental impacts of activities, including disadvantages and benefits, to be considered, assessed and evaluated.</p> <p>(xii) Summary and recommendations of all specialist studies conducted must be included in the BAR and EMPr.</p> <p>(xiii) Please ensure that the BAR indicate any recommendations of the EAP or specialists, which are to be included as conditions of authorisation, per Appendix 1(3)(1)(n).</p> <p>(f) Cumulative Assessment</p> <p>(i) Should there be any other similar projects within a 30km</p>	<p>updated in accordance with specialist studies done and is available as Appendix I attached to the BAR. The Attachments table on the 3rd page of the BAR references that specialists' studies are available under Appendix G of the BAR. Similar Site Verification Report table has been included under Section D point 4 Protocols as requested. Findings of specialist impacts significance is available under Section I: FINDINGS, IMPACT MANAGEMNT AND MITIGATION MEASURES of the BAR.</p> <p>(ix) Proof of specialist qualifications attached to each specialist report as available under Appendix G of the BAR.</p> <p>(x) Proof of specialist SACNASP registration attached to each specialist report (where applicable) as available under Appendix G of the BAR. Signed specialist declaration will be attached to the Final BAR under Section K: Declarations upon submission.</p> <p>(xi) Noted, refer to Appendix J: Impact Assessment.</p> <p>(xii) Summary and recommendations of specialist studies provided under Section I: Findings, Impact Management and Mitigation Measures of the BAR and available under Chapter 7 of the EMP.</p> <p>(xiii) Recommendations of the EAP included under Section J: General point 2. Recommendations of the EAP in the BAR.</p> <p>(f)(i)(a)-(d) There is currently no other similar project proposed within the Bontebok National Park. Cumulative impacts are described, assessed and mitigated as part of</p>
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	<p>radius of the proposed development site, the cumulative impact assessment for all identified and assessed impacts must be refined to indicate the following:</p> <p>(a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e., hectares of cumulatively transformed land.</p> <p>(b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations, mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</p> <p>(c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</p> <p>(d) A cumulative impact environmental statement on whether the proposed development must proceed.</p> <p>(g) Public Participation Process</p> <p>(i) The following information must be submitted with the final BAR:</p> <ul style="list-style-type: none"> • A list of registered interested and affected parties as per Regulation 42 of the NEMA EIA Regulations, 2014, as amended. • Copies of all comments received during the draft BAR comment period; and • A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the draft BAR. Please note that comments received from this Department must also form part of the comment and response report. Structure the comment and response report in a table format as per template under annexure 1, with separate columns, so that the response can be viewed alongside the comments, the date they were received, and the parties from whom they were received. <p>(ii) Please ensure that all issues raised, and comments received during the circulation of the draft BAR from registered I&APs and organs of the state that have jurisdiction (including this Department's Biodiversity Section: BCAdmin@environment.gov.za, Protected Areas Management Section and World Heritage Management Section) in respect of the proposed activity are adequately addressed in the final BAR.</p>	<p>impact assessment under Appendix J: Impact Assessment of the BAR and associated specialist mitigation measures are included in the EMPr requirements.</p> <p>Environmental Impact Statement provided under Section J: General of the BAR.</p> <p>(g)(i)-(iv) Proof of Public Participation Process conducted and information required in terms of terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended, available under Appendix F of the BAR.</p>
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		<p>(iii) Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.</p> <p>(iv) The Public Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.</p> <p>(h) Environmental Management Programme (i) Kindly ensure that the EMPr complies with the content of the EMPr in terms of Appendix 4 of the Environmental Impact Assessment Regulations, 2014, as amended.</p> <p>(ii) Please ensure that any specific mitigation measures identified in the BAR and specialist reports are incorporated into the EMPr.</p> <p>(iii) Please also include in the EMPr, a recommended frequency for the auditing of compliance with the conditions of the EA and EMPr (for the construction and post-construction monitoring phases), and the submission of such compliance reports to the competent authority.</p> <p><u>General</u></p> <p>Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.</p> <p>You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: <i>“Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority- (a) a basic assessment report, inclusive of any specialist reports, an EMPr, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which have been subjected to a public participation process of at least 30 days</i></p>	<p>(h)(i) The EMPr as attached under Appendix H of the BAR complies with the requirements of Appendix 4 of the EIA Regulations, 2014, as amended.</p> <p>(ii) All specialist mitigation measures included under Chapter 7 of the EMPr</p> <p>(iii) Proposed auditing requirements indicated under Chapter 4 of the EMPr.</p> <p>Point 2.5 Period for which EA is required is provided under Section J: General point 2. Recommendations of the EAP</p> <p>Noted.</p>
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		<p><i>and which reflects the incorporation of comments received, including any comments of the competent authority.”</i></p> <p><i>Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: “the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the documents contemplated in subregulation 1(a) will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised documents will be subjected to another public participation process of at least 30 days.”</i></p> <p>Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.</p> <p>You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence before an Environmental Authorisation is granted by the Department.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
CapeNature Rhett Smart	Commenting letter sent via email 24/03/2025	<p>Draft Basic Assessment Report for the Proposed Swimming Pool, Recreational Facilities and Associated Infrastructure at Die Stroom Picnic Site, Remainder of Erf 5338, Bontebok National Park, Swellendam (DFFE ref. no.: 14/12/16/3/3/1/3107)</p> <p>CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.</p> <p>Desktop Information</p>	

The footprint of the proposed development is mapped as Protected Area in the Western Cape Biodiversity Spatial Plan, as it is located within the Bontebok National Park (and should be reflected as such in Appendix D). The picnic site is located on the banks of the Breede River with a minor non-perennial tributary traversing the proposed development area. The vegetation type mapped for the site is Swellendam Silcrete Fynbos, with Cape Lowland Alluvial Vegetation mapped adjacent along the banks of the Breede River, both of which are listed as endangered.

Bontebok National Park Management Plan

The Western Cape Biodiversity Spatial Plan and Guidelines state that the desired management objective for Protected Areas is: “Must be kept in a natural state, with a management plan focused on maintaining or improving the state of biodiversity. A benchmark for biodiversity” (CapeNature 2024) The general guidelines for Protected Areas include inter alia:

- The management plan must identify allowable activities, which should be consistent at least with the CBA 1 category; the location of these allowable activities should be captured in a zonation plan in the management plan.
- Activities relating to the construction of roads, administrative or tourism infrastructure and services (such as water reticulation systems, power lines, etc.) that are required to support the primary function of the protected area and its allowable activities, are subject to NEMA authorisation and the protected area management plan.

The specific guidelines state “implementation of the protected area management plan”.

As is evident from the above, the management plan of a protected area is the guideline which informs permissible development within a National Environmental Management: Protected Areas Act (NEM:PAA) protected area. The Department of Forestry, Fisheries and the Environment (DFFE) has informed CapeNature that decision making on National Environmental Management Act (NEMA) applications are guided by the management plan. Section 19(1)(a) of the Regulations for the Proper Administration of Special Nature

Reserves, National Parks and World Heritage Sites states that no development contemplated in section 50(5) of the Act shall be implemented in any area other than an area specifically designated for such development in a management plan.

The Bontebok National Park Management Plan (2013 – 2023) refers to a day visitor facility and picnic area in the concept development plan for development within the timeframes of the plan and is included in the associated map (SANParks 2013). The location is within the low intensity leisure zone. The development proposal can therefore be considered to be aligned to the management plan at a broad scale. According to the SANParks website the management plan is under review for the 2023/24 period. There are localities of high sensitivity near to the development according to the sensitivity map, however SANParks will need to provide information regarding the relevant sensitivity criteria which resulted in the rating.

Screening and Site Sensitivity Verification

The results from the screening tool indicate very high sensitivity for terrestrial biodiversity, high sensitivity for animal species, medium sensitivity for plant species and low sensitivity for aquatic biodiversity (although there is very high sensitivity for the latter directly adjacent associated with the Breede River). The site sensitivity verification recommends a medium sensitivity for terrestrial biodiversity and plant species and a low sensitivity for animal species and aquatic biodiversity, with impact assessments for the medium sensitivity themes and compliance statements for the low sensitivity themes.

Terrestrial Biodiversity and Plant Species Impact Assessments

The vegetation occurring at the locality is reported in accordance with the National Vegetation Map i.e. Swellendam Silcrete Fynbos. We do however wish to query the accuracy of the National Vegetation Map at a fine scale as Cape Lowland Alluvial Vegetation would be expected to occur on both sides of the river as it is a vegetation type associated with rivers, although it would have been impacted by the existing facilities at the picnic site.

The condition of the vegetation outside of existing disturbance footprints is described to be in good condition. The sensitivity

Plant sensitivity map and map description amended in the updated Plant Impact Assessment to clearly indicate already cleared/transformed areas of lower sensitivity

	<p>map indicates a uniform medium sensitivity across the full extent of the proposed development footprint, however it is noted that this encompasses transformed areas which would presumably be of a lower sensitivity. The description also does not indicate any differentiation across the extent of the footprint.</p> <p>A list of plant species is included, none of which are Species of Conservation Concern (SCCs). It is noted that some taxa could not be identified to species level. In terms of the methodology, it is noted that transects were undertaken at sites of geomorphic or topographic variance as identified on aerial imagery. Clarification is therefore required regarding the area which was surveyed. The Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes (March & October 2020 – referred to as “the protocols”) state that the assessment must be undertaken within the proposed development footprint.</p> <p>The plant species assessment includes a list of rare plant species recorded within the Bontebok National Park and a map of the localities. This information should be accurately referenced. There are two endangered plant species which have been recorded in the vicinity of the picnic site according to this data. We wish to note that there is other scientific literature which can be referenced regarding the flora of the Bontebok National Park with the records indicating a total of 650 species, of which 52 are SCCs and 3 species are fully endemic to the national park (Kraaij 2010). The management plan indicates that a phytosociological study was in progress for Die Stroom which resulted in the above publication. As the site is located within a public access area within a national park there are numerous iNaturalist records for the locality, of which one is of one of the endangered species endemic to the national park as listed above (<i>Aspalathus burchelliana</i>) and the locality is within the proposed development footprint. We further wish to note that there are many species included in the project species list which are not included in the species list for the national park. We recommend that the plant species impact assessment is reviewed by the SANParks Scientific Services.</p>	<p>and Medium Sensitivity areas.</p> <p>The entire proposed development footprint area and its immediate surrounds (within a radius of about 10m) was surveyed. This description has been included in the amended Terrestrial and Plan Impact Assessment Reports.</p> <p>Plant species lists and publications as provided by park management and consulted during specialist assessment Referenced in the specialist assessment reports.</p> <p>The development site was revisited on 26 March 2025 to confirm the presence of the <i>Aspalathus burchelliana</i> as recorded on iNaturalist within the vicinity of the “Die Stroom” picnic site and what is believed to be the exact same specimen as recorded on iNaturalist was found to be located on the edge of the access road to Die Stroom picnic site however in comparing the photos of the specimen when originally recorded on iNaturalist to photos taken on 26 March 2025 ongoing human impacts (with or without the proposed development) will most likely lead to the destruction of the specimen if not relocated, hence relocation is proposed by the botanical specialist away from the road edge and outside of the proposed development footprint area. No other plant species of conservation concern were recorded with the proposed development area. SANParks Scientific Services cannot review the assessment as SANParks is the applicant and therefore not an independent party.</p>
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The impact assessment indicates that the impact associated with the loss of Swellendam Silcrete Fynbos and faunal habitat is medium negative before mitigation and low negative after mitigation. The impacts on plant SCCs and animal SCCs are rated a low negative both before and after mitigation. However, we wish to raise concern whether there are in fact any plant SCCs within the footprint based on the available information. Confirmation is required whether there are any specimens within the footprint and the preferred mitigation is avoidance rather than translocation.

The proposed mitigation measures are supported. However, we wish to query the recommendation of the use of *Panicum maximum* as this is a tall, tufted grass which is not suitable for lawns, but could be a feature plant. Search and rescue it often not successful however it can be undertaken as best practice. More important for the earthworks associated with the laying of the pipelines is the proper management of topsoil which should be separated from the subsoil and returned to the surface as soon as possible to allow for successful rehabilitation.

Animal Species Compliance Statement

With regards to the site sensitivity verification for animal species of low sensitivity, we wish to note that the protocols provide a guideline for the sensitivity rating, whereby confirmed habitat for an SCC results in a high sensitivity rating and a low sensitivity rating is where no natural habitat remains or natural habitat where there is no suspected occurrence of SCCs.

The compliance statement indicates that no SCCs were recorded within the footprint, however there are fauna SCC present within the national park such as bontebok (*Damaliscus pygargus pygargus*), listed as vulnerable (both nationally & internationally). It states that bontebok in addition to bird SCCs may utilize the site. There are recent records of bontebok within the Die Stroom picnic site. Based on the available information, the proposed footprint is within confirmed habitat for an SCC and the sensitivity should therefore be rated as high in accordance with the protocols and an impact assessment should be undertaken. The protocols further state that the

The development site was revisited on 26 March 2025 to confirm the presence of the *Aspalathus burchelliana* as recorded on iNaturalist within the vicinity of the “Die Stroom” picnic site and what is believed to be the exact same specimen as recorded on iNaturalist was found to be located on the edge of the access road to Die Stroom picnic site however in comparing the photos of the specimen when originally recorded on iNaturalist to photos taken on 26 March 2025 ongoing human impacts (with or without the proposed development) will most likely lead to the destruction of the specimen if not relocated, hence relocation is proposed by the botanical specialist away from the road edge and outside of the proposed development footprint area. No other plant species of conservation concern were recorded with the proposed development area. SANParks Scientific Services cannot review the assessment as SANParks is the applicant and therefore not an independent party.

Topsoil management recommendations included as part of mitigation measures proposed.

The Animal Species Compliance Statement has been upgraded to an Animal Impact Assessment, however the potential impact significance findings of the proposed development on Animal species of conservation concern and their associated habitat remains the same as was assessed during the Draft BAR phase as due to the location of the proposed development within Die Stroom picnic area already frequented by human activities and the minimal size of the area to be impacted it is not expected that the proposed development will have any unacceptable significant detrimental impacts on any animal SCCs nor their associated habitat as sufficient good condition habitat will remain within the park for any animal SCCs to utilise including Bontebok.

assessment must be undertaken in accordance with the Species Environmental Assessment Guideline which would require that the site ecological importance (SEI) should be calculated for each of the SCCs in accordance with the guideline (SANBI 2020). The latter also applies to plant species.

It is worth noting that bontebok weren't one of the species flagged in the screening tool as high or medium sensitivity despite the very well-known occurrence of this subspecies at this location. Two of the five bird species which were flagged as high sensitivity are considered likely to be present, although there may be more than this. We note that the management plan states that Cape vulture (listed as endangered nationally and vulnerable internationally) and black storks (listed as vulnerable nationally and least concern internationally) have been recorded in the park.

Aquatic Biodiversity Compliance Statement

As indicated in the desktop information review, there is a non-perennial river mapped traversing the development footprint according to the National Geospatial Information (NGI) spatial data, however it was not included within the screening tool resulting in a low sensitivity. The aquatic biodiversity compliance statement however verifies the presence of a non perennial river as indicated in Map 5. The alignment however differs from the NGI mapping. There is however no text included regarding the verification of the presence of the non perennial river.

The methodology for the aquatic biodiversity compliance statement states that following the desktop review, the field investigation consisted of: identifying sites of geomorphological or topographic variance (if present) and subjected to an evaluation of species present within transects established across the selected site; aquatic fauna and flora species were identified and collated (if present); and additional random sample points were selected from similar aquatic sites surrounding the proposed impacted areas for comparative purposes (if present). However, there is no text in the compliance statement indicating the outcomes of the field investigation. In this regard we wish to note that 3.3.4 of the protocols for aquatic biodiversity indicate that an aquatic

Aquatic Impact Statement has been replaced by an Aquatic Impact Assessment and the presence of the non-perennial drainage line is confirmed in the Aquatic Impact Assessment and maps as well.

Aquatic Impact Statement has been replaced by an Aquatic Impact Assessment.

	<p>biodiversity compliance statement must include a baseline profile description of biodiversity and ecosystems of the site.</p> <p>As Listing Notice 1 Activity 12 is applied for, it is interpreted that the non-perennial river meets the NEMA and National Water Act definition of a watercourse, which includes both a “river” and a “natural channel in which water flows regularly or intermittently”. We wish to query the field investigation methodology as this seems to be a duplication for the terrestrial biodiversity and plant species, and recommend that the Updated Manual for the Identification and Delineation of Wetlands and Riparian Areas should instead be used to inform the methodology (DWAF 2008). In this regard rivers are considered to consist of the channel and the riparian zone. The best practice Department of Water and Sanitation methodology should be used to determine the ecological state of the watercourses and accordingly inform the potential impacts. It is essential that comment is received from the Breede Olifants Catchment Management Agency (BOCMA). The site is additionally outside of the 1 in 100 year floodline of the Breede River and the riparian habitat has been modified by the existing picnic site.</p> <p>The non-perennial river is traversed by the existing access roads at two locations. The electrical cable and potable water and wastewater pipelines will be located within the disturbance footprint of the access road which traverses the non-perennial river. Based on the photographs, there are existing culverts under the roads which presumably adequately permit flow of water under the roads. Further information should however be provided in this regard. Based on the site development layout (Appendix B1), it appears that the one parking area may encroach upon the non-perennial river and riparian area. Further confirmation is required whether the parking lot avoids the watercourse and an appropriate buffer.</p> <p>Neither of these two potential impacts were identified in the compliance statement nor were mitigation measures recommended. We therefore wish to query the site sensitivity verification of low sensitivity as it is interpreted from the protocols that if there is a watercourse present which could be impacted upon, the sensitivity is rated as very high, as the only two options are very high and low sensitivity.</p>	<p>Aquatic Impact Statement has been replaced by an Aquatic Impact Assessment.</p> <p>Comment has been requested from BOCMA and provided, water use application is underway. BOCMA has confirmed the application process can continue under the ambit of a General Authorisation.</p> <p>The proposed parking areas will not encroach within the non-perennial river or riparian area as confirmed in the Aquatic Impact Assessment.</p> <p>Potential impacts of construction and operational activities on the hydrological functioning of the site and surrounds which includes the Breerivier and the non-perennial tributary have been assessed in the Aquatic Impact Assessment conducted and accordingly mitigated and mitigation measures included in the EMP requirements.</p>
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Project Proposal and Associated Impacts

The primary component of the development proposal is a new public swimming pool. The development components are listed, however the operation of the swimming pool is not described. Chlorine is most commonly used for keeping swimming pools clean, however chlorine has a negative impact on the environment, particularly if it enters freshwater systems such as the adjacent Breede River. Management of the backwash is critical in this regard. We therefore recommend that an alternative system should be used for maintaining the swimming pool which does not require the use of chlorine in a sensitive location such as this within a national park in close proximity to a major river system.

The existing picnic and recreational facility makes use of a soakaway system with a tank located a short distance away from the river. The proposal for the additional facilities is for a new soakaway tank located adjacent to the existing tank with associated pipelines. In general, CapeNature does not support the use of soakaway systems, particularly in sensitive locations near to major river systems, and also applies to private properties with no conservation status. It is our understanding that the Swellendam Municipality has a similar approach and comment must be obtained from them in this regard. The sewage system should either be a small-scale self-contained sewage treatment plant which produces effluent of an acceptable quality or a conservancy tank which is regularly serviced. Ideally the existing sewage system should be removed and upgraded to a new system as well.

With regards to the above, the Environmental Impact Assessment Regulations refer to five types of alternatives which need to be investigated for a proposed project, one of which is technology alternatives. The best practice technology for the swimming pool maintenance and sewage provision as described above are technology alternatives, and therefore alternatives have not been adequately investigated.

Conclusion

In conclusion, CapeNature does not support a chlorine-based

Additional technology alternatives such as self-contained sewage treatment plant or a conservancy tank which is regularly serviced has been assessed in the BAR,

		<p>swimming pool and soakaway sewage system. We recommend that the project design needs conform to a best practice design which minimizes ecological impacts, particularly taking into consideration the location within a national park in close proximity to a major river. Sufficient detail should be provided in this regard.</p> <p>With regards to the specialist studies the following needs to be addressed:</p> <ul style="list-style-type: none"> • Confirmation must be provided regarding the presence of plant SCCs within the footprint in accordance with the available information as described above. Avoidance of plant SCCs should be practiced as far as possible, otherwise appropriate mitigation must be recommended. • The Plant Species Impact Assessment should be reviewed by SANParks Scientific Services in respect of existing data. • The specialist studies must be updated to ensure full compliance with the protocols, including impact assessments where required. • The delineation of the aquatic features should be informed by the DWAF Manual. • Confirmation must be provided that the proposed parking area will not encroach within the riparian area of the non-perennial river and appropriate buffer and that the flow of the river will not be impacted, including by construction activities. • The Bontebok National Park Management Plan should be appropriately referenced as discussed. <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<ul style="list-style-type: none"> • Confirmation is provided regarding the presence of plant SCCs in the amended Plant Impact Assessment. Avoidance of plant SCCs is practiced as far as possible as can be seen from proposed development layout placement which is located as far as possible on already transformed areas such as existing road and services infrastructure footprints and existing parking area. • SANParks Scientific Services cannot review the assessment as SANParks is the applicant and therefore not an independent party. The Plant Species Impact Assessment however takes into consideration existing data as provided by park management. • Compliance with protocols in terms of specialist studies conducted has been confirmed within updated specialist reports. • Delineation of aquatic features has been informed by DWAF Manual and Risk Assessment as conducted by aquatic specialist refer to Aquatic Impact Assessment. • Aquatic Impact Assessment confirms that the proposed parking area will not encroach within any riparian area and that the flow of the non-perennial drainage line will not be impacted. • Bontebok National Park Management Plan appropriately referenced in specialists reports.
BOCMA Vhengani Ligudu	Commenting letter sent via email on 25/03/2025	RE: PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK, SWELLENDAM MUNICIPALITY- WESTERN CAPE	

		<p>With reference to the above-mentioned document received by this office with DFFE reference 14/12/16/3/3/1/3107 on the 18/02/2025 requesting comments.</p> <p><u>This office has reviewed the above-mentioned report and has the following comments:</u></p> <ol style="list-style-type: none"> 1. All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered. 2. Please note that the proposed activities require authorisation in terms of the National Water Act, 1998 (Act 36 of 1998) before commencement of the water use activities: <p>The following water uses are triggered: <i>Section 21 (c) - impeding or diverting the flow of water in a watercourse</i> <i>Section 21 (i) - altering the bed, banks, course or characteristics of a watercourse</i></p> <ol style="list-style-type: none"> 3. The proponent, DEPARTMENT OF AGRICULTURE, FORESTRY AND FISHERIES - BONTEBOK NATIONAL PARK has started the Water Use Authorisation process application with reference WU38499. All water use related issues will be addressed in the authorisation process. 4. Kindly note that an application for a Water Use Licence is not a guarantee that a Water Use Licence will be issued. The license application will be assessed in terms of Section 41 of the National Water Act, 1998 (Act 36 of 1998) and all other applicable criteria including an assessment of the impacts of the activities and the adequacy of the suggested mitigation measures. 5. Please note that engaging in activity that triggers the National Water Act without authorisation is an offence and will result in the BOCMA taking legal action against the proponent in terms of Section 151 of the National Water Act, 1998 (Act 36 of 1998). <p>This office reserves the right to amend and revise its comments as well as to request any further information.</p>	<ol style="list-style-type: none"> 1. Noted, this is as per EMP requirements. 2. Water use application process underway, confirmation obtained from BOCMA that the application can continue under the ambit of General Authorisation. 3. Noted, proponent details to be amended as the proponent is not DAFF, but SANParks. 4. Noted. 5. Noted.
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<p>DFFE Directorate: Biodiversity Conservation</p>	<p>Commenting letter sent via email on 02/04/2025</p>	<p>COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOK PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENDAM MUNICIPALITY, WESTERN CAPE PROVINCE</p> <p>Site inspection conducted on the 26th of March 2025 refers,</p> <p>The proposed development area has been mapped as part of later Other Natural Area. The development will not lead to high biodiversity impact and will not prevent ongoing ecosystem functionality of surrounding similar undeveloped natural areas provided that the proposed specialist recommendations are implemented. In accordance with the park management plan the proposed development site is located within an area mapped as Medium to Low sensitivity within the Low Intensity Leisure park use zone.</p> <p>Based on the site inspection findings and information provided in the report the Directorate: Biodiversity Conservation does not have any objections to the proposed developments; however, the following must be taken in consideration in order to minimise further loss to biodiversity:</p> <ul style="list-style-type: none"> • Avoid land use that will result in vegetation loss in important biodiversity areas. • Maintain large intact natural patches – try to minimise habitat fragmentation in a highly sensitive area. • Maintain landscape connections (ecological corridors) that connect important biodiversity areas. • Maintain ecological processes at all scales and avoid or compensate for any effects of land uses on ecological processes. 	<ul style="list-style-type: none"> • Development proposal is to be located within already transformed areas as far as possible as can be viewed from the Environmental Sensitivities map available under Appendix B of the BAR. • The proposal will not compromise large intact natural patches and will not cause habitat fragmentation as it is proposed on already disturbed areas as far as possible and on the edge of already transformed areas not “in the middle of” connected natural areas. • The proposal will not compromise landscape connections as it is proposed on already disturbed areas as far as possible and on the edge of already transformed areas not “in the middle of” connected natural areas. • The proposal is to be located within a footprint that is to be kept as small as possible and ecological processes such as hydrological flow of the non-perennial drainage line during heavy rainfall events to be maintained as is in line with EMP recommendations

		<ul style="list-style-type: none"> • Care must be taken to avoid the introduction and spread of non-native species. • Minimise land use types that reduce ecological resilience (ability to adapt to change), particularly at the level of water catchments. • Implement land use and land management practices that are compatible with the natural potential of the area. • Balance opportunity for human and economic development with the requirements for biodiversity persistence. • An environmental sensitivity map indicated environmental sensitive areas and features identified during the EIA process. • A map combining the final layout map superimposed (overlain) on the environmental sensitivity map. This map must reflect the proposed infrastructure location as stated in the EIA report. <p>In conclusion, all Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention Seoka Lekota.</p>	<ul style="list-style-type: none"> • In accordance with the EMP requirements alien vegetation management must be undertaken during and after construction activities and during operational phase of developments as per current standard operating practices of the park. • The proposed development is not expected to reduce ecological resilience of the site or surrounds as all potential impacts can be managed to an acceptable level of significance. • Proposed recreational land use and land management practices are in line with the park management plan objectives for the Die Stroom picnic site and surrounds. • Part of the reasons for the proposed development is to provide the local community with a safe recreational swimming pool facilities while also keeping potential biodiversity impacts to a minimum. • Updated environmental sensitivities map provided under Appendix B. <ul style="list-style-type: none"> • Updated environmental sensitivities map provided under Appendix B.
DEA&DP Development Facilitation Adri La Meyer	Commenting letter received via email on 02/04/2025	<p>COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF FACILITIES AND ASSOCIATED INFRASTRUCTURE WITHIN 32M OF A WATERCOURSE AT DIE STROOM PICNIC SITE ON THE REMAINDER OR ERF 5338 AT THE BONTEBOK NATIONAL PARK, SWELLENDAM (DFFE REF: 14/12/16/3/3/1/3107)</p> <p>1. The notification of a public participation process (“PPP”) in terms the Environmental Impact Assessment (“EIA”) Regulations, 2014 (as amended) and the availability of a Draft Basic Assessment Report (“BAR”), as received via email on 18 February 2025, refers.</p> <p>2.Thank you for the opportunity to provide comments on the Draft BAR. The Department further expresses its appreciation for your willingness to allow the submission of comments on the Draft BAR after the commenting period has ended.</p> <p>3. Please find comments from various directorates within the</p>	

	<p>Department on the Draft BAR dated 13 February 2025 that was available for download from the website of the environmental assessment practitioner. Kindly note that the Department will provide comments on the water use licence (“WUL”) application (if required) upon notification of the availability of the WUL Motivation Report and associated documentation for review and comments.</p> <p>Directorate: Development Management (Region 1) – Mr Ntanganedzeni Mabasa (Email: Ntanganedzeni.Mabasa@westerncape.gov.za; Tel.: (021) 483 2803):</p> <p>4. Based on the specialists’ findings, the proposed development will result in impacts with a low negative significance rating provided that the mitigation measures are implemented. It must be ensured that the development footprint and any no-go areas are clearly demarcated prior to commencement of construction activities.</p> <p>5. The Environmental Management Programme (“EMPr”) must be strictly implemented and adhered to during all the phases of the development.</p> <p>6. Comments from all relevant organs of state should be obtained, included, and adequately addressed in the Final BAR.</p> <p>7. Proof of the PPP undertaken must be included in the final report to be submitted to the competent authority for decision-making.</p> <p>8. The Final BAR and EMPr must meet all the regulatory information requirements as outlined in Appendices 1 and 4 of EIA Regulations, 2014 (as amended), respectively.</p> <p>Directorate: Pollution and Chemicals Management – Mr Gunther Frantz (Email: Gunther.Frantz@westerncape.gov.za; Tel.: (021) 483 2975):</p> <p>9. This Directorate is not in favour of soakaway systems; however, it is acknowledged that a soakaway system is most likely the most feasible option for wastewater management at the site, due to the lack of bulk sewage infrastructure. It is</p>	<p>4. Recommendation in accordance with EMP requirements.</p> <p>5. Recommendation recommended to be included as EA condition.</p> <p>6. All comments received included and addressed under Appendix F of the BAR.</p> <p>7. Proof of PPP undertaken included under Appendix F of the BAR.</p> <p>8. BAR and EMP compiled in accordance with requirement outlined in Appendix 1 and 4 of the EIA Regulations, 2014 (as amended).</p> <p>9. Water use application is underway, which would also require monitoring of soakaway discharge area. Hence monitoring requirements have been included under Operation Phase requirements of the EMPr.</p>
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	<p>understood that a mixed stream of sewage and swimming pool backwash water will be discharged via the new soakaway. It is recommended that monitoring of the soakaway discharge area takes place, for the build-up of chlorine or sodium enrichment in soils or groundwater, in the case of chlorinated or salt pool water, respectively. Such monitoring must be included in an operational and maintenance plan for the recreational facility.</p> <p>10. It is unclear from the Draft BAR what the capacity of the septic tank is and if it will be adequate to accommodate effluent inflows from the adjacent ablution facilities, especially during peak holiday periods.</p> <p>11. It is not clear from the Draft BAR if the pump room has a sump or lined retention dam to contain any sewage/wastewater that may build up during extended power outages (loadshedding) or malfunctioning pump equipment.</p> <p>12. Further to the above, it is recommended that backup power (portable or fixed) is available in the event of extended power outages in the area, to pump wastewater to the soakaway, especially during peak holiday seasons.</p> <p>13. Given the sensitive nature of the surrounding terrain, the following general recommendations for incorporation into the EMP are provided to prevent and manage the potential contamination emanating from the facility during the construction, operational and decommissioning phases:</p> <p>13.1. The responsible management of hazardous chemicals should always be practised, and the storage or handling of chemicals must not take place near any watercourses.</p> <p>13.2. All heavy earthmoving and transport vehicles must be in good working condition with no leaking hydrocarbon fuel, fluids or lubricant emanating from these vehicles.</p> <p>13.3. This Directorate acknowledges Chapter 8 of the EMP regarding the control of incidents in terms of section 30 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"). Please be reminded that the reporting of an incident during the construction or operational phase must also be reported to this Directorate.</p>	<p>10. Proposed septic tank capacity is 11 340L (3 days retention) calculated for 100 people/day which is numbers used for peak holiday periods.</p> <p>11. A sump will be installed as part of the pump room and emergency portable generator will be on standby during power outages.</p> <p>12. Emergency portable generator to be on standby.</p> <p>13.1 Recommendation included as part of EMP requirements.</p> <p>13.2 Recommendation included as part of EMP requirements.</p> <p>13.3 Noted, this is as per EMP requirements.</p>
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		<p>Directorate: Development Facilitation – Ms Adri La Meyer (Adri.LaMeyer@westerncape.gov.za; Tel.: (021) 483 2887):</p> <p>14. Please also include Activity 14(ii)(c)(i)(aa) of Listing Notice 3 of the EIA Regulations, 2014 (as amended) in the section dealing with the listed activities (section D of the BAR), as the Bontebok National Park is a protected area. Only subsection i(cc) was listed. The application form should also be amended accordingly to list the additional listed activity.</p> <p>15. It is noted that sewage effluent and backwash water from the swimming pool will be pumped to the proposed new septic tank with soakaway to be situated adjacent to the existing soakaway system. Considering the concerns raised by the Department's Directorate: Pollution and Chemicals Management as indicated above, and by CapeNature in their comments on the Draft BAR dated 24 March 2025 (their reference LS14/2/6/1/7/3/5338_recreation_Swellendam) regarding the soakaway system, has the construction of a conservancy tank as opposed to a septic tank been considered? Effluent from the conservancy tank would then be transported via a honeysucker for treatment and disposal at the Swellendam wastewater treatment works ("WWTW"), if the WWTW has the capacity to accept the additional wastewater load. The use of a conservancy tank would avoid or minimise any potential pollution to soil or groundwater.</p> <p>16. It is noted that all negative impacts associated with the proposed development can be reduced to an impact significance of low negative with the implantation of mitigation measures. Only the socio economic impact associated with the additional load on services infrastructure would result in an impact significance of medium negative with mitigation.</p> <p>17. Please note that the Screening Tool Report (Appendix 16A) generated on 15 March 2023 is unsigned. Further, Table 3 of the Site Sensitivity Verification Report must be amended to indicate the specialists' findings, as these assessments have been undertaken.</p> <p>18. Final comments from Heritage Western Cape on the Notification of Intent to Develop must be included in the</p>	<p>14. Listing Notice 3 Activity 14 is included as relevant listed activity to be authorised as a whole. A subsection of a listed activity is not a listed activity on its own, hence if the Listed Activity has been included all subsections under the specific listed activity is automatically included as applied for and potential impacts on the relevant features of the protected area i.e. indigenous vegetation etc have been assessed.</p> <p>15. As stated by park management the alternative of a self-contained sewage treatment plant or conservancy tanks service by the municipality cannot be considered as reasonable or feasible options as SANParks (the applicant and developer) does not have sufficient funds to firstly install a sewage treatment plant and secondly to appoint suitable trained staff to operate such a plant. Sufficient funds or trained staff is also not available to operate and manage a conservancy tank system.</p> <p>16.-</p> <p>17. Screening Tool Report has been updated and amended according to specialist investigations conducted and associated findings.</p> <p>18. Final comments form HWC will be provided to the competent authority once received, to date HWC has not yet provided comment on the HIA conducted as part</p>
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		<p>submission of the Final BAR to the competent authority.</p> <p>19. Please note that the abovementioned comments and recommendations do not pre-empt the outcome of the application. No information provided, views expressed and/or comments made by officials should in any way be regarded as an indication or confirmation that additional information or documents will not be requested; or of the outcome of any application submitted to the competent authority.</p> <p>20. The applicant is reminded of its “general duty of care towards the environment” as prescribed in section 28 of the NEMA, 1998 which states that “Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.”</p> <p>The Department reserves the right to revise initial comments and request further information based on any or new information received.</p>	<p>of the Draft BAR sent out for comments.</p> <p>19. Noted.</p> <p>20 Noted.</p>
<p>DFFE Directorate: Protected Areas Planning and Management Effectiveness Mr Thivhulawi Nethononda</p>	<p>Commenting letter sent via email on 02/04/2025</p>	<p>COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENDAM MUNICIPALITY, WESTERN CAPE</p> <p><u>Background and Discussion</u></p> <p>The Directorate: Protected Areas Planning and Management Effectiveness would like to thank you for the opportunity to review the Draft Basic Assessment report and Environmental Programme report for the aforementioned project. The proposed project will entail the development of a swimming pool, recreational facilities and associated infrastructures which will be located at the Die Stroom Site.</p> <p>Communal land from Swellendam Municipality and privately owned farms, including “Die Stroom”, was acquired thus formally proclaiming the Bontebok National Park in 1961. The</p>	

mission of the park is not only to conserve rare and threatened species found in the park but also to provide tourism and recreational opportunities and facilitate socio-economic benefits to surrounding communities. Local communities frequent Die Stroom Picnic Site for recreational purposes, including swimming in the perennial Breede River which borders the site.

As per the agreement between the Municipality and SANParks, the local community would still have access to Die Stroom for recreational purposes. After the proclamation of the Consumer Protection Act (CPA), SANParks Risk Management deemed the Breede River to be unsafe for various reasons, including water quality, clarity, depth and hazardous rubble found on the riverbed, the lack of lifeguards on duty and possible attacks by Zambezi (bull) sharks, which have been documented as dwellers of the Breede River.

SANParks has therefore cited “swim at own risk” for the aforementioned reasons at the relevant picnic site. As the Breede River is traditionally utilized by the local communities for swimming, SANParks would like to provide visitors with a safe swimming environment. The proposed development will offer day visitors an enclosed swimming pool with dedicated ablutions including male and female shower facilities and toilets.

The proposed swimming pool, recreational facilities and associated infrastructure at Die Stroom. The Picnic Site in the Bontebok National Park, Swellendam will include the following:

- Pool Backwash tank slab = 15m² for 5000liter JoJo
- Septic tank and Pump chamber = 40m² • Pool pump room = 40m²
- Ablutions/Shower/Change Area = 105m²
- Swimming Pool = 315m²
- Terrace less Pool = 1115m²
- Fence = 210m long and 1.5m high
- Physically Disabled Ramp = 80m²
- Parking = 240m²
- Underground electrical cable = 110m long (Area measured in sewer trench calculation)
- Sewer line /Soak-away = 260m long (Area = 390m²)
- Pool backwash and soak-away = 260m long (Area measured in

sewer trench calculation)

- Water supply line =25m long (Area 25m²) (Balance of area measured in sewer trench calculation)
- Soak-away = 150m² (15m x 10m)
- 2 x Biofilters = 64m² (4m x 8m each)

Construction footprint = 0.44ha

Proposed development will lead to the permanent clearance of ±0.2ha of indigenous vegetation.

The final development footprint for the developments as described above = ± 0.28Ha

Commercial and community activities in national park, nature reserve and world heritage site

- The application for Environmental Authorization (EA) is for the development of a swimming and associated infrastructure will be undertaken within the Bontebok National Park. The area is listed as a national park in terms of the protected area register and is managed by SANParks. The applicant is required to note section 50 (5) of the National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003) (NEMPAA); that provides as follows:
 - *No development, construction or farming may be permitted in a national park, nature reserve or world heritage site without the prior written approval of the management authority.*

- The Minister has, under Section 86 of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003), made the Regulations in the schedule on the 28th of October 2005, including Section 19(1)(a) under Regulations for the Proper Administration of Special Nature Reserves, **National Parks**, and World Heritage Sites stipulates:
 - (1) No development contemplated in section 50(5) of the Act shall be implemented— (a) in any area other than an area specifically designated for such development in a management plan; and (b) before a management authority has indicated in writing the nature and extent of the strategic or environmental impact assessment required for the development.
 - (2) No commercial activity or activity contemplated in section 50 of the Act, which requires an environmental impact assessment to be undertaken, either in terms of sub regulation (1)(b) or under any other law, may be implemented before a management authority has approved, with or without

- Section 50 (5) of the National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003) (NEMPAA) is noted and Section 50(5) authorisation letter provided by SANParks is available under Appendix L of the BAR.

conditions, the environmental impact assessment before it is submitted to the relevant authority for approval.

- It must be noted that the approval from the management authority as per the NEMPA Act Section 50 subsection 5, must be obtained and attached to the final report.

Compliance with the approved Bontebok National Park Management plan

- According to the Bontebok National Park Management Plan the proposed development is within the Low-Intensive Leisure zones.
- Therefore, the proposed development is consistent with the Management Plan for the Bontebok National Park (BNP).

Comments on the Draft Basic Assessment Report for the Proposed Swimming Pool, Recreational Facilities and Associated Infrastructure at Die Stroom Picnic Site in the Bontebok National Park on Erf Re/5338, Swellendam Municipality, Western Cape

After thorough review of the reports submitted and the site visit conducted on the 26th of March 2025, the directorate has the following comments:

- From the reports submitted, there is no indication of the laydown area:
 - As per the confirmation from the site visit, it was indicated that the laydown area will be located within the already disturbed area behind the existing ablutions. It is recommended that the laydown area must be indicated in all maps and be included in the layout as part of the developmental area.
- None of the proposed developments has been placed on or will have any physical impacts on existing watercourses on/near the site such as the Breerivier tributary (development will be outside of the 1:100-year floodline area) and the main course and hydrological functioning of the non-perennial drainage line crossing the picnic site is to remain as is.
 - As per the site visit conducted, it was noted that the development will indeed not affect the non-perennial drainage

- Section 50 (5) of the National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003) (NEMPAA) is noted and Section 50(5) authorisation letter provided by SANParks is available under Appendix L of the BAR

- In compliance with the requirements of the EMP, the construction laydown area must be established within already transformed areas such as the existing parking areas. Amended environmental sensitivities map have been updated to indicate proposed laydown areas as discussed and is available under Appendix B and included in the EMP.

- As per the requirements of the EMP Construction Phase all areas outside of the proposed development areas to be management as no-go areas and temporary

		<p>line crossing through the developmental area, however it is recommended that the area be fenced off to avoid any possible contact with the construction workers.</p> <p>- It was confirmed during the site visit that the proposed development is outside the floodline, however, due to the steep topography of the developmental area towards the river, a proper stormwater management plan must be developed and adhered to.</p> <p>In terms of sewage management, a closed septic tank with pump is proposed at the new ablution facilities and swimming pool site. Sewage and all pool backwash water are to be pumped to the proposed additional soak away which is to be placed adjacent to the existing soak away currently used at the picnic site. Water and sewer pipelines and electrical cables are all proposed underground to be placed along existing routes and roads crossing the non-perennial drainage lines to ensure minimal impact on the environment.</p> <p>- It is recommended that a culvert be installed where the pipelines and the road cross the non-perennial drainage lines, to avoid further disturbance of the drainage line during future possible maintenance.</p> <ul style="list-style-type: none"> • It is not expected that the proposed expansion will have any significant negative impacts on people's health in terms of noise, odours or visual characteristics. The site is located within the Bontebok National Park at an existing picnic area which is already managed by the park management to minimize noise, odours and visual impacts. Construction and operational phases will be managed in line with the requirements of the environmental management plan which contains mitigation measures to manage potential noise, odours and visual impacts of the development. <p>- There is currently one access gate and road in the park, overnight visitors may be affected by traffic, noise and visually, it is recommended that the construction vehicle and machinery must be fitted with silencers to dampen noise.</p> <p>- Construction activities must only take place during normal working hours on weekdays.</p> <p>- The construction vehicles must be limited to the</p>	<p>fencing must be placed around the proposed development areas to avoid and minimise construction impacts on adjacent areas i.e. the non-perennial drainage line not proposed for development.</p> <p>- Recommendation included as part of EMP requirements.</p> <p>- There are already existing culvert underneath the roads to remain as is as the proposed development is not expected to have an impact on stormwater discharged through the existing culverts.</p> <p>- Recommendations included as part of EMP requirements.</p> <p>- Recommendations included as part of EMP requirements</p> <p>- Recommendations included as part of EMP requirements</p>
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	<p>developmental area as much as possible.</p> <ul style="list-style-type: none"> - Dust suppression must be practiced throughout all the roads that will be accessed by the construction vehicle. - It is recommended that washing and maintenance of construction vehicles or machinery must be done outside the park to avoid oil spillage and chemicals washing off to the river. <ul style="list-style-type: none"> • No other reasonable or feasible activity alternatives exist as the reason for the proposed development is to expand the existing picnic facilities in accordance with the recreational needs that exist at the specific site as identified by park management. - The above is noted; however, destruction of vegetation must be strictly limited to the developmental area. <ul style="list-style-type: none"> • All areas falling outside of the proposed 0.44ha development area must be considered as no-go areas and proposed developments must be clearly demarcated before construction starts and remain demarcated throughout the construction phase. These requirements have been included in the EMP. - The directorate is in support of the demarcation of the no-go areas, we further recommend that these areas must be fenced off with construction nets, to avoid any access by the construction workers. - It is further recommended that the trenches and the swimming pool hole are also fenced off at night to avoid any fauna falling in. Before closure/filling in of the trenches, they must be checked for any possible fauna that could be trapped. <ul style="list-style-type: none"> • Planted grass such as for the proposed picnic area must be prevented from encroaching further into the remaining and rehabilitating indigenous vegetation landscaped and undeveloped areas. - The applicant must fully adhere to the recommended vegetation for landscaping, i.e. <i>Cynodon dactylon</i> (kweekgras) or <i>Panicum maximum</i> (buffelsgras). <ul style="list-style-type: none"> • A zonation plan that forms part of the protected area management plan must be adhered to, as it indicates activities that may take place in different sections of the protected area, and the conservation objectives of those sections. Consequently, it is recommended for the development to be undertaken within the appropriate zones of the national park. 	<ul style="list-style-type: none"> - Recommendations included as part of EMP requirements - Recommendations included as part of EMP requirements. - Noted, recommendation recommended to be included as EA condition. - Demarcation of no-go areas before and during construction activities is as per EMP requirements. - Recommendation included as part of EMP requirements. - This is as per EMP requirements. • The Bontebok National Park Management Plan (2013 – 2023) refers to a day visitor facility and picnic area in the concept development plan for development within the timeframes of the plan and is included in the associated map (SANParks 2013). The location is within the low intensity leisure zone. The development proposal can therefore be considered to be aligned to the management plan. In keeping with the objectives of the Low Intensity Leisure Zone within which the
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<p>The Directorate: Protected Areas Multilateral Programmes</p>	<p>Commenting letter sent via email on 15/04/2025</p>	<p>COMMENTS ON THE BASIC ASSESMENT REPORT FOR THE PROPOSED SWIMMING POOL, RECREATIONAL FACILITIES AND ASSOCIATED INFRASTRUCTURE AT DIE STROOM PICNIC SITE IN THE BONTEBOK NATIONAL PARK ON ERF RE/5338, SWELLENDAM MUNICIPALITY, WESTERN CAPE</p> <p>The Directorate: Protected Areas Multilateral Programmes within the Department of Forestry, Fisheries and the Environment (DFFE) would like to thank you for an opportunity to participate and comment of the on the Draft Basic Assessment Report (DBAR) and the Environmental Management Programme (EMPr) for the swimming pool, recreational facilities and associated infrastructure at Die Stroom picnic site in the Bontebok National Park on ERF RE/5338, Swellendam Municipality, Western Cape.</p> <p>The DBAR, the EMPr (dated 13 February 2025 and 14 January 2025 respectively) and the various specialist assessments reports for the proposed swimming pool, recreational facilities and associated infrastructure within Bontebok National Park have been reviewed and carefully considered by the Directorate staff. The Directorate would like to make the following comments on the DBAR:</p> <p>(a) Consideration of Cape Floral Region Protected Area World Heritage Site Values and Attributes.</p> <p>The proposed development is located in Bontebok National Park which is part of the Langeberg Complex of the Cape Floral Region Protected Area World Heritage Site. As such the potential impacts of the development on the attributes which conveys the Outstanding Universal Values (OUV) for which the Cape Floral Region Protected Areas was inscribed on the</p>	<p>(a) Potential impacts on the Outstanding Universal Value of a World Heritage Site have been assessed under Appendix J of the BAR. Potential botanical impacts have been assessed in the Plant Impact Assessment report.</p>

UNESCO World Heritage list should be investigated. The DBAR would benefit significantly from a dedicated section that explicitly incorporates the criteria and methodologies outlined in the UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context. It is therefore recommended that the report assess both direct and cumulative impacts on values and attributes of the Cape Floral Region Protected Areas World Heritage Site.

(b) Aquatic Impact Assessment

The DBAR lacks a detailed assessment of the potential impacts of the proposed development on aquatic ecosystems, aside from a brief compliance statement. Given the site's proximity to a Breede river and the proposal to discharge sewage and pool backwash water into a soakaway system (as outlined in Sections 1.4 and 11 of the DBAR), a comprehensive aquatic impact assessment may be warranted. There is a risk that nutrients such as nitrates and phosphates, as well as chlorine from the pool backwash, could seep into the groundwater or the Breede River. An assessment of soil permeability and groundwater flow direction is essential to evaluate the potential for contamination and to inform appropriate mitigation measures.

(c) Specialist Studies

It is noted that specialist studies submitted with the Draft Basic Assessment Report (namely the Plant Impact Assessment, the Aquatic and Animal Species Compliance Statement, and the Terrestrial Biodiversity Impact Assessment) all rely on the same two site visit dates (16 January 2019 and 17 August 2022). Additionally, these studies appear to have been conducted by a single specialist. While it is accepted that the development footprint is small in size, the scope and methodological requirements of these studies vary considerably. It has been noted that there is a significant overlap in the structure, language, and source material in the specialist reports, thus raising concerns regarding the independence, depth, and robustness of these assessments. In addition, the specialist studies lack adequate detail on survey methodologies undertaken including the duration, sampling transects, making it difficult to determine whether the assessments were undertaken with the necessary rigour and methodological distinction appropriate for their respective themes.

(b) The Aquatic Compliance Statement has been replaced with an Aquatic Impact Assessment, potential impacts on surface and water resources have been assessed in the Aquatic Impact Assessment.

(c) In accordance with the applicable protocols or minimum information requirements, which have been published in the Government Gazette (i.e. Government Gazette No. 43110 of 20 March 2020 and Government Gazette No. 43855 of 30 October 2020) a site sensitivity verification report which confirms or disputes the site sensitivities for each of the themes identified in the Screening Tool Report has been provided.

Where a protocol has been published for an identified theme, the respective specialist reports terms of reference and methodologies complies to the requirements of the protocol and is listed as such in the Terms of Reference for each applicable specialist study. Where a specific protocol has not been identified for a specialist study, such specialist study complies with the requirements of Appendix 6 of the Environmental Impact Assessment Regulations, 2014,

The specialist (Nicolaas Hanekom) whom conducted the Animal, Plant, Terrestrial Biodiversity and Aquatic Impact Assessments is independent and has the necessary SACNASP qualifications and conducted the studies in terms of the applicable protocols as listed in the reports.

It would be beneficial for the DBAR to provide clarification on how the fieldwork for all specialist assessments was conducted concurrently, and whether the level of effort was sufficient to meet the standards expected of an environmental impact study.

Noting the above, the Directorate: Protected Areas Multilateral Programmes is of the view that there are critical issues in the DBAR that should be addressed before finalizing the assessment and proceeding with the environmental authorization process.

Should you wish to correspond further on this matter, please quote Ms Thumeka Ntloko at tntloko@environment.gov.za and 012 3999531

