



**REFERENCE:** 16/3/3/1/F2/3/2041/20  
**NEAS REFERENCE:** WCP/EIA/0000797/2020  
**ENQUIRIES:** RONDINE ISAACS  
**DATE OF ISSUE:** 28 April 2021

## **ENVIRONMENTAL AUTHORISATION**

**APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) (“NEMA”) AND THE ENVIRONMENTAL IMPACT ASSESSMENT (“EIA”) REGULATIONS, 2014 (AS AMENDED): PROPOSED DEVELOPMENT OF CAMP SITES AND TOURIST FACILITIES ON THE FARM BLINKWATER NO. 472, CITRUSDAL.**

With reference to your application for the abovementioned, find below the outcome with respect to this application.

### **DECISION**

By virtue of the powers conferred on it by the NEMA and the EIA Regulations, 2014 (as amended), the competent authority herewith grants Environmental Authorisation to the applicant to undertake the list of activities specified in Section B below with respect to the preferred alternative as included in the Basic Assessment Report (“BAR”) dated 18 December 2020.

The granting of this Environmental Authorisation (hereinafter referred to as the “Environmental Authorisation”) is subject to compliance with the conditions set out in Section E below.

### **A. DETAILS OF THE HOLDER OF THIS ENVIRONMENTAL AUTHORISATION**

Cederberg Glamping (Pty) Ltd.  
c/o Mr. Wilhelm Adriaan van der Vyver  
66 Voortrekker Road  
**CITRUSDAL**  
7340

Tel.: (022) 921 2221  
Fax: (086) 523 8415  
E-mail: [blinkwater@citrusdallodge.co.za](mailto:blinkwater@citrusdallodge.co.za)

The abovementioned applicant is the holder of this Environmental Authorisation and is hereinafter referred to as “the holder”.

**B. LIST OF ACTIVITIES AUTHORISED**

Listed Activity	Activity/Project Description
<p><b>Listing Notice 1 of the EIA Regulations, 2014 (as amended):</b></p> <p><b>Activity 12:</b>  <i>"The development of-</i>  <i>(i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or</i>  <i>(ii) infrastructure or structures with a physical footprint of 100 square metres or more;</i></p> <p><i>where such development occurs-</i>  <i>(a) within a watercourse;</i>  <i>(b) in front of a development setback; or</i>  <i>(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; -</i></p> <p><i>excluding-</i>  <i>(aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;</i>  <i>(bb) where such development activities are related to the development of a port or harb</i>  <i>(cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies;</i>  <i>(dd) where such development occurs within an urban area;</i>  <i>(ee) where such development occurs within existing roads, road reserves or railway line reserves; or</i>  <i>(ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared".</i></p>	<p>Infrastructure/structures of more than 100m<sup>2</sup> will be constructed within 32m from the edge of a watercourse.</p>
<p><b>Activity 19:</b>  <i>"The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;</i></p> <p><i>but excluding where such infilling, depositing, dredging, excavation, removal or moving -</i>  <i>(a) will occur behind a development setback;</i>  <i>(b) is for maintenance purposes undertaken in accordance with a maintenance management plan;</i>  <i>(c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;</i></p>	<p>The development proposal entails the removing or moving, dredging, excavation, infilling or depositing of material of more than 10m<sup>3</sup> from the river. This is associated with the removal of Black wattle trees from the river banks and these areas may require stabilisation by planting new vegetation.</p>

<p>(d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or</p> <p>(e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies".</p>	
<p><b>Activity 27:</b>          "The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for -</p> <p>(i) the undertaking of a linear activity; or</p> <p>(ii) maintenance purposes undertaken in accordance with a maintenance management plan".</p>	<p>More than 1ha of indigenous vegetation will be cleared.</p>

<b>Listed Activity</b>	<b>Activity/Project Description</b>
<p><b>Listing Notice 3 of the EIA Regulations, 2014 (as amended):</b></p> <p><b>Activity 6:</b>          "The development of resorts, lodges, hotels, tourism or hospitality facilities that sleeps 15 people or more.</p> <p><b>i. Western Cape</b></p> <p>i. Inside a protected area identified in terms of NEMPAA;</p> <p>ii. Outside urban areas;</p> <p>(aa) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; or</p> <p>(bb) Within 5km from national parks, world heritage sites, areas identified in terms of NEMPAA or from the core area of a biosphere reserve; -</p> <p>excluding the conversion of existing buildings where the development footprint will not be increased".</p>	<p>Facilities will be constructed that sleeps more than 15 people.</p>
<p><b>Activity 12:</b>          "The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.</p> <p><b>i. Western Cape</b></p> <p>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</p>	<p>More than 300m<sup>2</sup> of critically endangered vegetation will be cleared.</p>

<p><i>Biodiversity Assessment 2004;</i></p> <ul style="list-style-type: none"> <li><i>ii. Within critical biodiversity areas identified in bioregional plans;</i></li> <li><i>iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas;</i></li> <li><i>iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or</i></li> <li><i>v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister".</i></li> </ul>	
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The abovementioned list is hereinafter referred to as "the listed activities".

The holder is herein authorised to undertake the following related to the listed activities:

The proposed development entails the development of camp sites and tourist facilities on the Farm Blinkwater No. 472, Citrusdal.

Two new camping sites (camp sites A and B) will be established adjacent to the riparian zone on the southern bank of the Elandskloof River. A glamping site will be established along the northern bank of the River. The total development footprint will be approximately 1.5ha to 2.5ha.

Two existing houses on the farm will be utilised as guest cottages and no additional cottages will be constructed.

Camp sites:

Approximately 40 stands will be established across two areas. Area A is approximately 6660m<sup>2</sup> (0.66ha comprising of 30-34 camp sites) and Area B is approximately 1650m<sup>2</sup> (0.17ha comprising of 4-6 camp sites). The camp sites will comprise of a level grassed area with an electricity point. Camp sites A and B will be serviced by an ablution block which will be shared between the different sites and water and electricity points will be located at the individual sites.

Ablution facilities:

An ablution facility will be established within the footprint of each camping site and will include toilets, shower and washing up facilities. Camp site A will have two ablution facilities since an existing camp site with a lapa/communal braai, pool and ablution block already exist on camp site A.

Glamping sites:

10-12 glamping sites of approximately 5100m<sup>2</sup> (0.51ha) will be established. The proposed glamping sites will consist of permanent safari tents which will be paced on wooden platforms.

Routine maintenance of the watercourse will also be undertaken. Working for Water was approached to assist with the removal of black wattle and other alien invasive trees. The removal of the trees therefore necessitates the stabilisation of the riverbank with indigenous vegetation. Alien vegetation will be monitored and removed as and when required.

### C. LOCATION AND SITE DESCRIPTION

The listed activities will be undertaken on the Farm Blinkwater No. 472, Citrusdal.

The farm is located immediately adjacent to the R310 between Ceres and Citrusdal.

The SG 21-digit code is: C02000000000047200000

Co-ordinates:

Proposed camp site A:

Latitude: 32° 37' 55.8" S

Longitude: 19° 06' 15.6" E

Proposed camp site B:

Latitude: 32° 37' 54.4" S

Longitude: 19° 06' 00.9" E

Proposed glamping site:

Latitude: 32° 37' 52.4" S

Longitude: 19° 05' 59.8" E

Refer to Annexure 1: Locality Plan and Annexure 2: Site Plan.

hereinafter referred to as "the site".

### D. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

W Nel Environmental Consulting Services (Pty) Ltd.

c/o Mr. Werner Nel

20 Gloxinia Street

**WELGEMOED**

7530

Cell: 082 447 5255

Fax: (086) 604 7737

E-mail: [info@wneecs.co.za](mailto:info@wneecs.co.za)

## E. CONDITIONS OF AUTHORISATION

### Scope of authorisation

1. The holder is authorised to undertake the listed activities specified in Section B above in accordance with and restricted to the preferred alternative, described in the BAR dated 18 December 2020 on the site as described in Section C above.
2. Authorisation of the activities is subject to compliance with the conditions set out in this Environmental Authorisation. The holder must ensure compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.
3. The holder must commence with, and conclude, the listed activities within the stipulated validity period which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority.

This Environmental Authorisation is granted for–

- (a) A period of five (5) years, from the date of issue, during which period the holder must commence with the authorised listed activities; and
  - (b) A period of five (5) years, from the date the holder commenced with an authorised listed activity, during which period the authorised listed activities for the construction phase, must be concluded.
4. The activities that have been authorised may only be carried out at the site described in Section C above in terms of the approved EMPr.
  5. Any changes to, or deviations from the scope of the description set out in Section B and Condition 2 above must be accepted or approved, in writing, by the competent authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the competent authority may request such information to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.

### Notification of authorisation and right to appeal

6. The holder of the authorisation must in writing, within 14 (fourteen) calendar days of the date of this decision –
  - 6.1 notify all registered interested and affected parties ("I&APs") of –
    - 6.1.1 the outcome of the application;
    - 6.1.2 the reasons for the decision;
    - 6.1.3 the date of the decision; and
    - 6.1.4 the date of issue of the decision;
  - 6.2 draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended);

- 6.3 draw the attention of all registered I&APs to the manner in which they may access the decision; and
- 6.4 provide the registered I&APs with:
  - 6.4.1 the name of the holder (entity) of this Environmental Authorisation,
  - 6.4.2 name of the responsible person for this Environmental Authorisation,
  - 6.4.3 postal address of the holder,
  - 6.4.4 telephonic and fax details of the holder,
  - 6.4.5 e-mail address, if any;
  - 6.4.6 the contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the National Appeal Regulations, 2014 (as amended).

### **Commencement**

7. The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notified the registered I&APs of this decision.
8. In the event that an appeal is lodged with the Appeal Administrator, the effect of this Environmental Authorisation is suspended until such time as the appeal is decided. In the instance where an appeal is lodged the holder may not commence with the activity, including site preparation, until such time as the appeal has been finalised and the holder is authorised to do so.

### **Written notice to the competent authority**

9. A minimum of 7 (seven) calendar days' notice, in writing, must be given to the competent authority before commencement of construction activities. Commencement for the purpose of this condition includes site preparation.
  - 9.1 The notice must make clear reference to the site details and EIA Reference number given above.
  - 9.2 The notice must also include proof of compliance with the following conditions described herein:  
Conditions: 6, 7 and 14.

### **Management of activity**

10. The draft Environmental Management Programme ("EMPr") dated 12 November 2020 (as compiled by W Nel Environmental Consulting Services (Pty) Ltd.) and submitted as part of the application for Environmental Authorisation is hereby approved and must be implemented.
11. An application for amendment to the EMPr must be submitted to the competent authority in terms of Chapter 5 of the EIA Regulations, 2014 (as amended) if any amendments are to be made to the outcomes of the EMPr, and these may only be implemented once the amended EMPr has been authorised by the competent authority.
12. The EMPr must be included in all contract documentation for all phases of implementation.

13. A copy of the Environmental Authorisation and the EMPr must be kept at the site where the listed activities will be undertaken. Access to the site referred to in Section C above must be granted and, the Environmental Authorisation and EMPr must be produced to any authorised official representing the competent authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein. The Environmental Authorisation and EMPr must also be made available for inspection by any employee or agent of the applicant who works or undertakes work at the site.

## **Monitoring**

14. The holder must appoint a suitably experienced Environment Control Officer ("ECO"), for the duration of the construction phase to ensure compliance with the provisions of the EMPr and the conditions contained in this Environmental Authorisation.

The ECO must–

- 14.1 be appointed prior to commencement of any construction activities commencing;
- 14.2 ensure compliance with the EMPr and the conditions contained herein;
- 14.3 keep record of all activities on site; problems identified; transgressions noted, and a task schedule of tasks undertaken by the ECO;
- 14.4 remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed;
- 14.5 provide the competent authority with copies of the ECO reports within 30 days of the project being finalized; and
- 14.6 conduct monthly site inspections during the construction phase.

## **Environmental audit reports**

15. The holder must, for the period during which the Environmental Authorisation and EMPr remain valid -
  - 15.1 ensure that the compliance with the conditions of the Environmental Authorisation and the EMPr is audited;
  - 15.2 submit an environmental audit report three months after commencement of the construction phase to the relevant competent authority and submit an Environmental Audit Report to the Competent Authority upon the completion of the construction phase; and
  - 15.3 thereafter submit an environmental audit report every five (5) years while the Environmental Authorisation remains valid.
16. The environmental audit reports must be prepared by an independent person and must address the objectives and contain all the information set out in Appendix 7 of the EIA Regulations, 2014 (as amended).

In addition to the above, the environmental audit report, must -

- 16.1 provide verifiable findings, in a structured and systematic manner, on–
  - (a) the level of compliance with the conditions of the Environmental Authorisation and the EMPr and whether this is sufficient or not; and
  - (b) the extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr and highlight whether this is sufficient or not;
- 16.2 identify and assess any new impacts and risks as a result of undertaking the activity;



- 16.3 evaluate the effectiveness of the EMPr;
  - 16.4 identify shortcomings in the EMPr;
  - 16.5 identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;
  - 16.6 indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation;
  - 16.7 include a photographic record of the site applicable to the audit; and
  - 16.8 be informed by the ECO reports.
17. The holder must, within 7 days of the submission of the environmental audit report to the competent authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and, where the holder has such a facility, be placed on a publicly accessible website.

### **Specific conditions**

18. Surface or ground water must not be polluted due to any actions on the site. The applicable requirements with respect to relevant legislation pertaining to water must be met.
19. An integrated waste management approach, which is based on waste minimisation and incorporates reduction, recycling, re-use and disposal, where appropriate, must be employed. Any solid waste must be disposed of at a waste disposal facility licensed in terms of the applicable legislation.
20. Should any heritage remains be exposed during excavations or any actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape (in accordance with the applicable legislation). Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains include archaeological remains (including fossil bones and fossil shells); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features; rock art and rock engravings; shipwrecks; and graves or unmarked human burials.

A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.

21. The holder of the Environmental Authorisation must, at all times, ensure that the activities comply with the Noise Regulations in terms of the relevant legislation.
22. The following recommendations provided in the Freshwater Assessment Report dated March 2020 and compiled by BlueScience, as included in the EMPr, must be implemented:
- 22.1 A Maintenance Management Plan ("MMP") must be compiled for the farm to advise on activities such as sediment removal, invasive alien vegetation, any nuisance growth of indigenous instream vegetation and repairs to infrastructure within the watercourse as well as the watercourse integrity.
  - 22.2 The MMP must be submitted to the competent authority for approval before commencement of operation.

- 22.3 The proposed camp sites must be set back at least 10m from the top of bank of the watercourse.
  - 22.4 The glamping sites must be established such that they comprise of an elevated platform that will prevent the need to clear a footprint for each site.
  - 22.5 The riparian zones of the river must be kept clear of invasive alien plants.
  - 22.6 The invasive alien vegetation must be cleared/controlled according to recommended alien vegetation clearing methods such as provided by the Working for Water and the woody debris must be removed from the river channel.
  - 22.7 The advice of a suitably qualified rehabilitation specialist must be obtained to guide the alien vegetation clearing and revegetation of the riparian zones of the river. Selected alien trees can be retained until such time as the new vegetation provides sufficient cover.
  - 22.8 Planting of faster growing local indigenous trees such as the Cape willow can be used to establish an initial vegetation cover while slow growing wild almond and wild olive trees become established.
  - 22.9 The river channel and banks may not be modified as a result of the proposed camp site establishment.
  - 22.10 The proposed camp sites may not be filled in and all structures, with the exception of the ablution facilities and the services to each camp site, must be temporary and not hard structures.
  - 22.11 The secondary channel to the north of the river within the proposed glamping site must be retained and rehabilitated.
  - 22.12 The highly invasive kikuyu grass *Pennisetum clandestinum* may not be planted within the camp sites along the river. Indigenous grasses such as Buffalo grass or kweek may be used.
  - 22.13 The ablution facilities for the proposed camp sites must be placed as far away from the watercourse at the foot of the hillslopes within the camp sites.
  - 22.14 No new structures such as weirs may be built within the stream for the provision of water.
  - 22.15 The access roads and services must be placed on the hillslope sides of the proposed camp sites to minimise the disturbance activities immediately adjacent to the riparian zone. The roads must comprise of permeable material.
23. The Holder of the EA must keep accurate record in a register of when the conservancy tanks are emptied by the appointed contractor and must be produced to any authorised official representing the competent authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.

24. A firebreak must be established on the southern side of the camp site above the road and the firebreak must be regularly maintained and monitored to ensure that it is not invaded by alien invasive shrubs and trees.
25. The requirements of the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993), must be adhered to.

### **General matters**

1. Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the listed activities.
2. If the holder does not commence with the listed activities within the period referred to in Condition 3, this Environmental Authorisation shall lapse for the activity, and a new application for Environmental Authorisation must be submitted to the competent authority. If the holder wishes to extend the validity period of the Environmental Authorisation, an application for amendment in this regard must be made to the competent authority prior to the expiry date of the Environmental Authorisation.
3. The holder must submit an application for amendment of the Environmental Authorisation to the competent authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. If a new holder is proposed, an application for amendment in terms of Part 1 of the EIA Regulations, 2014 (as amended) must be submitted.

Please note that an amendment is not required if there is a change in the contact details of the holder. In this case, the competent authority must only be notified of such changes.

4. The manner and frequency for updating the EMPr is as follows:  
Amendments to the EMPr, other than those mentioned above, must be done in accordance with Regulations 35 to 37 of the EIA Regulations, 2014 (as amended) or any relevant legislation that may be applicable at the time.
5. Non-compliance with a condition of this Environmental Authorisation or EMPr may render the holder liable to criminal prosecution.

## **F. APPEALS**

Appeals must comply with the provisions contained in the National Appeal Regulations, 2014 (as amended).

1. An appellant (if the holder of the decision) must, within 20 (twenty) calendar days from the date notification of the decision was sent to the holder by the competent authority -
  - 1.1 Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations, 2014 (as amended) to the Appeal Administrator; and
  - 1.2 Submit a copy of the appeal to any registered I&APs, any Organ of State with interest in the matter and the decision-maker *i.e.*, the competent authority that issued the decision.

2. An appellant (if NOT the holder of the decision) must, within 20 (twenty) calendar days from the date the holder of the decision sent notification of the decision to the registered I&APs -
  - 2.1 Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations, 2014 (as amended) to the Appeal Administrator; and
  - 2.2 Submit a copy of the appeal to the holder of the decision, any registered I&AP, any Organ of State with interest in the matter and the decision-maker *i.e.*, the competent authority that issued the decision.
3. The holder of the decision (if not the appellant), the decision-maker that issued the decision, the registered I&AP and the Organ of State must submit their responding statements, if any, to the appeal authority and the appellant within 20 (twenty) calendar days from the date of receipt of the appeal submission.
4. The appeal and the responding statement must be submitted to the address listed below:

By post:           Attention: Mr. Marius Venter  
Western Cape Ministry of Local Government, Environmental Affairs  
and Development Planning  
Private Bag X9186  
CAPE TOWN  
8000

By facsimile:   (021) 483 4174; or

By hand:           Attention: Mr. Marius Venter (Tel: 021 483 3721)  
Room 809  
8<sup>th</sup> Floor Utilitas Building, 1 Dorp Street, Cape Town, 8001

**Note:** For purposes of electronic database management, you are also requested to submit electronic copies (Microsoft Word format) of the appeal, responding statement and any supporting documents to the Appeal Authority to the address listed above and/ or via e-mail to [DEADP.Appeals@westerncape.gov.za](mailto:DEADP.Appeals@westerncape.gov.za).

5. A prescribed appeal form as well as assistance regarding the appeal processes is obtainable from Appeal Authority at: Tel. (021) 483 3721, E-mail [DEADP.Appeals@westerncape.gov.za](mailto:DEADP.Appeals@westerncape.gov.za) or URL <http://www.westerncape.gov.za/eadp>.

## G. DISCLAIMER

The Western Cape Government, the Local Authority, committees or any other public authority or organisation appointed in terms of the conditions of this environmental authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.

Your interest in the future of our environment is appreciated.

Yours faithfully

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**MR. ZAAHIR TOEFY**  
**DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)**

**DATE OF DECISION: 28 APRIL 2021**

CC: (1) Mr. Werner Nel (Werner Nel Environmental Consulting Services (Pty) Ltd.)  
(2) Ms. Danné Joubert (Cederberg Municipality)

E-mail: [info@wnecs.co.za](mailto:info@wnecs.co.za)  
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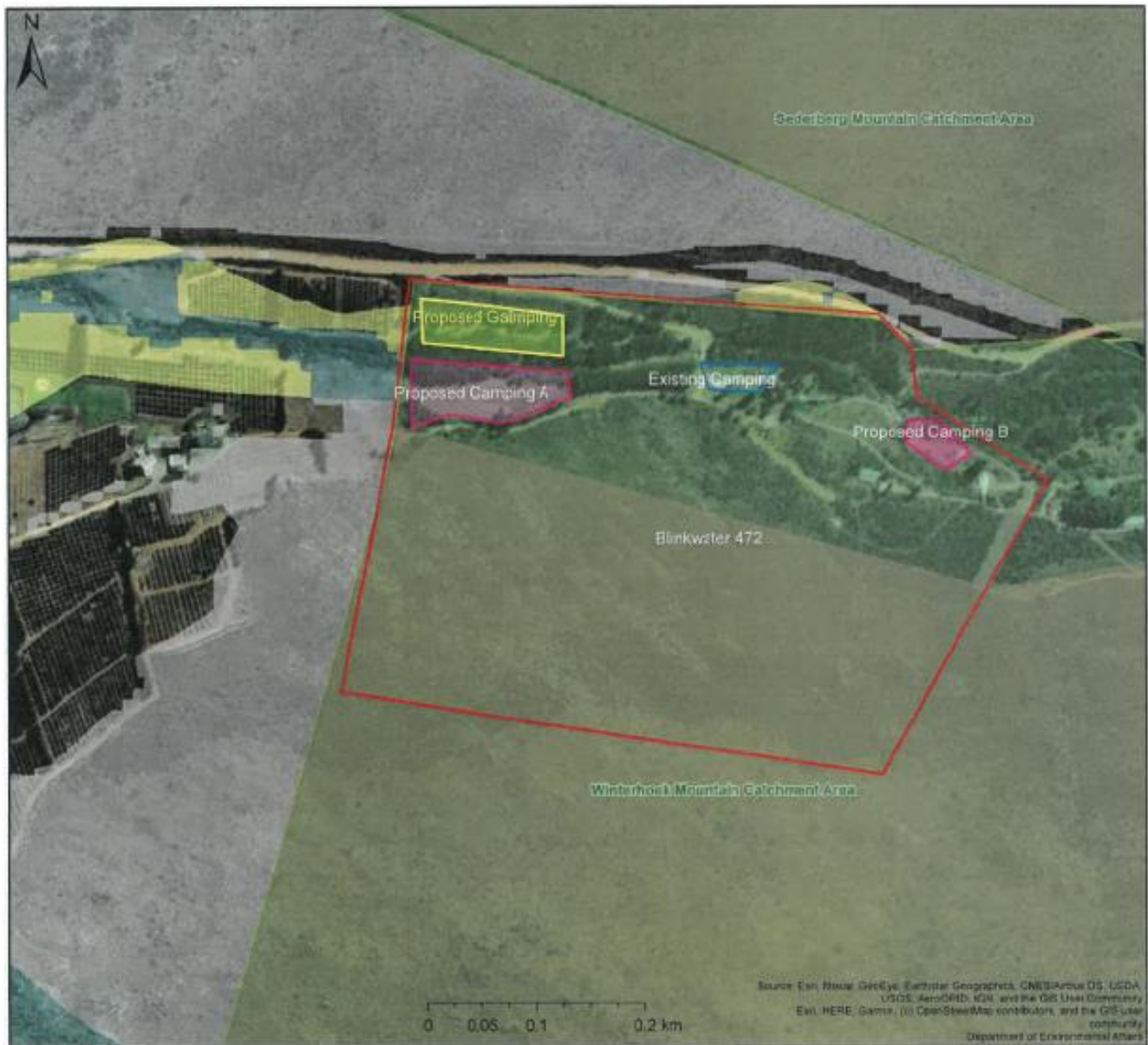
## ANNEXURE 1: LOCALITY PLAN



## ANNEXURE 2: SITE PLAN



## ANNEXURE 2: SITE PLAN





## **ANNEXURE 3: REASONS FOR THE DECISION**

In reaching its decision, the competent authority, *inter alia*, considered the following:

- a) The information contained in the Application Form received by the competent authority on 17 September 2020; the BAR dated 18 December 2020; the EMPr submitted together with the BAR; the comment from the Western Cape Department of Agriculture received by the competent authority on 17 February 2021; and the additional information received by the competent authority on 16 April 2021;
- b) The objectives and requirements of relevant legislation, policies and guidelines, including section 2 of the NEMA;
- c) The comments received from I&APs and the responses provided thereon, as included in the BAR dated 18 December 2020;
- d) No site visits were conducted. The competent authority had sufficient information before it to make an informed decision without conducting a site visit.

All information presented to the competent authority was taken into account in the consideration of the application for environmental authorisation. A summary of the issues which, according to the competent authority, were the most significant reasons for the decision is set out below.

### **1. Public Participation**

The Public Participation Process comprised of the following:

- Notices were placed at the Citrusdal Lodge, the Spar in Citrusdal, at the Blinkwater campsite and the Citrusdal Public Library;
- An advertisement was placed in the "Ons Kontrei" newspaper on 13 November 2020;
- E-mails were sent on 16 November 2020 to advise I&APs about the availability of the draft BAR;
- Background Information Documents were e-mailed and/or posted via registered post on 16 November 2020;
- Follow-up e-mails were sent on 27 November 2020 regarding the commenting period on the draft BAR;
- A copy of the draft BAR was placed at the Citrusdal Public Library and the Citrusdal Lodge on 11 December 2020;
- An electronic copy of the draft BAR was made available for download via a link via on DropBox on 13 November 2020; and
- The draft BAR was made available from 13 November 2020 until 14 December 2020.

### **Authorities consulted**

The authorities consulted included the following:

- West Coast District Municipality;
- Cederberg Municipality;
- Western Cape Department of Agriculture;
- CapeNature;
- Department of Water and Sanitation; and
- Heritage Western Cape.

The competent authority is satisfied that the Public Participation Process that was followed met the minimum legal requirements. All the comments and responses and objections that were raised were responded to and included in the BAR.

## 2. Alternatives

The farm is not a viable agricultural unit due to the topography and associated development costs. Furthermore, should this agricultural option be pursued, indigenous vegetation will have to be cleared and the mountainous area be stabilized to allow for cultivation.

### Preferred layout alternative – herewith authorised:

The preferred alternative entails the development of campsites and tourist facilities on the Farm Blinkwater No. 472, Citrusdal.

Two new camping sites (camp sites A and B) will be established adjacent to the riparian zone on the southern bank of the Elandskloof River. A glamping site will be established along the northern bank of the River. The total development footprint will be approximately 1.5ha to 2.5ha.

Two existing houses on the farm will be utilised as guest cottages and no additional cottages will be constructed.

### Camp sites:

Approximately 40 stands will be established across two areas. Area A is approximately 6660m<sup>2</sup> (0.66ha comprising of 30-34 camp sites) and Area B is approximately 1650m<sup>2</sup> (0.17ha comprising of 4-6 camp sites). The camp sites will comprise of a level grassed area with an electricity point. Camp sites A and B will be serviced by an ablution block which will be shared between the different sites and water and electricity points will be located at the individual sites.

### Ablution facilities:

An ablution facility will be established within the footprint of each camping site and will include toilets, shower and washing up facilities. Camp site A will have two ablution facilities since an existing camp site with a lapa/communal braai, pool and ablution block already exist on camp site A.

### Glamping sites:

10-12 glamping sites of approximately 5100m<sup>2</sup> (0.51ha) will be established. The proposed glamping sites will consist of permanent safari tents which will be paced on wooden platforms.

Routine maintenance of the watercourse will also be undertaken. Working for Water was approached to assist with the removal of black wattle and other alien invasive trees. The removal of the trees therefore necessitates the stabilisation of the riverbank with indigenous vegetation. Alien vegetation will be monitored and removed as and when required. The preferred alternative will be situated on previously cultivated land.

### "No-Go" Alternative:

This alternative entails maintaining the *status quo* and as such, the proposed tourist facilities will not be established. This alternative was not deemed as preferred as it would neither improve the resort facility nor the tourism in the area, nor would the riparian habitat be improved.

## 3. Impacts, assessment and mitigation measures

### 3.1 Activity Need and Desirability

The majority of the surrounding farms are active agricultural units with some farms providing various forms of accommodation and camping facilities to tourists.

Tourism is considered one of the main socio-economic drivers in the Western Cape Province, especially the greater Cederberg area. The location of the proposed development on the farm will act as a gateway to the Cederberg and surrounds. Furthermore, tourism is also considered to be the fastest growing industry in the area. The

natural environment and its assets place the area in a favourable position of becoming one of the leading tourism destinations for adventure seekers in the Province.

The proposed development is in line with the Municipal Spatial Development Framework as the proposal will have no impact on the existing activities on the property. The development will promote tourism and will strengthen the tourism infrastructure in the area.

The proposed development will provide current and future accommodation needs and also provide further benefits for local businesses. The proposed development supports the strategic objectives of the Integrated Development Plan, 2017-2022, such as:

- Tourism development, transformation and marketing;
- Tourism funding and resource mobilization; and
- Tourism monitoring and evaluation.

Part of the strategic objectives focus on unlocking the tourism potential of the Cederberg through the development of a range of new and existing tourism products, experiences and events that fulfill visitor requirements and maximize income, which the proposed development addresses.

### 3.2 Botanical Impacts

A Botanical Baseline Assessment Report dated 15 April 2020 was compiled by Bergwind Botanical Surveys & Tours CC to assess the potential botanical impacts associated with the proposed development.

According to the Botanical Baseline Assessment Report, the site has been transformed or has very small patches of natural vegetation.

The disturbance of the Farm Blinkwater is due to three sources, *i.e.*, fire, agricultural activities and clearing of woody alien invasive plants. The fires have mostly affected the distribution of tall proteoid fynbos. As such, with intermittent fires, the camp sites must be protected by a firebreak along the contours above the camp sites and along the lower slopes of Meulsteenkop. The R310 road provides an effective firebreak between the fynbos and the proposed camp sites on the northern side.

The site is located in an area of Cederberg Sandstone Fynbos. However, the zone of impact of the proposed camp sites is in a valley where the Elandskloof River flows, hence azonal riparian vegetation occurs along the river. No deep sandy areas supporting large stands of restios typical of some parts of the Cederberg occur on the farm. Cederberg Sandstone Fynbos now only occurs on the upper north-facing slopes on the farm, above the proposed camp sites, and none occur on the proposed camp sites itself.

The eastern side of the newly proposed camp site B had previously been invaded by invasive alien plants and was cleared. Lawn has subsequently been planted and is irrigated. On the northern side is some remaining riparian vegetation and on the southern side is an embankment (below a gravel road) that supports a stand of *Searsia angustifolia* as well as a few other fynbos species and some exotic black wattles that have not yet been removed. *Searsia pendulina*, an indigenous tree species not native to the Cederberg, has been planted in camp site B for shade. This species is desirable since it is not invasive. The lawn is exotic Kikuyu grass.

The area earmarked for the proposed glamping site, on the northern side of the river, is highly disturbed and invaded by black wattle.

Some old pine and wattle trees have been left in place so that the site is not barren. A rock outcrop is found on the southern side of camp site A.

The proposed development will have a negligible effect on Cederberg Sandstone Fynbos and will also have a minimal effect (negative or positive) on the riparian vegetation since this vegetation will be kept, to provide a positive ambience for the camp site.

The proposed camp sites will have a very low negative impact on indigenous vegetation and the removal of alien plants will ultimately have a positive effect, not only on the local camp site, but on the groundwater as well.

The only area of concern from a botanical perspective is the requirement to clear a firebreak along the contour above the camp sites. The tall shrub component of the undisturbed Cederberg Sandstone Fynbos will have to be removed, but will not require ploughing the soil. The loss of *Protea laurifolia* shrubs will be localized and since this species is not threatened in any way, the loss of these tall shrubs is acceptable. The impact will be medium negative without mitigation and low negative with mitigation.

The principal mitigation will be the continued removal of alien invasive trees and monitoring of regrowth. The removal of the trees will reduce the fire-hazard.

### 3.3 Freshwater Impacts

A Freshwater Assessment Report dated March 2020 was compiled by BlueScience to assess the potential freshwater impacts associated with the proposed development.

The proposed camp sites will be established adjacent to the Elandskloof River, a tributary of the Boontjies River in the Olifants River System near Citrusdal. The Elandskloof River is a perennially flowing watercourse.

The Elandskloof River upstream and into the site has been mapped as an aquatic Critical Biodiversity Area (wetland). Downstream of the site, the river has been mapped as an aquatic Ecological Support Area (wetland or watercourse). Seep areas occur on the hillslope adjacent to but outside of the site. These features will not be impacted by the proposed activities.

The Elandskloof River has good aquatic habitat with both instream and riparian fringing vegetation. The river condition at the site can be considered to be still in a moderately modified ecological condition.

The riparian zone of the Elandskloof River is in a moderately modified ecological state at the site as a result of upstream flow modification activities as well as habitat modification within the river reach at the site. The instream habitat of the Elandskloof River is largely natural to moderately modified. The major impacts to the instream habitat integrity are flow modification and physical disturbances to the watercourse channel and bed.

The present ecological status of the Elandskloof River and its associated wetlands is largely natural to moderately modified and should be maintained in its current ecological condition of a B/C Category.

The Freshwater specialist has therefore recommended a number of mitigation measures to minimise potential impacts on the watercourse. The potential freshwater impacts will be of a low negative significance prior to mitigation and very low significance post mitigation. These mitigation measures have been included in the EMP and conditions of this Environmental Authorisation.

### 3.4 Waste impacts

The sewage will be contained into conservancy tanks and regularly emptied by the appointed contractor. The current sewage system has a remote alarm system, which conveys a warning signal to indicate that the tanks are at a certain volume. This allows for enough time for the tanks to be emptied by the contractor.

### 3.5 Heritage impacts

According to the site assessment conducted by ACO Associates in December 2019, no artefacts or archaeological resources were identified. Heritage Western Cape confirmed in correspondences dated 30 January 2020 and 10 December 2020 that no further studies are required in terms of Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999).

### 3.6 Dust, traffic, noise and visual impacts

Potential dust, noise and visual impacts are anticipated during the construction phase. However, no significant potential traffic, dust, noise and visual impacts are anticipated as these impacts will be mitigated by the implementation of the mitigation measures included in the EMPr.

The development will result in both negative and positive impacts.

#### **Negative Impacts:**

- Potential water quality impacts.
- Potential noise and visual impacts.
- Loss of indigenous/riparian vegetation.

#### **Positive impacts:**

- Some employment opportunities will be created during the construction and operational phases of the development.
- Removal of alien invasive trees, which will reduce the potential fire hazard.
- Strengthening of the tourism sector in the Cederberg area.

#### **National Environmental Management Act Principles**

The National Environmental Management Act Principles (set out in section 2 of the NEMA, which apply to the actions of all Organs of State, serve as guidelines by reference to which any Organ of State must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), *inter alia*, provides for:

- the effects of decisions on all aspects of the environment to be taken into account;
- the consideration, assessment and evaluation of the social, economic and environmental impacts of activities (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment;
- the co-ordination and harmonisation of policies, legislation and actions relating to the environment;
- the resolving of actual or potential conflicts of interest between Organs of State through conflict resolution procedures; and
- the selection of the best practicable environmental option.

In view of the above, the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the EMPr, the competent authority is satisfied that the proposed listed activities will not conflict with the general objectives of integrated

environmental management stipulated in Chapter 5 of the NEMA and that any potentially detrimental environmental impacts resulting from the listed activities can be mitigated to acceptable levels.

You are reminded of your general duty of care towards the environment in terms of Section 28(1) of the NEMA which states: *“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.”*

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