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Your Ref: DC29/0019/2011

Mr Hlalelo Makwabe
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Dear Mr Makwabe

Addendum to the peer reviewed Tinley Manor South Banks Coastal Impact Assessment: 2015

Background

In early 2010, the Coastal Unit of Royal HaskoningDHV (then operating as SSI Engineers & Environmental Consultants) prepared a coastal assessment report for the Tinley Manor and Tugela landholdings of Tongaat Hulett to evaluate the environmental opportunities and constraints of these areas from a coastal development feasibility perspective. Subsequently, a follow-up development planning exercise for the Tinley Manor landholdings was undertaken.

In 2012 Royal HaskoningDHV initiated the required environmental impact assessment process for the proposed Tinley Manor Southbanks Coastal Development. In 2015, a specialist coastal impact assessment was undertaken, which was subsequently peer reviewed. This report highlighted the various aspects and activities of the proposed development which could potentially impact on the coastal environment.

The Tinley Manor South Banks design concept and planned layout has since been updated and refined. In summary, key amendments would appear to include:

- Amendment of previous fully gated estate concept to a new mixed use village scheme;
- Removal of agricultural concept (market gardening, banana plantations, orchards, and irrigation ponds etc.) and landscape strategy;
- Amendment from the previously proposed four resort nodes to a single resort node;
- Amendment of previous resort nodes to residential development (single residential and planned unit development);



- Increase in planned development areas (159.30ha previously identified developable area increased to 179.45ha developable area of the total area of 473.81 ha which equates to an increase from 33.62%¹ developable to 37.87% developable);
- Consolidation of wetland areas, proposed attenuation facilities, buffers, recreation areas, conservation and proposed agricultural uses into a single conservation zoning; and
- Areas previously identified for rehabilitation (falling outside the site boundary) are now excluded.

It is noted that the overall concept continues to propose, as previously, the optimal development of the site without compromising its environmental character and function. The updated design continues to capitalise on the undulating landscape, wetland areas and coastal vegetation as part of an eco-centric design concept, which includes both direct and indirect interactions with the uMhlali Estuary, through the numerous drainage lines, wetland areas, estuary and the shoreline.

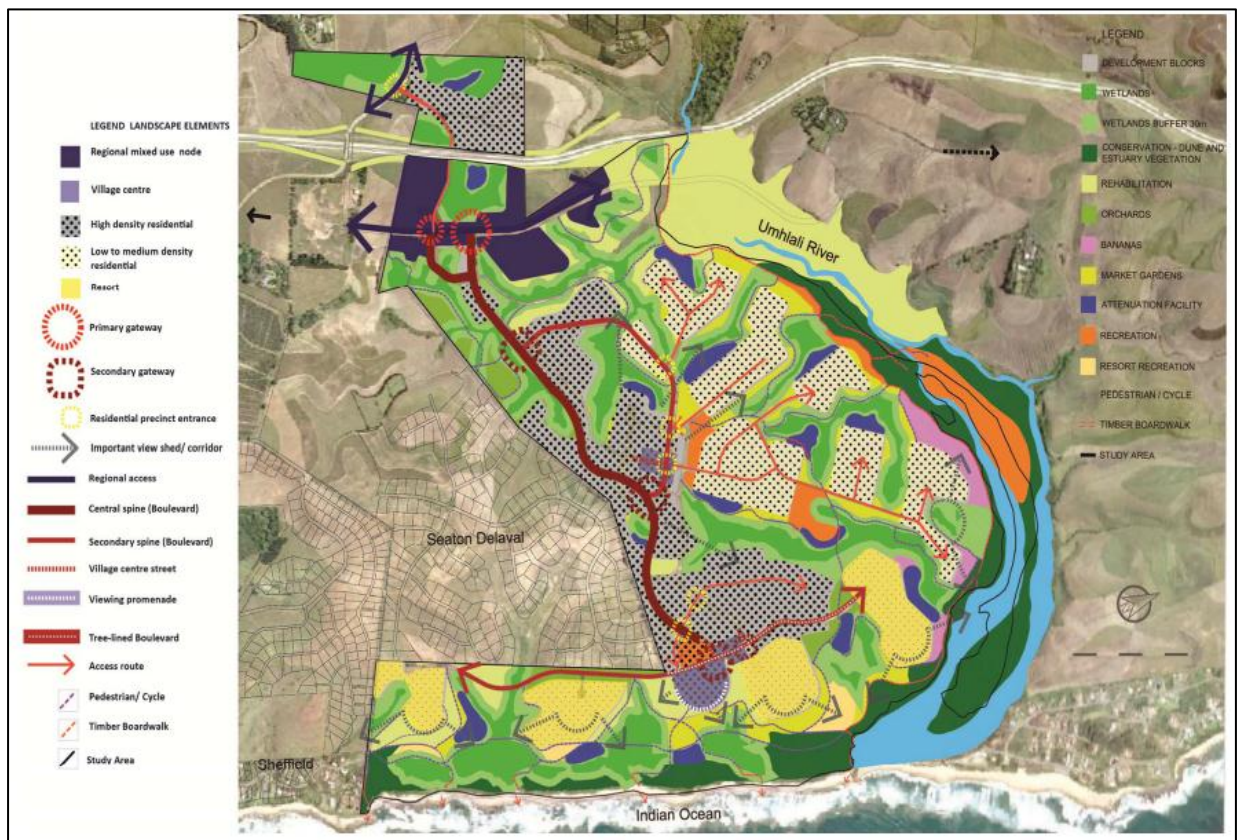


Figure 1: Original Landscape Strategy

¹ It should be noted that the percentage of developable area included in the original coastal impact assessment was incorrectly stated as 36.32% and not 33.62%. The developable area stated was however correct.

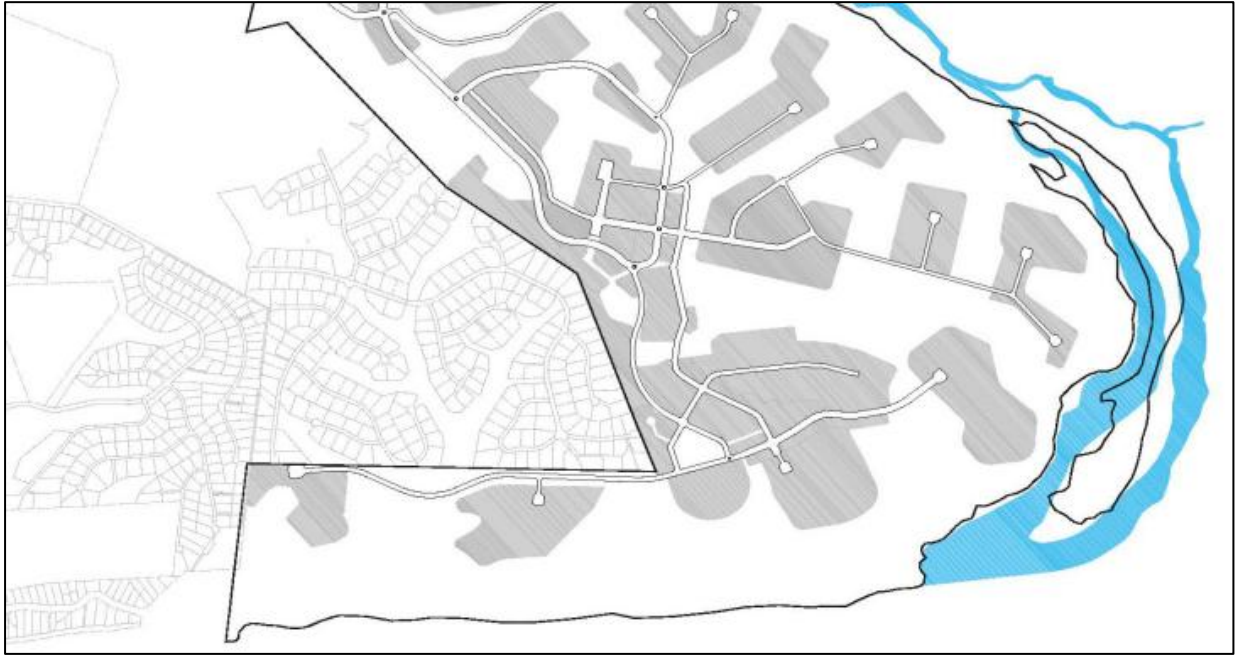


Figure 2: Applicable portion of Original Block Layout

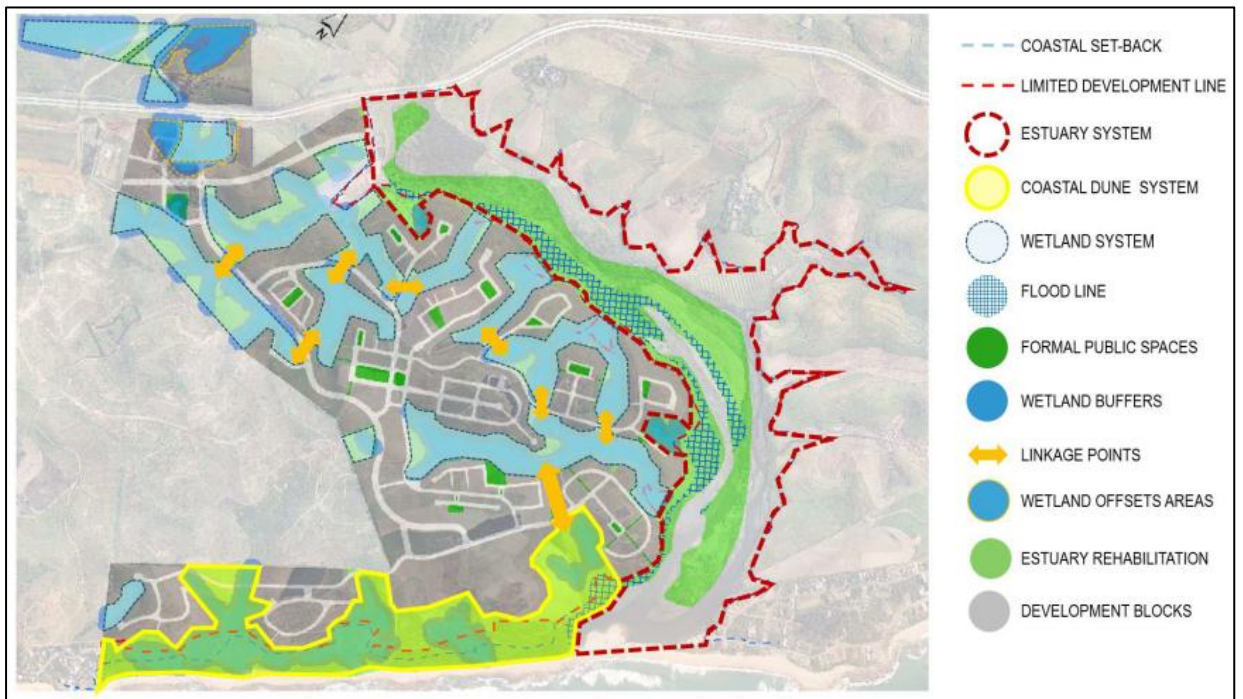


Figure 3: Updated Block Layout and Environmental Framework

Comments and recommendations

Comments and recommendations relating to these changes are provided as follows, based on the initial assessment methodology applied and potential impacts previously identified:

1. Climate change vulnerability –
No additional impacts noted or mitigation proposed. The proposed development remains back from the identified coastal hazard zone as well as limited development line.
2. Pollution –

The additional residential areas and road network proposed to be developed could imply potential additional solid waste and increased contaminated run-off which would need to be mitigated as previously detailed. The move away from the previously proposed agricultural concept implies reduced negative impacts from fertilizers and pesticides.

3. Stormwater runoff and contamination –

The incorporation of portions of the identified attenuation ponds within proposed development areas as the remaining areas inclusion within the conservation zoned open space are noted with concern. The former reducing the size of ponds dictated by the stormwater management plan while the latter, proposing development within the conservation zone setting potentially dangerous precedent. This matter will be addressed as part of the stormwater management plan.

4. Soil erosion –

No additional impacts noted or mitigation proposed.

5. Protection of coastal vegetation and natural habitats

No additional impacts noted or mitigation proposed other than slightly reduced size of conservation / green areas.

6. Use of natural resources –

The number of potential users could potentially increase with the increased developable area as well as the change in land use from resort to residential. The need to manage the remaining open space system holistically is therefore reiterated. Applicable / responsible coastal access previously proposed with access to and within sensitive areas managed/ controlled via pedestrian systems and elevated boardwalks, should be maintained.

7. Sense of place –

No additional impacts noted or mitigation proposed.

8. Amenity/ recreational opportunities -

While not part of this specific environmental impact assessment, the investigation of the provision of a safe swimming beach to accommodate the needs of both the resort and local residents is noted. Should this investigation and subsequent development application be successful, it is noted that the nature of usage of this beach will still be constrained and unable to support high intensity usage, predominately as a result of the adjacent topography as well as lack of vehicular access. It is noted that emergency vehicular access to the proposed public beach and accompanying amenity will be required, as a direct result of the potential risks associated with the use of this beach.

9. Coastal access –

Initial concerns regarding the previous gated-estate concept were noted and subsequently addressed. Mitigation measures previously proposed still apply.

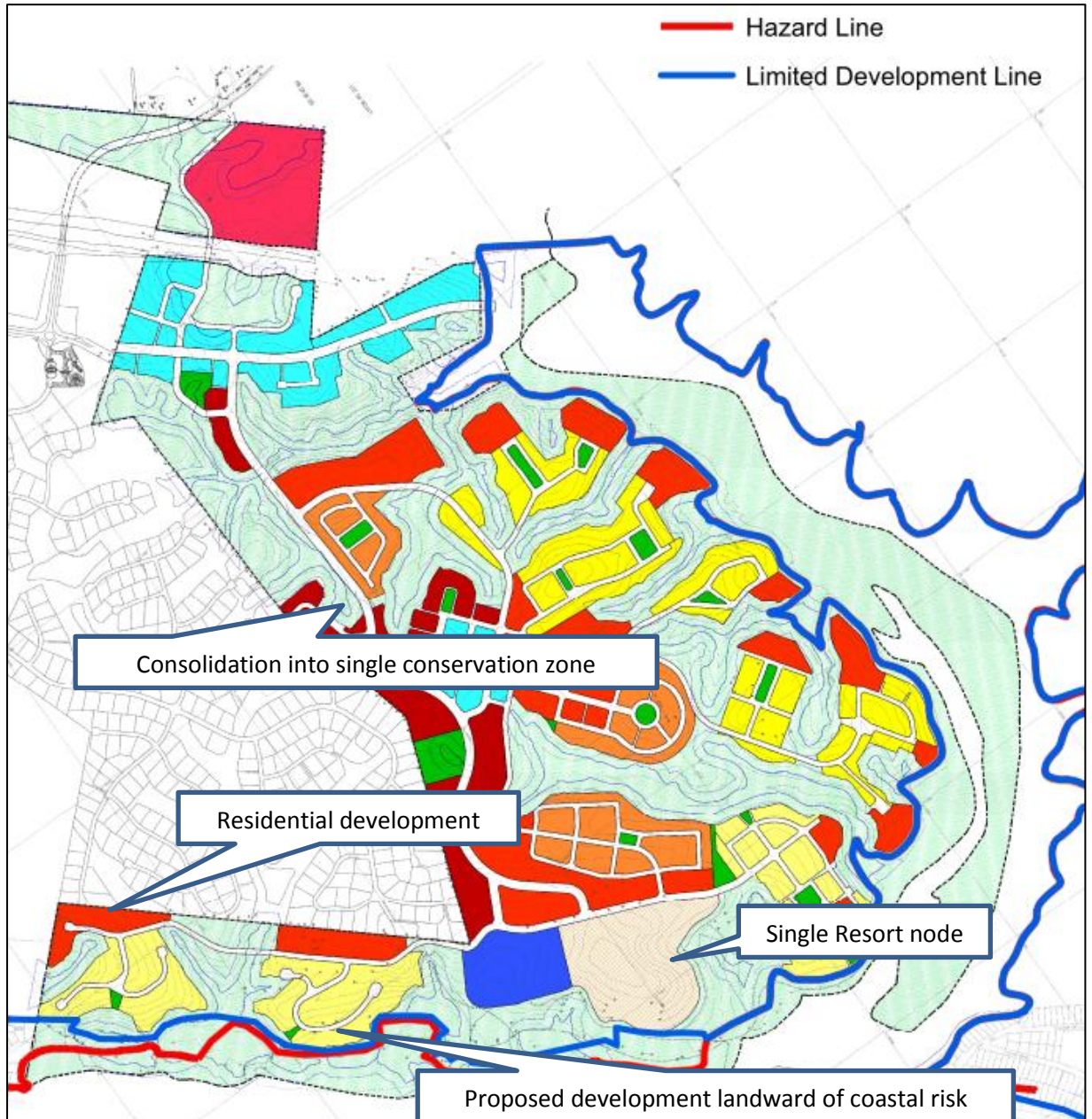


Figure 4: Annotated updated layout including hazard and limited development lines

Conclusion

The deviations from the original design concept and layout, upon which the original impact assessment and specialist comments were made, are not considered to have a significant additional impact on the coastal environment provided that the above-mentioned recommendations are heeded.

No amendment to the assessment criteria is considered necessary.

Yours sincerely,

Tandi Breetzke

Principal Specialist and Leading Professional: Coastal Management