



COASTWATCH KZN

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VIRGINIA BEACH PROPOSED BEACH BOMA

COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (BAR):

Coastwatch, WESSA Durban Branch and Birdlife Port Natal, non-governmental organisations formed by volunteers and operating with support of people interested and/or affected by issues relating to the area share interest in development and change of land use applications in the eThekweni area. The organisations serve to ensure that development in the eThekweni area is appropriate, sustainable and legally compliant. The following comments are submitted on behalf of these organisations.

From the outset we note concern with the proposed project (beach boma and associated infrastructure) and consider the report to be deficient in a number of respects which gives rise to the situation where the EAP and the authorities are in a position where they are unable to make a decision on the matter. We are of the opinion that analysis of the site (which although zoned "airport" is recognised as a site with conservation value) would support retreating all infrastructure from the back beach and dune cordon, and together with a more formalised access this would fulfil the requirements of coastal managers at a reduced cost to the taxpayer.

1. The Specialist Report: "Virginia Airport Proposed Widening of informal beach access roadway - Vegetation Mapping"

The terms of reference for the study are not given and the content of the report is aligned with its title description ie vegetation mapping. It offers no interpretation on the functional aspects of the vegetation.



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The lack of analysis provided in the basic assessment report is apparent. It is evident that a simple “vegetation assessment” cannot suffice as “specialist input” to the BAR. The specialist report is, at best, a list of plants encountered in the area under consideration. This amounts to a horticultural exercise, where no analyses or interpretation is given on the information presented, nor is there any attempt to look at the relationship between geomorphology and habitat structure and form.

The specialist identifies two habitat types, an early seral stage and more definitive dune forest structure, yet does not comment on the evidence before him, which speaks volumes on the coastal processes at work at this point. Quite clearly, there is a need to consider the site from an historical perspective, given the significant changes wrought in the region over the last 100 years, particularly with the establishment of the Virginia airport, which changed the backdune landscape.

In our opinion, the specialist input is inadequate and does not lend itself to decision-making on the part of the EAP, the applicant, or the authorities. More analysis is required.

2. Project Description

Coastwatch recognises the need to ensure access for all to the beaches of eThekweni and applauds the initiative to upgrade and improve facilities, however it is incumbent upon the Municipality, as the guardian of coastal management in the area, to ensure that it abides by sustainable development principles, as well as those contained within the Integrated Coastal Management Act (ICMA). It is evident that in considering the proposed project, it is important to commence with an analysis of the present situation, which inevitably leads to the question, “are the existing facilities in the correct position?” As noted, the Municipality will consider simply upgrading the existing facilities if they are “unsuccessful” in their bid to establish additional facilities. Coastwatch sees no consideration of the question posed above and as such, consideration of this proposal is recommended and should in effect be considered an “alternative” to be incorporated into the BAR.

The scant information provided, in the “specialist report”, if correctly analysed, would indicate that much of the “pioneer” habitat described may be attributed to the positioning of the existing ablution facility. Possibly an ALTERNATIVE option, is

to RETREAT the ablution facility leeward and implement a low key, managed access point. It follows that the “alternative” design options provided cannot be considered to be “alternatives” as anticipated in the spirit of the NEMA EIA regulations.

3. Layout alternatives

The layout alternatives are based upon the apparent economic basis for establishing restaurants, access points etc. There appears to be little consideration of dune and beach sediment dynamics and coastal processes which would inform on the positioning or placement of the described structures. Furthermore, the addition of “dune rehabilitation” as a possible “mitigation” is noble, but is it wise? A more thorough analysis of the study area under the specialist investigations would inform on such matters from a scientific perspective, rather than an arbitrary sketch plan based on recent aerial imagery.

4. Need and Desirability

Item 11.2 of the BAR considers, “need and desirability”. It is disputed that further development of facilities in the region will “improve” the poor socio-economic state of the beach through (implied) greater public presence and control. The socio-economic problems associated with this portion of beach / dune are common to many vegetated dune areas of eThekweni and beyond, and it would be irrational to take such an approach to open space and natural habitat areas, in general. As indicated above, an assessment and understanding of the natural processes at work in this area should be the basis of any real proposal for development.

Coastwatch would also question as to why this area is being considered for such facilities? This is said, when the same undesirable social issues arise at places such as “Rocket Hut” La Lucia (a few hundred metres along the beach), where such facilities may be more easily accommodated within the back beach, in areas readily frequented by the public.

While “illegal” beach driving is a noted problem within the study area, Coastwatch understands that this has been an historical problem and is also bathed in land legal matters, which cloud the ability to manage such activities in this area. Surely beach access for vehicles could be more easily controlled through a boom gate, rather than

the construction of restaurants and other facilities on the foredune and beach system, at this point?

It must be stated that “dune rehabilitation”, is effectively a horticultural response to unstable dune systems and unfortunately, is undertaken in an *ad hoc* manner based on the anthropogenic belief that “stable dunes” are preferable to “unstable dunes”. To repeat the above, a sound investigation of the coastal dynamics in effect in this area would inform of the need and desirability of dune rehabilitation. It should be noted that in considering the species list within the “specialist report”, the dune is comparatively diverse when viewed against other similar systems. What is however important, is to consider “why” such diversity and “what” does this say about this portion of coastline? The answer is obvious, but needs to be appreciated by those advocating the development.

The term “environmentally friendly” architecture is utilised in the proposal and images of wooden, rustic structures are incorporated into the report. Coastwatch would question whether such structures would fulfil the role of “improving control” in this area? Such structures effectively do not limit people movement which, presently, is the cause of much of the perceived “deterioration” of the area. In contrast, retreating all infrastructure from the back beach and dune cordon, with a more formalised access would align with coastal management objectives, at a reduced cost to the taxpayer.

Conclusion

Given the paucity of scientific information used to motivate this proposal and the obvious conflict that this development has with both ICMA and the stated coastal policies of the Province and eThekweni Municipality, Coastwatch wishes to record its opposition to this proposal.

It is recommended that the applicant provides either stronger motivation, grounded in sound scientific rational thinking, to support the proposal, or alternatively considers other areas for the establishment of such facilities.

We appreciate the opportunity to comment - thank you for the information.

Yours faithfully

A handwritten signature in black ink, appearing to read 'C. Schwegman'. The signature is written in a cursive, flowing style.

C SCHWEGMAN