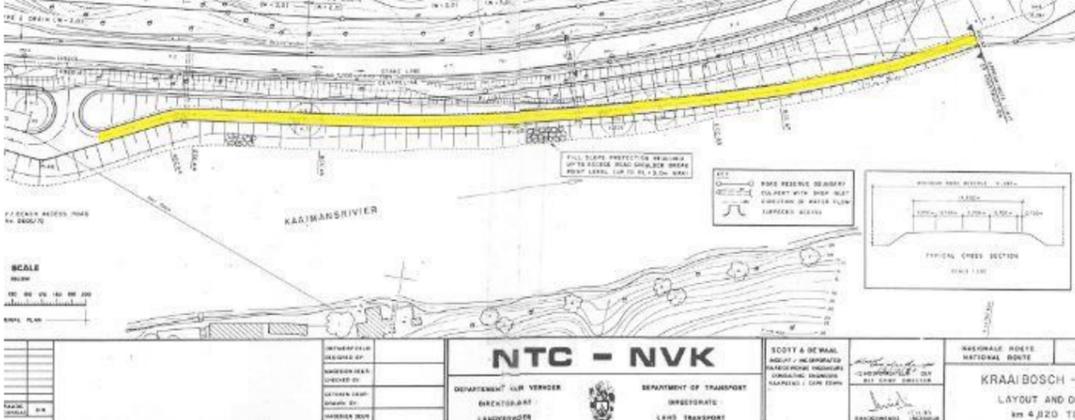


**EDEN COASTAL MANAGEMENT LINES  
COMMENTS AND RESPONSES FROM STAKEHOLDER ENGAGEMENT ROUNDS 1 & 2**

THEME	COMMENT	RESPONSE
Access	<p>George Ski Boat Club would like to register the coastal access at the Kaaimans River that functioned as the only access to the sea for launching when the river mouth is closed up.</p> <p>When the N2 upgrade took place in the 1980's the N2 was widened and this closed off the vehicle access to the beach where the club kept a small tractor that would assist in taking boats over to the sea for launching.</p> <p>As you will see from the attached N2 engineering diagram they were meant and intended to create a new small access track to the beach and the rock was dumped into the river along the edge for this purpose, however the work was not completed at the time and since then the public and specifically the George Ski Boat club have been denied access to the coast. At present the launch site is registered in the river and from there they can only access the sea when the mouth is open and the sand bank sufficiently scoured out to keep the mouth open and deep enough for access. With the reduced flow of water in the river, this only happens about every 4 years and will get less and less as the George Dam spillway level is due to be increased resulting in less frequent flow of sufficient capacity.</p> <p>As part of the N2 upgrade process currently in process they have raised this concern and request for the access to be reinstated, however to date it does not appear that this has been taken into consideration.</p> 	This point of access has been listed in the coastal access audit report for further authority follow-up
Access	Not all access points to the coastal area are mapped on the google earth file received. George Municipality has provided coastal access points as well as other amendments. Can the access points provided please be added?	At the time, only public contributions were mapped and circulated. The contributions from authorities and mapping of all formal and informal access points are contained in a separate database, and this includes the contribution from George Municipality.
Access	DEA commissioned a Situational Assessment for Ballots Bay – information contained in these reports need to be incorporated into the Eden Coastal Management Lines Coastal Access audit.	The reports have been accessed and the contents incorporated in the access audit.
Access	The road (track) down to the mouth of the Maalgate River on the western side of the river has been closed by the family who bought the land for their daughter. This road was used by fisherman for ages. The coast is not accessible anymore. This piece of land and access to the coast is not mentioned in the coastal access audit report.	This point of access has been listed in the coastal access audit report for further authority follow-up
Access	<p>Page 11</p> <ul style="list-style-type: none"> <li>• Point 9: Replace Gill with Giel</li> <li>• Point 14: Replace Colleen Bester with Corlize.</li> <li>• Point 16: Correct sentence to say – Not much more space for development but there is development potential inland – Herold's and Sandkraal farms with no significant agricultural value due to restricted access to water, but potential for development</li> <li>• Point 21: Replace Harold's with Herold's</li> </ul>	Edits have been effected.
Access	The coastal access audit report implies that historically there was public access to the beach at Koensrust. This is incorrect information and I would like you to please provide your source of this incorrect information. There was a secondary provincial road that ran from near the house at bo-puntjie to the Blombos road. This road was moved in the early 1980s so that it joined the Vermaaklikheid/Puntjie road at a previous entrance to the farm Koensrust. In the early 2000s this road was de-proclaimed by the provincial government at the request of Koensrust. In return we granted a servitude to Heuningbaai along our boundary as they were the only property owner along the road still using it as an access road to their property. The road had not been maintained by	<p>The suggested edits have been effected to the final iteration of the audit report.</p> <p>Please note that we are obliged to record all comments, concerns or complaints that are submitted by the public when we issue a call for public contributions. When responding to the comments received, we can correct any false allegations or records that were provided or clarify misconceptions. In respect of this project, we are obliged to include all the sites that were indicated as historic access points. These identified sites are subsequently verified by the municipality or any other relevant parties, as in this case by the relevant landowner.</p>

	<p>the provincial government for years and in fact was no longer visible beyond the yard at Heuningbaai.</p> <p>The road never went to the coast but in fact ran parallel to the road to Jongensfontein which it later joined. It might in fact have been an earlier road than the current Jongensfontein road.</p> <p>I would be very interested in seeing the material you have used and accessed that has informed you that this was a road to the coast at Koensrust. Failing that I would ask that you please remove any reference to historical coastal access through Koensrust.</p> <p>My lawyer who is copied in this will be writing to you in a more formal capacity.</p> <p><b>(Subsequently a lawyer's letter was received from Norman, Wink and Stephens Attorneys, Notaries and Conveyances.)</b></p>	
Access	<p>In the audit report, you refer to the Gourikwa natures reserve. Two issues need to be brought to your attention:</p> <ul style="list-style-type: none"> <li>• Histories was daar geen algemene openbare toegang tot die eiendom wat deur die staat saamgevoeg en gekonsolideer is om Gourikwa te vorm nie; sedert die staat se oorname van die eiendom in die vroeë 1980s ook nie; en sedert die staat se vervreemding van die eiendom per tender aan 'n private eienaar einde 1992 ook nie;</li> <li>• Voor die staat se oorname van die eiendom in die vroeë 1980s was daar 'n distrikspad 1522 wat openbare deurgang (nie toegang nie) gebied het. Hierdie pad is gesluit en in 1985 gedeproklameer. Tien jaar later, nadat die staat die eiendom ontruim het, het enkele hengelaars van Gouritsmond aansoek gedoen dat die pad herstel word. Die Wes-Kaapse Regering het die saak ondersoek en daarby volstaan dat die pad gedeproklameer bly – "die besluit is finaal en onherroeplik en die aangeleentheid word as afgehandel beskou". Verwysing R/P/R6/3/16&amp;18, Departement van Vervoer en Publieke Werke.</li> </ul> <p>The audit's reference to the Gourikwa Nature Reserve is thus inappropriate.</p>	<p>The suggested edits have been effected to the final iteration of the audit report.</p> <p>Please note that we are obliged to record all comments, concerns or complaints that are submitted by the public when we issue a call for public contributions. When responding to the comments received, we can correct any false allegations or records that were provided or clarify misconceptions. In respect of this project, we are obliged to include all the sites that were indicated as historic access points. These identified sites are subsequently verified by the municipality or any other relevant parties, as in this case by the relevant landowner.</p>
Access	<p>I have studied the draft coastal access points (stakeholder inputs), and note that the accesses that I sent you a while ago are not included. Were these excluded for a reason or just overlooked?</p>	<p>At the time, only public contributions were mapped and circulated. The contributions from authorities and mapping of all formal and informal access points are contained in a separate database, and this includes the contribution from Bitou Municipality.</p>
Access	<p>Thank you for the opportunity to comment on the preliminary Eden Coastal Access Audit.</p> <p>I am still waiting for feedback on my question regarding the locus standi of some of the wild and reckless claims made about so-called 'historic' coastal access routes between Gouritsmond and Still Bay.</p> <p>But I have no doubt that the Western Cape Department of Environmental Affairs and Development Planning will thoroughly research each of these unsubstantiated claims, especially in the light of the following:</p> <ul style="list-style-type: none"> <li>• Opportunistic attempts to exploit pristine marine areas for poaching activities (please refer to reports logged with Albertinia Police Station and Cape Nature, especially in recent years)</li> <li>• Opportunistic attempts to gain illegal coastal access in the Supreme Court Case between Fynbos Byere (Kosie Sauerma) and Groenkant Natuurreservaat (Case 17377 / 2009) which was rejected by the Cape High Court and the Appeal Court in Bloemfontein with costs in favour of Groenkant.</li> </ul> <p>I am also confident that the Department will comprehensively consult the Surveyor-General's office – which is the lead authority in this regard.</p>	<p>These concerns have been raised by several people and both perspectives are noted in the audit report. The audit will not pronounce on the validity of claims, but include them in the full record of contributions for further authority action.</p>
Access	<p>With regard to the traditional access paths to the beach in the Reebok/Tergniet area, these many paths have been in existence for generations and on the whole, follow the lines of the dunes, are unobtrusive and because there are a number of them, each path is not heavily used therefore the erosion is minimal and often repaired by the wind blowing sand back on to the path. If maintenance is required it is usually minimal and done by the nearest home owner. The paths are used by everyone. In contrast, with a few exceptions, the 'official' municipal steps are in constant need of repair and are often dangerous. Wooden planks/risers are often missing, the underside of concrete stairs is eroded by wave action and wind, undermining them, and the beach is littered with bricks, blocks and concrete from steps that have been undermined entirely and collapsed. The exceptions are steps that end in the mid dune area and then the path continues on the dune as with the informal paths. It should be a priority this debris from the beaches, and the remains of failed storm water works. There are steps that end in a jumble of huge rocks put there by the municipality in a failed attempt to stop erosion, these steps are particularly dangerous.</p> <p>Which brings me to my next point...Storm water attenuation. As far as I am aware there is no requirement for homeowners to slow down or attenuate storm water runoff from their properties.</p>	<p>The purpose of the audit is to identify such concerns for municipal attention and follow-up. The ideal should be that access paths be consolidated as far as possible, to limit the amount of maintenance required and damage to dune vegetation. Similarly, stormwater outlets need to be designed and maintained to prevent unnecessary and dangerous erosion.</p>

	<p>The run off from huge houses and totally hard surfaced properties is enormous and it runs straight into the streets and down to the dunes. In a number of places there are serious dongas caused by this run off. The storm water runoff needs to be managed in a way that prevents this by reducing hard surfacing, making it illegal to have roof run off discharging directly into the street and by attenuating the run off before it gets to the dunes.</p> <p>There is also a section at the bottom of De Jager Rd where the slope from the road to the beach is so steep that there has been significant slippage.</p> <p><b>(Photographs are available upon request)</b></p>	
Access	Properties with erven on the beach have their own access to the coast. These pathways erode the dunes and create wind channels which make the pathways bigger. How will you monitor the creation of private pathways to the coast through dunes and bushes?	Pathways through the dune undermine the dune. An audit will be conducted on coastal access, to check where historical, existing and desired access points are. The information collected from the delineation of Coastal Management Lines (CML) feeds into larger project that deals with coastal access.
Access	Will property owners be able to prohibit people from crossing their personal property?	Municipal functions along the coast include management of amenities and coastal access. The municipality would therefore determine and manage coastal access issues, including the securing or removal of access rights over private land.
Access	Where a proclaimed national park is present, there is conflict between SANParks and local municipality. Who overrules?	SANParks has jurisdiction over access control, but will not prohibit reasonable access. If it is a CapeNature area, then CapeNature is the implementing agent. By 2013, local municipalities were supposed to develop and implement by-laws but no municipality did this. Therefore Province decided in 2014 that they create model by-law. The Municipality would need to do an impact assessment for coastal access, the outcome of which will determine whether it is feasible. Does not necessary mean a full environmental impact assessment. Access to coast will be managed via zoning schemes and SPLUMA.
Access	Who calls the shots Eden District Municipality or George Local Municipality for access? Who pays for it?	If the Local Municipality says no, then district can check whether there is a need or Province step in. Inter-governmental relations dictate that municipalities are to get the funding for access provision. Provincial departments play facilitating roles.
Access	Why would people not want access to the beach? For example, if municipality says it's not feasible, can someone else come along and say there is a need and we will pay for it?	Yes. With providing access you need to be able to maintain it.
Access	When district and province says local must do it, and is not maintained. Local complains no money. E.g. Gwaing river mouth. The caravan park closed it for the public, but maintained it. Locals wanted access and George granted access, but the public then trashed the area. Local Municipality is not managing the area.	There must be a management plan in place. That is why the project includes an audit so people can see which areas need to be closed and where areas need to be maintained.
Access	Access to beach over property. What if people trash site. Acknowledge that local municipality need to maintain area?	The management plan for the specific access point will need to be specific in all these respects.
Access	What are the consequences for municipality who do not fulfill mandate?	The Local Municipality may get directives from Province. Action will take place to maintain the area.
Access	Reported issues to Green scorpions - nothing happened when reported that municipality are no doing anything to maintain Gwaing River Mouth. No responses.	This issue will be added to the database of access points, and the concerns specifically noted for Province's attention.
Access	Is that access to the pink line shown on maps access to the admiralty reserve?	Effectively the coastal public property, which often includes the admiralty reserve. The Admiralty reserve has significant environmental and social value. Parking areas should therefore be placed behind the sensitive area with managed access to the HWM / beach. Some property boundaries are to the HWM, which restricts access.
Access	The upper reaches of Plettenberg south are closed to the public, Plettenberg north not. Solar beach to Beacon Island hotel have facilities, the others do not.	Coastal access - previously the coastline was owned by people of South Africa in principle. In certain areas however access was denied. This could be due to legitimate reasons such as disturbance on foredunes that cause blowouts, but in other cases not. The process currently underway is to provide access and amenities where necessary.
Access	What about access for boats?	An application needs to be submitted to the correct authority. In the case of an EIA application all relevant information will be taken into account to inform decisions. The information from this study will be forwarded to Environmental Assessment Practitioners.
Access	Two years ago, access through private property was prohibited. What will this process mean for access to the coast on private property?	The purpose of the Act is to rectify such situations. The Act is not clear on implementation, but the coastal access project being undertaken should come up with some solutions.
Access	I will provide a list of all access routes to the coast for this area	Such information will be welcome and included in the audit database being compiled.
Access	How do you know where access was? Will you get someone to show you where access is?	In this respect, information from stakeholders is welcomed
Access	Do the alienated piece of land or beach belong to the owner of coastal property?	If formally alienated then likely not.
Access	How long will it take to do a complete audit of admiralty reserve?	This is unknown, but it will be a long process. By developing a strategy, a framework is put in place to assist local municipalities.
Access	Took a tour with Province regarding access between Langefontein and Buffelsfontein. Access must be kept open for the public. Letter received by municipality but property owner ignores letter from (letter provided)	This issue will be added to the database of access points, and the concerns specifically noted for Province's attention.

Access	Before I bought property, I went to department of transport to check access and transport. Got surveyor to mark beacons. How do these lines affect current and future access across coastal property?	Access must be reasonable and feasible. Make access to be sustainable and management. This process will designate nodes for access and non-access.
Access	In areas where there are mobile dunes, there are wooden pathways which are covered by sand and now useless. Why don't you liaise with municipality to tell them that its useless?	Sorting out such situations is one of the intentions of the coastal access strategy. In this case, the pathway was built without taxpayers money and responsibility for maintenance therefore becomes uncertain.
Access	Does access include boat access to sea?	Yes, but mostly pedestrian access to the beach. The ICM Act also refers to boat access as access.
Access	Does access include walkways?	Yes
Access	If I build a pathway from my house to river edge, would I need to get approval ?	This depends on an array of things, such as the design and municipal controls. It might need environmental authorisation. Start with a responsible design, and then it will be up to the municipality to determine what it may trigger and will be able to better advise further.
Access	At Vermaaklikheid, a private beach will it be affected by the lines at the Duiwenhoks	Historical issues are being considered by the Department of the Premier. It is important to know why people are trying to access the coast in order to prioritise resolution.
Access	Big debate on access to coast. About people claiming access to the sea. They have farms and fence off area to the sea.	People are not allowed to restrict coastal access. A Municipality has the mandate to formally designate access to land. In certain areas, just be aware that conservation, military base, protected area etc. may restrict access, especially if it is not reasonable or feasible from a management perspective.
Access	Who is responsible for access to the sea?	In terms of the Act, access to the coast is a mandate of the Municipality.
Access	So will local municipality be able to resolve access to the sea?	Yes, municipalities, with support from province, are obliged to step in and assist.
Access	A lot of erosion is present at the Infanta NSRI slipway. They have submitted a document to restore the area. Main access to sea is for ski boats. This is also of concern to the Angling club. There is an inclination to prohibit jet ski access to the sea as they are a problem to the NSRI. The only and closest place to access the coast is often used as launch site.	These are noted for the access audit database.
Access	People are told to launch at Infanta which is too far. Currently they are not allowed to launch into estuaries in the WC.	Jetskis are prohibited in MPAs. Launch sites are determined by management issues, conflicting user groups etc. In this case not enough information is available to engage, but the issue can be taken up outside the scope of this project.
Access	The authorities are very strict with jetskis. If you cannot prove that you using jetskis for fishing at the Breede you cannot launch.	This applies to kite surfers also.
Access	The delineated area where kite surfers are allowed – this overlaps with jetskis. There should be rules similar to road users, where jetskis give way to kitesurfers.	This is noted, and the recommendation passed on to the Estuarine Management Framework project.
Access	Do jetskis not do more damage than a motor boat? They are allowed in KZN why not WC? Natural processes can do more damage.	This is noted, and the recommendation passed on to the Estuarine Management Framework project.
Access	What do you define as access?	Access mostly looks at paths, parking areas and access points that are historic. In some cases also where there is a need for additional access points.
Access	Current methodology is based on scientific principles. Is the audit relating only to physical coastline. Does it also speak to people and other forms of access.	Everybody has the right to access the beach. There are however different phases and layers to access. The ICM Act says municipalities must draft bylaws in this regard. DEA&DP is assisting municipalities to do this. DEA&DP is also developing a provincial strategy to follow the national strategy developed in 2014. The national strategy however does not speak to subsequent amendments to the Act, and, although relevant, does not deal with issues that municipalities need to deal with. Therefore DEA&DP will be hosting a workshop to develop a provincial strategy and set a framework for the province. This will look at existing and historical access, specifically pedestrian access and where future access need to be considered and where access points can be consolidated.
Access	Is this the this the initial audit for access?	Yes. It aims to identify political history, and contentious issues along coastline. Some areas are limited in terms of access. The strategy will address these.
Access	Who is responsible for access? Is it District of Local Munics?	The District as per the ICM Act, but local mandate is also specified. The Constitution assigned responsibility to local municipalities. District municipalities have oversight role, and local municipalities an implementation role.
Access	Problem, with the District implementing the CMLs or access is that you wait for a long time	Agreed – it won't make sense for the District to implement bylaws, but they can develop model by-laws for local municipalities to implement.
Access	Free access to the coast, can I walk from beach to beach? Private landowners prohibiting people from access beach	The ICM Act says some areas are restricted because of protected areas, naval bases etc. but in principle access is allowed. It is a right that can be curtailed though for reasons of reasonability and feasibility, conservation etc.
Access	Have you done the access audit?	It has started and the engagements are used as an information gathering exercise.
Access	First do audit then consolidate	This is the overall strategy, yes.
Access	So can people walk on my property to the beach? What about property rights and security risk? How you going to manage and control it?	It is not clear-cut – people have the right to access the coast, but not necessarily via private land. The context needs to dictate the form of access. This project is the start of a process to clarify such matters.
Access	Is there any way the department can regulate selling of property by estate agents? Estate agents promote development along the coast as having private beaches.	There are no private beaches in the entire country.

Access	What if you have a beach but people cannot access it because of private land?	It is not clear-cut – people have the right to access the coast, but not necessarily via private land. The context needs to dictate the form of access. This project is the start of a process to clarify such matters.
Access	Do audit first then map and present to stakeholders.	This is the intention. The current phase is about information gathering, looking at contentious issues. Then coastal access land will be designated, which may or may not need some level of servicing and therefore management.
Access	I grew up on the land. How can I practice culture when prevented from accessing land?	This is precisely the type of concerns to be resolved through the coastal access strategy.
Access	Historically, one could fish anywhere and could drive along the beach and access anywhere, what happened now? What happened to those historical accesses to the beach?	Not all historical access routes will be opened again. A process is underway to look at the best practical places to access, where it is manageable.
Access	Does access include walking along a river? If there is path on her property, can I walk there to go and fish?	There are property boundaries along estuaries that must be respected, but in theory the coastal zone belongs to the public. Reasonability of access, however, is determined on case by case basis.
Access	Pezula estate is making access to Noetzie difficult	This will be added to the access audit database
Access	Uncertainty around who carries the liability for safety and risks e.g. fire where access routes are provided. Also, who maintains them.	This will hopefully be addressed in the broader Coastal Access Strategy project taking place in parallel to this study.
CML	Property boundaries and amenities, are these included in the CMLs?	These are considered, but the lines depend to a great extent on wave run up and erosion lines.
CML	Does the rule 3m above HWM for the admiralty reserve still apply?	Older title deeds probably speak to those. Some have zoned land adjacent to admiralty reserve.
CML	What is the purpose of different kinds of lines?	The different lines show different modelled outputs (Wave run up and erosion) and ultimately calculated risk for three time horizons (100yr lines low, 50 yr lines medium and 20 yr high)
CML	What is the relation between CMLs and coastal protection zone (CPZ)	These risk zones are combined with other factors to demarcate different management lines and a CPZ in order to inform and regulate coastal development. They are then incorporated into Spatial Development Plans. The CMLs are always narrower than the CPZ.
CML	Is the CPZ, the highest of the risk zones and where is this CPZ?	The ICM Act introduces a lot of definitions. The different risk projections inform where CML must go, but the CML can also follow seaward property boundaries. The CPZ as defined in the Act is something different. By default, in rural areas it extends 1km from the HWM and in urban areas, 100m. The Minister can however delineate a custom CPZ. All properties partially within the lines would be considered as though the entire property is within the line, which is not practical in all cases. Therefore the Minister will delineate the CPZ.
CML	Do the CMLs not go into the river? How far up the river do you go?	The CMLs only relate to estuaries, which are approximated by the 5m amsl contour line. This designates a single risk zone in estuaries as opposed to differentiated lines along the coast.
CML	Why was Cape Town allowed to do it on their own CMLs?	CCT is a Metro Municipality with sufficient resources, and they urgently needed to do their modelling. Before the ICM Act was promulgated, CCT already did their risk modelling. After the ICM Act came into force, the CCT was halfway through. CCT however does not have the mandate, and handed the methodology over to province for vetting. The CCT will be the first municipality to promulgate CMLs and will be used as test case.
CML	Are the lines meaningless. If you don't do anything. If you do, pre-empt measures	The information and guidance required by the project will be used by municipalities, both as implementation mechanisms and as guidance for decisions. This can inform development, for example where to place structures to survive 1:20 year event, or 1:100 year event
CML	For future development, good tool. If you want to develop, know the risks	This will assist municipalities and province on how to deal with developed areas that are under risk
Conservation	How does the delineation of CMLs impact nature conservation corridors from Glentana to Hartenbos?	The risk lines are the first level of risk modelling. Delineation of CMLs will take the place and will include conservation areas. In Eden the process is more complex because Eden is located in a national protected area. Planning and environment are directly linked. Implementation takes place on planning level. The final product is the overlay zones. Application for re-zoning will have planning scheme roles plus additional roles.
Conservation	Does this take into consideration any nature conservation audits or regulations	The management lines will accommodate all protected areas and sensitivities.
Consultation	Why has long-time residents not been consulted regarding coastal processes and coastal access? Residents have lived along the coasts for generations and have witnessed what the area looked like in the past and could better advise.	The engagement taking place is intended to obtain such insights from local residents with information.
Consultation	Why was there no stakeholder meeting in the town of Vermaaklikheid?	The project is unfortunately limited in scope and budget, and only able to have meetings in the main coastal nodes. The meetings are also only a part of the engagement process, which includes direct engagement, correspondence, several opportunities to provide comment on proposals and even engagements that will take place outside the scope of this project.
Consultation	Engagement process - adaptation to global change for coastal areas. Amazed by DEA. What is your engagement with local municipality? Why so weak attendance by local municipal members?	Each local municipality and planners sit on the Project Steering Committee and are therefore not obligated to also attend the public meetings.
Consultation	At what stage does stakeholder engagement take place?	Stakeholder engagement will take place every time a major deliverable is available, and even after project completion when the project moves to implementation phases.
Consultation	Do you involve the local municipalities in the coastal delineation process?	Each local municipality is represented on the Project Steering Committee.

Consultation	Will the presentation be circulated?	Yes they will be circulated.
Consultation	Concerned about the process that the Municipality has been excluded from the process. Access is a major issue.	Each municipality is represented on the PSC where they can indicate what is required for the project because they know what is happening.
Consultation	Why are meetings not in smaller towns such as Vermaaklikheid and Jongensfontein and fisherman's further up the estuary? Who, which official spoke on behalf of the Hessequa municipality? Feels like we are not being included in the decisions	The project is unfortunately limited in scope and budget, and only able to have meetings in the main coastal nodes. The meetings are also only a part of the engagement process, which includes direct engagement, correspondence, several opportunities to provide comment on proposals and even engagements that will take place outside the scope of this project. Hessequa municipality has several people involved in the management of the project.
EIA	Even if application need to be submitted, an EIA might need to be submitted?	If an EIA authorization is required, an application is required. Investigations then would proceed through scoping and EIA phases with all the necessary specialist studies to take place.
EIA	Does stakeholder engagement only take place after the project takes place?	An EIA has many phases and stakeholder engagement processes are allowed for in several phases.
EIA	Can an example be given of how the EIA and CML lines will differ?	The CML will be designed as a no-further development line, whereas the EIA line simply trigger the need for an EIA investigation that could allow a development to proceed if the impact is manageable.
Estuaries	How do you define estuary? Is this definition applicable to every river in South Africa?	The definition from the ICM Act is used.
Estuaries	What is the definition of estuary	This is defined in the ICM Act.
Estuaries	Sedgefield, section of the report does not include properties along the estuaries. Will you be addressing properties along the estuary?	Properties around estuaries are considered as well – refer to the project report for more detail
Estuaries	Happy with the use of the 5m contour for estuaries. Issue in Swartvlei, what happens when mouth is closed? Looked at 5m contour, it does not matter when mouth is open or closed.	The 5m contour is used irrespective of the state of the mouth.
Estuaries	How far would the 5m contour go in relation to the mouth of the estuary?	The model tries to be conservative. Plan is to have floodlines for all priority estuaries. The floodlines will replace 5m contour lines.
Estuaries	Explain 5m contour line for estuaries.	The 5m contour height is used as a proxy for the risk area where actual floodlines are not known. More detail is presented in the project report.
Estuaries	Keurbooms river flooded in 2007, houses got flooded. Mouth changes during a flood condition. How you considered these in your modelling?	Estuaries are difficult to model accurately. Calculated floodlines are available for the Keurbooms, so those are used, and all possible positions of the mouth considered.
Estuaries	What do you regard the Keurboom river as?	It is an estuary. Calculated floodlines are available for the Keurbooms, so those are used, and all possible positions of the mouth considered.
Estuaries	You keep referring to the coastal areas, does this include the river?	It includes estuaries. In estuaries, the 5m contour line (plus buffer if necessary) is used as the CML in the absence of floodlines.
Estuaries	CMLs versus estuary, what is the difference?	CMLs around estuaries will be determined based on the 5m contour rather than wave run-up and erosion projection.
Estuaries	No existing line where the coast stops and rivers starts	Estuaries are mixing points where the open coast lines are merged with the 5m contour in a reasonable way.
Estuaries	Goukou river, winter freshwater, but with the drought it became saline.	It remains estuary. Some estuarine lake systems close all the time but still remain estuaries.
Estuaries	Middle Brak Estuary Management Plan (EMP) - under review. Is it waiting for approval until the delineation of the coastal management lines (CMLs) is complete?	The Middle Brak EMP is completed now and no, the final EMP is not dependent on the completion of the CMLs.
Estuary	Rules same on estuary and sea	Estuaries are included in the definition of the coast, but different dynamics would change the applicability of controls.
Floodline	Why is the 1:100 year floodline so high in Sedgefield by the parking? There are rocky cliffs there.	This is likely related to the risk of mudslides. If the base is removed, the entire dune will collapse.
Floodlines	Is the 1:100 year floodline enforceable?	Province is trying to make the delineation of coastal management lines enforceable. Once regulations are implemented it will be enforced. Complications arise where existing development rights are granted. In Eden a lot of areas are below the 5m contour lines. The Province is trying to find solutions, and in some cases it may come down to expropriation. However, there is an attempt to apply passive retreat. E.g. once property subjected to some form of risk, it may become uninsurable and the value of property will drop. The Municipality may then be in a position to effect a land swop.
Floodlines	Floodlines are available for Great, Middle and Small Brak. Vleesbaai and others have not been done, will it be done?	Province is trying to obtain floodlines for all estuaries. The Municipality determined some floodlines for some estuaries but does not always have digital information. There is a priority list of estuaries for which floodlines will be done. The province is currently doing floodlines for the Breede River, and others are to follow.
Floodlines	Little Brak, closing of culverts were not taking into account when floodlines were done.	This will hopefully be avoided in future by having better risk projections in place.
Floodlines	Is the red line on the maps the floodline?	Unless proper floodlines have been determined, the risk line in estuaries is a 5m Light Detection and Ranging (LiDAR) contour line used as a proxy.

Floodlines	Overseas they are building on floodlines and houses are secured on stilts.	This possibility will be addressed through the use of overlay zones in the town planning scheme – one could have right to build it but with restrictions informed by building regulations.
Floodlines	Floodlines will it be with mouth open and closed?	Floodlines will take both scenarios into account.
Floodlines	Why are the floodlines around the Keurbooms so wide?	This is a matter of topography – the flatter, the wider the floodplain.
GIS and Mapping	Is the GIS information available?	Yes, it is made available in different formats.
GIS and Mapping	Dana Bay was never known as such. It was also known as Vleesbaai. The Koppe is not known as the Dana Bay Koppe, but as Fransmanshoek. Please revise the map to reflect this in the Eden CML report.	This will be verified and edits applied where necessary. However, sometimes the mapping products used are not editable.
High water mark	<p>My comment addresses the High-Water Mark and Coastal Management Lines for Leentjiesklip beach, Wilderness.</p> <p><b><u>High Water Mark Leentjiesklip</u></b></p> <ul style="list-style-type: none"> <li>I am delighted to see a proper determination of the high-water mark. Previously, this has been subject to anyone's interpretation.</li> <li>I agree with the placement of this line, as in 1953 we lost a structure which was situated a few metres behind this line to an extreme high tide and storm surge.</li> <li>I agree that no new structures should be built within 100, of this line for protection of the coastal dune vegetation and existing buildings and that fences should go to the HWM and not beyond it and be of a nature as to allow natural ingress and egress of sand and water should this occur during a storm surge.</li> </ul> <p><b><u>Coastal Management Lines Leentjiesklip</u></b></p> <ul style="list-style-type: none"> <li>I agree that the CML will also be used as the DSL for the Eden District. The development parameters for application below the CML and for application in the coastal risk zone are essential to ensure coastal and existing building protection. The tendency in recent times has been to destroy primary dunes for a view of the sea and to build houses far too forward in the Sands Road and Wilderness Dunes areas, thus putting them and the adjacent properties at risk.</li> <li>It is almost too late but at least the few remaining primary dunes and dune forests can be saved and the sense of place and beauty preserved. This is what Wilderness has become famous for and which attracts tourists and permanent residents.</li> </ul>	The information is appreciated and will be used for verification of the lines.
Implementation	Why is this information about CMLs not on the title deeds? Servitude and zoning is on it.	Servitudes must always be on title deeds, and this is something the Department is looking into in terms of implementation strategy. It will also be indicated on the zoning schemes of municipalities. That is why Province is working with municipalities.
Implementation	Any future development within the 1:100 year floodline area, will this be enforceable and disclosed to prospective new buyers and possibly written into property title deeds to protect the public?	The intention is to have the coastal management lines properly proclaimed and implemented via provincial and municipal schemes. Restrictions will be noted on title deeds where relevant.
Implementation	Would legislation force developers to disclose information of properties within the high, medium and low risk areas?	The ideal is for estate agents to inform people, and the intention is to have the restrictions on title deeds but the mechanism to implement this have not been figured out. The lines will also feature in municipal SDF and planning.
Implementation	The IMC Act links coastal management lines to spatial development management. Cannot recall seeing in Spatial Development Framework (SDF). Can you please ensure that this at be included into the SDF?	Each local municipality and planners sit on the Project Steering Committee (PSC). Municipalities are in the process of reviewing the SDF. CMLs will feed into the municipal SDFs. Province will also provide capacity to apply provisions of the ICM Act, and check draft SDFs for all municipalities. The Municipalities would need to report against the Act's requirements. Official engagement will continue to ensure the CMLs are included in the SDFs.
Implementation	What about Integrated Development Plans (IDPs) and SDFs that have already been approved? Will municipalities be informed that changes are required?	SDFs and IDPs are regularly reviewed. Alignment will not be perfect the first time round, but municipalities will include CMLs in the IDPs over time. GIS and Google Earth Imagery is available and is made available to municipality to assist their planning.
Implementation	Does the delineation of CML acknowledge existing IDP or Spatial Development Plans with local government?	Each local municipality and planners sit on the Project Steering Committee (PSC). Municipalities are in the process of reviewing the SDF. CMLs will feed into the municipal SDFs. Province will also provide capacity to apply provisions of the ICM Act, and check draft SDFs for all municipalities. The Municipalities would need to report against the Act's requirements. Official engagement will continue to ensure the CMLs are included in the SDFs.
Implementation	What is the timeframe for the implementation of the CMLs?	It is estimated that implementation of the CMLs is possibly by the end of 2018. The Member of Executive Committee (MEC) Anton Bredell wants to implement the delineation of the CMLs before he leaves office.
Implementation	Who is the Member of the Executive Committee (MEC)?	Mr Anton Bredell. He is the MEC for environment and spatial planning, making it easier to incorporate the coastal management lines into the spatial development plan.
Implementation	Is province going to tell municipality what to do or vice versa?	Province has a number of programmes supporting local municipalities. In some cases Province may be prescriptive, but generally there is significant effort going into collaboration.
Implementation	Municipal official's attendance for IDPs, but main concern is electricity and informal settlements, coastal management lines not concerned about.	Municipalities will be supported in the roll-out of the management lines.

Implementation	Financial mechanism in place for passive retreat for those living along high risk property	Different options would need to be explored based on the different situations. Although it would be nice for municipality to do a land swap, it might not be feasible for municipality to buy land that is undevelopable.
Implementation	Municipalities were given four years to implement the ICM Act in 2008, now it is 2016. If people did not voice opinion nothing would have happened. Acts should be place to be obeyed.	It is acknowledged that the Act took long to implement. It is taking place bit by bit but inconsistencies make implementation difficult – for example no consistent Low and High Water Mark has been established, Admiralty reserves are not consistent, and are even called different things such as amenity reserves. Admiralty reserves depend on what happened at a particular place. There are also conflicts where title deeds demarcate a HWM but the physical process differs. All municipalities must by 2018 have all their by-laws in place. DEA&DP will develop a model by-law for distribution to local municipalities to customize as required.
Implementation	Mainstream information? Will it be incorporated in the SDF?	The intention is to have the CMLs designated within the SDF.
Implementation	Development has been prevented on Western side of the river at Sedgefield, how can this be maintained into the future? The site is now public OS.	The information and guidance required by the project will be used by municipalities, both as implementation mechanisms and as guidance for decisions. This can inform development, for example where to place structures to survive 1:20 year event, or 1:100 year event
Implementation	Province can help local municipalities. Individual homeowners intentionally break the law and build gabions to secure homes. They willingly do this knowing they will get a section 24G. They just pay the fine and know that it will be legalized thereafter. Will this process feed into the EIA legislation? These gabions impact on the flow and flood rates of the river.	CMLs will feed into the EIA regulations. Province is aware of the situation and aim to create a consistent regulatory framework.
Mandate	Can the district municipality not take over CML responsibility?	There is already collaboration. Provincial, district and local and national representatives are on coastal committees. Local government coastal committee is a may not a must. There are also estuary advisory committees, that allow locals to advise on estuarine management. Issues of mandates is noted, and something the department is trying to sort out over time. That is why Department is developing a strategy so each organ of state knows what their responsibility is.
Mandate	So municipality will have all this information and will have the controls?	Each local municipality is represented on the Project Steering Committee.
Mandate	Does municipal land exist or not?	There is definitely municipally owned land but admiralty reserves are a grey area. The Province is in the process of doing an audit of the admiralty reserves. A proper record was not kept in the past.
Methodology	Projections to future. Did you look at what it was in the past and the impact the Rooikrans infestation has had on the dunes?	Historical aerial photography was used to determine long term trends. The project approach is cognizant of the impact of what will happen when Rooikrans are removed, but that can be managed in different ways.
Mitigation measures	Dunes that are in front of houses. Some owners want to reduce the height of dunes. Would this tool prevent people from doing this?	You are not allowed to reduce the height of the dune, it protects properties. Yes, the tool would prevent people from reducing height of the dune.
Mitigation measures	Rooikrans, the is a conflict of interest. On the one hand it stabilizes dune but at the same time it is an alien species.	Active vegetation of dunes allows indigenous vegetation and not alien vegetation. Legislation not conflicted. Programme working for coast remove aliens from coast, will always want to remove alien vegetation. We have indigenous vegetation that stabilizes dunes. Certain areas you want to stabilize. Should never allow alien vegetation on dunes.
Mitigation Measures	The 1:100 year floodline for Mossel Bay looks good. The area has had three floods to the extent of the 1:100 year floodline. Flooding happens during the spring tide and when it rains a lot. When these two events clashes, it causes a lot of erosion. In areas where massive damage has occurred, what will be done to prevent or mitigate impacts to protect development or infrastructure?	A range of measures are possible, but final decision on intervention is guided by the extent of damage, the cost of intervening and the projections of future risk. It might result in a decision to retreat development up the slope rather than reinstating protection.
Mitigation Measures	Land owners are not allowed to put up barricades on personal property in Western Cape but why is it allowed in Natal? Will what is being done in Western Cape have influence of what they did in Natal?	The ICM Act is a National Act, and does not apply to one province only. Erosion protection can be placed within property boundaries, and according to local building controls and/or EIA approval. However, in some cases people are building outside of their boundary. These defenses are sometimes instituted by municipalities where they feel it is in the people's interest to mitigate against erosion. For instance, investment in hotel industry.
Mitigation Measures	Are barricades to prevent coastal degradation and erosion to private properties allowed? In KwaZulu Natal, property owners are allowed certain prevention barricades.	Erosion protection can be placed within property boundaries, and according to local building controls and/or EIA approval.
Mitigation Measures	Do you know what the legislation says about people who want to protect their property?	Erosion protection can be placed within property boundaries, and according to local building controls and/or EIA approval.
Mitigation Measures	Some people place gabions in front of beach properties but all it does is transfer energy and erosion to their neighbours. How can this be prevented?	Erosion protection can be placed within property boundaries, and according to local building controls and/or EIA approval. The municipalities would ideally want consolidated sections of coastline protected through integrated means rather than as ad hoc interventions.
Mitigation Measures	Can you put concrete structures in front of your property?	Erosion protection can be placed within property boundaries, and according to local building controls and/or EIA approval.
Mitigation Measures	Is there a legislative process to enforce protection?	No, a municipality may feel they want to invest in the area and may then intervene. Legislation will inform what type of defenses are applicable.
Mitigation Measures	In other countries authorities purchase areas where people cannot develop on. Will this take place here?	No not at the moment. Although where it works out more feasible to do so, municipality may resort to this.
Mitigation Measures	Dune further west of Still Bay, dune management plan can change erosion of the area. Could be remedial measure.	Agreed, but the model can obviously not accommodate all possible interventions. It therefore takes the situation into consideration as is.
Mitigation Measures	Retaining wall, EIA process cancelled out?	All this information will inform the EIA setback line Only certain activities will then trigger the EIA process. Other activities will be managed through a range of other controls.
Mitigation Measures	Blombos strand - houses moved ten meters back. How do you stop erosion? So you just leave it?	You can't stop erosion. The property owner also cannot force an organ of state to implement protection measures.

Modelling	The HWM shown does not appear to match the High-Water Mark on the photography?	The modelling generated a 1:10 year wave run-up projection as proxy for the HWM. In some areas this is modelled more correctly than others, and this is used to refine the overall model.
Modelling	The modelling appears to be more inaccurate as you go up the rocky cliffs. The HWM must be rechecked.	Rocky cliffs are assumed to not be at risk from erosion, and hence not included in the model.
Modelling	How do you determine the risk lines?	A number of factors are considered, including a model of future wave run-up and erosion. Refer to the project report for more detail.
Modelling	Has the high-water mark (HWM) been accurately determined? The mapping shows the HWM halfway up the cliffs and through homes which is obviously incorrect. Is this due to a projection or data error?	Modelling was not done for the rocky sections, and the line is therefore still to be refined. Also be aware that imagery on Google Earth is not always perfectly aligned with properly georeferenced GIS information.
Modelling	You only speak about erosion and do not consider accretion. The high-water mark (HWM) receded and moved forward about 30 m, one storm in 2008 eroded the bay 15 to 20 m. Foredunes accreted, but now the HWM is moving back.	Accretion can be included in the geomorphological model where it is present. However, short-term erosion and recovery should not influence long term trends that allow natural equilibrium between erosion and accretion to dictate erosion rates.
Modelling	Have you treated aolianite as hard rock?	Geomorphologists consider the aolianite to erode, albeit at a slower rate than sand.
Modelling	Are you speaking of vertical or horizontal erosion?	Horizontal erosion
Modelling	Who was the specialist and what is his qualifications?	The technical team was led by Dr. Keming Hu, hydrological engineer and Dr. Dave Brew, Coastal Geomorphologist.
Modelling	Did someone come to Still Bay and physically do tests? So it is based on facts.	Yes they did. The geomorphological model is based on a detailed methodology, and observational information. Detailed tests (e.g. granular size) do not form part of this project as the scale is too big.
Modelling	Aolianite layer, quite high, have these factors been considered?	This was factored into the erodibility projections.
Property Rights	Can development take place in high risk areas	One cannot build if HWM is above property, and existing structured will probably not be allowed to be rebuilt after being destroyed. If the property is above the HWM, conditions would apply. The restrictions are yet to be determined.
Property Rights	New developments are selling property along the coast and are not informing property owners about the risk or that their property falls within the 1:100 year floodline.	The Municipality still tries to inform property owners, as they are well informed of risk. Unfortunately, developers are often unscrupulous and there are also many people who do not think it will impact them. DEADP is working with financial institutions and banks to better inform investment and funding decisions.
Property Rights	In the past municipalities allowed the development on low lying areas which should not have happened. What will happen now?	This is an issue of development rights. It is not possible to summarily remove a property owner's right. The Department is looking into how this issue can be resolved though.
Property Rights	How was development allowed below N2 on Kaaimans River?	These are likely historic development rights and cannot be taken away. The Coastal Protection Zone (CPZ) to be developed will incorporate these and manage appropriately. Could also have commenced prior to the EIA regulations.
Property Rights	How will the risks and management lines affect undeveloped properties? E.g. Cola Beach.	This is an issue of development rights. It is not possible to summarily remove a property owner's right. The Department is looking into how this issue can be resolved though. It might mean restricted development is allowable.
Property Rights	How would this change historic development rights?	It is not clear yet how approvals are to be revoked, but the main intention is to curb irresponsible development going forward. This will be done through zoning schemes and other controls.
Property Rights	You have the right to sensor development rights? What do you mean by sensor?	Authorities cannot remove rights without compensation, but municipalities can advise on what mitigation measures to implement to reduce risk and liability.
Property Rights	It is a misnomer that if you have a beach front property you have a right to put a pathway through dune which is not. It is illegal.	Correct. It is regulated through various pieces of legislation.
Property Rights	Can you own portion of a river but not a portion of seawater?	You can own land under a river, but not land under sea. Once the HWM moves up, you lose property right over that section.
Property Rights	Has admiralty reserves been sold off?	Admiralty reserves are automatically coastal property and cannot be sold any more. In some instances in the past, authorities did sell the land.
Red line diagrams	I do not understand red line diagrams.	The issue of Red Line Diagrams relates to planning and surveyance, and not to this project.
Red line diagrams	Enquires whether article in Cape Times 18 October 2016 is related to this project	The issue of Red Line Diagrams relates to planning and surveyance, and not to this project.
Risk projection query	Why are the CMLs in Mossel Bay so high above the Reebok caravan park?	Location will be double-checked. High erosion lines are related to a flat topography, high wave energy and/or erodible sand
Risk projection query	Massive dunes at river mouth of the Great Brak Estuary. Ablution facilities and parking areas are gone. The amount of erosion cannot be aligned to the volume in the table in the presentation.	Location will be double-checked. Erosion on the inside of the estuary is not modelled due to the dynamic nature of the estuarine area.
Risk projection query	The risks in Vleesbaai are projected far inland which does not make sense. Relook. What is the model based on?	The location will be double-checked A number of factors are considered, including a model of future wave run-up and erosion. Refer to the project report for more detail.
Risk projection query	Vleesbaai appears to be silting up. There is a theory that there is a sandbank moving up to Dana bay. How far did you look at the ocean movement?	Detailed bathymetry is not available for such a large section of coastline, so we only have information for the -15m contour line. The information will be considered for Vleesbaai.

Risk projection query	Sandbank silting up is also happening along the Reebok Coastline. The sand beds are exposed. Sand deposits but the ocean is still eroding the dunes. Sediment transport at Great Brak does not diverge as per the image in the presentation.	These locations and processes can be double-checked.
Risk projection query	Headland bypass systems - this may assist in reducing erosion in areas such as the Goukamma River Mouth. Check paper published by G.B. Hellstrom. That whole system in the nature reserve could be reactivated and could protect things like Buffalo Bay Road.	Will be considered for the purposes of the geomorphological model.
Risk projection query	The coastal erosion and delineation at the Little Brak river mouth is vastly more than the predictions made in the presentations. The huge dunes, parking areas, ablution blocks have been washed away in the last 20 years. Consider relooking at the coastal erosion factors for the Little Brak river.	The location will be double-checked
Risk projection query	The Dune in Sedgefield is an artificial foredune. Vegetate the dune to prevent erosion. That dune eroded 8m. Irrigation pipes poking out of the sea now. Erosion 0.5 m per year. More than double than estimated amount presented. There are periods where no erosion takes place and all of sudden there is more erosion. The face of the dune is very steep from the erosion. Goes to aolianite headland. In the Fishing club in Knysna, there is a picture that was taken in the 1930s and you will see it was open. Developers wanted to build and created the dune.	The location will be double-checked
Risk projection query	The parking area by the coast in Kusweg in Gouritsmond is a problem. The sand dune is eroding	The location will be double-checked
Risk projection query	West of Still Bay, not a blow out, owner removing sand.	This will be checked in the GIS.
Risk projection query	The 5m line at Sedgefield is very conservative given that floods have exceeded this due to local obstructions.	The location will be double-checked
Risk projection query	The erosion rate at Sedgefield is likely more than 0.5m/yr, given the wave and wind attack on the rehabilitation efforts along the beach.	The location will be double-checked
SANParks jurisdiction	Queried the relationship between DEADP and SANParks especially considering the new SDF does not address the issue. Specifically, is The Island in Sedgefield under SANParks jurisdiction, and how does the HWM come into play in this matter.	This is something that will be verified with the authorities.
Sea level rise	The sea level rise study done four years ago, is it still applicable to this area? East of Swartvlei.	It is considered, but was more conservative and rather different in approach. The different approaches should be considered for their specific intended purposes.
Timeframes	When do you need to finalise the delineation of the CMLs?	The current project will run until end August. Then the MEC will need to have it gazette, which includes another round of stakeholder engagement. In the meantime it will be available on the provincial website. CCT lines are to be tested in December 2017, and Eden, Overberg and west Coast will soon follow. There was a hold-up trying to figure out the implementation mechanisms and coastal access issue. There is therefore several phases and this is the start. In parallel there is a Provincial coastal access strategy and model by laws for the municipality being developed.