

In terms of the **National Environmental Management Act** and 2014 Environmental Impact Regulations as amended, 2017, for:

**PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON
ERF 1363, PARADYS STRAND, KOUGA LOCAL MUNICIPALITY,
EASTERN CAPE**

DRAFT BASIC ASSESSMENT REPORT

DEDEAT REFERENCE NUMBER: EC08/C/LN1&3/M/18-2026

REVIEW AND COMMENT PERIOD: 1 June – 1 July 2026



PREPARED FOR THE APPLICANT:

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DATE:

1 June 2026

TABLE OF DEFINITIONS
<p>Basic Assessment Report – A tool used by the EAP to submit to the competent authority if listed activities is triggered in Regulations GNR 327 and GNR 324 as per NEMA to make a decision regarding a proposed development.</p>
<p>“development footprint” means any evidence of physical alteration as a result of the undertaking of any activity;</p>
<p>“coastal waters” means -</p> <ul style="list-style-type: none"> (a) marine waters that form part of the internal waters or territorial waters of the Republic referred to in sections 3 and 4 of the Maritime Zones Act, 1994 (Act No. 15 of 1994), respectively; and (b) subject to section 26, any estuary.
<p>Composition of coastal protection zone</p> <p>(1) Subject to subsection (2), the coastal protection zone consists of -</p> <ul style="list-style-type: none"> (a) land falling within an area declared in terms of the Environment Conservation Act, 1999 (Act No. 73 of 1989), as a sensitive coastal area within which activities identified in terms of section 21(1) of that Act may not be undertaken without an authorisation; (b) any part of the littoral active zone that is not coastal public property; (c) any coastal protection area, or part of such area, which is not coastal public property; (d) any land unit situated wholly or partially within one kilometre of the high-water mark which, when this Act came into force- <ul style="list-style-type: none"> (i) was zoned for agricultural or undetermined use; or (ii) was not zoned and was not part of a lawfully established township, urban area or other human settlement; (e) any land unit not referred to in paragraph (d) that is situated wholly or partially within 100 metres of the high-water mark; (f) any coastal wetland, lake, lagoon or dam which is situated wholly or partially within a land unit referred to in paragraph (d)(i) or (e); (g) any part of the seashore which is not coastal public property, including all privately owned land below the high-water mark; (h) any admiralty reserve which is not coastal public property; or (i) any land that would be inundated by a 1:50 year flood or storm event. <p>(2) An area forming part of the coastal protection zone, except an area referred to in subsection (1)(g) or (h), may be excised from the coastal protection zone in terms of section 26.</p>
<p>“coastal wetland” means -</p> <ul style="list-style-type: none"> (a) any wetland in the coastal zone; and (b) includes - <ul style="list-style-type: none"> (i) land adjacent to coastal waters that is regularly or periodically inundated by water, salt marshes, mangrove areas, inter-tidal sand and mud flats, marshes, and minor coastal streams regardless of whether they are of a saline, freshwater or brackish nature; and (ii) the water, the subsoil and substrata beneath, and bed and banks of, any such wetland;
<p>Critical Biodiversity Area – Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.</p>
<p>“development” means the building, erection, construction or establishment of a facility, structure or infrastructure, including associated earthworks or borrow pits, that is necessary for the undertaking of a listed or specified activity,</p>

[including any associated post development monitoring] but excludes any modification, alteration or expansion of such a facility, structure or infrastructure, including associated earthworks or borrow pits, and excluding the redevelopment of the same facility in the same location, with the same capacity and footprint;
“development setback” means a setback line defined or adopted by the competent authority;
Environmental Assessment Practitioner – an individual responsible for the planning, management, coordination or review of environmental impact assessments, strategic environmental assessments and environmental management programmes.
Environmental Control Officer – A site agent who needs to ensure that all environmental authorisation and conditions are adhered to during the construction phase of the project
Ecological Support Area – Areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of PAs or CBAs and are often vital for delivering ecosystem services.
Environmental Management Programme – an environmental management tool used to ensure that undue or reasonably avoidable adverse impacts of the construction, operation and decommissioning of a project are prevented; and that the positive benefits of the projects are enhanced
“estuary” means a body of surface water - (a) that is part of a water course that is permanently or periodically open to the sea; (b) in which a rise and fall of the water level as a result of the tides is measurable at spring tides when the water course is open to the sea; or (c) in respect of which the salinity is measurably higher as a result of the influence of the sea.
“estuarine functional zone” means the area in and around an estuary which includes the open water area, estuarine habitat (such as sand and mudflats, rock and plant communities) and the surrounding floodplain area, as defined by the area below the 5 m topographical contour (referenced from the indicative mean sea level);
“indigenous vegetation” refers to vegetation consisting of indigenous plant species occurring naturally in an area, regardless of the level of alien infestation and where the topsoil has not been lawfully disturbed during the preceding ten years;
interested and affected party - an whose name is recorded in the register opened for that application in terms of regulation 42 of NEMA regulations.
“interests of the whole community” means the collective interests of the community determined by- (a) prioritising the collective interests in coastal public property of all persons living in the Republic over the interests of a particular group or sector of society; (b) adopting a long-term perspective that takes into account the interests of future generations in inheriting coastal public property and a coastal environment characterised by healthy and productive ecosystems and economic activities that are ecologically and socially sustainable; and (c) taking into account the interests of other living organisms that are dependent on the coastal environment.
“local community” means any community of people living, or having rights or interests, in a distinct geographical area within the coastal zone;
“maintenance” means actions performed to keep a structure or system functioning or in service on the same location, capacity and footprint;
Maintenance Management Plan – means a maintenance management plan for maintenance purposes defined and adopted by the competent authority

National Environmental Management Act (Act 107 of 1998) as amended 2017 – national environmental legislation that provides principles for decision-making on matters that affect the environment.
Protected area - an area of land or sea that is formally protected by law and managed mainly for biodiversity conservation. Protected areas recognised in the National Environmental Management: Protected Areas Act (Act 57 of 2003) (hereafter referred to as the Protected Areas Act) are considered formal protected areas in the NPAES. The NPAES distinguishes between land-based protected areas, which may protect both terrestrial and freshwater biodiversity features, and marine protected areas.

TABLE OF ABBREVIATIONS	
BAR	Basic Assessment Report
CBA	CBA Critical Biodiversity Area
CMP	Coastal Management Plan
DEDEAT	Eastern cape Department of Economic Development, Environmental Affairs and Tourism
DFFE	Department of Forestry, Fisheries and the Environmental
DWS	Department of Water and Sanitation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EFZ	Estuarine Functional Zone
EIA	Environmental Impact Assessment
EMP	Estuary Management Plan
EMPr	Environmental Management Programme report
ESA	Ecological Support Area
GA	General Authorisations
IAP	Interested and Affected Party/ies
KLM	Kouga Local Municipality
MMP	Maintenance Management Plan
NEMA	National Environmental Management Act (Act 107 of 1998)
NEMPAA	National Environmental Management: Protected Areas Act (Act 57 of 2003)
NEMWA	National Environmental Management Waste Act (Act
PA	Protected Area
SAHRA	South African Heritage Resources Agency
SANBI	South African National Biodiversity Institute
SBDM	Sarah Baartman District Municipality
STR	Screening Tool Report

APPENDIX 1 OF REGULATIONS	DESCRIPTION	CROSS REFERENCE IN BAR
3a	Details of the EAP and CV	Appendix G2
3b	Location of Activities	Section A1
3c	Layout Plan	Section A1; Appendices A - C

3d	Description of the scope of the proposed activity including the triggered and specified activities, associated structures and infrastructure and the way the proposed development relates to the triggered activities	Section A1 - 8
3e	Description of the policy and legislative context within which the development is proposed and how is each one applicable to the proposed activity	Section A10
3f	The motivation for the need and desirability (including the development at that specific location)	Section A9
3g	The motivation for the preferred site, activity, and technology alternative	Section A1 - 8
3h (i)	Details of all the alternatives considered	Section A1 - 8
3h (ii)	Details of the Public Participation Process (PPP) undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs Section 5	Section C
3h (iii)	A summary of the issues raised by interested and affected parties, and an indication of the way the issues were incorporated, or the reasons for not including them Section 5	Section C, Appendix E
3h (iv)	The environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects	Section B and Section D2
3h (v)	The impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration, and probability of the impacts, including the degree to which these impacts- (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed, or mitigated;	Section D
3h (vi)	The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives	Appendix G1
3h (vii)	Positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects	Section D2
3h (viii)	Possible mitigation measures that could be applied and the level of residual risk	Section D2; Appendix F

3h (ix)	Outcome of the site selection matrix	Section D2; Appendix F
3h (x)	If no alternatives, including alternative locations for the activity, were investigated, the motivation for not considering such	Section A1 - 8
3h (xi)	Concluding statement indicating the preferred alternatives, including the preferred location of the activity	Sections D4
3i	Full description of the process undertaken to identify, assess and rank the impacts the activity will impose on the preferred location through the life of the activity, including- (i) a description of all environmental issues and risks that were identified during the environmental impact assessment process; and (ii) an assessment of the significance of each issue, risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures	Sections D
3k	Summary of the findings and impact management measures identified in any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final report	Sections D4
3l	Environmental impact statement containing a map and a summary of the positive and negative impacts of the proposed development and alternatives	Sections D4
3m	Based on the assessment, and where applicable, impact management measures from specialist reports, the recording of the proposed impact management objectives, and the impact management outcomes for the development for inclusion in the EMPr	Section D
3n	Any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of the authorisation	Section D
3o	Description of any assumptions, uncertainties, and gaps in knowledge which relate to the assessment and mitigation measures proposed	Section A and Section D
3p	Reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation	Section D
3q	Where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required, the date on	Section A

EAP Services

	which the activity will be concluded, and the post-construction monitoring requirements finalised	
3r	Undertaking under oath or affirmation by the EAP	Appendix G2
3s	Details of any financial provisions for the rehabilitation, closure, and ongoing post decommissioning management of adverse environmental impacts	Not applicable

EXECUTIVE SUMMARY

Introduction

Erf 1363 is situated on de Jager street in Paradys Strand (SG Code: C03400110000136300000) and falls within 100 meters of the high-water mark of the sea.

The owner of the property is proposing to develop a dwelling with an estimated development footprint of 298.9m² which will include an estimated 43.8m² decking area. A lookout point is also proposed which will be equipped with a walkway leading from the house to the lookout point and it will be set above the vegetation (similar to a rope bridge). The lookout area will be an estimated 20m². Approximate central coordinates: 34° 6'21.00"S; 24°53'16.07"E

Due to the dynamic nature of the site within a coastal environment, the dwelling is recommended to be designed in such a way to prevent instability of the dunes and to prevent erosion. Maintaining a dense vegetation cover will trap and stabilise the sand to some extent and avoid the nuisance of sand encroachment. The house design should keep this in mind in terms of doorways and outside spaces. A raised structure would allow sand transport under the structure with less nuisance inside the buildings. The eastward part of the property could be raised (inundated by sand) in future years as the frontal dune migrates onto the property. The rate of movement is not known at this stage. To avoid possible shifts, it is advised that the foundations/pylons of the building on Erf 1363 extend down as far as possible along the southwestern side of the building (engineering advise recommended on depths). This will allow movements of the upper part of the dune without impacting the foundations of the building on Erf 1363. The risk of these shifts is less towards the north of Erf 1363.

The proposed development triggers activities in Listing Notice 1 and Listing Notice 3 of the Environmental Impact Assessment Regulations, 2014 (as amended, 2017) published in terms of the national Environmental Management Act (Act 107 of 1998) (NEMA) and therefore requires an environmental authorisation to be issued by the competent authority before development can commence. The competent authority for the application is the Eastern Cape Department of Economic Development, Environmental Affairs and Tourism.

Environmental Sensitivities

A screening tool has been developed by the Department of Forestry, Fisheries and Environmental Affairs (DFFE). The Screening Tool identifies related exclusions and/ or specific requirements including specialist studies applicable to the proposed site and/or development, based on the national sector classification and the environmental sensitivity of the site. A screening report was generated for the proposed project; the site verification report is provided as Appendix D1. The sensitivities identified and verified are provided below.

Table 1: Verification of environmental sensitivity identified in DFFE screening tool report

Specialist Study as per Screening Tool Report	Environmental sensitivity as per screening tool report	Verification of environmental sensitivity	
Agriculture Assessment	High	Low	The sensitivity rating provided by the Screening Tool Report is disputed. The rating is based on the land capability rating and cropland use. There is no agriculture practiced within the highly

Specialist Study as per Screening Tool Report	Environmental sensitivity as per screening tool report	Verification of environmental sensitivity	
			developed areas. The 740m2 site is underlain by windblown sand and is designated as residential 1 and not suited to agriculture. .
Landscape/Visual Impact Assessment	NA	Low	The visual character of the study area consists of visually appealing natural coastal landscapes and modified landscapes including residential, tourism, roads and footpaths. The proposed activity will be developed to blend in with the natural environment and wont deteriorate visual quality of the area. No further assessment is deemed necessary; the concept design and proposed SDP is considered to fit in with the site and surrounding land uses. Mitigation measures to are included in the EMPr submitted with the BAR
Agricultural	High	Low	The sensitivity rating provided by the Screening Tool Report is disputed. The rating is based on the land capability rating and cropland use. There is no agriculture practiced within the highly developed areas. The site is not suited to high intensity agricultural development.
Socio-Economic Assessment	NA	Low	No further assessment is deemed necessary; the proposed development will have a low positive impact on social and economic conditions and contribute towards rates and taxes in the area and employment of contractors and service providers and purchase of local goods. Mitigation measures to are included in the EMPr submitted with the BAR
Animal Species assessment including avian	Medium	Low	The 740m2 site is underlain by windblown sand and is designated as residential 1 with the surrounding area being the seafront and other houses. No specific populations of threatened species were identified within the footprint; the entire footprint is situated within transformed and degraded habitat. The SCC included in the STR are not expected to be affected by the proposed development due to the limited footprint and extensive more suitable habitat being present in the surrounding area.
Aquatic Biodiversity Impact Assessment	Low	Low	No aquatic features were identified within close proximity (100 meters) to the site. Stormwater management and sewage management mitigation measures are included in the EMPr to prevent polluted and / or excessive runoff from the site.
Archaeological and Cultural Heritage Impact Assessment	Low	Low	No further assessment is deemed necessary, however mitigation measures to prevent unnecessary impact on heritage resources are recommended and will be included in the EMPr submitted with the BAR.
Paleontological Impact Assessment	Very High	Medium	No paleontology assessment is deemed to be necessary for the proposed development on the residential erf; however, mitigation measures to prevent unnecessary impact on paleontological resources are recommended and will be

Specialist Study as per Screening Tool Report	Environmental sensitivity as per screening tool report	Verification of environmental sensitivity	
			included in the EMPr submitted with the BAR .It is recommended that a specialist search dune sand moved to facilitate the development once construction commences as the current intact and dense ground cover would prevent a valuable assessment at pre-construction stage.
Plant Species Assessment	Medium sensitivity	Low Sensitivity	<p>The historical vegetation mapped on site is St Francis Dune Thicket (least concern) (NatVEG map, 2019)</p> <p>Vegetation mapped as southeastern Strandveld of fynbos biome (NATVEG, 2024); however, the site is confirmed by the EAP to be representative of St Franci Dune thicket.</p> <p>The majority of vegetation on site will remain intact. The dwelling will be 300m2 (maximum including look out point) however the excavated area will be less due to proposed design of dwelling and method of construction (i.e. to assemble foundations off site and transport to site) this approach will minimise disturbance on the site</p> <p>No endemic and range restricted species were recorded as being present. Several species are known from the surrounding area, but unlikely to be affected by the proposed activity. No Endangered or Critically Endangered flora species were confirmed to be present nor known to be present in the affected area. PNCO (Provincial Nature Conservation Ordinance) permits are unlikely to be required as no species protected in terms of the provincial PNCO were recorded within the actual proposed footprints. Milkwood trees are present (one large individual and several seedlings associated with the remnant thicket clumps, but these will not be affected and will be retained. Respective permits will be required for removal during site clearing.</p>
Terrestrial Biodiversity Impact Assessment	Low	Low	<p>The historical vegetation mapped on site is St Francis Dune Thicket (least concern) (NatVEG map, 2019)</p> <p>Vegetation mapped as southeastern Strandveld of fynbos biome (NATVEG, 2024); however, the site is confirmed by the EAP to be representative of St Franci Dune thicket.</p> <p>The majority of vegetation on site will remain intact. The dwelling will be 300m2 (maximum including look out point) however the excavated area will be less due to proposed design of dwelling and method of construction (i.e. to assemble foundations off site and transport to site) this approach will minimise disturbance on the site.</p>
Geotechnical Assessment	NA	medium	A geomorphological assessment was requested to be conducted to address the impact of development in a dynamic coastal area.
Marine Impact Assessment	NA	medium	

Specialist Study as per Screening Tool Report	Environmental sensitivity as per screening tool report	Verification of environmental sensitivity	
Visual Assessment	NA	NA	Aspects related to visual impacts are addressed in the basic assessment; however no specific specialist study is deemed to be required.
Civil Aviation Assessment	High sensitivity	Low sensitivity	A civil aviation assessment / compliance statement is excluded as the proposed development will not have an impact on civil aviation aerodrome.
Defence theme	Low sensitivity	Low sensitivity	A defence them compliance statement is excluded as the proposed development will not have an impact on the defense theme.

Impact Assessment summary

Several impacts were identified for construction phase, and a few identified in the planning and operational phase. Measures are recommended to mitigate anticipated impacts. The potential impacts associated with the proposed development are considered to be negative of low to medium significance without any mitigation. However, all potential impacts should readily be reduced to low significance provided the construction work and ongoing operation of the development are carried out with due diligence and the appropriate mitigation measures, as recommended in this report, are adhered to. No negative impacts of high or very high significance were identified. The development is expected to have a positive impact on local employment and property value.

Public participation

The draft basic assessment report will be provided to registered interested and affected parties for a 30-day comment and review period.

Registration date for interested and affected parties: 12 January – 16 February 2026

The application for EA has been submitted to the DEDEAT and accepted on 22 April 2026 (DEDEAT Reference number: EC08/C/LN1&3/M/18-2026).

The draft BAR is hereby provided to interested and affected parties for a 30-day comment and review period. The BAR will then be updated with all comments received and responses, as required. The Final BAR will then be submitted to the DEDEAT for a 107-day decision making by the competent authority.

Comment and review on draft BAR: 1 June – 1 July 2026

Conclusion

The draft basic assessment has assessed the no go option, alternative 1 (initial SDP), the concept design and proposed service options. Measure are recommended to mitigate identified potential impacts, including input into the final SDP and designs. With mitigation measures in place the majority of identified direct impacts are expected to be negative of negligible / low significance.