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2013-10-30

ATTENTION: Mr Riaan Kuchar

Directorate: Infrastructure & Planning  
Overstrand Municipality  
PO Box 20  
Hermanus  
7200

Dear Sir

**COMMENT ON THE DRAFT OVERSTRAND INTEGRATED DEVELOPMENT FRAMEWORK (IDF)  
AND**

**ON THE DRAFT STRATEGIC ENVIRONMENTAL MANAGEMENT FRAMEWORK (SEMF)**

The comments in this letter are the result of discussions held in two public meetings organised by the Hermanus Ratepayers Association in partnership with the Hermanus Business Chamber and Whale Coast Conservation, and attended by members of the public and representatives of other Overstrand civil society organisations. Whale Coast Conservation is pleased to contribute to the development of the above referenced documents on behalf of its members and in collaboration with partner civil society organisations.

## **1 Introduction**

The general view is that the IDF and SEMF documents are good first drafts. They do, however, require improvement before they can be used for the purposes outlined within them. The comments contained within this submission should not be viewed as criticism of the drafts but as input to aid their improvement.

The National Development Plan 2030 (NDP) has been used as a reference to objectively review the contents of the IDF and the SEMF. The National Environmental Management Act

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Environmental Management Framework Regulations (2010-06-18) (NEMA:EMF) has been used as the reference for the contents of the SEMF.

The IDF and SEMF need to be forward looking handbooks for change and to prompt urgent transformative activity. Amongst many other issues, the NDP deals with the need for:

- 1.1 Spatial transformation
- 1.2 Enhance the resilience of people and the economy to climate change.
- 1.3 Longer Term - Implement realistic, bold strategies and global partnerships to manage transition to a low-carbon economy.
- 1.4 Develop a set of indicators for natural resources and publish an annual state of health of identified resources to inform policy.
- 1.5 Short Term - Respond quickly and effectively to protect the natural environment and mitigate the effects of climate change.
- 1.6 Reduce greenhouse gas emissions and improve energy efficiency.

These six NDP policy directives need to be responded to in the IDF and the SEMF.

## 2 Spatial Transformation

### 2.1 “Business as usual” is not appropriate - Scenario Planning is needed

The NDP clearly indicates that we **can’t afford “business as usual”**. Development planning needs to be based on what we know about and want in the future, not on an extrapolation of what has occurred in the past. While the draft IDF has done a good job of integrating formerly independent strategic planning documents, and uses language that is consistent with contemporary planning thinking, it fails to respond adequately to several important aspects of what we know about the future. This is particularly true of the statements of “Where we want to be in 2050” statements made under the IDF Strategic Directives headings in the IDF Part 3: Strategic Framework. These statements all assume that the Overstrand of the future will be determined by a perpetuation of past trends, with improvements in management and economic circumstances and performance and better management of the environment. This is not realistic because we know there are several **“game-changers”** beyond the control of the Overstrand community that alter the circumstances within which the Overstrand municipality and community will work and live.

Four of the game-changers are **population growth**, **climate change**, the **cost of energy** and the **management of waste**; experts may add others such as food security and social issues arising out of poverty (especially health and crime). **A formal process of scenario planning should be used**, with expert input, to develop realistic scenarios for the Overstrand under which different assumptions are made about population, energy, climate and other factors. This scenario planning process should allow for testing the sensitivity of the IDF to changes in assumptions about the factors that will influence our destiny in order to educate decision makers and the community on how to respond sensibly and timeously to changing circumstances.

## 2.2 Building Integrated, Functional Communities

The NDP describes reducing travel distances and costs, especially for the poor, by 2030, as the most important spatial transformation necessary. It lists the following as being the means by which this should be achieved:

- 2.2.1 The population should live closer to the workplace
- 2.2.2 Increase urban densities
- 2.2.3 Move jobs and investments towards dense townships
- 2.2.4 Strong measures must be in place to prevent further development of housing in marginal places (i.e. those that are inconsistent with achieving 2.2.1 to 2.2.3)
- 2.2.5 Commuting transport must be safe, reliable & energy efficient
- 2.2.6 There must be better coordination between modes of transport

The draft IDF deals with these 6 NDP policy directives at a greater level of detail, particularly in the section of the IDF setting out activities.

The lack of a human settlement plan in the IDF is a serious shortcoming that should be addressed. While provision of housing is a national and provincial competence, the spatial planning to provide for housing that is situated according to the NDP policy is a municipal duty. The municipal IDF also needs to:

- Set out the plans for commuting transport and coordination of the various transportation modes
- Provide spatial plans for community amenities necessary to support the community, such as educational institutions, medical facilities, law enforcement, etc.

### **2.3 Accommodation of Population Growth**

As the IDF correctly states, the all spatial and development planning depends upon a realistic estimation of the population and its demographics. There is a need to review the assumption made in the document that the population will be only 140 000 by 2050 and adjust the spatial development framework to accommodate a more realistic population size.

The proposal in 2.3.2 of the IDF that the overall population growth rate will be 1.5% between 2011 and 2050 is not credible unless specialist verification of this estimate can be provided. Access was given to a report from a respected member of the Faculty of Economic and Management Science at the University of Stellenbosch that indicates that the likely population growth rate will be double that used in the IDF.

On top of past reasons for in-migration, one of the expected effects of climate change is migration from areas affected by weather extremes to coastal areas such as the Overstrand.

It is estimated that, currently, the overall occupancy of dwelling units in the more affluent Overstrand residential areas is less than 40%, the majority being holiday houses. For the building of a functional and sustainable community, for the Overstrand economy to become resilient under the expected effects of climate change and the steep increase in the cost of energy and services, the occupancy of these dwelling units will need to increase substantially.

These effects are likely to substantially affect the population of the Overstrand in the 2013 - 2050 period. The underestimation of population growth in the IDF is a potentially fatal flaw.

### **2.4 Cost of Energy and Water**

The spatial transformation of the Overstrand needs to factor in the impact of a dramatic escalation in the cost of all sources of energy and of water. It is clear that the increasing costs and possible shortages due to the impact of climate change may impact on the on the mobility of people and goods within, to and from the Overstrand and on the way people use energy and water in their homes and places of employment.

The IDF needs to respond to the likely impact of this cost increase and potential scarcity of energy and water supply on the Overstrand community. The response needs to include consideration of the impact of energy and water cost and scarcity on holiday home occupancies, businesses and on the tourism industry.

## **2.5 Management of Waste**

Landfill sites and sewage treatment works in the Overberg all run out of capacity within the 2050 time horizon of the IDF, the date by which this will occur being highly sensitive to the estimates for population growth. The IDF needs to make urgent plans for dealing with waste at its source. Perpetuating historical waste treatment techniques will not resolve the problem; new “zero waste” approaches to waste avoidance are essential.

## **2.6 Management of Transport (refer to attached Hermanus Ratepayer’s Association document for expert input on transportation policy and strategy).**

The NDP policy directives regarding planning for safe, reliable, energy efficient commuting transport demands departure from the paradigm of private car-dominated modes of transport to public and non-motorised modes of transport. The IDF needs to provide clear policy guidelines for the development of the future modes of transport and make bold steps towards implementing these. The IDF should set out a transportation policy and strategy that makes the proposed development of R43 realignment / Hermanus by-pass unnecessary.

The IDF needs to focus on accommodating population growth by substituting public transport for the use of private cars in order to efficiently utilise existing roads and transport infrastructure rather than investing in the construction of roads, such as the “realignment” of the R43 / Hermanus by-pass road.

# **3 Enhance the resilience of people and the economy to climate change**

The IDF needs to make more realistic statements about the desired future, that factor in predicted climate change induced changes in the Overstrand’s circumstances, and provide plans that respond appropriately.

Climate change is referred to in numerous sections of the IDF, but only in general terms (sea surface temperature rise, sea level rise, atmospheric temperature rise, drought, deluge rain, storm surges). **There is no attempt made in the IDF to describe the expected impact of these**

**upon the Overstrand nor to provide any detail about what adaptation and mitigating steps should be planned for up to and beyond 2050.** This is a serious shortcoming that needs to be addressed.

The Working Group I Contribution to the IPCC Fifth Assessment Report Climate Change 2013: The Physical Science Basis - Summary for Policymakers, released in September 2013, provides the basis on which predictions for and the effects of climate change can be based. There is a high level of confidence in these predictions. They should be given serious consideration and urgent actions should be taken to prepare for their inevitable effect on our community.

In compliance with the National Development Plan's policy that all spheres of government need to enhance the resilience of people and the economy to climate change, **the IDF needs to interpret predicted climate change effects on all aspects of life in the Overstrand and to plan specific adaptation and mitigation measures.** Within the 2050 time horizon of the IDF, climate change will impact on the natural and built environment, on the municipality's maintenance and development of infrastructure and services and on its emergency services, on population growth and its demographics, on the community's lifestyles and wellbeing and on economic activity in the community. It will also affect the source of food and other supplies from areas outside of the Overstrand and may impact on international tourist travel from parts of the world from which many of the tourists currently travel.

**An awareness, education and skills development programme is needed** to develop capacity in the community and amongst the municipal employees to respond to the climate change and to become resilient to it. **The municipal communications strategy, which should detail the role of community newspapers and radio in contributing to community awareness, needs to be included into the IDF.**

#### **4 Implement realistic, bold strategies and global partnerships to manage transition to a low-carbon economy**

In order to respond to the NDP policy directive to implement bold strategies to manage transition to a low-carbon economy the Overstrand should **implement an integrated "Transition Town" and "Zero Waste" programme.** Such a programme will develop economic resilience in the local economy and in the community by responding to many problems related to climate change, high energy costs, waste management and low employment levels.

**Transition Town programmes** build community resilience by building the local economy and self-sufficiency. Transition programmes aggressively economise on resource consumption and move away from dependence upon fossil fuel energy sources and are consistent with the NDPs policy directive to put strategies in place to “reduce greenhouse gas emissions and improve energy efficiency”(1.6 above). They promote community based enterprises and local supply of goods and services by the community to the community. There are many examples of Transition Towns throughout the world from which learning can be taken.

**Zero Waste initiatives** tackle waste by seeking to eliminate waste at source rather than disposing of waste. San Francisco is an example of a Zero Waste City and there are many examples of zero waste companies, one of which is General Motors SA which will eliminate waste sent to landfill sites by 2015.

The implementation of both Transition and Zero Waste approaches have impacts upon spatial planning. **The IDF should present a strategy that combines the Transition and Zero Waste initiatives and makes provision to accommodate these in the spatial plans.**

## **5 Develop a set of indicators for natural resources and publish an annual state of health of identified resources to inform policy.**

The SEMF provides an environmental “situation analysis” but this does not align with international, national or provincial “state of the environment outlook reports” (SoEOR). It is recommended that the SEMF should be reorganised to align with the headings and format of the national and provincial SoEORs and that it should be used to guide both environmental management policy and activities and those of all other municipal departments and of the private sector.

The Western Cape State of the Environment Outlook Report, 2013, shown in fig.1, should be adapted to reflect what is currently know about the Overstrand environment and incorporated into the SEMF.

Western Cape State of the Environment Outlook Report - 2013	
Air Quality	→
Biodiversity & Ecosystem Health	↓
Climate Change	↓
Energy	↓
Human Settlements	↑ ??
Inland Water	↓
Land	→
Oceans & Coasts	↓
Waste Management	↑ ??

The dominantly downward trend shown in the Western Cape SoEOR illustrates the urgency with which short term actions need to be taken to be in line with the NDP's policy directive to "respond quickly and effectively to protect the natural environment and mitigate the effects of climate change" (1.5 above). The action plan listed in the SEMF and the IDF need to reflect this urgency and to be strengthened.

## 6 Alignment of the SEMF with Legislation and Policy Guidelines

**Spatial Planning Categories (SPC) used in the SEMF do not align with the Western Cape provincial SPCs and should be brought into alignment.** The important aspect of this is the additional levels of categorisation provided by the provincial SPCs that improve the protection provided to threatened and endangered species. The much coarser and less discriminating Overstrand SEMF SPCs should be replaced by the provincial SPCs.

**The definitions in the SEMF should exactly align with the most restrictive/conservative versions contained in legislation.** This is important given that the SEMF will be used as the basis for deciding Environmental Impact Assessments and any deviation from the definitions found in legislation will lead to confusion. For example, the definition of an "estuary" should be that found in the NEMA EIA regulation Listing 3, which defines an estuary in terms of its functional area. Other definitions should be checked against those found in legislation.

**The SEMF should give clarity on and reinforce the protection of nature reserves / protected areas** by giving clear policy statements that encroachment for development and roads not



directly serving the purpose of the nature reserve / protected area will not be permitted under any circumstances by the Overstrand municipal land use planning authority.

## 7 Expansion of Marine Protected Areas

The SEMF refers to existing marine protected areas and includes a map (Fig.13) alluding to future protected areas. To protect the already depleted fisheries and provide for rebuilding stocks, **there is a need to extend marine protected areas and to identify no-take zones comprising at least 20% of the total Overstrand coastline.** It is recommended that this should be incorporated into the SEMF as a high priority.

Thank you for the opportunity to make input and comment upon the Overstrand IDF and SEMF. The WCC and its civil society partners will be pleased to engage in discussion with the municipality and to provide explanation and elaboration on any aspect of the contents of this document that the municipality wishes to clarify or challenge.

Please acknowledge receipt of this document and respond to the issues raised.

Yours faithfully



Rob Fryer  
Manager