



KAMER VAN KOOPHANDEL
EN NIJVERHEID ARUBA

**ZIENSWIJZE KvK TEN AANZIEN VAN
HET CONCEPT RUIMTELIJK
ONTWIKKELINGSPLAN 2019
(cROP 2019)**

DIP	
Ingek.:	15 MAR 2019
Volg.nr.:	

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Boulevard #10

The Ministry of Spatial Development, Infrastructure and Environment
Mr. Otmar Oduber, B. Sc.
By means of Mr. dr. Rigoberto H. Croes
Sabana Blanco 68
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Message by hand delivered

Oranjestad, March 15, 2019
KvKno. 019-19/SV/rc

TELEPHONE:

Secretariat:
(297) 582-1120

Topic: opinion on the ROP 2019 documentation

Your Excellency,

Registers/Business Info:
(297) 582-1566

Through this letter the Aruba Chamber of Commerce and Industry (KvK) would like to express her opinion on the content of the draft Ruimtelijke Ontwikkelingsplan 2019 (cROP 2019). The KvK has the responsibility to represent its ca. 17,000 registered businesses and has made an effort to consult the opinion of the private sector and take into consideration their input based on expertise. KvK has also given the community the opportunity to present their concerns through a Town Hall Meeting held on March 12, 2019. The KvK represents and expresses an objective and sectoral point of view and attempts to present these ideas and concerns in a constructive manner to improve our economic and social well being.

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The KvK is in support of the cROP 2019 and its endeavors; however there are certain areas and topics which require clarification, changes and improvements in its execution. We have included our opinions in writing and we look forward to your prompt reply on the issues presented herein and a continuation of good communication and enforcement of the mindset of "Trahando Hunto".

BANK ACCOUNTS:

Aruba Bank:
112.354.6

Banco di Caribe:
814771.01

Caribbean Mercantile Bank:
611.799.06

RBC Royal Bank:
90.06.176

REMARKS FROM THE CHAMBER OF COMMERCE:

General remarks:

It is unclear for the KvK how the size (total surface) of each zone has been determined. We suggest including an indication of the percentage of the share of the surface of the areas that are being allocated to each zoning category as defined on the map, compared to the total island surface. Preferably, according to any international standard/benchmark definition or matched with a need/requirement for Aruba as to a minimum (or maximum) of total area allocated for a specific zoning category. An appropriate balancing of the share of each area is recommended. The KvK is of the opinion that there should be an explanation to clarify how the new zones are defined and why there is such a big difference between the zones of the ROP selected in 2009 and the same areas in ROP 2019.

Due to the fact that it is unclear how the partition, in percentages for each zone has been determined, it is likewise unclear if there is a balance between all zones at all.

Page 2 KvKno. 019-19/SV/rc

For example, the balance between the share of 'natuurgebied' and 'woongebied' in areas with decades-old use (and investment in property acquisition by families) for agriculture, residential/commercial development. The community has expressed that this is not considered and interpret this as a win-win situation. There are large swathes of green areas in Parke Arikok, the whole of the north coast, the coastal areas and some large Government-owned land available for nature is a disproportionate portion of green space, which reduces the need of declaring small to medium sized property land plots for residential/commercial development as 'natuurgebied'.

The ROP 2019 does not mention the Watty Vos Boulevard (WVB) and how urban development impact is included in the planning. It is very important to indicate in the ROP 2019 that the WVB was planned for the use of the local population to reach places of work, places of residence, schools and personal services and not create land use for the expansion of tourism or the creation of industrial areas alongside the WVB. The KvK is of the opinion that these industrial and intensely commercial areas should be concentrated in clusters of common use in a particular zone (Barcadera, Eagle, Dakota zuid, Kibaima Tanki Flip road for example). Savaneta for example is a residential area where many commercial activities take place amongst the residential zones. In this aspect consideration must be taken to specify the marine area and its purposes. Property acquisition by tourists, tend to appreciate land value excessively. This makes the area around it inaccessible for locals that already have to deal with very high prices in the Noord Palm Beach areas because of this. Please let us not spread land inflation caused by wealthier foreigners' demand crowd-out or locals form convenient residential locations along or connected to WVB now and in the future. This sort of expansion of tourism activities penetrating Aruban residential neighborhood would be a contradiction and detrimental very to the cost of living of locals. The KvK strongly suggests to keep WVB as the fast-paced traffic route for all neighborhood inhabitants to travel to (most of the workplaces) in Noord and Oranjestad in the morning (San Nicolas travel time is of the essence) and likewise guarantee a rapid return to their places of residence, so they can visit their local supermarkets, take their children to activities after school or just improve their quality of life by reducing car travel time. The creation or stimulation of other economic activities than those serving the locals, such as personal services, bakeries, supermarkets, schools, financial institutions, sports facilities, parks, pharmacies, doctors, government services, in a convenient and easy to reach location will increase traffic and increase travel time.

There are zones mentioned in the ROP that do not comply with their existing assigned description or purpose, meaning that the purpose is different in the ROP from the existing purpose. As there is still no ROPv in place several plots are not protected. Destruction to green areas during the period under the ROP of 2009 has not been accounted for and no one has been held responsible for damages made.

There are also cases where property land was absorbed to be part of Parke Arikok which would have been reimbursed. However, we understand that the Government has never paid these owners or compensated them in any way. How will the Government of Aruba (GOA) avoid this from happening again? Some people have actually put these properties as collateral for financing or have invested family savings in property that is now worthless.

Page 3 KvKno. 019-19/SV/rc

This is not a characteristic of rule of law, common sense and consideration of the effect on others of rather arbitrary decisions.

The colors used in the mapping are somewhat confusing. Certain areas that border each other are not clear due that the colors are very similar. Also, when requesting detailed explanation to the exact border of the colored areas this is not available either. We suggest having the Spatial Department (*Kadaster*) mark the specific borders and make them available online, with an explanation of every color category and icons.

It is unclear for the KvK if any analysis has taken place which would describe why the ROP 2019 has changed so much from the previous ROP. The sustainable aspects are somewhat unclear and it should include a specification as to whom has been consulted (experts, NGO's and directly affected citizens in each area/zone) in order to come with an assignation or alterations for the areas. Certain areas which in previous ROP 2009 (and ROP 2019) have certain assignation are not being followed as indicated. For example tourist activities assigned in areas of local residential use are now included, which is and will cause extra traffic and/or noises. There is no ROPv to rely upon to take action.

The ROP 2019 categorizes the tourist activities of houses (home-sharing like AirBnB) as touristic activities but does not mention what action will be taken for the protection of the home owners within a residential zone who have a right to peaceful enjoyment of their home, without increased foot traffic, recreation activities (parties with loud music). The ROP is a specific tool to guarantee this enforced with a ROPv. Due to the fact that the previous ROP 2009 was not supported by a ROPv nothing was done against these activities and the question remains whether the ROP 2019 will undergo the same process for the coming decade. Will enforcement of these rules be effectuated and respected? Too many laws cannot be, because of no specific persons/authorities in charge of doing the job because of lack of funds.

It has come frequently to our attention that when the community requests specific information and explanations from DIP, there is no one to attend them. There is a need for more detailed presentations and effective information channels in order to have a better understanding of the contents and reasoning behind the ROP.

The community is requested to submit their feedback through an opinion (*'zienswijze'*) however the uncertainty exist from the community whether this will be taken into consideration at all, like it happened before. Will the rule of law be applied like in a developed democratic society?

In the community there is the need to have more time for the community to be able to voice their opinion and contribute to the ROP 2019. The decree to start the legal process was issued on December 21, a mere 48 hours before Christmas Eve and the New Year, simultaneous with the first round of tax reform. There were at least 6 days with Government offices closed for business in that period. And then came carnival and by February 15 the *'inzage'* was finished; only web page consultations were possible. It was bad timing and the people's serious concern on this matter should be addressed urgently. This is not a legislation to decide on the color of a license plate. This law affects the lives of all residents, their family patrimony, the economy, their personal finances, and their future. A longer period is needed, of at least 30 days more for such a fundamental law.

Page 4 KvKno. 019-19/SV/rc

The commercial community has also indicated the need to see the KvK forming part of the RRO: Raad Ruimtelijke Ontwikkeling. Earlier in the letter it is mentioned that KvK represents at least 17,000 small, medium and large businesses and indirectly the well-being of customers and employees. KvK has the facilities, personnel and networking capabilities to be a true representative of these interests and values.

There is no indication whether the carrying capacity of the island has been taken into consideration in order to assign more areas for hotels or commercial purposes for example.

The KvK desires to be informed if there is a report by a reliable source, the Algemene Rekenkamer Aruba (ARA) for example, to document how the enforcement and implementation of the 2009 ROP has been since 2009. If there has been a study or investigation, than this should be publicized.

It is now unclear how the ROP 2019 was elaborated, without having any relevant and reliable historical data on what happened the past decade. There should be statistical information available supporting the economic impact of the ROP 2009 and also on what fines have been given and what exceptions have been granted and other factual details which would have been the basis to create the new Draft ROP 2019.

The KvK strongly encourages to an ROPv legislation in place, as soon as possible. In particular to clarify cases where there is already a commercial area defined.

The ROP indicates that exceptions are possible however it does not stipulate what the criteria are for an exception to be granted. The KvK advises to have these ready before the next legislative and implementation steps are taken.

In regards of topics mentioned under 1.1. Woningbouw:

The GOA should indicate how it will stimulate the accommodation of empty buildings dispersed all over the island. It should be balanced in the ROP areas. At the moment there is extensive over-construction and low occupancy all over the island.

The ROP 2019 should stipulate the requirements for parcels or zones which currently have assigned a commercial destination as mentioned in the previous ROP 2009 and indicate the reasons why there are certain areas which now have a different purpose such as residential in the ROP 2019. Likewise there are land plots located in the middle of commercial and residential areas, with all utility infrastructure present, ideal building surface and connectivity to main roads, that have been unexpectedly and without any previous consultations or explanation converted into natuurgebied, while the best use is to fill-up empty plots among houses, and businesses to avoid these needs be served with new land development in undisturbed further away areas.

The ratio of high quality residential area and social housing area should be clarified in the ROP 2019.

Investors who have already invested into the development of certain projects in areas that now according to the ROP 2019 have a different zone purpose should not be jeopardized in their business and have their projects ostracized or ruined. These victims rightfully feel their constitutional property protection rights violated if there are economic or financial damage as a consequence of these decisions, then these affected persons and companies should be properly compensated for the financial damage incurred. Furthermore, the investors should receive a clarification on the continuation of their projects.

Page 5 KvKno. 019-19/SV/rc

The KvK strongly suggests a review of these cases and to attend them individually. The rule of law so demands. There is a large area in Palm Beach which has been transformed to allow the construction of a condominium. The residents of the area have indicated that this was not in the previous ROP 2009 and feel that their rights are being diminished since this area is not intended for such project, especially as most condominiums/apartments are being used for tourist activities which cause a lot of vehicular and pedestrian traffic (we all see today how many AiriBnB tourists are walking the streets to save money on transport) and of course noise (mentioned earlier).

KvK is of the opinion, that if local residents invest their life savings in a property, that for decades is located in a purely local residential area, they should not be arbitrarily affected in their quality of life, value of their lifetime investment (their home) or with excessive value increase (property taxes) or traffic increase by their own Government's decision..

It is unclear what the difference is between condominiums and apartments. There is no clarification in the ROP 2019 of the difference. Furthermore, these are not properly regulated.

In regards of topics mentioned under 1.2. Toerisme:

Any development, in particular of hotels near the Baby Beach and Rodgers Beach area, should keep into consideration the nesting areas and spatial requirements for ocean life, by way of protection of mangroves, turtle nesting space, control of water pollutant risk (oil from cars leaking in parking lots and roads close to water, harsh cleaning detergents, fertilizers etc.)

The ROP 2019 should clarify that the beach area will remain accessible for locals to enjoy their island's natural assets and no more construction that increases population density close to the beaches should be allowed.

The requirements for construction of hotels in the Colony area should be specified. Furthermore, clarification on requirements such as all-inclusive or not, amount of rooms, the ratio between local labor force and imported, brand name and category hotel/chain should be given in the ROP 2019.

We recommend for the hotels to be build in San Nicolas be destined for eco tourism, boutique resorts, located in planned subdivisions (verkavelingsplannen) divided in small plots 2,500 to 5,000m² for hotels of 50 to 100 rooms with a planned pedestrian traffic access of these multiple plots towards the beach, via wide landscaped boulevards, without crossing vehicle roads (higher tourism value). Mass tourism is not recommended and discouraged, because of labor impact and quick use of available land, leaving nothing for the future generations. To create critical mass for adequate spin-off effect in San Nicolas, a 4 star hotel of 250 rooms will impact as much as the Aruba Caribbean Hotel impacted our economy in 1959. However, it will not empty Palm Beach and Eagle Beach hotels suddenly of 100's of employees and creating vacancies to be filled by immigrants with their spouses and children (population increase)

To justify the construction of a 900 room hotel it is implied that a growth in tourism and airlift is expected. The study for this growth should be mentioned to support the construction of new (boutique) hotels in the Colony area. The results and recommendations of studies made for the development of this area should be explained and publicly discussed. The KvK is of the opinion that a steady growth of the 900 rooms of a period of 15 years, absorbing new generations of employees would benefit the country better than an abrupt growth of 900 rooms.

Page 6 KvKno. 019-19/SV/rc

The The ROP 2019 should stimulate the development of sustainable tourism, in particular for the hotels and assigned areas. From the map we can deduct that the green area at Tierra Del Sol has been changed into tourist activities. Can the GOA give a clarification for this specific change?

Does this mean that the golf course, essential for this category of tourism and the role of the Golf course itself, as a required need for the high-end tourism market (the reasons it was created) will be eliminated? As the GOA desires high income tourism, a golf course is one of the factors to draw the tourists. We would like to have a statement of the GOA regarding this matter. From the map we deduct that the green area at Divi Links is changed into tourist activities. It is necessary that there is a clarification for this specific change. Furthermore, there must also be an explanation on what this means for the existence of the golf course area. Will there be more hotels build on this piece of area? ATA indicates the need for high value and low impact development to help the growth in tourism. The ROP should consider this vision or indicate and motivate any deviation of this vision to support the plans for hotel developments.

The KvK supports the standpoint of ATA for the development of high value and low impact tourism. It should be demonstrated through the ROP 2019 that 900 extra rooms fit in this structure and preferably clustered together with existing tourism development and not spread out further "into the interior".

This zone mentions the AirBnB and other company that rent houses as a tourism activity. These activities should therefore only be allocated in the tourism zones. The GOA is aware of the development of these tourist activities in the areas that are allocated for residential areas. The ROP 2019 should clarify whether the GOA will take action against these tourist developments in residential zones as this is a direct breach of the ROP 2009 and 2019.

The criteria for the AirBnB in Aruba should be stipulated. Furthermore, the AirBnB type of accommodation should be monitored and remain compliant with local taxation. The KvK has noticed that there is no plan or regulations formalized regarding the AirBnB development in Aruba. This is of importance for the safety in residential areas. This is in conflict with the zoning regulations for residential areas. AirBnB is not included in the sectors for tourism development and are not regulated with a nuisance permit or any other required licenses or permits. The ROP 2019 needs to stipulate on which grounds it makes exceptions for tourist activities in residential zones Similar to certain businesses located in residential areas (such as septic tank) The KvK is of the opinion that only AirBnB should be allowed in residential areas (home rental), not resort construction.

Without a nuisance permit there will be a proliferation of activities in residential areas. This should also be applicable for condominiums near residential areas. As of now there is an agreement with AirBnB, but there are other similar type of business models that do not have any agreement and this can be considered as illegal and not easily controlled. The complaints of the residents in these zones are growing and their right to peaceful enjoyment of their resident is being infringed. Also this development contributes to the effect that there are less affordable houses for local residence to rent or to purchase.

Page 7 KvKno. 019-19/SV/rc

In regards of topics mentioned under 1.3. *Economie*:

The development of Port City should compensate the economic aspects of the ROP 2019. The status and developments regarding the "Port City" the last large plot of land in a very crucial and socially (potential quality of life impact) and strategic location have not been discussed in public or made available to the public and NGO's Trade organizations, local investors, interested persons to view in order to give an opinion in regards of the destination of this very important part of Aruba, in the ROP 2019. The KvK has come to know that there is planning for two hotels (!) but no indication of any decision regarding condominiums. The KvK strongly advises to reconsider this project and its purpose. At this moment, more rooms are not needed to alleviate employment. We are at a time where we have tourism job vacancies that cannot be filled. For what reasons should we develop any more rooms? Consideration should be taken of the moratorium until unemployment generates the need to develop in stages. Otherwise we would be solving the employment problems of other countries and eliminating the vacancies of jobs of the future for our children and next generations. The taking into account the land shortage problem of 'Erfpacht', the unsurmountable land development requirements for 'Eigendom plots', that makes it almost impossible for families to split inherited property, the KvK would strongly advise to allocate primarily local residents to the new Port City residential location and keep new commercial initiatives on a minimum in order not to cannibalize on the current long term established (and long term jobs held) in the businesses in the area and create possibilities to stimulate commerce in the main street area with population moving more into downtown and opening homes for next generation and current home seekers. This strategy will stimulate locals to find residence in downtown area (attracted by ocean views, convenient location 200 meters away from Watty Vos boulevard, the Bushiri beach access) and it also saves on allocating undisturbed new plots of land taken from nature for residential needs. This concept would generate new consumers and stimulate businesses downtown. Port City area should not be targeted for further commercial development. A waterfront residential development should be carried the existing commerce. There should not be buildings constructed that obstruct the current view to the ocean. These should be of high rise and with ample space in between for public and vehicle access up to the waterfront, which should be exclusively pedestrian. View to the ocean between buildings of architectural value and beauty from an amplified (more lanes) L.G. Smith Boulevard should be the goal. Furthermore, this should not affect the fishing and fishermen's facilities in the area. Improvements for them and sport fisherman's of other areas should be encouraged with better facilities.

There must be clarification regarding the development of Barcadera for residence and commercial areas: condo's and boutique hotels. It is a location where buildings cannot be too high because of aircraft traffic. The noise is considerable. It is an ideal location to mix occasional residential to take advantage of the view with intense high-tech hydroponics, taking advantage of the closeness of the port for their supplies, ideal location for distribution to supermarkets via Watty Vos Boulevard and Kibaima Tanki Flip road and Smith Boulevard to Savaneta, San Nicolas. Light industrial and distribution is also encouraged to be clustered there.

Page 8 KvKno. 019-19/SV/rc

The GOA needs to make clear how it will tackle the situation of the existing commercial buildings which are currently not rented or long-term in abandonment without any maintenance, and which do not resemble the desired infrastructure of Oranjestad and San Nicolas in order to be an asset to the economy.

The GOA is required to clarify what are the stimuli for commercial areas according to the ROP 2019. The existing or new companies must be encouraged to 'move' to the designated commercial zones / parks and create strong commercial areas.

There must be transparency in the further development and expansion of the refinery, airport and cruise-ship area according to the ROP 2019.

Agriculture is not specifically mentioned on the map. This has to be defined and indicated how it will be managed and developed. We refer to previous case of Barcadera and recommend areas of rain flow downhill to take advantage to make Dams for water storage. Paradera, Sero Pita, Matividiri, Yaburibari areas for example.

In regards of topics mentioned under 1.4. *Zorg, welzijn en sport*:

It should be specified in the ROP 2019 which areas/projects are assigned for recreational purposes such as Parke Curason. It is important that these are sustainable and continuously maintained to keep traffic and better use of the capital invested. The same reasoning is valid for the Linear Park and other existing recreational zones between houses. The safety and durable lighting is also very important.

The areas that are selected for medical, wellness and eco-tourism development should be specified in the ROP 2019.

In regards of topics mentioned under 1.5. *Verkeer en vervoer*:

The ROP 2019 should identify the areas which have higher need for facilities for cyclists, pedestrians and the disabled.

Parking areas near hotels need to be developed to hide the large volumes of vehicles of employees and tourists. Properties should be allocated for parking for the guests and workforce. The KvK recommends to invest in several multi floor parking spaces combined with office for supporting services to the hotel area, to increase feasibility with rental income. The sunk investment cost could be taxed, very long term (30 years) with a special purpose property tax surcharge.

In regards of topics mentioned under 1.6. *Duurzaamheid*:

Stricter measures when building needs to be specified: consequence for not complying with rules and regulations. Give a deadline for recognizing permits, subject to conditions that must be allowed. If the 'onteigeningsverordening' is implemented, the results, the costs and its success need to be explained. The owner needs to know what the impact will be on the leasehold.

There is no mentioning about the current digging areas which are used for (illegal) dumping. There is no policy in place to address any sort of action.

Page 9 KvKno. 019-19/SV/rc

There is in Seroe Tjishi (illegal) dumping that has been done by the Government and how can this be justified without a clear explanation and a plan.

The dugout areas need to be assigned within the ROP 2019. Possible landfill zones need to be identified and specified which category they belong to in the ROP 2019.

In regards of topics mentioned under 1.7. *Natuur en landschap*:

The ROP 2019 should describe what can be understood under 'protection and conservation of green areas'. A clear decision has to be taken to what will happen to owners of properties that fall within the borders of the protected green areas.

Proper compensation of losses has been mentioned before. Furthermore, define whether they can request permission to develop within their premises. If areas are currently in development it must be clear if this development can proceed for economic use.

There is no explanation as why there is a distinction between "nature" and "protected areas". What can or cannot be developed, what are consequences of breaking the law etc.

Owners who have an ongoing land development business, economic use of plots, developed or being developed, should be excluded from restrictions of their ongoing initial activities/plans. It conflicts with constitutional property rights. The capacity should be considered: if a green area is removed for tourist activities, then somewhere else which is allocated for tourist activities should be taken in and assigned as a green area. The value should be considered and a switch does not imply extra destruction to the natural environment but this should be executed with consideration to maintain green areas.

A policy needs to be in place for reforestation and sustainable green areas that are not in use anymore for industrial/commercial residential, or have been cleaned up in the past for other uses.

Certain green zones from the ROP 2009 have been eliminated and changed in the ROP 2019 to tourist activities. One example is the area of Tierra Del Sol and Divi Links. The change needs to be substantiated with proper justification. There should be clarification in why certain areas are now touristic. The criterion has to be specified and explain if hotels will be developed in this area and the reasoning behind expansion of tourism area versus the green zones. This should be strongly motivated with explanation and a possible study of this area.

The KvK would like to see that the golf course area of Divi Links should permanently remain a green area and not to be developed into a touristic zone. We would like to avoid seeing the golf course to be replaced or allocated for expansion of the hotels for profit only. If the Golf zoning is permanent, its use by the current or future development, for that sole purpose, is assured.

There is no consideration in the ROP 2019 for the necessity of having breakwaters and piers constructed to maintain the quality of the beach areas. This should also be in consideration with the marine life and the concept for a marine park.

It is unclear how the determination has been conducted to indicate which areas are allocated for a marine park. Did the ROP 2019 take the protected marine parks of the Landsbesluit of December 20, 2018 AB 2018 no. 77 into consideration? These protected areas should be mentioned specifically in the ROP 2019.

Furthermore, the conservation and protection against further destruction of for example the mangroves should also be specified.

Page 10 KvKno. 019-19/SV/rc

These are very critical points for the ecosystem and survival of different stakeholders ranging from fisherman to tourism related businesses.

We would like to point out that the marine parks should be protected against fishing by non-locals in our territorial waters and causing damage to our economy. Furthermore, there are fishing nets being sold in local stores that should be banned since these nets also catch small fishes and turtles but also causing great damage to the marine world

The boundaries and terrain of the north shore needs to be supported by a study to clarify its purpose. Furthermore, the ROP 2019 should indicate to a certain extend how much can be build per area.

Property land in ROP 2019 has their rights and these have to be respected. In particular if these plots have already been developed or are being developed or have an economic intention.

In regards of topics mentioned under 1.8. Monumenten en cultuurhistorie:

It should be mentioned in the ROP 2019 how San Nicolas will be developed into a "cultural and heritage capital" and the impact of the bars and the red light district around the corner. The bars and 'service ladies' has its influence and reputation on San Nicolas as a touristic/ cultural and family area development. It casues stagnation of new investments in retail, shies away consumers and generates less desirable nighttime activities in the adjacent streets. Shoud we move the red-light district to another location close nearby (one or two steets to the north where the "hanchi's" are?) All clustered together and with one entrance and a wall around it, like a gated community? That would free up the main street to become retail and recreational.

The criteria for building / infrastructure that fits Aruba should be identified. The ROP 2019 should include recommendations and examples of how its culture and identity factors are safeguarded in order to remain touristic and attractive.

The requirements for the archeological and monumental protected areas should be specified in the ROP 2019. In particular the natural (geological) monuments such as the various rock formations, caves, dunes and public beaches needs to be strictly protected with specific instructions and restrictions. Eagle Beach is one of the most

famous beaches in the world and there is no protection or restriction to maintain this geological monument and should be preserved in pristine condition for this and all future generations.

There are many abandoned (monumental) buildings in San Nicolas and Oranjestad and the ROP 2019 should provide guidance to their preservation and use.

In regards of topics mentioned under 1.9. Uitvoering:

A deadline or date should be specified to indicate when the ROPV can be expected to be formalized.

The RRO: Raad Ruimtelijke Ontwikkeling should have members with experience on all sectors in order to successfully create a balanced plan in the interest of Aruba.

KvK is available and willing to take part in the Raad Ruimtelijke Ontwikkeling. Based on the neutral position of the KvK, the KvK would be a suitable member of the council and would like to be considered to join (request of the community).

Page 11 KvKno. 019-19/SV/rc


The community should be heard and we suggest having meetings with each neighborhood and collect information from the residing stakeholders. They would know better

In regards of topics mentioned under 1.13 Transformatiegebied:

It is not clear how the government wants to achieve turning a commercial area into a highly valued residential area. There are buildings which have already an assigned purpose, either residential or commercial, and the latter is an ongoing business which should not be jeopardize as a consequence of the transformation zone. The ratio of a multidisciplinary zone should be explained further and the existing buildings/houses should be protected.

We are always willing to explain this to you during a personal conversation. If there are any questions please contact the Secretary, Mrs. Sonja Velthuisen, tel. 5821120 /ext. 41/29.

Sincerely yours,



Kawish Misier
President



Sofia (Sonja) J.G. Velthuisen
Executive Director