

**WESTERN HEADS / GOUKAMMA
CONSERVANCY**

For attention: Janet Ebersohn

3 October 2020

Dear Ms Ebersohn

OBJECTIONS TO THE DRAFT BASIC ASSESSMENT REPORT PRODUCED BY ECOROUTE ENVIRONMENTAL CONSULTANCY FOR A PROPOSED DEVELOPMENT ON PORTION 76 (A PORTION OF PORTION 54) OF THE FARM UITZICHT 216

The Western Heads–Goukamma Conservancy, in its capacity as a registered “Interested and Affected Party” wishes to detail below its objections to the draft basic assessment report referred to above.

A. Threatened biodiversity

- 1) Uitzicht 216 Portion 76 is part of a **Critical Biodiversity Area (CBA)**, first proclaimed by Knysna Municipality in its Spatial Development Framework (SDF) in 2006, and reconfirmed in the Integrated Spatial Development Framework (ISDF) of 2013, and the current draft SDF (Knysna Municipality, 2020a). CBAs are terrestrial (land) and aquatic (water) areas which must be safeguarded in their natural or near-natural state because they are critical for conserving biodiversity and maintaining ecosystem functioning. These areas include:
 - a. natural areas identified as requiring safeguarding in order to meet national biodiversity thresholds.
 - b. areas required to ensure the continued existence and functioning of species and ecosystems, including the delivery of ecosystem services.
 - c. important locations for biodiversity features or rare species.

The Environmental Assessment Practitioner (EAP) recognises the significance of this classification on pages 61 and 62 of their report, and even states that the objective of a CBA is to “Maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate”.

This objective appears to have been ignored because on page 58 the EAP seems quite content to proceed with the application despite acknowledging that 4.3% of the site will be destroyed if the development is approved.

- 2) Most of the CBA on the Brenton peninsula consists of Knysna Sand Fynbos (FFd 10) – which has been proclaimed as a **Critically Endangered** ecosystem (vegetation type). The Biodiversity Act (Act 10 of 2004) provides for the listing of threatened or protected ecosystems, in one of four categories: critically endangered (CR), endangered (EN), vulnerable (VU) or protected. The purpose of listing threatened ecosystems is primarily to reduce the rate of ecosystem and species extinction. This includes preventing further degradation and loss of structure, function and composition of threatened ecosystems.

The terrestrial ecosystems were listed in the Government Gazette no. 34809 of 9 September 2011, and Knysna Sand Fynbos appears on page 52. It also states that “if any other development that requires environmental authorisation Impacts on a threatened ecosystem, that impact should be avoided, minimised, mitigated and/or offset as appropriate. In determining the significance of impact on biodiversity in an EIA process, loss of natural habitat in a **Critically Endangered** or endangered ecosystem should be ranked as highly significant”.

The proposed development would destroy 1 200 m² for the farm manager's house and 3 650m² for 80% of the 830 m access road (5.5 m wide) which is in FFd 10. This impact is not acceptable in terms of the above legislation, and less damaging alternatives need to be proposed and evaluated.

- 3) A Regalis Environmental Services (RES) 2005 report describes the natural vegetation of the Western Heads and splits it into 16 distinct vegetation types. Uitzicht 216/ 76 contains seven of these vegetation types (Map 4.1), mostly in pristine condition (Map 4.2), some of which only occur on the Brenton peninsula (*):

- Moist Dune Fynbos
- Goukamma Dune Thicket
- Arid Dune Fynbos*
- Brenton Dune Fynbos*
- Primary Dune Slack Fynbos*
- Primary Dune & Cliff Fynbos*
- Foredune

In the Basic Assessment Report (BAR) prepared by the EAP the asterisked vegetation sub types have all been classified as Southern Cape Dune Fynbos (FFd 11), and "Least Threatened", without taking into account the RES (2005) report (attached).

- 4) The application/ BAR does not comply with "Procedures to be followed for the assessment and minimum criteria for reporting of identified environmental themes in terms of section 24(5) (a) and (h) of the National Environmental Management Act, 1998, when applying for Environmental authorisation. Protocol 3: Terrestrial animal species" Government Gazette no. 42946 dated 10 January 2020 (Knysna Municipality, 2020b).
- 5) No detailed biodiversity study has been done for rare and threatened plants and animals, as is required in the above legislation.
- 6) The property is located within the expansion footprint of the Garden Route National Park (GRNP) and is both a corridor for wildlife movement (east-west and north-south), and a buffer zone to the GRNP. The property is located between two properties that are in the process of being incorporated into the GNRN. This has not been recognised or dealt with by the EAP.
- 7) The primary dune is home to very special and sensitive vegetation. Removal of vegetation will cause erosion and landslides, as have been seen elsewhere along this strip of coastline.

Impact of development

- 1) The developers are planning to build the main residence on the primary dune. A lot of concrete and/or piles will be needed for the huge house envisaged. Will the 2.5m wide road planned provide access for construction vehicles?
- 2) The proposed access road to the main residence goes over the summit of the secondary dune, involving a steep climb and sharp bend. Construction vehicles such as excavators, concrete, sand and brick delivery trucks would not be able to get around such a sharp bend, and consequently more damage would have to be done to the secondary dune summit to make a wider bend.
- 3) It is proposed that sewerage is treated in septic tanks with a soakaway into the sandy (very permeable) substrate. It is also proposed that water is supplied from boreholes – how will contamination from sewerage be avoided?
- 4) The visual impact of a large house on the primary dune will be highly detrimental to the residents of Buffalo Bay, Brenton-on-Sea, and other Uitzicht properties. The natural beauty of the 5 km unspoilt beach (one of the finest in South Africa) would be defaced and there would be a loss of "sense of place". Furthermore there would be adverse impacts on tourism and property values.

- 5) A very large (160 kl) swimming pool is planned. How is it intended to dispose of the filter back wash water without harming the environment?
- 6) Why does the main dwelling have to have a footprint of 4 000 m²? That is the area of 4 residential erven in Brenton on Sea. Surely, if the largest houses being built in Brenton-on-Sea can be built on a single 1 000 m² stand there is no justification for the footprint of the main dwelling to be any more than 1 000 m².
- 7) It is proposed that water is obtained from rainwater off the roof and borehole(s). The elevation at the bottom of the primary dune slack where the borehole(s) would be drilled is c. 40m above mean sea level so it is likely that the water will be brackish and not fit for consumption. The quantity of water required would quickly lower the water table until sea water was drawn into the borehole pump. Another problem is how would the drilling equipment be got to the site to prove the water resource?

Knysna Spatial Development Framework

Zoning Scheme

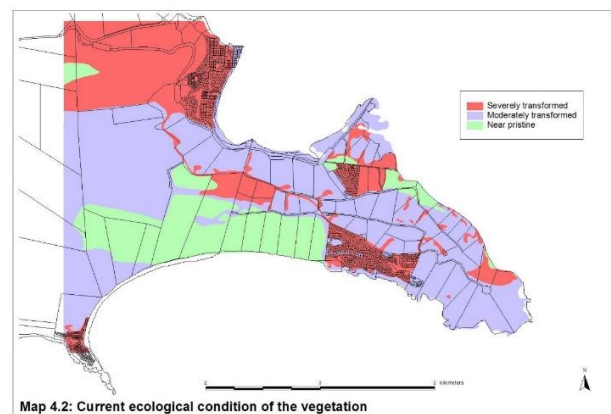
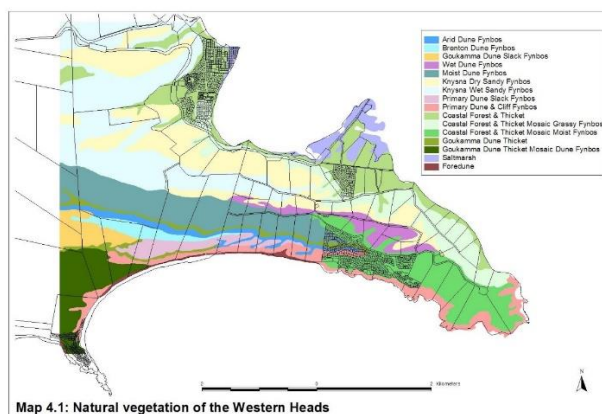
- 1) The area is located within a Core1b spatial planning category, which is the highest conservation status after formally protected areas which are located in a Core1a category.
- 2) The property is zoned Agriculture 1. The primary right is for a dwelling house and only such buildings or infrastructure that are reasonably connected with the main farming activities. As there are minimal farming activities on the property (bee keeping), no additional dwelling or unit is permitted.
- 3) Furthermore the Zoning Scheme does not permit any additional dwelling unit within 1 km of the high-water mark of the sea, unless such unit is attached to the main house and does not exceed a floor area of 60m². Since the entire property falls within 1km of the high water mark of the sea the additional unit will have to be attached to the main house and is restricted to a maximum of 60m².
- 4) The main dwelling, together with the attached additional unit should be located as close as possible to the existing public road, to minimise damage to the Knysna Sand Fynbos.

Alternatives have not been considered

Only two alternatives are considered, both of which would cause unacceptable and illegal environmental damage. An alternative that does not cause such damage has not been evaluated – namely that the main dwelling, together with the attached additional unit should be situated as close as possible to the access road on the northern boundary of the property. This alternative would destroy less than 1 000 m² of sensitive vegetation instead of over 8 000 m².

Maps

The maps below are extracted from RES (2005), with kind permission of the author.



References

Department of Environmental Affairs, 2020. Procedures to be followed for the assessment and minimum criteria for reporting of identified environmental themes in terms of sections 24(5)(a) and (h) of the National Environmental Management Act 1998, when applying for environmental authorisation. Protocol 3: Terrestrial animal species" Government Gazette no. **42946**. 10 January 2020.

https://www.gov.za/sites/default/files/gcis_document/202001/42946gon9_0.pdf

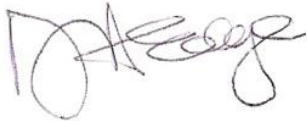
Knysna Municipality, 2020a. Draft Municipal Spatial Development Framework. May 2020.

Knysna Municipality, 2020b. Zoning Scheme By-law. 29 June, 2020. Province of the Western Cape: Provincial Gazette Extraordinary no. **8258**.

<https://www.knysna.gov.za/wp-content/uploads/2020/07/Knysna-Zoning-Scheme-By-law-2020.pdf>

Regalis Environmental Services (JHJ Vlok), 2005. The natural vegetation of the Western Heads (Knysna): notes on its ecological sensitivity and proposed future development. Unpublished report for the Western Heads Goukamma Conservancy.

OBJECTION SUBMITTED BY:



Dr David Alan Edge

Chairperson

Western Heads–Goukamma Conservancy

OBJECTION SUPPORTED BY:

- 1) Brenton Ratepayers Association
- 2) Buffalo Bay Homeowners Association
- 3) Uitzicht 216 property owners



**environment, forestry
& fisheries**

Department: Environment, Forestry
and Fisheries
REPUBLIC OF SOUTH AFRICA

FORESTRY WESTERN CAPE

Private Bag X 12, Knysna 6570
WCE0045/09/20-21

Tel: (044) 302 6900 Fax: (044) 382 5461 E-mail: MelanieKo@daff.gov.za

Enquiries: M Koen Ref: F13/11/2 Date: 30 September 2020

Eco Route Environmental Consultancy
Attention: Janet Ebersohn
Tel/ Cell: 044 343 2232/ 082 557 7122
Email: janet@ecoroute.co.za

**BASIC ASSESSMENT REPORT THE PROPOSED CONSTRUCTION OF AN ACCESS ROAD,
RESIDENTIAL DWELLING AND FARM MANAGERS HOUSE ON PORTION 76 OF THE FARM 216
UITZIGHT, BRENTON, KNYSNA**

- 1 Forestry is responsible for the implementation and the enforcement of the National Forest Act (NFA), Act 84 of 1998 as amended and the National Veld and Forest Fire Act, Act 101 of 1998 as amended (NVFFA). Thank you for giving Forestry this opportunity to comment on above application.
- 2 Forestry studied the supporting documents for the above mentioned application and the following points related to Forestry's mandate i.e. the implementation of the NFA are applicable
 - a. The above proposal still has to undergo a land-use planning application through the Knysna Municipality: Land-use planning Section.
 - b. Forestry will thus formally comment on the land-use application firstly before providing further comment to above application
 - c. Request that a more recent Plant Species Assessment of above property be conducted by a Specialist and that this Specialist report be forwarded to the Department for perusal with ample photo record templates of the whole study area- especially after the recent fires.
 - d. The exact location of these protected/ forest/ thicket patches/ of protected/ indigenous trees be surveyed/ GPS'd and overlaid within any developmental proposals to determine how these vegetation areas will be impacted- this information to be compiled within a report
- 3 Due to the Nation-Wide COVID-19 Lockdown, officials are working remotely for the duration of the lockdown period; and thus site inspections are not conducted at this stage. Site inspection might be required at a later stage, in due course, once safe to do so
- 4 Forestry reserves the right to revise initial comment based on any additional information that may be received or obtained

Yours Faithfully

p.p. AREA MANAGER FORESTRY: WESTERN CAPE

FW: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

From janet@ecoroute.co.za <janet@ecoroute.co.za>

Date Mon 17/02/2025 12:18

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Should you require any information please do not hesitate to contact me.



Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

From: Steve Krumm <stevek@netactive.co.za>

Sent: Wednesday, 30 September 2020 06:52

To: Janet Ebersohn <janet@ecoroute.co.za>; corne.steyn@icloud.com; constance.kapopo@investec.co.za; smallville@seanet.co.za; sucam@mweb.co.za; ejones@biothermenergy.com; craig.benadie@gmail.com; johns@elink.co.za; rob@multi-sc.co.za; nicci@futureworks.co.za; orachrysops@gmail.com; chrisandtix@telkomsa.net; 'Lorna Watt' <lornawatt@telkomsa.net>

Cc: 'Candace Myers' <candacemyers29@gmail.com>; 'Tony Rischbieter' <anthonyjames@icon.co.za>; Picca <piccascene@cyberperk.co.za>; 'Christa le Roux' <christa.a.leroux@gmail.com>

Subject: Re: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

Dear Janet,

Please register Brenton Ratepayers Association as an Interested and Affected Party in this process and we will be submitting a comment.

Thank you

Judy Harrison

Brenton Ratepayers Association

083 266 1200

From: Janet Ebersohn <janet@ecoroute.co.za>

Date: Thursday, 03 September 2020 at 13:16

To: <corne.steyn@icloud.com>, <constance.kapopo@investec.co.za>, <smallville@seanet.co.za>, <sucam@mweb.co.za>, <ejones@biothermenergy.com>, <craig.benadie@gmail.com>, <johns@elink.co.za>, Judy Harrison and stephen krumm <stevek@netactive.co.za>, <stevek@netactive.co.za>, <rob@multi-sc.co.za>, <nicci@futureworks.co.za>, <orachrysops@gmail.com>, <chrisandtix@telkomsa.net>, 'Lorna Watt' <lornawatt@telkomsa.net>

Subject: FW: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton





ECO-ROUTE ENVIRONMENTAL CONSULTANCY

EIA PROCESS

Notification of Public Participation: Draft Basic Assessment Report

The Proposed Construction of an Access Road, Residential Dwelling and Farm Managers House on Portion 76 of the Farm 216 Uitzicht, Brenton, Knysna Local Municipality, Western Cape

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998) as amended, the National Environmental Management Act: Environmental Impact Assessment Regulations 2014 as amended of a Public Participation Process to be undertaken from **03/09/2020 – 03/10/2019** under the authority of the Department of Environmental Affairs /DEA.

The following EIA Listed Activities are applicable:

Government Notice No. R324: (Listing Notice 3 of 2014 as amended)	Activity 4: (i) ii(aa) Activity 12: (a) i. ii.
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The Draft Basic Assessment Report may be reviewed for comment from **03/09/2020 – 03/10/2020** on Eco Routes website www.ecoroute.co.za. Should you wish to gain further information regarding the project or wish to register as an Interested and Affected Party please contact the Environmental Assessment Practitioner (details below). Please provide written comments with your name, contact details and an indication of any direct business, financial, personal or other interest which you may have in the development.

Environmental Assessment Practitioner: Janet Ebersohn

PO. Box 1252
Sedgefield
6573

Cell: 082 55 77 122
Fax: 086 402 9562
Email: janet@ecoroute.co.za

Additionally, information may be accessed via our website: www.ecoroute.co.za

Should you require any information please do not hesitate to contact me.



Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

B.I.V
P.O. Box 930
Stellenbosch
29 September 2020

Janet Ebersohn
P.O. Box 1252
Sedgefield
6573

Sent by e-mail: janet@ecoroute.co.za

Dear madam

Draft Basic Assessment Report: The Proposed Construction of an Access Road, Residential Dwelling and Farm Manager's House on Portion 76 of the Farm 216 Uitzicht, Brenton, Knysna Local Municipality, Western Cape.

The Buffelsbaai Inwoners Vereniging (BIV) acts on the public invitation to register as an Interested and Affected Party for the environmental assessment process currently being undertaken for Portion 76 of the Farm 216 Uitzicht, Brenton, Knysna Local Municipality, Western Cape. Please thus register the Association as an I &AP. If our understanding of the status of the process is correct, a Draft Basic Assessment Report (which we assume will include a Draft Site Development Plan with description of the proposed activity) has already been prepared. Upon receipt of the aforementioned documentation the Association will hopefully get a better understanding of the nature and extent of the proposed improvements and will then be in the position to comment.

We await your urgent response in this regard.

Greetings



H Knoesen: for and on behalf of the BIV

Voorsitter: Jacques Malan

Ondervoorsitter: Denis Booysen

Sekretaris: Roelof Feenstra

Tesourier: Pieter Carstens

FW: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

From janet@ecoroute.co.za <janet@ecoroute.co.za>

Date Mon 17/02/2025 12:19

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Should you require any information please do not hesitate to contact me.



Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

From: John Sole <johnmsole@gmail.com>

Sent: Tuesday, 29 September 2020 20:14

To: Janet Ebersohn <janet@ecoroute.co.za>; Evan Jones <ejones@biothermenergy.com>; Craig Benadie <craig.benadie@gmail.com>; Owen Williams <honeychildhoney@gmail.com>

Subject: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

Due to the time restrictions, please acknowledge receipt of this email.

Name : John and Anne Sole

Contact : 083-651-0610

Email : johnmsole@gmail.com

Interest : No direct business, financial interest but
Owner of Portion 114 of the Farm 216 Uitzicht, Brenton

Note : We have previously requested to be registered as an interested and affected party.

Comments on Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton as downloaded from www.ecoroute.co.za :

1. Page 21 of the draft BAR states "*The property is currently vacant, but was used for tourist facilities that include a restaurant, and farm store.*".

Page 21 further states "*The developer intends to re develop the property into a restaurant, farm stall and residential dwelling: The property was previously used as a tourist facility that was very popular to local communities and tourist.*" All these statements are false in relation to the Portion 76 of Farm 216, the specific property for which this draft BAR is intended and leads to confusion. Is this a 'cut and paste' issue or something more sinister?

These statements are certainly not what has been presented in the rest of the draft BAR however, a statement of major concern on page 4 "*Section G of this report. The preferred alternative is a restaurant, farm stall and residential dwelling. (No re-zoning required, as consent use already in place). Alternative 1 would be a restaurant and 5 resort units (rezoning required).*"

Irrespective of the alternatives suggested an EIA would still be required for ANY development planned in the Coastal protection zone. These various statements are at odds with the rest of the draft BAR. What is the intended development plan and/or what is the intention behind these statements? Is this indicative of the quality of the physical assessment done on the property itself. Perhaps also a 'cut and paste' assessment!!

2. We disagree with the sentiment expressed on page 42 in relation to the question "Will the proposed land use/development set a precedent for similar activities in the area (local municipality)?"

The location of the "main" dwelling appears to be within the Coastal protection zone and as such the Integrated Coastal management Act is applicable. It is most definitely within 100m of the high tide mark. This is an extremely environmentally sensitive zone and construction in this zone should be rejected as approval will in all likelihood create a precedent for adjacent properties and cause irreparable damage to the region.

3. No mention has been made for the establishment of a walkway to the beach down the dune from the "main" dwelling. This must either be disclosed in detail, so the impact can be assessed or there must be an explicit condition precluding the building of a walkway to the beach due to the erosion and the sensitivity of the site (Oyster Catchers et al) in the event that this BAR recommends the development.

4. The layout of the "main" dwelling appears to be more in line with the establishment of a boutique hotel or B&B. This has not been disclosed or stated as part of the intended use, however, if this EIA process recommends/approves the development based on the current level of disclosures then there must be an explicit condition prohibiting the use as a boutique hotel or B&B as the impact for such use has not been evaluated.

5. One of the possible alternatives for the provision of electrical power is the use of an MV supply on overhead cables on Kerk Street. This needs to be rejected outright.

6. The disclosure on "managers dwelling" is extremely sparse with absolutely no indication of the number of rooms, provision for permanent staff/employees, vehicles etc and the associated usage impact cannot be fully assessed. The proposed size, essentially 1000 sqm for the "managers" dwelling raises concerns about the intended or non disclosed usage.

7. Relaxation of the building line is not justifiable based on the argument presented. The entire property is critical fynbos (Critical Biodiversity Area) and if it is acceptable to build a road >800m x 2.5m with the associated destruction then an alternative location which doesn't require the relaxation of the building line must be found. A huge double storey "managers" house of approx 1000sqm (600sqm ground floor + 400 1st floor) directly adjacent to Kerk Street requiring the permanent relaxation of the building line should be rejected. The visual and other impacts cannot be assessed due to the sparse information presented in relation to the "managers" dwelling. An alternative location for a "managers" dwelling can/must be found without encroaching on the building line.

8. Kerk Street is a sand-road/single track road which is not maintained by Knysna council and any excess traffic will have a detrimental effect so there needs to be clear disclosure on expected vehicle use and/or conditions imposed to minimise impact. Additionally any significant road works will need to be specifically environmentally assessed as there is a range of rare geophytic orchids, Brunsvigia and Haemanthus some of which are in the road reserve and will be negatively impacted.

9. Large scale building operations raise security concerns for the general area and need to be considered and addressed.

10. Page 62 refers to the expected capital value of the activity on completion? Value ± R800,000.00 Is this correct or another error?

11. The proposed bee farming operation while desirable has a very low potential at < 1 hive per hectare based on real experience of bee keeping in the Brenton fynbos area and would simply be incidental.

Yours sincerely

John and Anne Sole



**Western Cape
Government**

Transport and Public Works

ROAD NETWORK MANAGEMENT

Email: Grace.Swanepoel@westerncape.gov.za

tel: +27 21 483 4669

Rm 335, 9 Dorp Street, Cape Town, 8001

PO Box 2603, Cape Town, 8000

REFERENCE : TPW (Job 27968)
ENQUIRIES : Ms GD Swanepoel
DATE : 30 September 2020

Eco-Route Environmental Consultancy
PO Box 1252
SEDGEFIELD
6573

Attention: Ms J Ebersohn

Dear Madam

**DRAFT BASIC ASSESSMENT REPORT: PROPOSED CONSTRUCTION OF AN ACCESS ROAD,
RESIDENTIAL DWELLING AND FARM MANAGERS HOUSE ON PORTION 76 OF FARM 216 UITZICHT,
BRENTON, KNYSNA LOCAL MUNICIPALITY**

1. Your e-mail on behalf of Eco-Route Environmental Consultancy on 3 September 2020 to the District Roads Engineer, Oudtshoorn refers.
2. From an environmental point of view this Branch will not be opposed to the issuing of an Environmental Authorisation, provided that:
 - 2.1 The unconstructed road reserve running along the northern boundary is suitably upgraded at its intersection with Divisional Road 1600 (DR1600), for which this Branch is the Road Authority.
 - 2.2 The necessary approvals in terms of this Branch's Legislation are obtained if any external service is installed along or across DR1600 to Farm 216/76.

Yours faithfully

SW CARSTENS

For CHIEF DIRECTOR: ROAD NETWORK MANAGEMENT

ENDORSEMENTS

1. Eco-Route Environmental Consultancy

Attention: Ms J Ebersohn (e-mail: janet@ecoroute.co.za)

2. Garden Route District Municipality

Attention: Mr JG Daniels (e-mail)

3. District Roads Engineer
Oudtshoorn

4. Mr SW Carstens (e-mail)

5. Mr E Burger (e-mail)

FW: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

From janet@ecoroute.co.za <janet@ecoroute.co.za>

Date Mon 17/02/2025 12:21

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Look at all addresses

Should you require any information please do not hesitate to contact me.



Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

From: Pamela Booth <pbooth@knysna.gov.za>

Sent: Thursday, 03 September 2020 12:34

To: Janet Ebersohn <janet@ecoroute.co.za>; samantha@ecoroute.co.za

Subject: RE: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton



Hi Janet

I don't see the Basic Assessment report for 76/216 on your website?

I followed the live link provided below.

Pam

From: Janet Ebersohn <janet@ecoroute.co.za>

Sent: Thursday, 03 September 2020 12:09

To: 'Melanie Koen' <MelanieKo@daff.gov.za>; mark.lakay@pgwc.gov.za; 'Danie Swanepoel'

<Danie.Swanepoel@westerncape.gov.za>; 'DEADP-EIAAdmin George'

<DEADPEIAAdmin.George@westerncape.gov.za>; coastalenquiries@westerncape.gov.za;

manie.abrahams@westerncape.gov.za; Manie Abrahams <Manie.Abrahams@westerncape.gov.za>;

Manabrah@pgwc.gov.za; ghsmith@ruraldevelopment.gov.za; jprodehl@pgwc.gov.za; runkek@nra.co.za; Colin

Fordham <landuseadvicesouth@capenature.co.za>; 'Maretha Alant' <maretha.alant@sanparks.org>; Pamela Booth <pbooth@knysna.gov.za>; knysna.ratepayers.assoc@gmail.com; corvdw@elsenberg.com; hans@edendem.co.za; cmalgas@pgwc.gov.za

Subject: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton



ECO-ROUTE ENVIRONMENTAL CONSULTANCY

EIA PROCESS

Notification of Public Participation:

Draft Basic Assessment Report

The Proposed Construction of an Access Road, Residential Dwelling and Farm Managers House on Portion 76 of the Farm 216 Uitzicht, Brenton, Knysna Local Municipality, Western Cape

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998) as amended, the National Environmental Management Act: Environmental Impact Assessment Regulations 2014 as amended of a Public Participation Process to be undertaken from **03/09/2020 – 03/10/2019** under the authority of the Department of Environmental Affairs /DEA.

The following EIA Listed Activities are applicable:

Government Notice No. R324:	Activity 4: (i) ii(aa)
(Listing Notice 3 of 2014 as amended)	Activity 12: (a) i. ii.

The Draft Basic Assessment Report may be reviewed for comment from **03/09/2020 – 03/10/2020** on Eco Routes website www.ecoroute.co.za. Should you wish to gain further information regarding the project or wish to register as an Interested and Affected Party please contact the Environmental Assessment Practitioner (details below). Please provide written comments with your name, contact details and an indication of any direct business, financial, personal or other interest which you may have in the development.

Environmental Assessment Practitioner: Janet Ebersohn

PO. Box 1252
Sedgefield
6573

Cell: 082 55 77 122
Fax: 086 402 9562
Email: janet@ecoroute.co.za

Additionally, information may be accessed via our website: www.ecoroute.co.za

Should you require any information please do not hesitate to contact me.



Kind Regards
Janet Ebersohn
Bsc.Hon Environmental Management
EAPASA Registration Number: 2019/1286
082 5577122

FW: Portion 76 of the Farm 216 Uitzicht, Brenton-on-Sea

From janet@ecoroute.co.za <janet@ecoroute.co.za>

Date Mon 17/02/2025 12:18

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Should you require any information please do not hesitate to contact me.



Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

From: Christa le Roux <christa.a.leroux@gmail.com>

Sent: Thursday, 01 October 2020 10:08

To: Janet Ebersohn <janet@ecoroute.co.za>

Subject: Portion 76 of the Farm 216 Uitzicht, Brenton-on-Sea

Dear Janet

Please register us as an Interested and Affected Party in this process. We will be submitting a comment on the Proposed Construction of an Access Road, residential dwelling and farm managers house on Portion 76 of the Farm 216 Uitzicht, Brenton, Knysna Local Municipality, Western Cape.

Kindest regards

Christa le Roux and Owen Williams



1 October 2020

Janet Ebersohn
Eco Route Environmental Consultancy

Per email: janet@ecoroute.co.za

Dear Miss Ebersohn

RE: SANPARKS OBJECTION DRAFT BASIC ASSESSMENT REPORT PORTION 76 OF THE FARM UITZICHT NO 216

Portion 76 of Farm Uitzicht 216 is in the buffer zone the Garden Route National Park (GRNP), in the potential expansion footprint, in a Priority Natural Areas and in the Knysna Sand Fynbos Coastal Corridor. The Landowner of Portions 75 and 39 of the Farm Uitzicht 216 has already signed a Resolution consenting to the declaration of the properties as part of the GRNP. Achieving a long-term conservation outcome on Portion 76 is important to SANParks. The property contains Knysna Sand Fynbos which is an ecosystem that is Critically Endangered in terms of Section 2 of the NEMBA (Act 10 of 2004) and Goukamma Dune Thicket. The property is 21.01 ha in extent and zoned Agriculture 1.

As stated in the draft BAR, the entire property is classed as Critical Biodiversity Area (CBA) in terms of the Western Cape Biodiversity Spatial Plan 2017 which is defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure. The main objective of a CBA area is to maintain it in a natural or near natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low impact, biodiversity sensitive land uses are appropriate.

The proposal is to exercise the primary land use rights of the property, (i.e. construction of a main farmhouse and farm manager's house). The development proposal entails the following:

- (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²).
- (ii) The construction of one farm manager's house in the north-western corner of the property (600m²).
- (iii) The construction of a new internal road to provide access to the southern portion of the property.

The proposed development is approximately 8 765m² in size. SANParks representatives visited the site on 8 September 2020.

addo elephant

agulhas

augrabies falls

bontebok

golden gate highlands

karoo

kgalagadi transfrontier

knysna lake area

kruger

mapungubwe

marakele

mountain zebra

namaqua

table mountain

tankwa-karoo

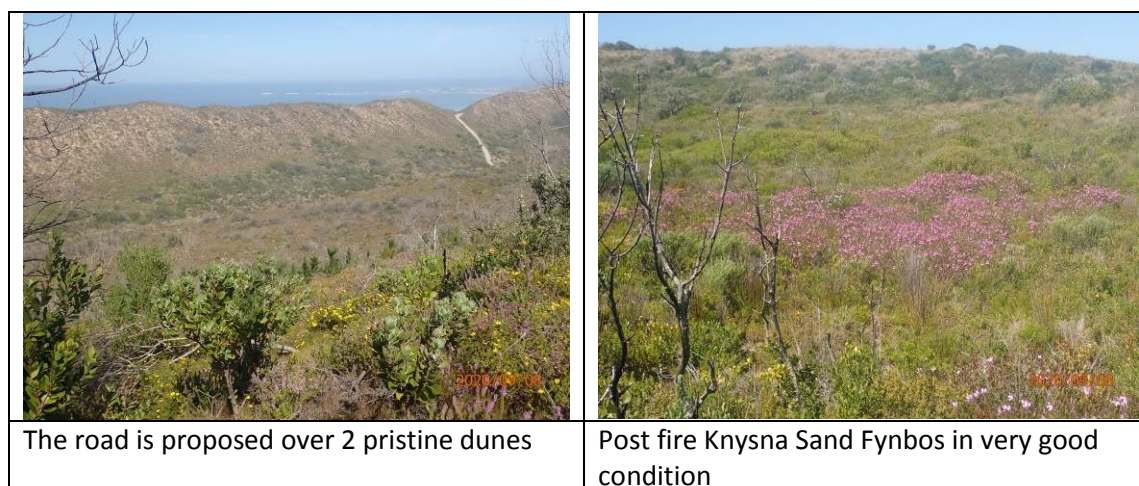
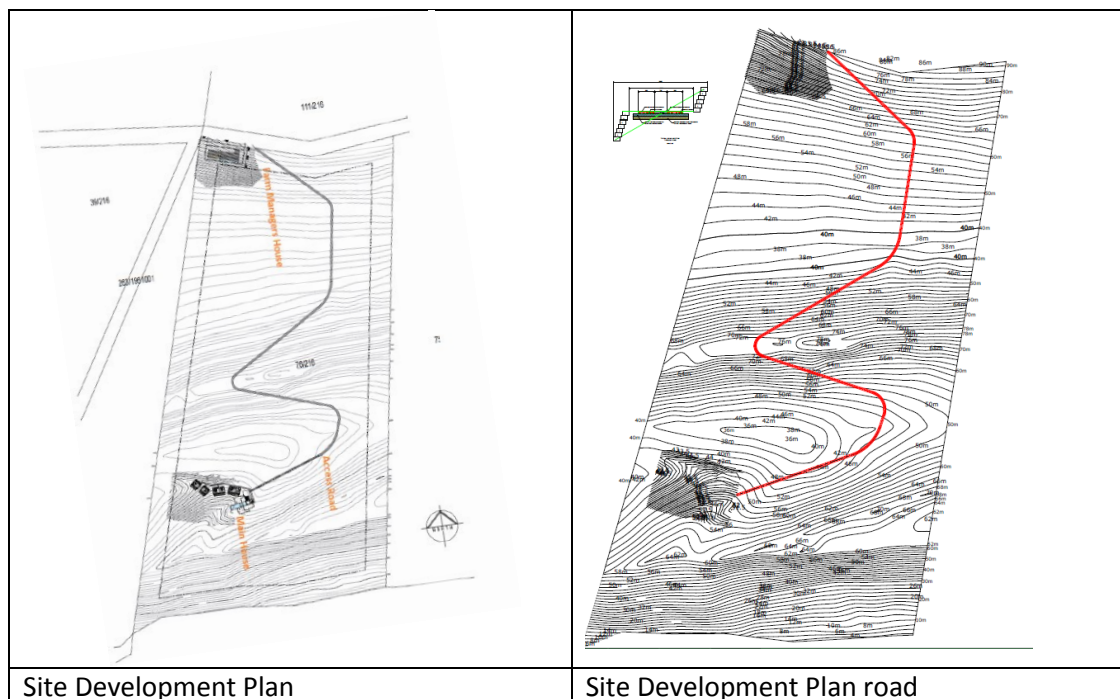
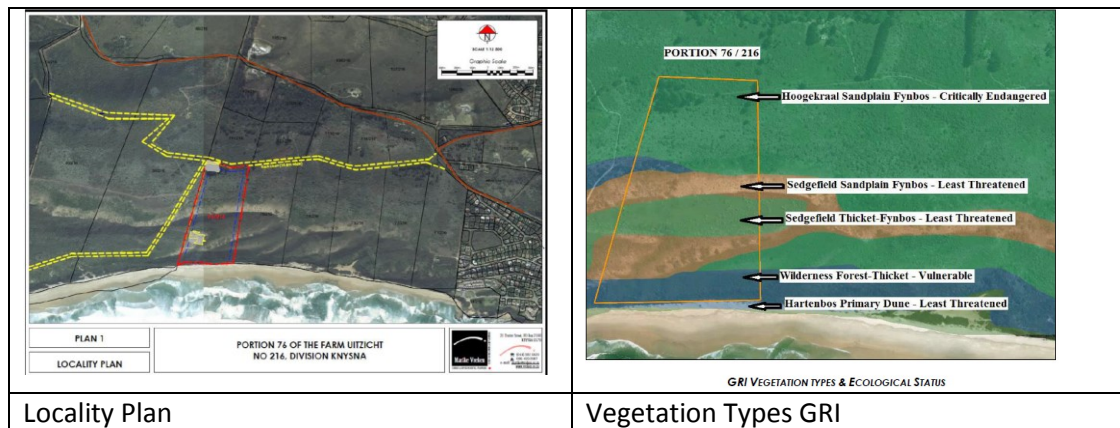
tsitsikamma

|ai-|ais/zichtersveld

vaalbos

west coast

wilderness



The Main Dwelling House:

The primary dwelling unit will be situated in the south western portion of the property consisting of the following inter leading rooms:

- Six (6) bedrooms.
- Open plan living area consisting of a kitchen, lounge area, dining area, kitchen, bar, scullery, bathroom and wine cellar.
- Open deck and swimming pool.

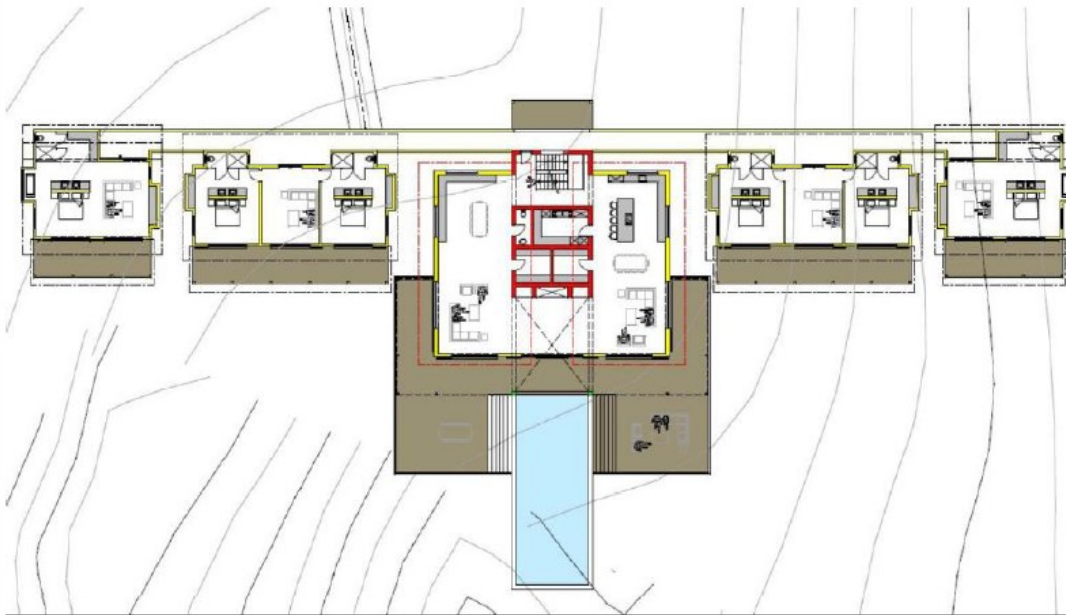


FIGURE 1: PROPOSED MAIN DWELLING HOUSE

The Farm Managers House:

The farm manager's house is to be situated in the north-western corner and will encroach the prescribed 30 meter building line, and therefore an application must be made for a permanent departure and relaxation of the northern and western building lines.

The main reason why the house encroaches the prescribed building line is to prevent unnecessary disturbance of sensitive critical endangered Knysna Sand Fynbos.

The proposed footprint in the building line area is an existing transformed area (alien vegetation present) and consist of the following:

- Ground Floor 600m²
- First floor 400m²
- Footprint 600m²
- Disturbance Area 1200m²

Access to Portion 76 of the Farm Uitzicht 216:

Access is obtained from the Northern portion of the property from an existing servitude road that runs along the boundary of the property. The current access will remain in place

Items for clarification:

- Backwash from swimming pool was not considered in the DBAR. Fynbos is not a good receiving environment for the backwash.
- Access to beach – surely desirable – no boardwalk or footpath was proposed to the beach.
- Installation of boreholes. The impact of drilling for boreholes was not discussed in the DBAR.

Water Reticulation

The applicant propose to supply water for the development by means of the following:

- Installing boreholes – an application for a water licence will have to be submitted to Breede- Gouritz Catchment Management Agency.
- A large percentage of the water demand will be provided for by collecting rainwater. The total roof areas will be 842m² and with an average rainfall for the Knysna area of 500mm per year will supply 421kl. The rainwater will only supply in the order of 87% of the demand.
- The main building will make provision for 110kl rainwater/borehole storage.

Extract from DBAR

SANParks objects to the proposal for the following reasons:

1. Site Development Plan footprint. The property is in the GRNP potential expansion footprint, as reflected in the approved GRNP Management Plan, and in a CBA in terms of the Western Cape Biodiversity Spatial Plan 2017. SANParks disagrees with the statement below that the areas chosen for development was to have the least negative impact on the environment. The proposed Site Development Plan (6 bed main dwelling with pool, farm managers house and access route) will have an unnecessary significantly negative impact on biodiversity conservation, the sense of place of the area and transform and fragment the Knysna Sand Fynbos Coastal Corridor.

The No Go Alternative

PO Box 1252 Sedgfield, 6573

www.ecoroute.co.za

{ 46 }

The proposed re-development of Portion 76 of the farm Uitzicht 216, will remain vacant and the landowner will not be able to exercise his right to develop a residential dwelling and farm manager's house.

Details of the alternatives considered

The sizes of the footprints of the farm managers house and main residential dwelling house was options considered for alternatives. The proposed areas to construct the houses was carefully evaluated after consideration of all specialist reports and areas chosen where the least negative impacts on the receiving environment can be expected.

Extract from DBAR

2. Biodiversity Stewardship or long-term conservation outcomes were not discussed in the DBAR. The conservation of the vegetation on the property is of national importance. Without a commitment to consent to the declaration of the property as part of the GRNP or with a Biodiversity Stewardship agreement with CapeNature in place, SANParks will continue to object to the proposed development.
3. Land use rights. SANParks takes note that Marike Vreken urban and environmental planners were appointed to apply for the required land use rights from Knysna Municipality. From the information provided there was no mention of rezoning the natural portion of the property to Open Space Zone III. Further discussion in this regard is required to ensure a long-term conservation outcome. Relaxation of the building line adjacent to Kerk Laan could be supported.

The subject property is now zoned **Agricultural Zone I (AI)** in terms of *Knysna Municipality: Zoning Scheme By-Law, 2020*. According to the transition table, the method used to determine this was:

"All existing Agricultural Zones to be converted to Agriculture 1. The new definition of "Agriculture" includes "Agricultural Industries".

Objective: The objective of this zone is to promote and protect agriculture on farms as an important economic, environmental and cultural resource. Limited provision is made for non-agricultural uses to provide rural communities in more remote areas with the opportunity to increase the economic potential of their properties, provided these uses do not present a significant negative impact on the primary agricultural resource.

Member: HM Vreken
Reg. CK 2005/032114/23 VAT: 469022106

Extract from Specialist Planning Report for EA

house (agricultural worker accommodation). The new <i>Integrated Knysna Zoning Scheme Bylaw</i> provides the following definitions for a "dwelling house" and "agricultural worker accommodation":	
dwelling house	a building containing only one dwelling unit, together with such outbuildings as are ordinarily used with a dwelling house, including: • a storeroom and garaging; • a second dwelling or additional dwelling, with a floor area which does not exceed 60m²; provided that application for consent use must be submitted if the second dwelling or additional dwelling is larger than 60m²; • a braai room; • renewable energy structures for household purposes; • home occupation; • letting to lodgers; • a bed and breakfast establishment; and • home childcare.
agricultural worker accommodation	accommodation provided for bona fide agricultural workers, including accommodation for labourers and farm managers, as determined by the Municipality based on the extent of the bona fide agricultural activities on the land unit.

OPEN SPACE ZONE III (OSIII) <i>The objective of this zone is to provide for the conservation of natural resources in areas that have not been proclaimed as nature areas (non-statutory conservation), in order to sustain flora and fauna and protect areas of undeveloped landscape including woodlands, ridges, wetlands and the coastline. A range of consent uses is provided to supplement and support the main objective of this zone.</i>		
Primary uses	• Nature conservation area	Consent uses • Environmental facilities • Harvesting of natural resources • Tourist facilities • Utility service • Tourist accommodation? • Function venue?
OPEN SPACE ZONE IV (OSIV) <i>The objective of this zone is to provide for the conservation of natural resources in areas that have been proclaimed as nature areas (statutory conservation), in order to sustain flora and fauna and protect areas of undeveloped landscape including woodlands, ridges, wetlands and the coastline. A range of consent uses is provided to supplement and support the main objective of this zone.</i>		
Primary uses	• Nature reserve	Consent uses • Conference facility • Function venue • Tourist accommodation • Tourist facilities • Utility service

Extract from Specialist Planning Report for EA	Extract from Integrated Knysna Zoning Scheme Bylaw
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SANParks could support development in the node where the Managers Cottage is proposed adjacent to Kerk Laan, as discussed on-site on 8 September 2020. It would be preferable if all development is consolidated into one area (the area where the farm managers cottage is

proposed) to minimise fragmentation of the landscape and impact on the sensitive fynbos environment.

The applicant should be reminded that the main objective of Priority Natural Areas and CBAs is to maintain it in a natural or near natural state, with no further loss of natural habitat. Only low impact, biodiversity sensitive land uses are appropriate. The property is currently pristine and was not previously developed.

SANParks request to meet with the landowners to discuss a way forward that can benefit biodiversity conservation and allow for low impact development without the need for a road over the pristine dunes. The current proposal will set a very bad precedent for potential development of other properties in the Knysna Sand Fynbos Coastal Corridor. The properties on both side of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023.

SANParks reserves the right to revise initial comments if additional information becomes available.

Yours sincerely



Maretha Alant
GRNP: Environmental Planner

CC:	Megan Taplin	SANParks
	Vuyiswa Thabethe	SANParks
	Danie Smit	DEFF
	Danie Swanepoel	DEADP
	Collin Fordham	CapeNature
	Pam Booth	Knysna Municipality
	Dave Edge	Western Head-Goukamma Conservancy



28 January 2021

Janet Ebersohn
Eco Route Environmental Consultancy

Per email: janet@ecoroute.co.za

Dear Miss Ebersohn

RE: SANPARKS FOLLOW-UP COMMENT DRAFT BASIC ASSESSMENT REPORT PORTION 76 OF THE FARM UITZICHT NO 216 AFTER SITE VISIT WITH LANDOWNERS AND SOUTHERN CAPE FIRE PROTECTION ASSOCIATION

SANParks objected to the proposed development on 1 October 2020. A site visit with the landowners and EAP took place on 4 January 2021. Key points discussed:

1. Proposed footprint of the main house. The landowners were not willing to change the proposed footprint of the main house to a position adjacent to Kerk Laan. They were willing to move the house to the level area behind the frontal dune to reduce visual impact.
2. Proposed road over the sand dunes. SANParks continue to object to the construction of a road over the sand dunes. The landowners indicated that their preferred option is to use Susan Campbell's road for access. They could use Kerk Laan and access via the gate and use the steep section of the Campbell road. The proposed option to use the Campbell road will reduce the negative impact on biodiversity but will necessitate a new section of road to be constructed on the Campbell property and over Portion 76. SANParks will not support construction of new roads where there are viable alternatives.
3. Maretha Alant met with Susan Campbell. Ms Campbell is opposed to providing access for the proposed development over her land.
4. Footpath to the beach. Portion 76 of Farm Uitzicht 216 has a steep gradient to the beach and a footpath is not proposed in the BAR.
5. Drilling for water required. The proposal is that water will be supplied by a borehole. Bringing drilling equipment to the proposed site for the main house will have a negative impact on biodiversity. Previous attempts to drill for water in the area yielded poor return.
6. Contract National Park footprint. The property is in the priority protected area expansion footprint, in the Western Heads coastal ecological corridor, that can potentially link the Goukamma Nature Reserve with the Knysna Estuary. The property was included in the South African National Parks Land Inclusion Plan for the period 2020 – 2023 for the Garden Route National Park (GRNP). The landowners may be interested in incorporating the property into the GRNP but more information is required from SANParks. SANParks will further engage with the landowners when our draft documents are in place.

addo elephant

agulhas

augrabies falls

bontebok

golden gate highlands

karoo

kgalagadi transfrontier

knysna lake area

kruger

mapungubwe

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mountain zebra

namaqua

table mountain

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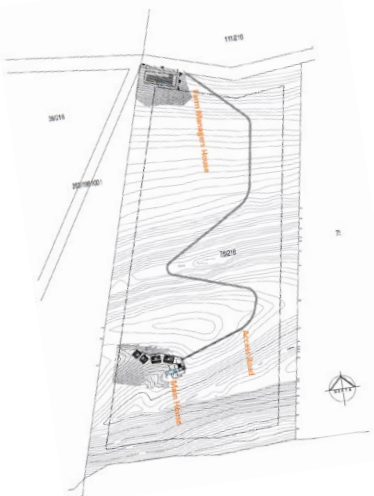
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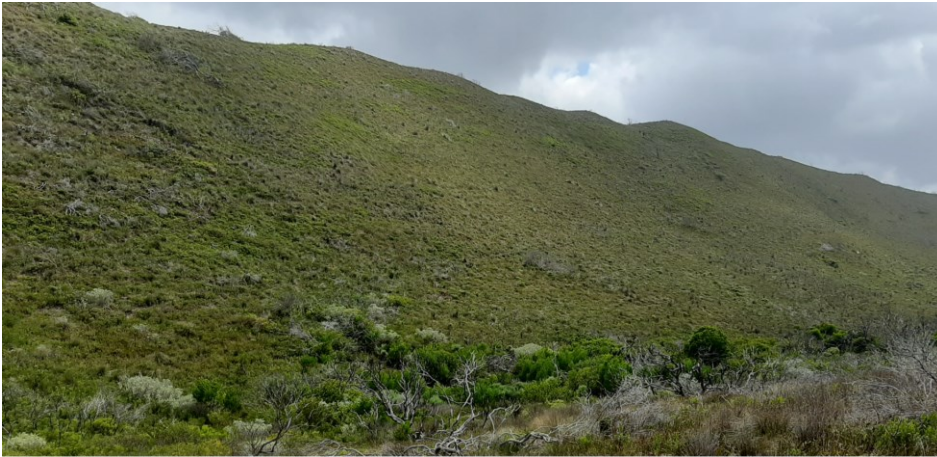
	
Proposed Site Development Plan with main house, road and managers cottage.	The proposed option to use the Campbell road will reduce the negative impact on biodiversity but will necessitate a new section of road to be constructed on the Campbell property and over Portion 76.



Proposed location of main house in flat area with high biodiversity value



Area for the proposed main house in foreground



SANParks continue to object to the construction of a road over the sand dunes



Portion 76 of Farm Uitzicht 216 has a steep gradient to the beach and a footpath is not proposed in the BAR.



Susan Campbell's road

A follow up fieldtrip with SANParks and the Southern Cape Fire Protection Association (FPA) present took place on 9 January 2021. Key points discussed:

- Development adjacent to Kerk Laan. Developing the main house in a disturbed area adjacent to Kerk Laan will have the least negative impact on biodiversity and landscape functionality. Other advantages are that the drilling equipment and construction vehicles will have easy access to the site via an existing road.
- Development in the low lying area, over the two sand dunes or using the Campbell road, will compromise landscape functionality and set a bad precedent. It will create fragmentation of a pristine coastal corridor.



Disturbed area adjacent to Kerk Laan suitable for development

- Fire management. The landowners are members of the Southern Cape FPA. It is possible to make fire breaks to protect infrastructure at the landowner's preferred location for the main house. However, Kerk Laan could act as a firebreak if it is widened and slashed. In a case of emergency, it would be less risky to evacuate people from Kerk Laan than from a fynbos corridor with tricky access for fire trucks. The Campbell road and the new section of road that would need to be constructed from Campbell road to preferred site would not be ideal roads for the Knysna Fire Department as their trucks would struggle to gain access easily to the house. However, Kerk Laan would be a much easier access point for fire trucks and this should be considered for fire safety in this fire-prone area. Conducting an ecological burn in future will also be more risky with infrastructure developed in the fire path. The June 2017 fire and the ecological burn executed on 15 May 2017, that slowed the fire down dramatically before it reached Brenton, is still fresh in our memories. A functional Fire Management Unit in the Knysna Sand Fynbos will be desirable as there will be future fires.

Navigating an ecological burn on private land in the GRNP buffer zone

Objectives:

1. Restore Knysna Sand Fynbos (CR)
2. Reduce fuel load to protect plantations & infrastructure

Challenges included:

- Fire plan approval for multiple landowner involvement (signed fire-break agreements, insurance not available for damage caused by an ecological burn)
- Wild fires in other areas and unpredictable weather (complex to find a date)
- Fire breaks had to be made 3 times
- Resources involved: 3 x Fire trucks, 6 x skid units (bakkie sakkies); 85 people on day 1 to 3; 50 people week 1; 20 people week 2; 10 people week 3; standby helicopter
- 12 hour shifts as opposed to 8 hour days (overtime), rations and PPE
- The fire spotted and a helicopter had to water bomb the fire (unplanned additional R 46 848)
- The risk of burning near an urban area

Role-players

- o Buffalo Bay Ratepayers: Start up R 30 000
- o SC FPA: Planning, WOF teams, drone, incident command
- o PG Bison (firebreaks, operations and standby)
- o Knysna Municipality: Fire Department & Community Services
- o SANParks: Planning, Operational personnel, BSP buffer zone teams & Honorary Rangers
- o Landowners: WWF, Susan, Andre
- o Brenton Ratepayers: support
- o Villa Castollini: provided food

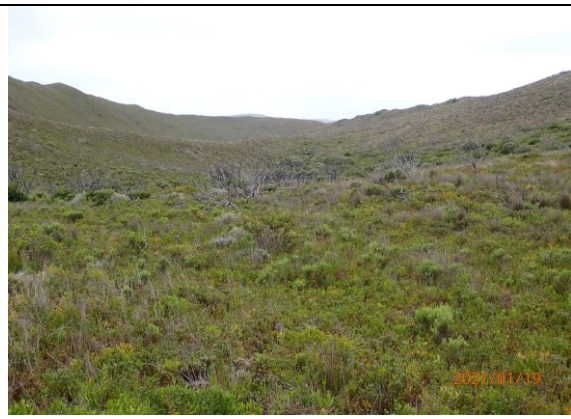
Eco-burn successfully executed on 15 May 2017 (Duration: 3 weeks with mopping up)

Benefit: Eco-burn minimised the impact of 7 June 2017 fire on Brenton on Sea community

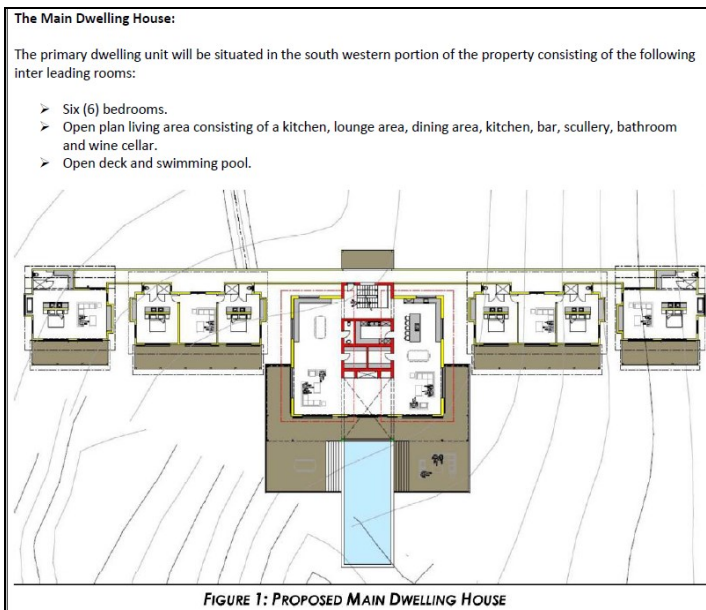
**Maretha Afant (SANParks)
Dirk Smit (SC FPA)**



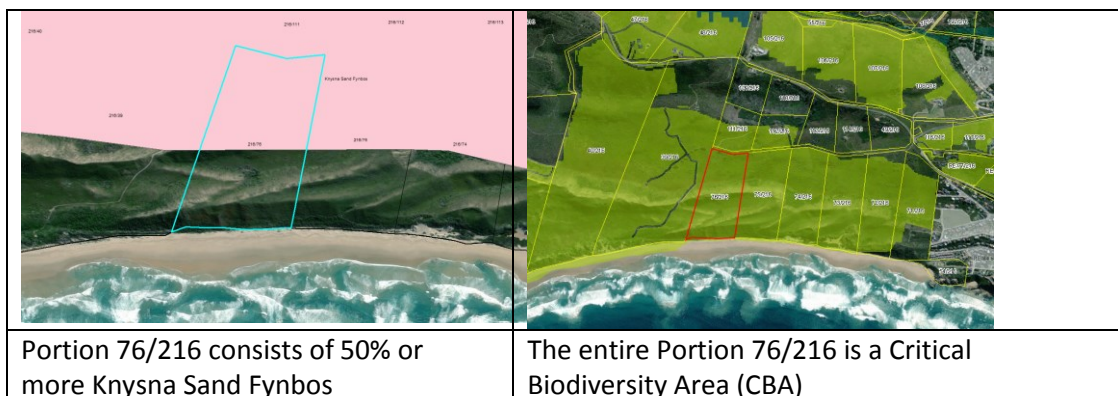
Development at Kerk Laan will have good views and limit disturbance of fynbos.

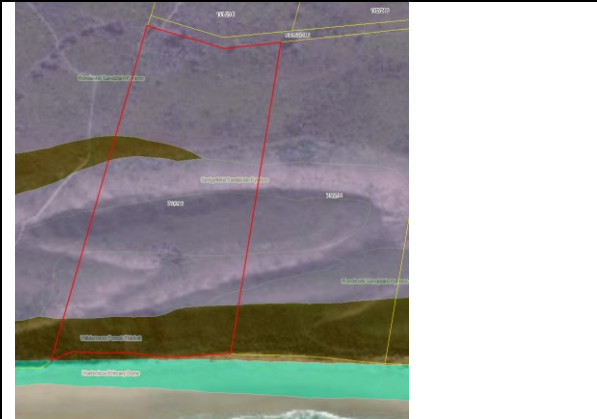


Development in the low lying area over the two sand dunes will compromise landscape functionality and set a bad precedent.



- Conservation value of property. More than 50% of the property contains Knysna Sand Fynbos and the entire property is a Critical Biodiversity Area (CBA). Although the Kerk Laan area is located in Knysna Sand Fynbos the transformation footprint can be limited with a good Site Development Plan and the current landscape functionality corridor will then be maintained. Knysna Sand Fynbos hosts threatened plant species and five threatened butterfly taxa (Mecenero *et al.* 2013), including CE taxa *Orachrysops niobe* (Brenton Blue) and *Thestor brachycerus* and is poorly protected. The original extent of Knysna Sand Fynbos was 15 355 ha. The remaining natural extent is 1 478 ha (9.6%) and the Western Cape target is 3 531ha (23%). The Knysna Sand Fynbos asset is in deficit. Not only is Knysna Sand Fynbos endemic to the Western Cape, but it is also confined to a very specific and limited geographical area along the Garden Route coast (only found from the coastal flats from Wilderness, generally to the north of the system of lakes, several patches around the Knysna Lagoon, with more isolated patches eastwards to the Robberg peninsula near Plettenberg Bay). There is excellent landscape heterogeneity on the property.



	
2018 Vegetation Map: Knysna Sand Fynbos and Goukamma Dune Thicket	Vlok Vegetation Map: Wilderness Forest-Thicket, Sedgefield Sandplain Fynbos

In summary, from a biodiversity conservation, landscape functionality and integrated fire management perspective developing the main house adjacent to Kerk Laan is the preferred alternative for SANParks. Developing in the core of the Knysna Sand Fynbos Coastal Corridor will set a very bad precedent and contribute to a loss of biodiversity and landscape fragmentation. The properties on both sides of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023. SANParks will continue to object to the access road over the sand dunes.

SANParks will be available for a site visit with DEFF when required in the process.

SANParks reserves the right to revise initial comments if additional information becomes available.

Yours sincerely



Maretha Alant
GRNP: Principal Planner

CC:	Megan Taplin	SANParks
	Danie Smit	DEFF
	Zama Langa	DEFF
	Danie Swanepoel	DEADP
	Dirk Smit	SC FPA
	Pam Booth	Knysna Municipality
	Dave Edge	Western Head-Goukamma Conservancy
	Andre Peach	Landowner
	Hans Swart	Landowner
	Susan Campbell	Adjacent Landowner

FW: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

From janet@ecoroute.co.za <janet@ecoroute.co.za>

Date Mon 17/02/2025 12:19

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Should you require any information please do not hesitate to contact me.

Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

-----Original Message-----

From: Steve & Barbara Gettliffe <stebar@barkly.co.za>

Sent: Monday, 14 September 2020 10:16

To: janet@ecoroute.co.za

Subject: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

Good morning Janet

We would like to register as an I and AP.

We need to be kept up dated as this is a very sensitive area, on primary dunes and could have a significant effect on the biodiversity and ecological functioning of the area.

Regards

Steve Gettliffe (WESSA Knysna- Plett)

FW: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

From janet@ecoroute.co.za <janet@ecoroute.co.za>

Date Mon 17/02/2025 12:19

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Should you require any information please do not hesitate to contact me.



Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

From: Evan Jones <ejones@biothermenergy.com>

Sent: Tuesday, 29 September 2020 10:32

To: janet@ecoroute.co.za

Cc: John Sole <johnmsole@gmail.com>; Jennifer Jones <jenny.jonescx@gmail.com>

Subject: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

Dear Janet

As trustee of JenEvan Property Trust (owner of portion 112 of Farm 216 Uitzicht) I hereby register as an Interested and Affected Party with respect to the above development.

Below is a summary of my main concerns are the following:

1. While power supply appears to be proposed as off grid solar there is still Eskom supply alternatives, one of which is a 1665m MV over head line following the access road. This overhead line would have significant detrimental visual impact visually and create a hazard to birds of the likes of harriers, fish eagles and herons. This alternative is strongly opposed and should not be an option, the off grid solar option is supported.
2. The proposed location of the managers house on the NW corner requires relaxation of the 30m building line based on invalid motivation of mitigating impact on the Knysna Fynbos. As scan be seen in the Ecological status map on page 57 of the BA, this NW corner has already been impacted by alien Pine vegetation and thus this motivation is inaccurate and or invalid. The true motivation is far more likely the preferable gradient and better view to the sea. Further there is no reason to create unnecessary visual impact onto the access road which is frequented by Brenton local persons walking along Kerk St on a property of this size.
3. The site road box cuts will be deep in places and require retaining support which will create significant visual disturbance of the northern face of the pristine coastal dune. Visual impact mitigation measures are not mentioned and need to be added in some suitable form eg ensuring these can be vegetated and not end up as concrete walls both a visual disaster and risk to wild life.
4. The internal roads are stated to be 2.5m concrete strip with passing lanes which is prudent (due the gradients) however paved roads are highly detrimental. It is far more environmentally prudent to limit the paving / concrete strips to areas only where necessary and not on the level valley portion.

5. The access road (Kerk St) is currently a single jeep track and carries very little traffic. Cl 5.3 of the Services Report states that the access road will need to be upgraded. While some maintenance of the access road is necessary, major road works will have severe impact on the pedestrian / dog walkers who use this road daily. What is the plan / specification for the upgrade and who will be funding this ?

Please acknowledge receipt.

Best Regards

Evan Jones | Technical Director

BioTherm Energy (Pty) Ltd

Building 1, Leslie Ave East, Design Quarter District, Fourways

P: +27 (0) 11 367 4616 | F: +27 (0) 11 367 4601 | M: +27 (0) 76 807 9815

E: ejones@biothermenergy.com



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Re: Proposed development on Portion 76 of Farm 216, Uitzicht, Knysna

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Date Tue 01/04/2025 12:44

To Yvonne Kemp <ykemp@mweb.co.za>; admin@ecoroute.co.za <admin@ecoroute.co.za>

Good afternoon, Ms Kemp.

I trust that this email finds you well.

I hereby acknowledge receipt of your email to be registered as an I&Ap for the project.

The link to the relevant documentation available on the website is as follows:

www.ecoroute.co.za/node/107

Thank you for your attention to this matter.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

EcoRoute



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From: Yvonne Kemp <ykemp@mweb.co.za>

Sent: Friday, March 28, 2025 8:48 PM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>; admin@ecoroute.co.za <admin@ecoroute.co.za>

Subject: Proposed development on Portion 76 of Farm 216, Uitzicht, Knysna

I, Yvonne Ruby Kemp, tel 083 442 1201, wish to be added as an Interested & Affected Party for the DFFE public participation process, ref 14/12/16/3/3/1/3114, regarding the proposed development on Portion 76 (a portion of Portion 54) of Farm 216, Uitzicht, Knysna, Western Cape. I am a resident of Brenton-on-Sea and have for many years walked regularly in the area with my dogs, enjoying the beautiful fynbos, abundant birdlife and other wildlife on this property. I am concerned that a development would be destructive; please send me information about the proposed development.

Yours sincerely,

Yvonne Kemp

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forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

Ref: Residential Dwelling on Portion 76, Uitzicht, Knysna

Enquiries: Mr Thivhulawi Nethononda/Mashudu Mudau

Tel: 0123999553/9945 Fax: (012) 359 3636

E-mail: tnethononda@dffe.gov.za

Ms. Bianca Gilfillan
Eco Route Environmental Practitioners
PO Box 1252
Sedgefield
6573
joclyn@ecoroute.co.za

Dear Ms Gilfillan

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE

Background and Discussion

The Directorate: Protected Areas Planning and Management Effectiveness would like to thank you for the opportunity to review the Draft Basic Assessment report for the aforementioned project. The proposed project will entail the construction of one (1) main dwelling house to be situated in the southwestern corner of the property (3000m²), farm manager's house and a new internal road to provide access to the southern portion of the property.

Portion 76 of the Farm 216 is situated within 1.5 km from Brenton on Sea Residential Area, Knysna Western Cape and the Southern boundary borders the Brenton Beach. The property is 21.01 hectares in extent. The Application area is zoned "Agriculture Zone I" and "Agriculture" is a primary land use right in this zoning category. The proposal is to exercise the primary land use rights of the property, (i.e. construction of a main farmhouse and farm manager's house). The property is located within the Knysna National Lake Area.

Compliance with the Regulations for the Proper Management of the Knysna National Lake Area

According to the Knysna Spatial Development Plan, the proposed area is zoned as an Agricultural Zone I. The proposed area falls within a protected area, the Knysna Protected Environment which is managed by the South African National Parks. Therefore, the proposed development must be consistent with Regulations for the Proper Administration of the Knysna Protected Environment, 2009. In terms of the regulations, prior authorizations must also be obtained from the management authority before certain



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COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE

activities can be undertaken. Furthermore, the development must be undertaken within the appropriate zones of the protected area.

Comments on the Draft Basic Assessment Report for Proposed Development of a Residential Dwelling on Portion 76 of the Farm 216 Uitzicht, Knysna, Western Cape

The Directorate: Protected Areas, Planning and Management Effectiveness reviewed the report and has the following comments:

- The property is located within the expansion footprint of the Garden Route National Park (GRNP) and is both a corridor for wildlife movement (east-west and north-south), and a buffer zone to the GRNP.
 - In page 73 of the BAR, the EAP recognizes all the protected areas that surround the proposed development and further recognizes that the project area is within the Knysna National Lake Area. However, fails to recognize the Garden Route National Park that borders the Knysna National Lake Area. As per the Park's Management Plan, the proposed development is located within the Priority Natural Area. These areas are important for ecological corridors purposes between the Park and the surrounding protected areas, as well as expansion of the Park. The property is located between two properties that are in the process of being incorporated into the GRNP.
- The entire property is classed as Critical Biodiversity Area (CBA) which is defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure. The main objective of a CBA area is to maintain it in a natural or near natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only Low impact, biodiversity sensitive land uses are appropriate.
 - It is a concern that the EAP considered a development of ± 8 ha within CBA as a low impact land use.
 - Most of the CBA on the Brenton peninsula consists of Knysna Sand Fynbos which has been proclaimed as a Critically Endangered ecosystem. Development of two separate houses in a critically endangered ecosystem is questionable.
 - The Applicant is also proposing to construct a large swimming pool, this will put more pressure on the vegetation and the dunes as deeper excavations are needed. Furthermore, there is no indication on how the applicant intends to dispose the filter back wash water.
- Taking the CBA into consideration a low impact route was followed during the planning stages of the alternatives in order to have the least impact on the receiving environment.
 - The above statement indicates that a low impact route was followed in order to have least impact on the receiving environment. It is questionable on how the Applicant/EAP
 - intends to have low impact while developing on sensitive dunes along the Coastal Protection Zone.
- The DBAR states that the Western Cape Spatial Development Framework puts a lot of focus on the protection / conservation of cultural and scenic landscapes. The application area is located



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COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE

on a prominent hill area. The visual impact was taken into consideration with the current design. The DBAR further indicates that the proposal is in line with the provisions of the spatial document and will not detract from the existing spatial pattern of the area which is agriculture zoned properties.

- The existing spatial pattern of the area is in the agriculture zone and has natural vegetation. It is questionable that the development of a large house on a prominent hill is considered to be in line with spatial pattern. Development on the dune will be highly detrimental to the natural beach and there would be a loss of “sense of place”.
- As per ariel map the coastline strip is currently facing erosion and landslides, any additional development within the dunes will be detrimental.
- The property consists of steep dunes, how is the applicant intending on accessing the beach, this information has not been discussed in the report.
- Although the main house is being proposed on the least concern vegetation type (Goukamma Dune Thicket), the vegetation cover on the dunes is of great importance for the stability of the dunes.

As per the Knysna Spatial Development Framework, the proposed development is within the Coastal Management Line and the Sea Level Rise Risk. This indicates that the main house will likely be affected by the sea level rise.

It is recommended for the EAP to fully address the above-mentioned concerns or comments, where applicable provide clarity on certain matters to the Directorate: Protected Areas Planning and Management Effectiveness and consider comments submitted by all other Stakeholders, Interested and Affected Parties.



Ms Amanda Dana-Mfikili

Designation: Director: Protected Areas Planning and Management Effectiveness (Acting)

Date: 29 May 2025



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forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA · 0001 · Environment House · 473 Steve Biko Road, Arcadia, · PRETORIA

DFFE Reference: 14/12/16/3/3/1/3114

Enquiries: Ms Zamalanga Langa

Telephone: 012 399 9389 **E-mail:** zlanga@dffe.gov.za

Ms Bianca Gilfillan
Eco Route Environmental Consultancy
PO Box 1252
SEDGEFIELD
6573

Cell phone Number: 079 189 5060
Email Address: bianca@ecoroute.co.za

PER MAIL / E-MAIL

Dear Ms Gilfillan

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED DEVELOPMENT OF TWO RESIDENTIAL DWELLINGS ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE

The application and the draft Basic Assessment Report (BAR) dated January and received on 27 February 2025, refers.

This letter serves to inform you that the following information must be included to the final BAR:

(a) Participation Process

- Please ensure that all issues raised, and comments received during the circulation of the BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section and Protected Areas Management Section) in respect of the proposed activity are adequately addressed in the Final BAR. Proof of correspondence with the various stakeholders must be included in the Final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
- A comments and response trail report (C&R) must be submitted with the final BAR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.



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N.N.

- The final BAR must provide evidence that all identified and relevant commenting authorities have been given an opportunity to comment on the proposed development.

(b) Listed activities

- Activity 12 of Listing Notice 3- The activity description provided for this listed activity must be amended to indicate the size of the area where the indigenous vegetation will be cleared.
- Please ensure that the relevant listed activities are applied for, and they are specific and can be linked to the development activity or infrastructure as described in the project description. Please provide a full description of how the listed activity is triggered by the proposed development, including the threshold where necessary whilst ensuring that the project description is correct and relevant to the project for each listed activity and for activities in listing notice 3, please ensure to choose the most appropriate sub listing.
- If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted for final review and decision making. Please note that the Department's has been amended and can be downloaded from the following link <https://www.dffe.gov.za/forms>.

(c) Specialist Assessment

- It is brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were published in Government Notice No. 320 of 20 March 2020 (i.e., "the Protocols"), and in Government Notice No. 1150 of 30 October 2020, have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols unless proof is provided to demonstrate that the specialist assessments were commissioned prior to 50 days after the promulgation of GN 320 and after promulgation of GN1150 (30 October 2020).
- In addition to the above, you are hereby drawn to the following:
 - The Specialist Declaration of interest forms must be attached for all specialist studies to be conducted in the final BAR. The forms are available on Department's website (please use the Department's template).
 - Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of proposed rehabilitation, and all other proposed structures that they have assessed and are recommending for authorisations.
 - The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.
 - Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.
 - Please note further that the protocols require certain specialists' to be registered with SACNASP. Refer to the relevant protocols in this regard.
 - The SSRV appended as part of the application form does not take into consideration the themes as reflected in the screening tool. Please ensure that the themes and their sensitivity are discussed in the final BAR.
 - The screening tool has identified the agricultural theme as having high sensitivity. However, the motivation provided in the SSRV is insufficient, as it fails to clearly indicate the sensitivity of the agricultural theme in the same manner as the other themes. If, following a site sensitivity verification assessment by a specialist or Environmental Assessment Practitioner (EAP), this theme is determined to be of medium or low sensitivity, please be aware that the protocols for the agricultural

theme stipulate that an Agricultural Compliance Statement, prepared by a soil scientist or agricultural specialist registered with the South African Council for Natural Scientific Professions (SACNASP), must be submitted with the BAR. On the other hand, if the site verification assessment confirms that the agricultural theme is indeed high sensitivity, as initially indicated by the screening tool, a comprehensive agricultural assessment will be required. Please ensure that the appropriate agricultural assessment is submitted along with the BAR. This will be considered as new information and will necessitate circulation for a second round of Public Participation Process (PPP).

- Please take note that based on the selected classification, and the known impacts associated with the proposed development, the screening tool has provided a list of specialist assessments for inclusion in the assessment report. It is the responsibility of the EAP to confirm or dispute the list of specialists provided and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation
- Please ensure that the Site Verification assessment, as required by the relevant environmental themes and assessments, complies with the requirements of the protocols. Should it be determined that there is a need for additional specialist studies to be undertaken based on the outcome of public participation, these must be commissioned and be included in the final BAR reports for public comment.
- The content of the BAR must include a table summarising the specialist studies required by the Screening Tool and the sensitivity rating of the Screening Tool (very high, high, medium, low), another column indicating the sensitivity of the site after the EAP/Specialist conducted the Site Verification Assessment and a column indicating whether these studies will be conducted or that compliance statement is submitted.
- Please be reminded that section 2(3) of NEMA requires developments to be socially, environmentally and economically sustainable, while section 2(4)(i) of NEMA requires the social, economic and environmental impacts of activities, including disadvantages and benefits, to be considered, assessed and evaluated.
- Summary and recommendations of all specialist studies conducted must be included in the BAR and EMPr.
- Please ensure that the BAR indicates any recommendations of the EAP or specialists, which are to be included as conditions of authorisation, per Appendix 1(3)(1)(n).

(d) Need and desirability

- A motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location.

(e) Layout map

- The layout maps for all alternatives provided must be overlaid in a sensitivity map showing different sensitivities as identified on site. The map must show the following:
 - Position of all proposed infrastructure
 - The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines, Flood lines etc. that will be affected.
 - Buffer areas; and
 - All “no-go” areas.

(f) General content of the report

- The final BAR must comply with the content of BAR as indicated under Appendix 1 of the EIA Regulations 2014 as amended. Content of BAR as per Appendix 1 must be included in the BAR as table of content and it must show the sections or page numbers where all requirements has been addressed in the BAR.

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- Coordinates of the proposed development must be provided, as well as coordinates of the linier infrastructures as applied for (Start, middle and end point).
- If the municipal services will be utilized for the proposed development, you are required to provide a letter of the confirmation of availability of services from the Municipality

General

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority -

(a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority."

Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: "the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in sub-regulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days".

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely



Dr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Signed by: Ms Nyiko Nkosi

Designation: Control Environmental Officer: National Integrated Authorisations Projects

Date: 31/03/2025

cc:	Dr Andre Peach	Midnight Storm Investments 180 (Pty) Ltd	Email: andrepeach@lantic.net
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RE: Site Visit for -14/12/16/3/3/1/3114- Proposed development of a Residential Development on Portion 76 of the Farm 216, Uitzicht, Knysna, Western Cape

From Nyiko Nkosi <NNKOSI@dfpe.gov.za>

Date Mon 09/06/2025 14:39

To bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Cc Mashudu Mudau <MaMudau@dfpe.gov.za>; Vanessa Weyer <vanessa.weyer@sanparks.org>; Zama Langa <ZLANGA@dfpe.gov.za>; Janet Ebersohn <janet@ecoroute.co.za>; Thivhulawi Nethononda <TNETHONONDA@dfpe.gov.za>

Dear Bianca

Please take note that the site visit is planned for 26 June 2025 and not 26 July 2025.

Regards
Nyiko

From: Nyiko Nkosi

Sent: Monday, 09 June 2025 13:31

To: bianca@ecoroute.co.za

Cc: Mashudu Mudau <MaMudau@dfpe.gov.za>; Vanessa Weyer <vanessa.weyer@sanparks.org>; Zama Langa <ZLANGA@dfpe.gov.za>; Janet Ebersohn <janet@ecoroute.co.za>; Thivhulawi Nethononda <TNETHONONDA@dfpe.gov.za>

Subject: Site Visit for -14/12/16/3/3/1/3114- Proposed development of a Residential Development on Portion 76 of the Farm 216, Uitzicht, Knysna, Western Cape

Dear Bianca

The Department, through the Chief Directorate: Integrated Authorisation and the Directorate: Protected Areas, is planning to conduct a site visit for the abovementioned projects on **26 July 2025**.

Kindly confirm your availability for this date and advise on the type of vehicle most suitable for accessing the site.

Please note that the Department has also extended an invitation to SANParks to participate in the proposed site visit, and they have confirmed their availability for the indicated date

Regards

Ms Nyiko Nkosi

Control Environmental Officer: National Integrated Authorisations Projects

Chief Directorate: Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Tel No: 012 399 9392

Cell No: 071 607 2145

From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Sent: Thursday, 29 May 2025 10:49
To: Ephron Maradwa <EMaradwa@dfpe.gov.za>
Cc: Zama Langa <ZLANGA@dfpe.gov.za>; Salome Mambane <SMAMBANE@dfpe.gov.za>; EIAAdmin <EIAAdmin@dfpe.gov.za>; 'Joclyn Marshall' <joclyn@ecoroute.co.za>; 'Carina' <admin@ecoroute.co.za>; janet <janet@ecoroute.co.za>
Subject: Re: 14/12/16/3/3/1/3114- Proposed development of a Residential Development on Portion 76 of the Farm 216, Uitzicht, Knysna, Western Cape

Good morning, Ephron.

I trust that this email finds you well.

We refer to the Proposed Development of a Residential Development on Portion 76 of the Farm 216, Uitzicht, Knysna, Western Cape.

Please find attached the letter requesting an extension concerning the prescribed timelines outlined in the National Environmental Management Act (NEMA) for the Application.

Thank you for your attention to this matter.

Should you require any information, please do not hesitate to contact me.

Best regards

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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From: Ephron Maradwa <EMaradwa@dfpe.gov.za>
Sent: Thursday, February 27, 2025 14:00
To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Cc: Zama Langa <ZLANGA@dfpe.gov.za>; Salome Mambane <SMAMBANE@dfpe.gov.za>; EIAAdmin <EIAAdmin@dfpe.gov.za>
Subject: 14/12/16/3/3/1/3114

Dear Bianca

14/12/16/3/3/1/3114

ACKNOWLEDGEMENT OF RECEIPT OF THE APPLICATION AND DRAFT BASIC ASSESSMENT REPORT FOR ENVIRONMENTAL AUTHORISATION FOLLOWING A BASIC ASSESSMENT PROCESS FOR THE PROPOSED DEVELOPMENT OF TWO RESIDENTIAL DWELLINGS ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE.

The Department confirms having received the Application Form and Draft Basic Assessment Report for Environmental Authorisation for the abovementioned project on 26-27 February 2025. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 2 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 19 of the EIA Regulations, 2014 as amended.

Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.

Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Kindly quote the abovementioned reference number in any future correspondence in respect of the application.

EIA Applications

Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Please note that this email is for the receipt and processing of online applications only, and is not monitored for responses. All queries must be directed to EIAAdmin@dffe.gov.za.

-
You are advised that this mailbox has a 48 hour response time.

Please note that this mailbox has a 5mb mail limit. No zip files are to be attached in any email.

DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape sent successfully to mamudau@dffe.gov.za

From WeTransfer <noreply@wetransfer.com>

Date Thu 15/05/2025 11:07

To bianca@ecoroute.co.za <bianca@ecoroute.co.za>



**DFFE Reference number:
14/12/16/3/3/1/3114 - Portion
76 of the Farm Uitzicht, Knysna,
Western Cape sent to
mamudau@dffe.gov.za**

2 items, 623 MB in total • Expires on 18 May, 2025

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Recipients

mamudau@dffe.gov.za

Download link

<https://we.tl/t-gWpRVwydOU>

2 items

Appendices for Website

Draft BAR Portion 76.zip
462 MB

Message

Good day,

Please find the Draft BAR and the Appendices.

Best regards

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

EcoRoute

To make sure our emails arrive, please add noreply@wettransfer.com to [your contacts](#).

Re: Proposed development on Portion 76 of Farm 216, Uitzicht, Knysna

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Date Tue 01/04/2025 12:44

To Yvonne Kemp <ykemp@mweb.co.za>; admin@ecoroute.co.za <admin@ecoroute.co.za>

Good afternoon, Ms Kemp.

I trust that this email finds you well.

I hereby acknowledge receipt of your email to be registered as an I&Ap for the project.

The link to the relevant documentation available on the website is as follows:

www.ecoroute.co.za/node/107

Thank you for your attention to this matter.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

EcoRoute



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From: Yvonne Kemp <ykemp@mweb.co.za>

Sent: Friday, March 28, 2025 8:48 PM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>; admin@ecoroute.co.za <admin@ecoroute.co.za>

Subject: Proposed development on Portion 76 of Farm 216, Uitzicht, Knysna

I, Yvonne Ruby Kemp, tel 083 442 1201, wish to be added as an Interested & Affected Party for the DFFE public participation process, ref 14/12/16/3/3/1/3114, regarding the proposed development on Portion 76 (a portion of Portion 54) of Farm 216, Uitzicht, Knysna, Western Cape. I am a resident of Brenton-on-Sea and have for many years walked regularly in the area with my dogs, enjoying the beautiful fynbos, abundant birdlife and other wildlife on this property. I am concerned that a development would be destructive; please send me information about the proposed development.

Yours sincerely,

Yvonne Kemp

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Ref: Residential Dwelling on Portion 76, Uitzicht, Knysna
Enquiries: Mr Thivhulawi Nethononda/Mashudu Mudau
Tel: 0123999553/9945 Fax: (012) 359 3636
E-mail: tnethononda@dffe.gov.za

Ms. Bianca Gilfillan
Eco Route Environmental Practitioners
PO Box 1252
Sedgefield
6573
joclyn@ecoroute.co.za

Dear Ms Gilfillan

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE

Background and Discussion

The Directorate: Protected Areas Planning and Management Effectiveness would like to thank you for the opportunity to review the Draft Basic Assessment report for the aforementioned project. The proposed project will entail the construction of one (1) main dwelling house to be situated in the southwestern corner of the property (3000m²), farm manager's house and a new internal road to provide access to the southern portion of the property.

Portion 76 of the Farm 216 is situated within 1.5 km from Brenton on Sea Residential Area, Knysna Western Cape and the Southern boundary borders the Brenton Beach. The property is 21.01 hectares in extent. The Application area is zoned "Agriculture Zone I" and "Agriculture" is a primary land use right in this zoning category. The proposal is to exercise the primary land use rights of the property, (i.e. construction of a main farmhouse and farm manager's house). The property is located within the Knysna National Lake Area.

Compliance with the Regulations for the Proper Management of the Knysna National Lake Area

According to the Knysna Spatial Development Plan, the proposed area is zoned as an Agricultural Zone I. The proposed area falls within a protected area, the Knysna Protected Environment which is managed by the South African National Parks. Therefore, the proposed development must be consistent with Regulations for the Proper Administration of the Knysna Protected Environment, 2009. In terms of the regulations, prior authorizations must also be obtained from the management authority before certain



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COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE

activities can be undertaken. Furthermore, the development must be undertaken within the appropriate zones of the protected area.

Comments on the Draft Basic Assessment Report for Proposed Development of a Residential Dwelling on Portion 76 of the Farm 216 Uitzicht, Knysna, Western Cape

The Directorate: Protected Areas, Planning and Management Effectiveness reviewed the report and has the following comments:

- The property is located within the expansion footprint of the Garden Route National Park (GRNP) and is both a corridor for wildlife movement (east-west and north-south), and a buffer zone to the GRNP.
 - In page 73 of the BAR, the EAP recognizes all the protected areas that surround the proposed development and further recognizes that the project area is within the Knysna National Lake Area. However, fails to recognize the Garden Route National Park that borders the Knysna National Lake Area. As per the Park's Management Plan, the proposed development is located within the Priority Natural Area. These areas are important for ecological corridors purposes between the Park and the surrounding protected areas, as well as expansion of the Park. The property is located between two properties that are in the process of being incorporated into the GRNP.
- The entire property is classed as Critical Biodiversity Area (CBA) which is defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure. The main objective of a CBA area is to maintain it in a natural or near natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only Low impact, biodiversity sensitive land uses are appropriate.
 - It is a concern that the EAP considered a development of ± 8 ha within CBA as a low impact land use.
 - Most of the CBA on the Brenton peninsula consists of Knysna Sand Fynbos which has been proclaimed as a Critically Endangered ecosystem. Development of two separate houses in a critically endangered ecosystem is questionable.
 - The Applicant is also proposing to construct a large swimming pool, this will put more pressure on the vegetation and the dunes as deeper excavations are needed. Furthermore, there is no indication on how the applicant intends to dispose the filter back wash water.
- Taking the CBA into consideration a low impact route was followed during the planning stages of the alternatives in order to have the least impact on the receiving environment.
 - The above statement indicates that a low impact route was followed in order to have least impact on the receiving environment. It is questionable on how the Applicant/EAP
 - intends to have low impact while developing on sensitive dunes along the Coastal Protection Zone.
- The DBAR states that the Western Cape Spatial Development Framework puts a lot of focus on the protection / conservation of cultural and scenic landscapes. The application area is located



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The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE

on a prominent hill area. The visual impact was taken into consideration with the current design. The DBAR further indicates that the proposal is in line with the provisions of the spatial document and will not detract from the existing spatial pattern of the area which is agriculture zoned properties.

- The existing spatial pattern of the area is in the agriculture zone and has natural vegetation. It is questionable that the development of a large house on a prominent hill is considered to be in line with spatial pattern. Development on the dune will be highly detrimental to the natural beach and there would be a loss of “sense of place”.
- As per ariel map the coastline strip is currently facing erosion and landslides, any additional development within the dunes will be detrimental.
- The property consists of steep dunes, how is the applicant intending on accessing the beach, this information has not been discussed in the report.
- Although the main house is being proposed on the least concern vegetation type (Goukamma Dune Thicket), the vegetation cover on the dunes is of great importance for the stability of the dunes.

As per the Knysna Spatial Development Framework, the proposed development is within the Coastal Management Line and the Sea Level Rise Risk. This indicates that the main house will likely be affected by the sea level rise.

It is recommended for the EAP to fully address the above-mentioned concerns or comments, where applicable provide clarity on certain matters to the Directorate: Protected Areas Planning and Management Effectiveness and consider comments submitted by all other Stakeholders, Interested and Affected Parties.



Ms Amanda Dana-Mfikili

Designation: Director: Protected Areas Planning and Management Effectiveness (Acting)

Date: 29 May 2025



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forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA · 0001 · Environment House · 473 Steve Biko Road, Arcadia, · PRETORIA

DFFE Reference: 14/12/16/3/3/1/3114

Enquiries: Ms Zamalanga Langa

Telephone: 012 399 9389 **E-mail:** zlanga@dffe.gov.za

Ms Bianca Gilfillan
Eco Route Environmental Consultancy
PO Box 1252
SEDGEFIELD
6573

Cell phone Number: 079 189 5060
Email Address: bianca@ecoroute.co.za

PER MAIL / E-MAIL

Dear Ms Gilfillan

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED DEVELOPMENT OF TWO RESIDENTIAL DWELLINGS ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE

The application and the draft Basic Assessment Report (BAR) dated January and received on 27 February 2025, refers.

This letter serves to inform you that the following information must be included to the final BAR:

(a) Participation Process

- Please ensure that all issues raised, and comments received during the circulation of the BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section and Protected Areas Management Section) in respect of the proposed activity are adequately addressed in the Final BAR. Proof of correspondence with the various stakeholders must be included in the Final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.
- The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
- A comments and response trail report (C&R) must be submitted with the final BAR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.



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The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others

N.N.

- The final BAR must provide evidence that all identified and relevant commenting authorities have been given an opportunity to comment on the proposed development.

(b) Listed activities

- Activity 12 of Listing Notice 3- The activity description provided for this listed activity must be amended to indicate the size of the area where the indigenous vegetation will be cleared.
- Please ensure that the relevant listed activities are applied for, and they are specific and can be linked to the development activity or infrastructure as described in the project description. Please provide a full description of how the listed activity is triggered by the proposed development, including the threshold where necessary whilst ensuring that the project description is correct and relevant to the project for each listed activity and for activities in listing notice 3, please ensure to choose the most appropriate sub listing.
- If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted for final review and decision making. Please note that the Department's has been amended and can be downloaded from the following link <https://www.dffe.gov.za/forms>.

(c) Specialist Assessment

- It is brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were published in Government Notice No. 320 of 20 March 2020 (i.e., "the Protocols"), and in Government Notice No. 1150 of 30 October 2020, have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols unless proof is provided to demonstrate that the specialist assessments were commissioned prior to 50 days after the promulgation of GN 320 and after promulgation of GN1150 (30 October 2020).
- In addition to the above, you are hereby drawn to the following:
 - The Specialist Declaration of interest forms must be attached for all specialist studies to be conducted in the final BAR. The forms are available on Department's website (please use the Department's template).
 - Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of proposed rehabilitation, and all other proposed structures that they have assessed and are recommending for authorisations.
 - The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.
 - Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.
 - Please note further that the protocols require certain specialists' to be registered with SACNASP. Refer to the relevant protocols in this regard.
 - The SSRV appended as part of the application form does not take into consideration the themes as reflected in the screening tool. Please ensure that the themes and their sensitivity are discussed in the final BAR.
 - The screening tool has identified the agricultural theme as having high sensitivity. However, the motivation provided in the SSRV is insufficient, as it fails to clearly indicate the sensitivity of the agricultural theme in the same manner as the other themes. If, following a site sensitivity verification assessment by a specialist or Environmental Assessment Practitioner (EAP), this theme is determined to be of medium or low sensitivity, please be aware that the protocols for the agricultural

theme stipulate that an Agricultural Compliance Statement, prepared by a soil scientist or agricultural specialist registered with the South African Council for Natural Scientific Professions (SACNASP), must be submitted with the BAR. On the other hand, if the site verification assessment confirms that the agricultural theme is indeed high sensitivity, as initially indicated by the screening tool, a comprehensive agricultural assessment will be required. Please ensure that the appropriate agricultural assessment is submitted along with the BAR. This will be considered as new information and will necessitate circulation for a second round of Public Participation Process (PPP).

- Please take note that based on the selected classification, and the known impacts associated with the proposed development, the screening tool has provided a list of specialist assessments for inclusion in the assessment report. It is the responsibility of the EAP to confirm or dispute the list of specialists provided and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation
- Please ensure that the Site Verification assessment, as required by the relevant environmental themes and assessments, complies with the requirements of the protocols. Should it be determined that there is a need for additional specialist studies to be undertaken based on the outcome of public participation, these must be commissioned and be included in the final BAR reports for public comment.
- The content of the BAR must include a table summarising the specialist studies required by the Screening Tool and the sensitivity rating of the Screening Tool (very high, high, medium, low), another column indicating the sensitivity of the site after the EAP/Specialist conducted the Site Verification Assessment and a column indicating whether these studies will be conducted or that compliance statement is submitted.
- Please be reminded that section 2(3) of NEMA requires developments to be socially, environmentally and economically sustainable, while section 2(4)(i) of NEMA requires the social, economic and environmental impacts of activities, including disadvantages and benefits, to be considered, assessed and evaluated.
- Summary and recommendations of all specialist studies conducted must be included in the BAR and EMPr.
- Please ensure that the BAR indicates any recommendations of the EAP or specialists, which are to be included as conditions of authorisation, per Appendix 1(3)(1)(n).

(d) Need and desirability

- A motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location.

(e) Layout map

- The layout maps for all alternatives provided must be overlaid in a sensitivity map showing different sensitivities as identified on site. The map must show the following:
 - Position of all proposed infrastructure
 - The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines, Flood lines etc. that will be affected.
 - Buffer areas; and
 - All “no-go” areas.

(f) General content of the report

- The final BAR must comply with the content of BAR as indicated under Appendix 1 of the EIA Regulations 2014 as amended. Content of BAR as per Appendix 1 must be included in the BAR as table of content and it must show the sections or page numbers where all requirements has been addressed in the BAR.

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- Coordinates of the proposed development must be provided, as well as coordinates of the linear infrastructures as applied for (Start, middle and end point).
- If the municipal services will be utilized for the proposed development, you are required to provide a letter of the confirmation of availability of services from the Municipality

General

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority -

(a) a basic assessment report, inclusive of specialist reports, an EMP, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority."

Should there be significant changes or new information that has been added to the BAR or EMP which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: "the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMP, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMP or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in sub-regulation (1)(a) and that the revised reports or, EMP or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days".

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely



Dr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Signed by: Ms Nyiko Nkosi

Designation: Control Environmental Officer: National Integrated Authorisations Projects

Date: 31/03/2025

cc:	Dr Andre Peach	Midnight Storm Investments 180 (Pty) Ltd	Email: andrepeach@lantic.net
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RE: Site Visit for -14/12/16/3/3/1/3114- Proposed development of a Residential Development on Portion 76 of the Farm 216, Uitzicht, Knysna, Western Cape

From Nyiko Nkosi <NNKOSI@dfpe.gov.za>

Date Mon 09/06/2025 14:39

To bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Cc Mashudu Mudau <MaMudau@dfpe.gov.za>; Vanessa Weyer <vanessa.weyer@sanparks.org>; Zama Langa <ZLANGA@dfpe.gov.za>; Janet Ebersohn <janet@ecoroute.co.za>; Thivhulawi Nethononda <TNETHONONDA@dfpe.gov.za>

Dear Bianca

Please take note that the site visit is planned for 26 June 2025 and not 26 July 2025.

Regards
Nyiko

From: Nyiko Nkosi

Sent: Monday, 09 June 2025 13:31

To: bianca@ecoroute.co.za

Cc: Mashudu Mudau <MaMudau@dfpe.gov.za>; Vanessa Weyer <vanessa.weyer@sanparks.org>; Zama Langa <ZLANGA@dfpe.gov.za>; Janet Ebersohn <janet@ecoroute.co.za>; Thivhulawi Nethononda <TNETHONONDA@dfpe.gov.za>

Subject: Site Visit for -14/12/16/3/3/1/3114- Proposed development of a Residential Development on Portion 76 of the Farm 216, Uitzicht, Knysna, Western Cape

Dear Bianca

The Department, through the Chief Directorate: Integrated Authorisation and the Directorate: Protected Areas, is planning to conduct a site visit for the abovementioned projects on **26 July 2025**.

Kindly confirm your availability for this date and advise on the type of vehicle most suitable for accessing the site.

Please note that the Department has also extended an invitation to SANParks to participate in the proposed site visit, and they have confirmed their availability for the indicated date

Regards

Ms Nyiko Nkosi

Control Environmental Officer: National Integrated Authorisations Projects

Chief Directorate: Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Tel No: 012 399 9392

Cell No: 071 607 2145

From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Sent: Thursday, 29 May 2025 10:49
To: Ephron Maradwa <EMaradwa@dfpe.gov.za>
Cc: Zama Langa <ZLANGA@dfpe.gov.za>; Salome Mambane <SMAMBANE@dfpe.gov.za>; EIAAdmin <EIAAdmin@dfpe.gov.za>; 'Joclyn Marshall' <joclyn@ecoroute.co.za>; 'Carina' <admin@ecoroute.co.za>; janet <janet@ecoroute.co.za>
Subject: Re: 14/12/16/3/3/1/3114- Proposed development of a Residential Development on Portion 76 of the Farm 216, Uitzicht, Knysna, Western Cape

Good morning, Ephron.

I trust that this email finds you well.

We refer to the Proposed Development of a Residential Development on Portion 76 of the Farm 216, Uitzicht, Knysna, Western Cape.

Please find attached the letter requesting an extension concerning the prescribed timelines outlined in the National Environmental Management Act (NEMA) for the Application.

Thank you for your attention to this matter.

Should you require any information, please do not hesitate to contact me.

Best regards

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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From: Ephron Maradwa <EMaradwa@dfpe.gov.za>
Sent: Thursday, February 27, 2025 14:00
To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Cc: Zama Langa <ZLANGA@dfpe.gov.za>; Salome Mambane <SMAMBANE@dfpe.gov.za>; EIAAdmin <EIAAdmin@dfpe.gov.za>
Subject: 14/12/16/3/3/1/3114

Dear Bianca

14/12/16/3/3/1/3114

ACKNOWLEDGEMENT OF RECEIPT OF THE APPLICATION AND DRAFT BASIC ASSESSMENT REPORT FOR ENVIRONMENTAL AUTHORISATION FOLLOWING A BASIC ASSESSMENT PROCESS FOR THE PROPOSED DEVELOPMENT OF TWO RESIDENTIAL DWELLINGS ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE.

The Department confirms having received the Application Form and Draft Basic Assessment Report for Environmental Authorisation for the abovementioned project on 26-27 February 2025. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 2 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 19 of the EIA Regulations, 2014 as amended.

Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.

Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Kindly quote the abovementioned reference number in any future correspondence in respect of the application.

EIA Applications

Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Please note that this email is for the receipt and processing of online applications only, and is not monitored for responses. All queries must be directed to EIAAdmin@dffe.gov.za.

-
You are advised that this mailbox has a 48 hour response time.

Please note that this mailbox has a 5mb mail limit. No zip files are to be attached in any email.

DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape sent successfully to mamudau@dffe.gov.za

From WeTransfer <noreply@wetransfer.com>

Date Thu 15/05/2025 11:07

To bianca@ecoroute.co.za <bianca@ecoroute.co.za>



**DFFE Reference number:
14/12/16/3/3/1/3114 - Portion
76 of the Farm Uitzicht, Knysna,
Western Cape sent to
mamudau@dffe.gov.za**

2 items, 623 MB in total • Expires on 18 May, 2025

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2 items

Appendices for Website

Draft BAR Portion 76.zip
462 MB

Message

Good day,

Please find the Draft BAR and the Appendices.

Best regards

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

EcoRoute

To make sure our emails arrive, please add noreply@wettransfer.com to [your contacts](#).



WESTERN HEADS-GOUKAMMA CONSERVANCY

NPO: 285-693

81 TULBAGH STREET

KNYSNA 6571

<https://westernheadsgoukamma.co.za>

Attention:

By email:

Draft Basic Assessment Report - The Proposed Development on Portion 76 (A Portion of Portion 54) of Farm 216 Uitzicht, Knysna, Western Cape | Eco Route

DFFE Reference number: 14/12/16/3/3/1/3114 – Portion 76 of the Farm Uitzicht 216, Knysna, Western Cape

Objections to the above Draft Basic Assessment Report (DBAR) by the Western Heads Goukamma Conservancy (registered with CapeNature 2004), hereinafter referred to as WHGC

- WHGC is supported by the **Table Mountain Fund (TMF)**, a subsidiary of **WWF South Africa**, (WWFSA) in a project to conserve and restore the Critically Endangered **Knysna Sand Fynbos (FFd10)**.
- The WHGC also works closely with **SANParks** in its Park Expansion objective, by facilitating **Contractual National Park (CNP)** agreements between landowners and SANParks.

Structure of this document

This document addresses the above referenced DBAR, following the section headings and page numbering employed by the applicant.

SECTION B – Property description (pp 13–14)

The applicant states (p. 13):

“The entire property is classed as Critical Biodiversity Area (CBA) which is defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure. The main objective of a CBA area is to maintain it in a natural or near natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low impact, biodiversity sensitive land uses are appropriate. Taking the CBA into consideration a low impact route was followed during the planning stages of the alternatives in order to have the least impact on the receiving environment”.

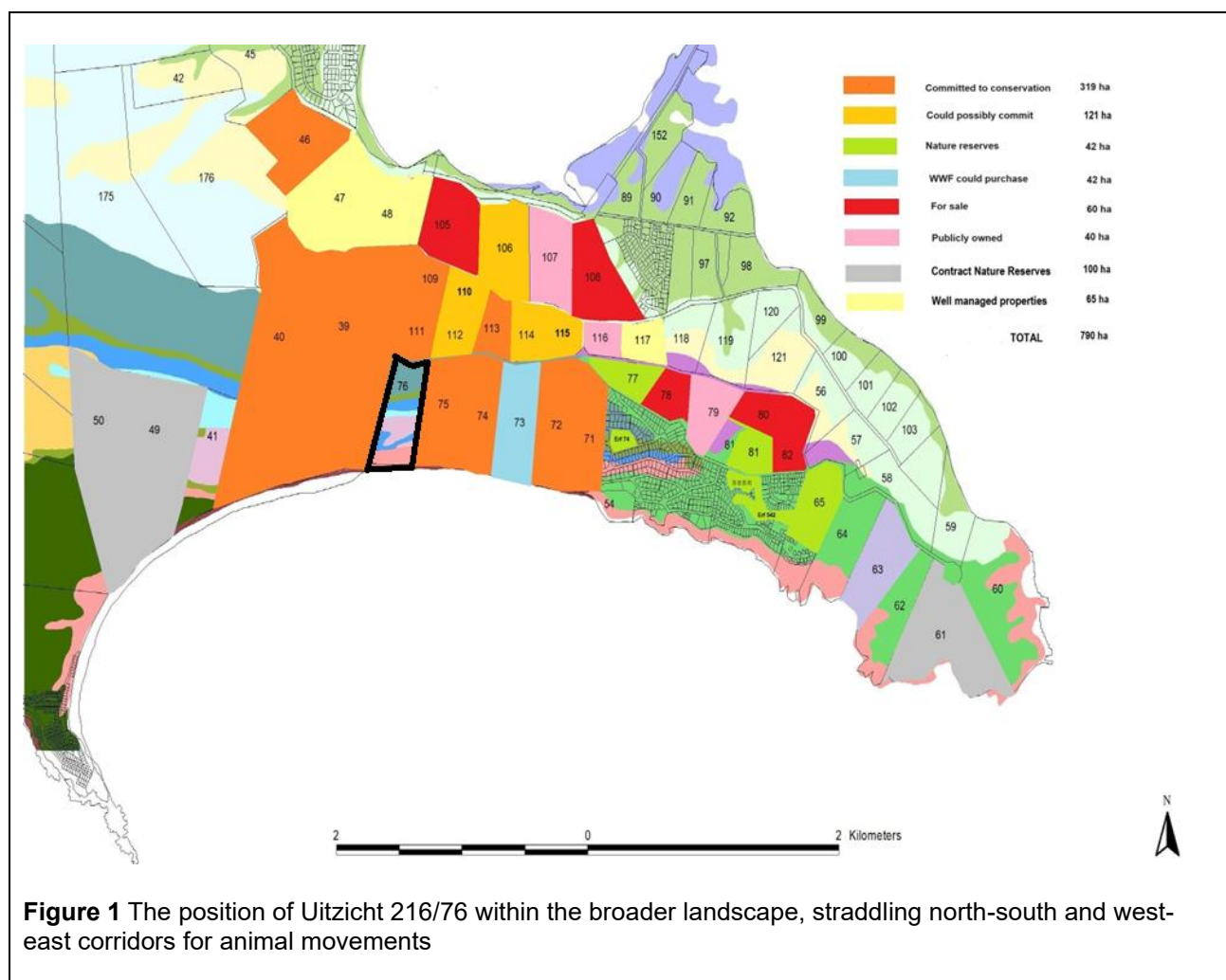
WHGC submits that the applicant, in addition to not taking full cognisance of the above, has not considered the property in its landscape, ecological and human context and this has resulted in an ill-considered and fatally flawed development proposal, for the reasons given below:

Landscape context

Uitzicht 216/76 is situated within an exceptionally sensitive **Critical Biodiversity Area (CBA)**, which is of the highest conservation, aesthetic and tourism value not only for the residents of Knysna, but also for the region. The property is immediately adjacent to the SANParks CNP properties Uitzicht 216/39, 40, 74, 75 and 111 (Fig. 1).

This CBA itself is of enormous regional and national conservation importance because:

- It contains the largest remaining contiguous extent of the Critically Endangered Knysna Sand Fynbos (FFd 10) vegetation type.
- It is within the expansion footprint of the **Garden Route National Park (GRNP)**.
- It is a natural scenic area as per the **National Heritage Resources Act (NHRA)**, and will provide future growth of tourism activities, which will benefit all the inhabitants of the Brenton Peninsula and the whole Knysna area.
- It has the highest conservation status (Core1b) for spatial planning purposes in the Knysna and **Western Cape Spatial Development Framework (WCSPDF)**.



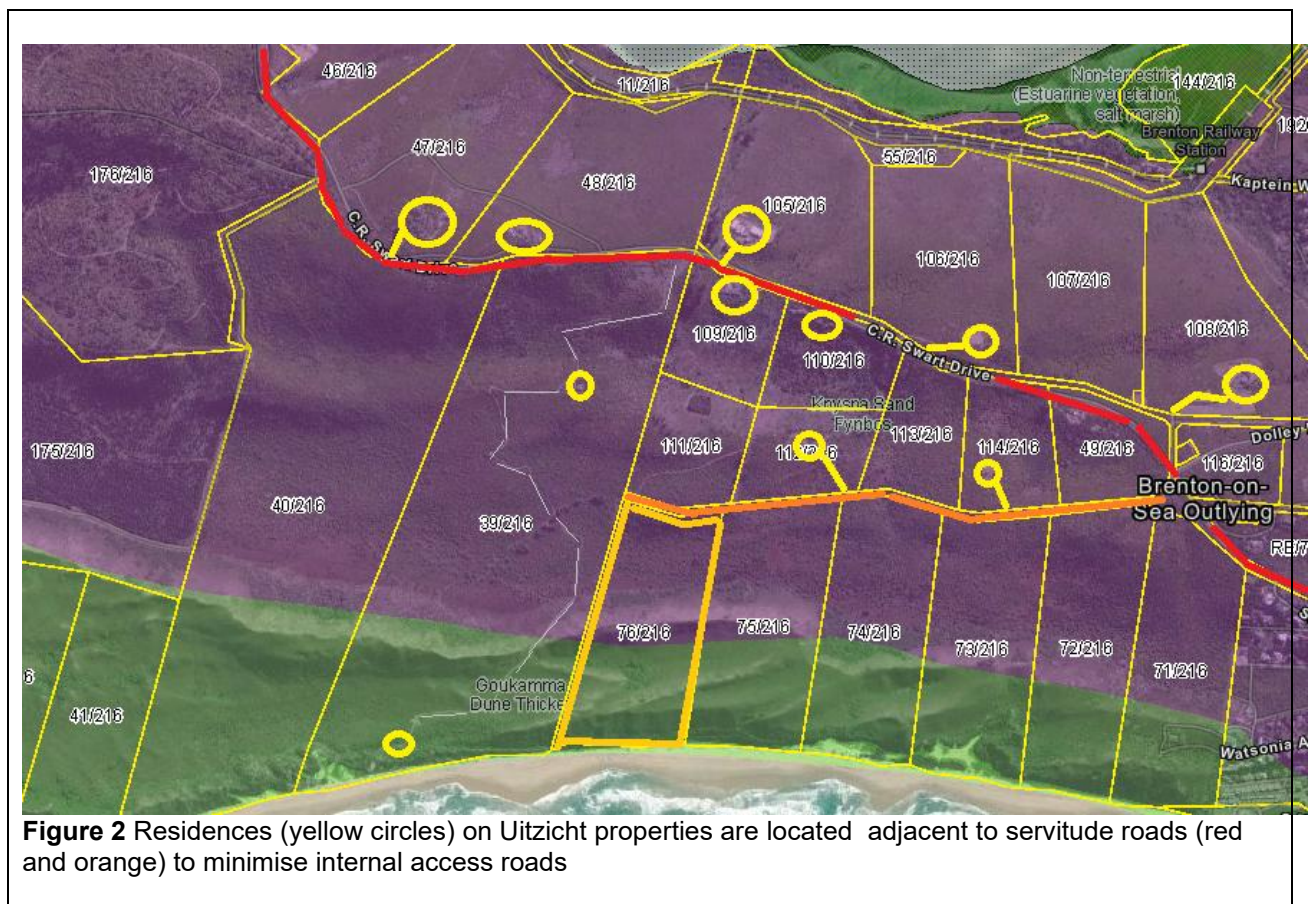
- It is within the **Coastal Protection Zone (CPZ)** defined by the **Coastal Management Act 24 of 2008 (CMA)**.
- It has been the subject of extensive and costly conservation and restoration efforts by the WHGC, TMF, WWF, SANParks, CapeNature and conservation sensitive landowners in the CBA.

These conservation and restoration efforts include:

- Persuading Uitzicht properties to become SANParks CNPs
- Alien clearing & rehabilitation programmes funded by the TMF and WWFSA
- Purchase of three large properties by the WWFSA and declaration of CNPs
- Expert botanical surveys to record the plant species within the CBA.
- Implementation of a coordinated fire management programme to protect dwellings from fire and restore a natural fire regimes through periodical ecological burns, guided by the **Southern Cape Fire Protection Agency (SCFPA)** .

Location of existing Uitzicht residences in relation to servitude roads

Existing residences on all Uitzicht 216 properties are located as close as possible to municipal or provincial roads to prevent further fragmentation and disturbance by linear infrastructure such as internal roads (Fig. 2). The only exception (Uitzicht 216/39) has a historical road which was in existence when the current owners acquired the land in the early 1970s and runs along a registered public servitude that eventually leads to the coast. Uitzicht 216/39 (90 ha) also has a small dwelling close to the coast, which is a wooden structure between the primary and secondary dunes with an estimated disturbance footprint of 600 m². This dwelling is not visible from the beach, Buffalo Bay, Brenton on Sea, or any public roads.



There are therefore no visible buildings on the primary sand dunes between Brenton on Sea and Buffalo Bay. This natural and unspoiled beach is an international tourist attraction and one of the crown jewels of Knysna's many natural attractions, which drive its tourism industry, possibly second only to the famous Knysna Heads.

Objection 1

The WHGC submits that the DBAR has failed to address adequately the landscape context of the proposed property development, and has misleadingly stated that “The property does not fall within the protected area, neither does it border a protected area” (DBAR pp. 25-26).

SECTION C – Location of activities (pp. 13–17)

This section of the DBAR only shows the preferred Alternative 1, which includes linear infrastructure (an internal road), which is covered below in section G, and found to not be allowed in a **CBA Core 1 SPC** in terms of the **Western Cape Land Use Planning Guidelines Rural Areas 2019** (WCLUPGRA).

SECTION D – Scope of proposed activities

Primary dwelling - disturbance footprint and profiles

Only a basic floor plan of the preferred main dwelling proposed for the south-western corner of the site has been submitted for consideration (see Fig. 3 below), despite a reference to other architectural drawings. However, there are no details pertaining to elevations, sections, 3D views, floor levels, or any external views from different angles. Reference is made to the approximately 3,000 m² disturbance area, without clarifying how much of this is building footprint, disturbance during construction, parking areas, water storage, utility areas sewerage disposal facilities, topsoil storage areas and so on. The floor plan in Fig. 3 has no scale and we can only guess that the main dwelling appears to be approximately 55m long and could be double or even triple storey.

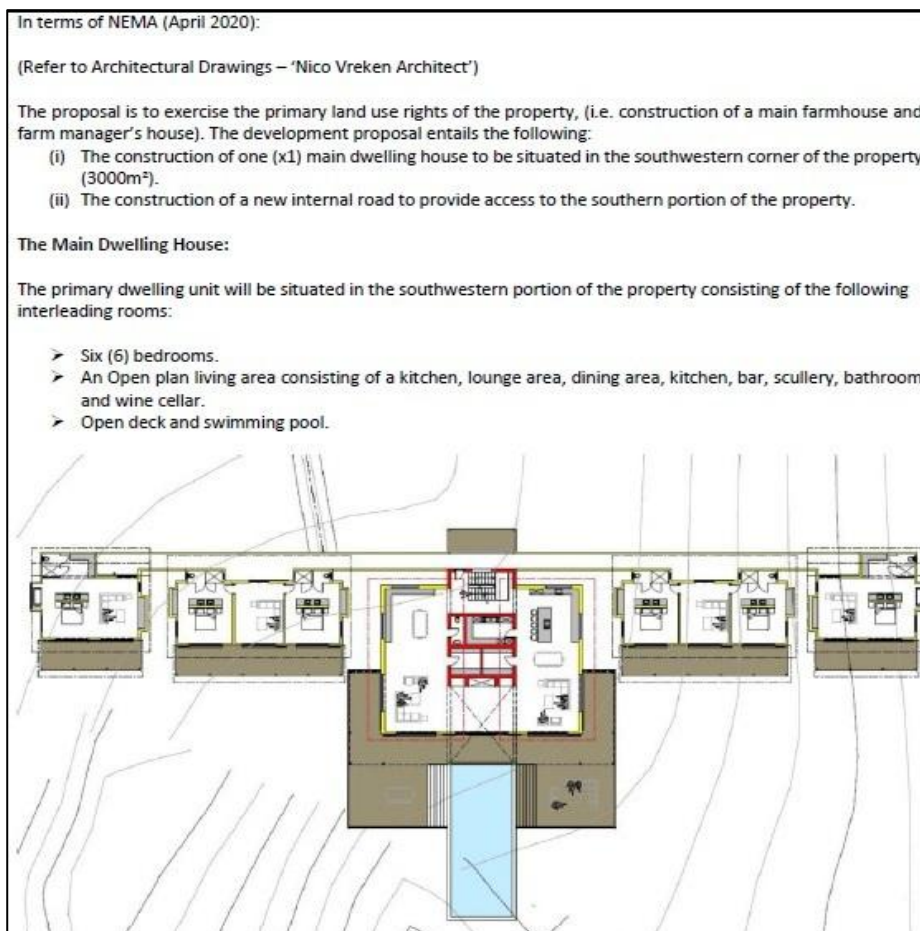


Figure 3 – Architectural plan of the proposed main dwelling

The structural information provided in the DBAR gives no evidence that any attempt was made to minimise the footprint of the main dwelling as is required when planning a development in a known CBA.

The extensive spread-out or “detached room” layout of the proposed main dwellings can be seen in the layout sketches provided in Appendix B1 Alternative Layouts 1 & 2 that the “dwelling” seems to be a resort or lodge under the guise of a single residence with “detached rooms”. The result is an enormous building footprint that far exceeds the footprint of a conventional design of even a luxury 6 bedroom house, which ranges from 600 to 1200 m².

In both the layouts provided, the said “rooms” are designed as completely independent units, and this results in a much bigger footprint than a traditional residential design. The WCLUPGRA 2019 guidance for Core 1 area requires a “small low-density footprint” and an “appropriate scale and form”. The proposed main dwelling with a disturbance area of 3000 m² far exceeds the biggest houses in the Brenton or Buffalo Bay neighbourhoods. We conclude that the architect has not been instructed to “minimise biodiversity loss” or to offer designs with “appropriate scale and form” as required for CBAs.

Objection 2

The WHGC therefore objects to the unnecessarily extensive and spread-out design of the main dwelling. There has clearly been insufficient effort not only to minimise the disturbance footprint and biodiversity loss, but also to mitigate the aesthetic impact in a very sensitive natural landscape.

Drilling boreholes for water

The DBAR (p. 50) says that the primary source of water will be rainwater collection from the roof. The expected annual yield would be 420 kl, which be less than the demand. Consequently it is intended to drill one or two boreholes to make up the shortfall in supply.

The environmental risk and impact of borehole development has not been considered in the DBAR and EMPr. Three major risk factors need to be addressed:

- Movement of heavy drilling equipment to remote locations over steep slopes and sandy soil conditions can cause severe damage to the sensitive vegetation. If drilling is to take place near Kerk Laan this risk is to some extent mitigated.



Figure 4 – boreholes situated close to Kerk Laan.

- The use of drilling fluids as per Appendix D3 and D10 “This is done by flushing drill fluids, fines and debris from the borehole on completion of drilling. The method used is that of plunging and surging”. These fluids need to be captured and disposed of in a suitable offsite location.
- Since the proposed locations of the boreholes are far from the proposed main dwelling on the southern part of the site pipelines will have to be installed. (estimated length 830 m). requiring excavation of 100-80 cm wide and 50 cm deep pipe trenches with disturbance and fragmentation impacts (footprint of the water pipeline/s) could be between 6– 800 m².

Objection 3

The WHGC insists that the drilling and usage of boreholes can only be done if the environmental risk is carefully managed. The best mitigation factor is to reduce the number of people occupying any dwelling, so that less water is required. All other families in this area collect sufficient rainwater from their roofs to meet all their needs.

Manager's dwelling

- Only one dwelling is allowed if the property is within 1 km from the shoreline according to the CMA.
- If the property is zoned Agriculture 1 only one dwelling is allowed unless actively farming (Manager's house).
- We therefore support the applicant's decision not to apply for a second dwelling.

Internal road

- The need for an internal road is the result of an illogical and flawed site selection process, as described under **Section G** below. Furthermore, information provided in the DBAR on the true extent and impact of this internal road is ambiguous. The DBAR (p. 40) specifies the road as being 830m long and 2.5 m wide with a construction disturbance of 4m to 5.5m wide.
- The Civil Services Report does not credibly calculate the total disturbance footprint of the road. It can be deduced from DBAR pages 40 & 46 that the disturbance area and loss of biodiversity is calculated between 4150 to 4565 m² . However, this does not adequately allow for the required retaining walls to stabilise the mobile sand on the steep slopes and hairpin bends, particularly on the highly unstable slopes of the Arid Dune Fynbos described by Vlok (2005). It also omits the need for installing a stormwater drainage system to prevent erosion. The reference to a 2.5m wide surface area of the road is therefore an attempt to conceal the true extent of the disturbance required to build it. The Geotechnical Test Report itself specifies the need for “*significant earth works and retaining walls*” as well as “*an additional 2-meter disturbance envelope surrounds all proposed roads*”. (DBAR page 76).
- Reinforced concrete strip roads (Fig. 4 above) are environmentally harmful, and except on steep slopes the internal road should be built of natural materials like the road on Uitzicht 216/39.
- Will this internal road be sufficiently strong and wide enough to support heavy construction equipment which has a large turning circle?
- The internal road traverses a steep second primary dune with a >50% gradient to reach the main dwelling in the southwest part of the property. Appendix D12 Civil Services Report (p. 13) shows the volume of soil to be removed & added. Fig. 4 also shows the ground stabilising blocks needed due to the extreme gradient of the road over the second primary dune.
- There is no consideration of the impact of an estimated 4 000 ton topsoil excavation (Appendix D12 Civil Services Report) during road construction. The majority of this soil needs to be

removed and some potentially stored for back fill. This 4 000 ton or 2282 m³ of soil will require over 400 loads of 10 ton trucks that hold a high environmental risk component. It will also place huge pressure on the farm road which is the only access to the site (see Fig. 4 “the dirt track along the road reserve will need to be upgraded”).

- Amongst the environmental impacts of the proposed internal road even after it is built will be:
 - disruption & fragmentation of the vital east-west ecological corridor for animals
 - stimulation of alien plant growth in the disturbance area
 - roadkill of animals from heavy vehicle traffic during construction and later passage of clients to and from what appears to be a “boutique hotel” on the primary dune
- Aesthetic Impact of the road, which will be visible from CR Swart Drive, Brenton on Sea and Buffalo Bay.

Objection 4

The WHGC therefore objects to the proposed internal road based on:

- its illegality in terms of WCLUPGRA 2019 guidelines pertaining to Core 1 SPC
- the unacceptably high biodiversity loss of vegetation
- the fragmentation of the Critically Endangered Knysna Sand Fynbos
- the unacceptable aesthetic impact of the internal road.

Upgrading of Kerk Laan

The preferred Alternative 1 will result in two major construction projects – the main dwelling and the internal road, both of which will require heavy construction equipment. The Appendix D12 Civil Services Report has the following statement:

5.3 ROADS

There is an existing road network servicing this area, all roads leading to the road reserve are tarred and of good quality. The dirt track along the road reserve will need to be upgraded.

Kerk Laan provides access to the Uitzicht 216 properties 111, 112, 113, 114, 76, 75, 74, 73, 72 and 71. It is a narrow, unsurfaced sand and gravel road, which is scarcely wide enough for two vehicles to pass each other. The road verges contain some rare plants, and in some places the Endangered butterfly SCC *Aloeides thyra orientis* sits on the road or the sandy verges around midday. Widening the road will cause significant environmental damage.

Objection 5

The WHGC insists that a full environmental impact assessment has to be done of the upgrading of Kerk Laan, which is entirely within a CBA 1.

SECTION E – Environmental considerations

Critical Biodiversity Area

The Terrestrial Animal Species Assessment (Leitner 2024) identified that the entirety of Uitzicht 76 lies in a CBA1 critical biodiversity area, and that it must be maintained in a natural or near-natural state, with no further loss of habitat. Degraded areas should be rehabilitated. Only low impact, biodiversity-sensitive land uses are appropriate. The property was rated as VERY HIGH sensitivity

as far as terrestrial animals are concerned, since one SCC was observed and the habitat was suitable for three other SCCs.

Vegetation types

The Plant Species and Terrestrial Biodiversity Assessment (Fouché 2024) looked at the SANBI vegetation types (VEGMAP, 2018) but also at Vlok's vegetation types (2005) which are on a finer scale (see Fig. 5). Knysna Sand Fynbos (FFd10) is equivalent to Vlok's "Moist Dune Fynbos", which is south facing and moderately steep in places. Goukamma Dune Thicket (AT36), which Mucina & Rutherford had named South Cape Dune Fynbos (FFd11) in 2006, is only present as a thin strip in Vlok's vegetation mapping, found at the bottom of the primary dune. Higher up the dune this becomes Arid Dune Fynbos, which is north facing, very steep and sandy near the summit, and erodes easily if the vegetation is removed. The proposed "internal road" has to overcome this substantial obstacle. After the top of the dune it descends into south facing and gently sloping Brenton Dune Fynbos (BDF), a very rare vegetation sub-type poorly represented in the Goukamma Nature Reserve (GNR). In the shallow valley Primary Dune Slack Fynbos occurs, which is only found on the Brenton dunes and even scarcer than BDF. On this incredibly rare vegetation the applicant wants to build a 3000 m² dwelling, which will be high enough to be seen from Buffalo Bay behind the highest primary dune (with Arid Dune Fynbos). The steep, densely vegetated Primary Dune & Cliff Fynbos continues down to the Fore dune.

Fouché (2024) found that the vegetation now mapped as Goukamma Dune Thicket contains a number of Red List plants and has a HIGH sensitivity ecologically. From an environmental perspective it would be difficult to find a place less suited to building a house.

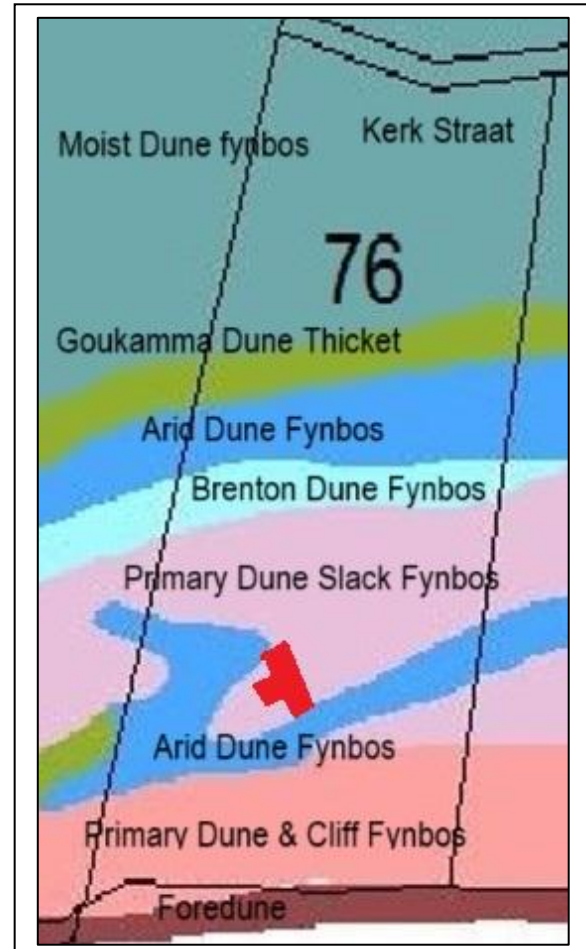


Figure 5 – The vegetation of Uitzicht 76

6. SITE SENSITIVITY VERIFICATION

6.1 Terrestrial Biodiversity

The sensitivity of the **terrestrial biodiversity** theme for the site is confirmed as **Very High** as the site contains a significant area of remaining natural vegetation of a CR vegetation type (Knysna Sand Fynbos) north of the large barrier dune on the site, which is threatened by invasive plants, especially pines. The southern section of the site is also sensitive habitat, characterised by a strandveld-fynbos mosaic with thicket patches in fire refugia on the site (i.e., the dune slacks, and some sections on the dune crests). Furthermore the whole site is a CBA1, and forms part of an area that served an important corridor function along the coastline.

6.2 Botanical diversity

The **site sensitivity in terms of the terrestrial plant species** theme is confirmed as **High**, as the site is home to several SCC, and there is some spatial heterogeneity over the site in terms of the distribution of the SCC found.

These High and Very High sensitivities mean that is of critical importance to minimise the disturbance area of all activities during construction and operations, and in fact it would be best to not disturb the southern part of Uitzicht 76 at all.

Objection 6

The WHGC asserts that insufficient emphasis has been placed on the environmental sensitivity of the southern section of the site, which confirms the very poor judgement of making this area the site of the main dwelling.

SECTION F – Need and desirability

Exercising primary rights

- ‘Dwelling unit’ means a self-contained interleading group of rooms with not more than one kitchen, used only for the living accommodation and housing of a single family, together with such outbuildings as are ordinarily used therewith.
- Six bedrooms seems an awful lot for a single family.
- The Coastal Management Act – within 1km from shoreline only one dwelling is allowed.
- Knysna zoning scheme only allows for one dwelling unit per erf for Agriculture 1 properties unless there are substantial farming activities.
- Beekeeping does not qualify and local residents say there are very low yields from this activity – because there is not enough forage (nectar sources) for more wild bees on the Brenton Peninsula.

Objection 7

Whilst the WHGC supports the applicant’s entitlement to exercise its primary rights for a property zoned for Agriculture 1, the preferred main dwelling exceeds by far the definition of a dwelling. Refer to Section D and Objection 2 for details.

SECTION G – Alternatives considered (pp. 44–52, and 76–77)

As per the applicant’s DBAR section G (p. 44), the development aims to “exercise the owner’s primary land use rights for Agriculture Zone 1 properties to a residence (dwelling)”. The entire property is classed as a CBA, and this places constraints on what is allowed from an environmental perspective, as below and elsewhere in this submission.

Western Cape Land Use Planning Guidelines Rural Areas (WCLUPGRA 2019)

WCLUPGRA (2019) classified the Western Heads CBA as Core 1 SPC. The DBAR wrongly refers (p. 36) to the superseded legislation “Draft Western Cape Rural Development Guidelines (2009)”.

Relevant factors from WCLUPGRA 2019 pertaining to Core 1 SPC (CBA) that need to be considered are summarised as follows:

4.1.2 GUIDELINES ON LAND USE AND ACTIVITIES IN THE CORE 1 SPC

- *human impact must be restricted to ensure that there is no further loss of natural habitat*
- *structures associated with activities in Core Areas should preferably be located in neighbouring Buffer areas*
- *structures should preferably be located on disturbed footprints*

- “Appropriate form and scale”
 - **aesthetic qualities** of the receiving environment must be the factor determining the appropriate scale and form of the proposed development
 - **small low density footprints**, appropriate technology and design concepts should be encouraged (e.g. Enviro-loos, temporary structures, green architecture and use of natural resources)
 - **structures to achieve least impact**
- Land uses that should not be located in Core 1
 - **linear infrastructure of any sort that will cause significant loss of habitat and/or disrupts the connectivity of ecological corridors**



These guidelines specifically exclude the construction of an internal road (linear infrastructure), and therefore the only place a dwelling can be is as close as possible to the existing road along the northern boundary (Kerkstraat – Fig. 3), which for some reason the applicant has not given any attention to, despite it being advocated for by SANParks in written and verbal exchanges. This would minimise the project footprint, reduce the fire risk, limit landscape fragmentation, and result in a much lower (< 1 500 m²) transformation of the property.

The DBAR illogically provides three (3) site plan alternative layouts (pp. 73–74), two of which include an internal road, which is not permitted, and one of which includes using the Uitzicht 216/39 existing road, which the owner of this property has refused to entertain.

Figure 4 – Alternative 4

The DBAR mentions four (4) site plan alternative layouts, but does not provide the site layout of Alternative 4, which is “*preferable because it minimises project footprint, reduces fire risk, limits landscape fragmentation, and results in less than 1% transformation of the property, compared to over 2% for other options*” (DBAR p.77)

The DBAR Illogically selects the worst two Alternatives (1 & 3 ref BAR page 76) contrary to the conclusion that Alternative 4 is the best as per Page 77, and ignores the fact that an internal road is not allowed under the WCLUPGRA 2019 guidelines pertaining to Core 1 SPC. The applicant needs to be interrogated as to why Alternative 4 (Fig. 6) is not being considered, and Alternative 1 is the preferred option.

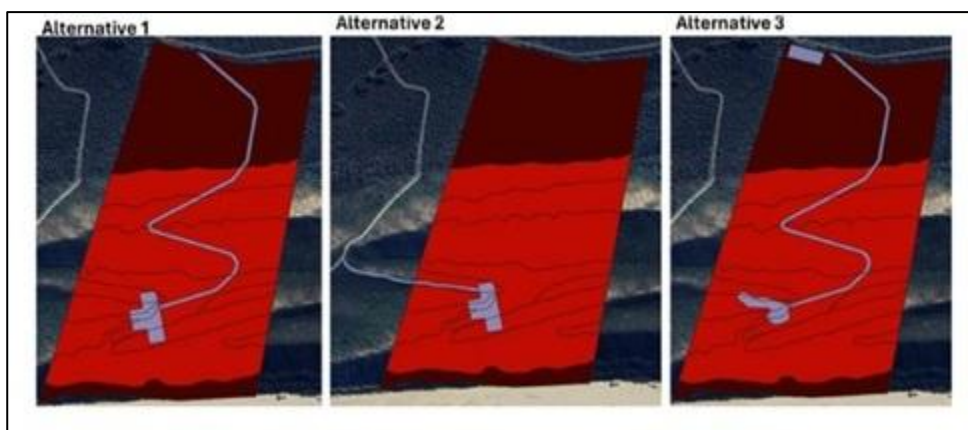


Figure 5 – The three alternatives assessed in the DBAR – Alternative 4, the least environmentally damaging, was not considered

The proposed development on Portion 76/216 will affect sensitive fynbos and strandveld vegetation within a Critical Biodiversity Area 1 (CBA 1). The impact assessment recommends Alternative 4 as the best layout, with Alternative 2 also being viable. Both result in Minor or Negligible impacts, while Alternatives 1 and 3 risk requiring offsets due to Moderate impacts. Alternative 4 is preferable because it minimizes project footprint, reduces fire risk, limits landscape fragmentation, and results in less than 1% transformation of the property, compared to over 2% for other options.

Extract from the DBAR (p. 77)

Comparative Table of Disturbance footprints in square meters (m²)

	Preferred Alternative 1	Alternative 2 (use 216/39 road)	Alternative 3 (two dwellings)	Alternative 4 (least impact)
Primary dwelling	3000	3000	4000	1200
Road	4565	500	4565	200
Manager's House	0	0	1200	0
Water Pipeline/s	415	600	600	200
Total*	7 980 m²	4 100 m²	10 365 m²	1 600 m²
% of total property	4.0%	2.0%	5.2%	0.8%

*These totals exclude unknown disturbances e.g. water tanks, internal road retaining walls and water aspects, primary residence parking area, etc.

Objection 8

Consequently the WHGC objects to the selection of Alternative 1 and supports Alternative 4, which was also favoured by SANParks, several other I & APs and the applicant's own biodiversity experts because:

- No internal road will be needed, with its huge biodiversity and visual impacts
- No main dwelling on the primary dune with significant biodiversity and visual impacts
- Main dwelling will be in an already disturbed area, as the legislation favours
- shorter water pipeline from boreholes, which might not be needed anyway

SECTION H – Details of the public participation process (PPP)

The notices and advertisements seem to have been dealt with properly, and most of the I & APs are listed in Appendix G.

The issues raised by the I & APs and responses given in the DBAR are summarised below:

Issues raised by I & APs	Responses in DBAR
1) Solar energy preferred to Escom supply	Solar energy is being used
2) Relaxation of 30m boundary line for manager's not acceptable	No manager's house
3) Box cuts on road over primary dune will need retaining wall supports – must be vegetated to reduce visual impacts	See geotechnical report
4) Internal road to be concrete strip construction essential areas, more natural designs across the valley	See geotechnical report - limited to

5) Kerk Laan is an unmaintained sand road which cannot support construction vehicles	Road will be upgraded
6) Building on primary dunes will affect biodiversity and ecological functioning	No response
7) SANParks – Uitzicht 76 is in buffer zone of GRNP	Noted
8) Knysna Sand Fynbos coastal corridor fragmented	Noted
9) Critically Endangered Knysna Sand Fynbos is present	Noted
10) Critical Biodiversity Area – only biodiversity sensitive land uses	Noted
11) Preferred development plan has disturbance area of 8 765 m ²	No response
12) How will swimming pool backwash be disposed of	To septic tanks or recycle
13) No access to beach down steep primary dune	Noted
14) How will drilling equipment get to the site?	Will use small drilling m/cs
15) Impact of drilling for water not discussed in BAR	Being evaluated
16) Significant harm to biodiversity, alters character of landscape and fragments the coastal corridor	Noted
17) Conserving CR vegetation types nationally important	Accepted but not all CR
18) Stewardship with CapeNature or SANParks essential	Under consideration
19) Development close to Church Street preferred	Refuse to consider this
20) Creates a bad precedent for future developments	Noted
21) Fire risk to a house on the primary dunes, House near Church Street easier to access	Noted
22) Large construction operations raise security concerns	No response
23) Coastal Management Act - main dwelling within 100m of high tide mark is environmentally sensitive	No response
24) The preferred main dwelling looks like a boutique hotel or B&B – is this the real intention?	Noted
25) Usage of the manager's dwelling to be detailed	No manager's house
26) Rare plants in the road reserve could be harmed	Ignored
27) Bee farming not economically feasible < 1 hive per ha	No bee farming
28) Forestry to comment on land-use application to KM	Pending
29) Send more recent plant list to DFFE for comment	Sent to DFFE
30) Exact locations of forest/ thicket patches needed	Sent to DFFE
31) For preferred alternative 4.3% of CBA disturbed	Noted
32) 2005 Vlok report identified 16 vegetation types – 7 in pristine condition occur on Uitzicht 76	Insists that vegetation is Least Threatened
33) EAP has classified all vegetation in the southern part of property as Goukamma Dune Fynbos, disregarding Vlok 2005 report	No change – need to contest this
34) No biodiversity study done for threatened plants and Animals	Animals Very High Sensitivity
35) Uitzicht 76 between two SANParks CNPs	Noted
36) Primary dune has special and sensitive vegetation removal will cause erosion	Their experts have assessed and this and say it can be done
37) Is a 2.5m wide road sufficient for construction vehicles - steep climbs and hairpin bends	Claim that 2.5 m road is wide enough
38) Soakaway from septic tanks used to treat sewerage will possibly leak into borehole water - probably	Will carefully design the system to prevent leakage

brackish anyway

- | | |
|--|---|
| 39) Large house on primary dune negatively impacts view for residents of Buffalo Bay, Brenton-on-Sea and Uitzicht, defacing natural beauty of the pristine beach and affecting tourism and property values | The Heritage Statement said the impacts will be small |
| 40) Why a 3000 m ² house when stands in Brenton on Sea are only 1000 m ² ? | There are six bedrooms all on one level |
| 41) Knysna zoning scheme only allows one dwelling for unless substantial farming activity – beekeeping does not qualify | No manager's house Agriculture 1, |
| 42) Coastal Management Act – up to 1 km from shoreline only one dwelling is permitted. | No manager's house |
| 43) Only two alternatives considered whereas the least environmentally harmful alternative 4 is ignored. EAP must state why this option was not considered. | Noted |

Objection 9

Out of 43 issues raised by the I & APs, 4 issues elicited “No response” and 12 elicited “Noted”. Some feedback was given on the other 25 issues, in most cases unsatisfactorily.

The WHGC objects to the incomplete PPP and asks that the EAP fully responds to all the issues raised.

SECTION I – Natural Heritage Resources and visual impact assessments (VIA)

- 1) The DBAR exclusively relies upon “Appendix D1 Heritage Impact Statement (HIA)” for visual impact assessments (VIA). However, the DBAR (p. 84) clearly states that the Appendix D1 should not be regarded as an HIA, but as a scoping report that offers supplementary information.
- 2) The requirement for a full VIA as per “DEADP WC Visual Guideline” is triggered as the area is classified as a “Protected area with significant visual qualities”.
- 3) Furthermore, the following legislation specifically applies to the study area, as per the Garden Route Environmental Management Framework, the Knysna Spatial Development Framework (SDF), SANParks Contractual National Park agreements and the Coastal Management Act (CMA):
 - Areas with protection status, such as national parks or nature reserves;
 - Areas with proclaimed heritage sites or scenic routes;
 - Areas with intact wilderness qualities, or pristine ecosystems;
 - Areas of important tourism or recreation value;
 - Areas with important vistas or scenic corridors
- 4) The quantum of the development also necessitates an appropriate VIA because the size and scale of the current proposal is very large (>7000 m² disturbance), with a high risk that the development will detract from the natural rural characteristics of the area and significantly change its sense of place, possibly causing environmentally aware residents to move elsewhere.
- 5) It is important to note that critical details required for a VIA are not provided in the DBAR. The available information of the main dwelling is high level and lacks important detail, e.g. scale, form and bulk. No architectural drawings or 3D were provided or considered for any the different options. Important details of the internal road are also not available to be considered in a VIA.

- 6) Consequently, for assessment of the visual impact, the DBAR just states that the site is “*barely visible in the distance*” and that the “*proposed development is barely visible in the distance*”, and refers to Appendix D1 Fig. 18, stating that the proposed development will have no visual impact on the aesthetic value of the affected area.



Appendix D1 Figure 18 – Views from C R Swart road looking towards the study area that is not readily visible from the road unless you stop at a lookout point from where 216/76 is also barely visible in the distance

- 7) None of the photos provided are from highly impacted positions on the tourist route, populated places as well as the farm residences located within proximity of the site, e.g. Whale Viewpoint, Angels Leap Viewpoint or the Brenton Beach. The photos in Appendix D1 are therefore not a true reflection of the visual impact of the development.
- 8) The DBAR has also failed to consider the visual impact from Buffalo Bay. The impact will be significant, in terms of the proposed enormous main dwelling, during daylight hours as well as the significant light pollution at night.
- 9) The DBAR states and concludes that “*Consequently, the proposed development will have no visual impact on the aesthetic value of the affected area.*” and rate the Visual impact as Low (BAR page 108 and EMPr p19-20)
- 10) The DBAR is also silent regarding the visual impact of the internal road. The internal road will be fitted with lights as well as have prominent features such as “*significant earth works and retaining walls*” (Geotechnical Test Report)

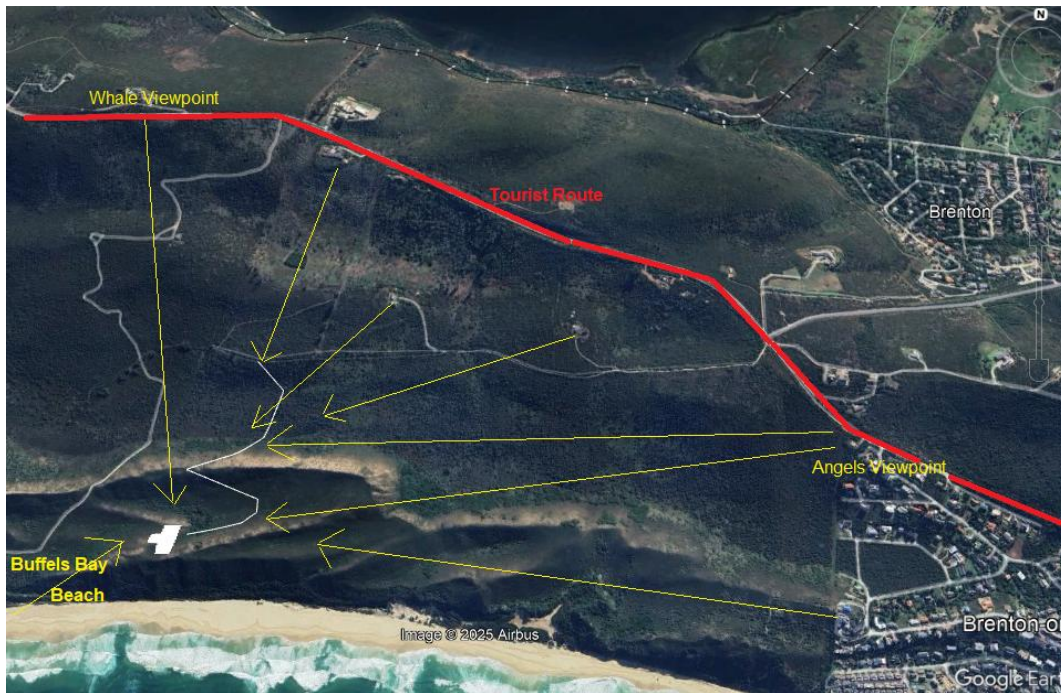


Figure 6 – Google Earth map showing visibility of the proposed site and road from a major tourist road, Brenton and Buffalo Bay beaches, populated places and farm residences located in proximity to the site.

Key aspects for VIA have not been made available

No report was presented that appropriately evaluates the Visual Impact of the development (residences and road) as per requirements of “DEADP WC Visual Guideline”

- the project's physical aspects (form, scale, and bulk) on the landscape and receptors.
- the visual impact from various required locations: tourist route, beach (tourist place), populated places, homesteads (farm residences) located within proximity of the site
- as per required VIA criteria, such as the nature, extent, duration, intensity, probability, and significance of the impacts.
- propose and evaluate potential mitigation measures to minimize or avoid the negative visual impacts, such as landscaping, screening, or altering the design of the development.
- the visual impact of the road and the main dwelling from Buffels Bay
- light pollution at night.

Objection 10

The WHGC therefore objects to the DBAR’s conclusion that the development “has no visual impact on the aesthetic value of the affected area” as it relies on the conclusions and statements as per “Appendix D1 Heritage Impact Statement” that, by own admission, was not intended as a VIA; nor does it comply to the Western Cape's Guidelines for Involving Visual and Aesthetic Specialists in EIA Processes (CSIR 2005). (Ref Oberholzer, B. 2005. *Guideline for involving visual and aesthetic specialists in EIA processes: Edition 1*. CSIR Report No ENV-S-C 2005 053 F. Republic of South Africa, Provincial Government of the Western Cape, Department of Environmental Affairs and Development Planning, Cape Town)

Objection 11

WHGC objects to the missing and/or ambiguous information and details provided in the DBAR, EMP and Appendices

The key missing and/or ambiguous information and details are:

- Internal road disturbance footprint
 - No definite disturbance information provided, only vague 830m long with between 4.5-5.5 m wide
 - Missing information regarding volume of soil to be excavated, removed and replaced with imported aggregate
 - What will happen to the “Topsoil” that contains the very important seed bank
 - Water
- Internal road visual impact
 - This was also highlighted by SANParks in their previous comments, but has still not been addressed.
- Water pipeline disturbance footprint
- Location and footprint of the 110kl water storage tanks estimated as disturbance of 200 m² (22 x 5 kl tanks)
- Septic tank and soak away location and disturbance footprint
- Access to beach: no boardwalk or footpath was proposed to the beach
 - *“The applicant is assessing the option of including beach access in their considerations”* page 5 Appendix F Comments and Response Report
- Backwash from swimming pool as Fynbos is not a good receiving environment for the backwash
 - The proposed solution was a proposal to feed it to the septic tank that will only serve to destroy the septic tank biotics.
- No consideration was given to the Long-term conservation plans for this property that it is situated in a very sensitive CBA1

Objection 12

The applicant has not demonstrated a Duty of Care for this property, particularly since it is situated in a CBA1.

For example the applicant has not done any Invasive Alien Clearing since taking possession of the property in 2017, despite being in contravention of the NEMBA Alien and Invasive species regulations and lists (2020). Multiple environmental studies by the EAP and environmental specialists, including the 2020 scoping study, have pointed out since 2017 the threat of invasive species to the CBA1, as well as the fire risk, and the importance of removing them. It would not have cost very much to have done this fairly soon after the June 2017 fire, but now it has become very expensive.

Conclusions

- The WHGC does not dispute the applicant’s primary land use right to building a residence.
- However, the WHGC objects to the illogical selection of the proposed site location as well as the enormous building footprint.
- The WHGC is extremely concerned about the high environmental impact of the proposed internal road that is required to access the irrationally proposed site.

The WHGC’s objections are primarily caused by illogical conclusions in the BAR that result in unnecessary large & severe biodiversity loss, ecosystem fragmentation and aesthetic/visual impact.

Various I & APs have pointed out a very feasible and low environmental impact location on the northern boundary; however, this option was not evaluated or presented by the DBAR.

The WHGC requests that the Regulator considers the failure to follow the due process required in a DBAR specifically with regard to:

- 1) The selection of the proposed location of the primary residence and required internal road, which has the highest environmental and aesthetic impact of all the alternatives. It appears that the selection was made based on the desire of the owner to have the primary residence as close to the beach as possible. This location has the highest biodiversity loss and ecological impact.
- 2) The evaluation of all the "site alternatives" for the primary residence ignores the obvious option of locating the structures in the disturbed footprint on the "northern boundary". Also to consider that the presented site alternatives are practically identical and simply ignore the low ecological impact site alternative.
- 3) the large building footprint size of the "main residence" that is excessive due to a "spread-out design". The proposed footprint of >3000 m² is excessive, especially bearing in mind the requirement to minimise disturbance in a CBA.
- 4) The absence of building designs, levels and building aesthetics that are key attributes required for a VIA. This is compounded by the fact that the proposed location is very visible from various public and tourist locations.
- 5) The likely significant Visual impact that was not assessed by the DBAR.
- 6) The DBAR's conclusion that "insignificant visual impact" of the proposed site relies on a scoping document and without the required VIA.
- 7) the DBAR's illogical conclusion that the proposed location of the primary residence and required road will not set a precedent or change the character of this pristine area.
- 8) The WHGC also points out that the WCSPF guidelines were not considered, and that the proposal would result in the first and only dwelling on the primary dune between Brenton and Buffalo Bay.
- 9) There are multiple key specifications and facts that are ambiguous or missing in the BAR and EMPr that could result in an ambiguous EA and EMPr e.g. building footprint, disturbance footprint, key aesthetic details of the proposed building, internal road exact path and total disturbance footprint, 110kl water storage tanks and supply pipeline disturbance footprints, Septic tank & soak away location and footprint, the management (use, removal and storage) of topsoil & subsoil from proposed substantial site and road excavations.
- 10) The proposed but unspecified "upgrading" of Kerk Laan with a high risk of severe environmental impact as it is currently a "low key, minimal impact" road in a CBA1 and conservation area.

The WHGC reserves the right to revise its initial comments and to request further information based on any additional information that may be received.

Your sincerely



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TABLE 4.1: Land-use guidelines for protected areas and Critical Biodiversity Areas. Spatial layers can be viewed in CapeFarmMapper and on SANBI BGIS (continued).

Map category	Desired management objective	General guidelines	Specific guidelines
Critical Biodiversity Area I: Terrestrial & Forest	Maintain in a natural or near-natural state, with no further loss of habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land-uses are appropriate.	- Biodiversity loss and land-use change in verified CBAs should not be permitted. Unauthorised land-use change or degradation by neglect or ignorance must be monitored as a matter of priority. - Ideally, conservation management activities should be the primary land-use in all Biodiversity Priority Areas, or they should at least be managed in ways that have no negative impact on species, ecosystems, or ecosystem services. - Conservation efforts should focus on conserving Species of Conservation Concern and populations of keystone species and species responsible for pollination and seed dispersal.	- Ideally, developments should be avoided in these areas. If they cannot be avoided, it must be shown that the mitigation hierarchy has been applied. If the impact cannot be avoided or reduced to a residual low significance, a biodiversity offset may be considered as a last resort. - The features behind a site being identified as a CBA must be fully investigated. Some areas may appear degraded but still be important for water or ecological connectivity for example. - Relevant specialist studies must form part of a Basic Assessment or the Scoping and EIA process for all land-use applications in these areas, using the services of an experienced and locally knowledgeable biodiversity expert who is registered with the South African Council for Natural Scientific Professions (SACNASP). - Applications for land-use of any kind should be referred to the Land-use and Conservation Planning team at CapeNature.

Western Cape Land Use Planning Guidelines Rural Areas

TABLE 1: CATEGORIES ON THE BIODIVERSITY SPATIAL PLAN MAP AND THEIR RECOMMENDED CORRESPONDING SPATIAL PLANNING CATEGORY

		WCBSP MAP CATEGORY						
		PROTECTED AREAS PA	CRITICAL BIODIVERSITY AREA 1 (TERRESTRIAL/AQUATIC) CBA 1	CRITICAL BIODIVERSITY AREA 2 (DEGRADED) CBA 2	ECOLOGICAL SUPPORT AREA 1 (TERRESTRIAL/AQUATIC) ESA 1	ECOLOGICAL SUPPORT AREA 2 ESA 2	OTHER NATURAL AREAS (NATURAL TO NEAR-NATURAL/DEGRADED) ONA	NO NATURAL REMAINING NNR
SPATIAL PLANNING CATEGORY	CORE 1	●	●					
	CORE 2			●	●			
	BUFFER 1						●	
	BUFFER 2					●	●	
	AGRICULTURE							●
	SETTLEMENT							●

TABLE 1: CATEGORIES ON THE BIODIVERSITY SPATIAL PLAN MAP AND THEIR RECOMMENDED CORRESPONDING SPATIAL PLANNING CATEGORY

4.1 GUIDELINES FOR THE CORE 1 SPC

4.1.1 DESCRIPTION AND OBJECTIVE

Core 1 Areas are those parts of the rural landscape required to meet targets/thresholds for **biodiversity patterns or ecological processes** (i.e. Protected Areas and Critical Biodiversity Areas). These include habitats classified as highly irreplaceable, critically endangered, or endangered terrestrial (land), aquatic (rivers, wetlands and estuaries) and marine habitats.

These also include areas currently not yet exhibiting high levels of biodiversity loss, but which should be **protected and restored**, in order to ensure biodiversity pattern and ecological process targets/thresholds can be met, in the most efficient way possible. It also includes essential biological corridors vital to sustain their functionality.

Three components of the rural landscape as mapped by the Western Cape Biodiversity Spatial Plan, make up Core 1 Areas, with the following management objectives:

- **Protected Area** in terms of National Environment Management: Protected Areas Act (NEM: PAA): Must be kept in a natural state, with a management plan focused on maintaining or improving the state of biodiversity.
- **Critical Biodiversity Area 1: Terrestrial:** Maintain in a natural or near-natural state with no further loss of natural habitat.
- **Critical Biodiversity Area 1: Aquatic:** Keep natural, with no further loss of habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land-uses are appropriate.

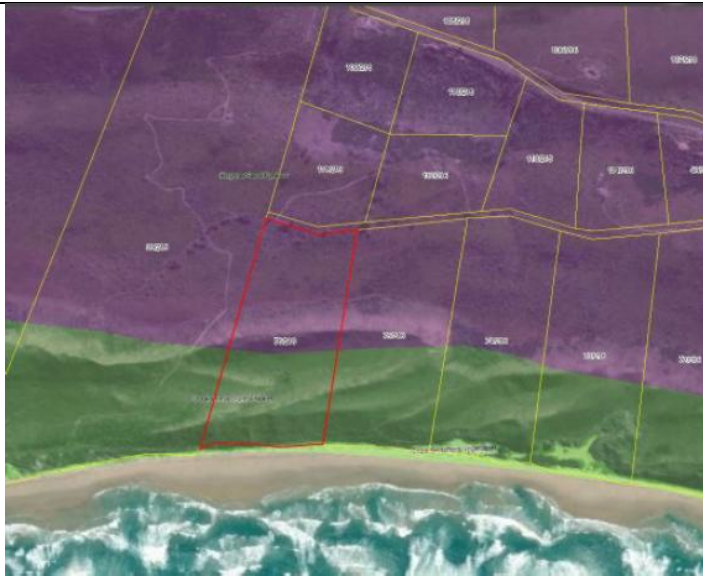
The Core 1 SPC:

- Identifies which parts of the rural landscape are of highest conservation importance, and if they are currently protected or not.
- Informs expansion of the Protected Area network through a Protected Area Expansion Strategy.
- Delineates areas that must be maintained in, or restored to, a natural state in order to sustain biodiversity patterns and processes and the functionality of eco-system services.
- Identifies areas of land that could serve as biodiversity offset receiving areas.
- In combination with Core 2 Areas, spatially defines the 'core' of the rural landscape's ecological network.

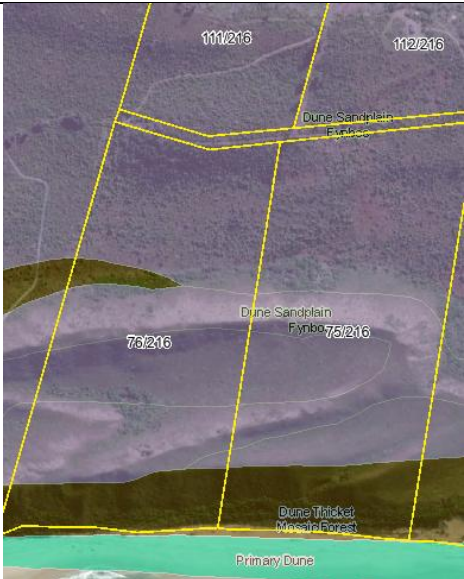
4.1.2 GUIDELINES ON LAND USE AND ACTIVITIES IN THE CORE 1 SPC

What kinds of activities?

- Essentially Core areas are 'no-go' areas from a development perspective. Accordingly, human impact must be restricted to ensure that there is no further loss of natural habitat.
- Conservation management activities, such as alien clearing, research and environmental education should be encouraged.
- Subject to stringent controls the following biodiversity-compatible land uses (i.e. those of very low impact) may be accommodated in Core 1 areas:



2018 Vegetation Map: Knysna Sand Fynbos and Goukamma Dune Thicket



Vlok Vegetation Map: Wilderness Forest- Thicket, Sedgfield Sandplain Fynbos

Die Omgewingskonsultant
Ecoroute Environmental Consultants
Posbus 1252
SEDFIELD
6573

FEENSTRA INC

Prokureurs, Transportbesorgers, Notarisse en
Handelsmerk Prokureurs
Attorneys, Conveyancers, Notaries and Trademark
Attorneys

Dorpstraat 6 / 6 Dorp Street Stellenbosch 7600
Posbus / PO Box 1029 Stellenbosch 7599

Tel: 021 883 8012
Email / Epos : roelof@feenstrainc.co.za
VAT no / BTW Nr: 4820276055

Aandag: Me. Bianca Gilfillan

E-pos: admin@ecoroute.co.za /
bianca@ecoroute.co.za

Geagte Me Gilfillan

7 April 2025

RE: BESWAAR BUFFELSBAAI INWONERS VERENIGING: GEDEELTE 76 VAN DIE PLAAS UITZICHT NR. 216

Ons tree op namens die Buffelsbaai Inwoners Vereeniging.

Die Buffelsbaai Inwoners Vereniging (BIV) verteenwoordig 160 uit 209 inwoners/eiendomme in Buffelsbaai. Die BIV het ernstige besware rakende die huidige ontwikkelings voorstel soos via die voorgeskrewe omgewings proses aan BIV gelewer vir oorweging. Die BIV het 'n noue verbintenis met die WHGC en dit sluit in gemeenskaplike sienings rakende veral die bestuur, bewaring en behoud van die unieke natuurlike omgewing. Die BIV vertrou die bevindings en siening van die kundiges in die relevante velde soos deur WHGC aangevra. In hierdie lig onderskryf die BIV dus die aangehegte opsommende kommentaar van die WHGC.

Die BIV behou die reg voor om sy bogemelde kommentaar te hersien en by te werk, asook om verdere inligting aan te vra wat verband hou met enige nuwe inligting wat beskikbaar gestel en ontvang mag word.

Groete

RJ FEENSTRA

 **Buffelsbaai Inwonersvereniging (BIV)**

Tel: +27 (0) 83 331 9397

Epos: biv.bsa@gmail.com

Web: www.buffelsbaai.net



Die Omgewingskonsultant

Ecoroute Environmental Consultants

Posbus 1252

SEDGEFIELD

6573

bianca@ecoroute.co.za / admin@ecoroute.co.za

Aandag Bianca Gilfillan

7 April 2025

Draft Basic Assessment Report - The Proposed Development on Portion 76 (A Portion of Portion 54) of Farm 216 Uitzicht, Knysna, Western Cape | Eco Route

Reference: DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

The WHGC does not dispute the owner's primary land use right to a residence. However, the WHGC objects to the illogical selection of the proposed site location as well as the enormous building footprint. The WHGC is extremely concerned about the high environmental impact of the proposed internal road that is required to access the proposed site.

The WHGC objections are based primarily due to illogical conclusions in the BAR that result in large & severe biodiversity loss, ecosystem fragmentation and aesthetic/visual impact.

Various Stakeholders have pointed out a very feasible and low environmental impact location on the northern boundary; however, this option was not evaluated or presented by the BAR.

The WHGC request that the Regulator consider the comprehensiveness of the due process and proposals in the BAR specific to:

- a. **The selection of the proposed location of the primary residence and required internal road** as it has the highest ecological and aesthetic impact of all the alternatives due to the need for an internal road. The selection of the preferred location is irrational from an environmental impact perspective. It appears that



Buffelsbaai Inwonersvereniging (BIV)

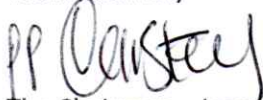
Tel: +27 (0) 83 331 9397
Epos: biv.bsa@gmail.com
Web: www.buffelsbaai.net



the selection was made based on the desire of the owner to have the primary residence as close to the beach as possible. This location has the highest loss of biodiversity and ecological impact.

- b. The evaluation of all the “site alternatives” for the primary residence that ignores the proposed “northern border”. Also consider that the presented site alternatives are practically identical and do not consider a low ecological impact site alternative(s).
- c. the large building footprint size of the “residence” that is excessive due to a “spread out design”. Considering the proposed residence of >3000sqm is excessive especially bearing in mind the requirement to minimise disturbance in a CBA.
- d. The absence of building designs, levels and building aesthetics that are key attributes required for a Visual Impact Assessment. This is compounded by the fact that the proposed location is very visible from various public and tourist locations.
- e. the large Visual impact that was discounted by the BAR.
- f. the BAR’s conclusion of an “ignorable visual impact” of the proposed site relying on a scoping document and without the required Visual Impact Assessment (VIA).
- g. the BAR’s illogical conclusion that the proposed location of the primary residence and required road will not set a precedent or change the character of this untouched area. The WHGC point out that the WCSPF guidelines were not considered, and the proposal will result in the **first and only primary residence** on the primary dune between Brenton and Buffels Bay.
- h. to various key specifications and terms that are ambiguous or missing in the BAR and EMPr that could result in an ambiguous EA and Environmental management E.g. building footprint, disturbance footprint, key aesthetic details of the proposed building, internal road exact path and total disturbance footprint, 110kl water storage tanks and supply pipeline disturbance footprints, Septic Tank & Soak away location and footprint, the management (use, removal and storage) of topsoil & subsoil from proposed substantial site and road excavations.
- i. the unquantified “upgrading” of Kerk Laan with high risk of severe environmental impact as it currently is a “low key” road in a CBA1 and conservation area.

Yours faithfully



The Chairman – Jacques Malan





REF: BL/BHOA

2 April 2025

Eco-Route Environmental Consultancy
P O Box 1252
SEDFIELD
6573

ATTENTION: BIANCA GILFILLAN

PER E-MAIL
bianca@ecoroute.co.za

Dear Bianca

PORTION 76 (A PORTION OF PORTION 54) OF THE FARM UITZICHT 216.

1. We refer to the attached notice in respect of the public participation process.
2. We represent the Belvidere Homeowners Association (**BHOA**).
3. Belvidere Estate is located within the demarcated boundaries of the Western Heads / Goukamma Conservancy.
4. The application site is also located within the Western Heads / Goukamma Conservancy.
5. **Herewith comments regarding the Environmental Impact Assessment application:**

5.1 The site is located in an area demarcated as a critical “biodiversity area”.

...2/

- 5.2 The development potential of the site is therefore extremely limited and subject to stringent environmental criteria.
 - 5.3 The “farming” potential of the site is even more restricted and limited.
 - 5.4 The application proposes the construction of two dwellings – a main house and a farm manager’s cottage.
 - 5.5 The proposal of a main house and a farm manager’s cottage is misleading and an attempt to create the impression that “farming activities” will require accommodation for a “farm manager”.
 - 5.6 The BHOA objects to the attempt to create two “separate” dwellings on the site.
 - 5.7 We acknowledge the fact that a main and a second dwelling can be permitted on the site in terms of the applicable zoning
 - 5.8 The site is furthermore subject to a very specific “disturbance area” where structures must be located.**
 - 5.9 Both the dwellings must be located in the “disturbance area”.
 - 5.10 No structures should be allowed on the primary dune facing the Buffalo Bay / Brenton Beach.
6. We reserve the right to supplement our comments when additional information becomes available.

7. We also require a site plan indicating the locality of the two structures within the disturbance area.

Yours faithfully

BREDA LOMBARD TOWN PLANNERS

A handwritten signature in black ink, appearing to read 'S Van B Lombard', written in a cursive style.

S VAN B LOMBARD

PROF TOWN PLANNER (REG NO. A/700/1992)



REF: BL/BHOA

10 March 2025

Eco-Route Environmental Consultancy
P O Box 1252
SEDFIELD
6573

ATTENTION: BIANCA GILFILLAN

PER E-MAIL
bianca@ecoroute.co.za

Dear Bianca

PORTION 76 (A PORTION OF PORTION 54) OF THE FARM UITZICHT 216.

1. We refer to the attached notice in respect of the public participation process.
2. Breda Lombard Town Planners represent the Belvidere Homeowners Association (**BHOA**).
3. The BHOA is a pro-active association that manages Belvidere Estate.
4. The BHOA is also involved in the Western Heads / Goukamma conservancy initiatives.
5. Kindly register the BHOA as an interested and affected party.

...2/

6. **Contact information for the process:**

- Breda Lombard Town Planners
- 38 Bompas Road
- DUNKELD
- 2196
- E-mail: breda@bredalombard.co.za
- Landline: 011 327 3310

7. **Kindly acknowledge receipt. We are awaiting the draft report.**

Yours faithfully

BREDA LOMBARD TOWN PLANNERS



S VAN B LOMBARD

PROF TOWN PLANNER (REG NO. A/700/1992)

cc: BELVIDERE HOMEOWNERS' ASSOCIATION EXECUTIVE COMMITTEE

RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

From BC Admin <bcadmin@dffe.gov.za>

Date Tue 25/03/2025 12:52

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>; janet@ecoroute.co.za <janet@ecoroute.co.za>

Cc MMatlala Rabothata <MRABOTHATA@dffe.gov.za>; Lindiwe Victoria Dlamini <LVDlamini@dffe.gov.za>; Nompumelelo Lekalakala <NLekalakala@dffe.gov.za>

Dear Sir/Madam

DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation on the 06 March 2025 to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs M Rabothata and Ms Lindiwe Dlamini (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers.

Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dffe.gov.za for attention of Mr Seoka Lekota.

Kind regards,

Lindiwe Victoria Dlamini

Directorate: Biodiversity Mainstreaming and EIA

Branch: Biodiversity and Conservation

473 Steve Biko Road|Private Bag X477|Pretoria|001

Cell: 0606295852|Email: lvdlamini@dffe.gov.za

Website: www.environment.gov.za

From: admin@ecoroute.co.za <admin@ecoroute.co.za>

Sent: Thursday, 06 March 2025 14:18

To: Bathandwa Ncube <BNcube@dffe.gov.za>; Lydia Kutu <LKutu@dffe.gov.za>; Danie Swanepoel <Danie.Swanepoel@westerncape.gov.za>; OCEIA <OCEIA@dffe.gov.za>; OCEIA <OCEIA@dffe.gov.za>; Tabisile Mhlana <tmhlana@dffe.gov.za>; Rueben Molale <RMolale@dffe.gov.za>; Nathan.Jacobs@westerncape.gov.za; Noluvo.Toto@westerncape.gov.za; Stephanie.barnardt@westerncape.gov.za; 'Vanessa Stoffels' <Vanessa.Stoffels@westerncape.gov.za>; Azni.November@westerncape.gov.za; Dirk.Prinsloo@westerncape.gov.za; RobertsJ@dwa.gov.za; 'Cor Van der Walt' <Cor.VanderWalt@westerncape.gov.za>; 'Brandon Layman' <Brandon.Layman@westerncape.gov.za>; Melanie Koen <Mkoen@dffe.gov.za>; Innocent Mapogole <imapogole@dffe.gov.za>; leptieshaam Bekko <leptieshaam.Bekko@westerncape.gov.za>; Mercia J Liddle <Mercia.Liddle@westerncape.gov.za>; Hilda.Hayward@westerncape.gov.za; Ryan.Apolles@westerncape.gov.za; BC Admin <bcadmin@dffe.gov.za>; KMathetja@dffe.gov.za; MMatlala Rabothata <MRABOTHATA@dffe.gov.za>; melvin.schwartz@dalrrd.gov.za

Cc: bianca@ecoroute.co.za; janet@ecoroute.co.za

Subject: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Dear State Department,

Kindly find below link to the Draft BAR and relevant appendices.

<https://we.tl/t-n4gdnfQtUo>

A 30-day public participation will be held from **06/03/2025 – 07/04/2025**. Please submit your comments to the EAP undersigned in this time.

Should you have an issue accessing the link above, please visit our website to view all documents: www.ecoroute.co.za/node/107

ECO-ROUTE ENVIRONMENTAL CONSULTANCY

EIA PROCESS



Notification of Public Participation:

**Proposed Development on Portion 76 (A Portion of Portion 54) of Farm 216,
Uitzicht, Knysna, Western Cape**

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998), the National Environmental Management Act: Environmental Impact Assessment Regulations 2014, as amended, of a 30-day Public Participation Process to be undertaken under the authority of the Department of Environmental Affairs and Development Planning (DEA&DP) reference: 14/12/16/3/3/1/3114.

The Public Participation Process will run from 06 March 2025 – 7 April 2025

The following EIA Listed Activities are applicable:

Government Notice No. R324 (Listing Notice 3): Listed Activity 4

Government Notice No. R324 (Listing Notice 3): Listed Activity 12

A Draft Basic Assessment Report and relevant appendices will be sent via email to all registered Interested and Affected Parties/ I&APs for public review and comment. Alternatively, all relevant documents may be accessed via our website during the public participation period: www.ecoroute.co.za

In addition, a hardcopy will be placed at the New Horizons Public Library for I&APs without access to internet.

Should you wish to comment on the Draft report, gain further information regarding the project or wish to register as an Interested and Affected Party please contact the Environmental Assessment Practitioner (details below).

Please provide written comments with your name, contact details and an indication of any direct business, financial, personal, or other interest which you may have in the development.

Environmental Assessment Practitioner: Bianca Gilfillan (EAPASA Reg 2023/7929)

P.O. Box 1252, Sedgefield, 6573

Email: bianca@ecoroute.co.za/ admin@ecoroute.co.za

Tel: 064 691 4394

www.ecoroute.co.za

Kind regards,

Carina Leslie

Personal Assistant/Admin

Office: 064 691 4394

www.ecoroute.co.za



Eco Route
Environmental Consultancy

Re: Request to Register as interested and affected party 14/12/16/3/3/1/3114 portion 76 of 216 Uitzight

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Date Tue 01/04/2025 12:44
To Judy Harrison <judyh883@gmail.com>; admin@ecoroute.co.za <admin@ecoroute.co.za>

Good afternoon, Ms Harrison.

I trust that this email finds you well.

I hereby acknowledge receipt of your email to be registered as an I&AP for the project.

The link to the relevant documentation available on the website is as follows:

www.ecoroute.co.za/node/107

Thank you for your attention to this matter.

Best regards

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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From: Judy Harrison <judyh883@gmail.com>
Sent: Friday, March 28, 2025 7:19 PM
To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>; admin@ecoroute.co.za <admin@ecoroute.co.za>
Subject: Request to Register as interested and affected party 14/12/16/3/3/1/3114 portion 76 of 216 Uitzight

Please register me as an interested and affected party in the above mentioned Environmental Impact assessment.

Thank you

Judy Harrison

[Judyh883@gmail.com](mailto:judyh883@gmail.com)

0832661200

FW: [Public participation] Objection to the proposed development at section 76 Uitsicht, Brenton.

From admin@ecoroute.co.za <admin@ecoroute.co.za>

Date Tue 25/03/2025 12:41

To bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Hi Bianca,

Please see comment received.

Kind regards,

Carina Leslie

Personal Assistant/Admin

Office: 064 691 4394

www.ecoroute.co.za



Eco Route
Environmental Consultancy

From: admin@ecoroute.co.za <admin@ecoroute.co.za>

Sent: Tuesday, 25 March 2025 11:17

To: admin@ecoroute.co.za

Subject: [Public participation] Objection to the proposed development at section 76 Uitsicht, Brenton.

Tanja Meyburgh (not verified) (info@tanjameyburgh.co.za) sent a message using the contact form at

<https://www.ecoroute.co.za/node/107>.

The sender's name

Tanja Meyburgh

The sender's email

info@tanjameyburgh.co.za

Subject

Objection to the proposed development at section 76 Uitsicht, Brenton.

Message

To who it may concern,

I am the new owner of section 74 and 75 Uitsicht which lies adjacent to this property. I bought into this area in support of the Western Heads Conservancy and SANPARKS and their work to conserve this land into perpetuity. It is my intention, as it is of other property owners in the area to put these properties into the custodianship of SANPARKS to bring them into protection for future generations. The critical nature of saving this particular area has also been recognized by the World Wildlife Fund.

I completely object to the development proposed on portion 76 for a number of reasons:

1. The footprint of the main house and managers cottage are completely out of line with the current building guidelines.
2. The main house is to be constructed on a primary dune which is exactly what SANPARKS and the Western Heads Conservancy are trying to save due to the ecological importance of this kind of habitat which is endangered worldwide.

3. The footprint area of the main house is completely oversized. From the 200 square meters allowed, to 3000 square meters. This would seem more in line with a hotel or B&B, and a public use area than a house.
4. The road to get to the house will damage the flora and the soil and be an eyesore in the area.
5. The Kerkstraat road is currently a small jeep track and cannot manage additional traffic. None of the neighbors have been approached in this regard. I have no interest in contributing financially to the development of this road and losing the rural feeling of the properties that were bought as agricultural with intention to be turned to conservation. The additional traffic that this kind of development will affect all the properties along Kerkstraat and contribute to noise and light pollution of a pristine wilderness area.
6. The eye sore of this size development is clear as it will sit in the middle of a conservation area and destroy the rural nature of the surroundings.
7. I fully support the Western Heads Conservancy and SANparks endeavors to conserve this critical area and will be submitting further objections in regard of this development.

Kind regards

Tanja Meyburgh

Owner at Portion 74 and 75 Uitsicht

RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

From johan@paradisefound.co.za <johan@paradisefound.co.za>

Date Tue 18/03/2025 12:05

To bianca@ecoroute.co.za <bianca@ecoroute.co.za>; 'jacques malan' <jacques@jacquesdmalan.com>

Cc admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebe@knysna.gov.za>; 'Susan Campbell' <sucam@mweb.co.za>

Thank you Bianca,

For some reason I have also not been notified - representing the Western Heads Goukamma Conservancy.

We have been confirmed by e-mail by Janet on 22 February as I&AP.

Please note that we require 30 days from notice to compile our response.

Kind regards

Johan

Johan Labuschagne

Cell +27 83 635 0479

e-mail: johan@paradisefound.co.za

6 Greenhill Lane, Knysna 6571, Garden Route, South Africa

From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Sent: Tuesday, 18 March 2025 10:07 AM

To: jacques malan <jacques@jacquesdmalan.com>

Cc: admin@ecoroute.co.za; pagtrust@mweb.co.za; Vera Carstens <vcarstens0@gmail.com>; Roelof Feenstra <roelof@feenstrainc.co.za>; Henrico Knoesen <henrico@knoesen.com>; Hilton Stroebe <hstroebe@knysna.gov.za>; Susan Campbell <sucam@mweb.co.za>; johan@paradisefound.co.za

Subject: Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Goeie more, Jacques.

Baie dankie vir die epos.

Die link vir al die dokumentasie op die webtuiste is soos volg:

www.ecoroute.co.za/node/107

[Draft Basic Assessment Report - The Proposed Development on Portion 76 \(A Portion of Portion 54\) of Farm 216 Uitzicht, Knysna, Western Cape | Eco Route](#)

Portion 76 of the Farm 216 is situated within 1.5 km from Brenton on Sea Residential Area, Knysna Western Cape and the Southern boundary borders the Brenton Beach. The property is

21.01 hectares in extent. The entire property is classed as Critical Biodiversity Area (CBA) which is defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure

www.ecoroute.co.za

Groete

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

EcoRoute



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From: jacques malan <jacques@jacquesdmalan.com>

Sent: Tuesday, March 18, 2025 9:43 AM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; Vera Carstens <vcarstens0@gmail.com>; Roelof Feenstra <roelof@feenstrainc.co.za>; Henrico Knoesen <henrico@knoesen.com>; Hilton Stroebel <hstroebel@knysna.gov.za>; Susan Campbell <sucam@mweb.co.za>; johan@paradisefound.co.za <johan@paradisefound.co.za>

Subject: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Hallo Bianca

Stuur asb volledige dokumentasie na my toe oor die bostaande openbare deelname proses. Ek wil dringend daarna kyk.

Ek is betrokke by die Buffelsbaai Inwonersvereniging wat omtrent driekwart van die eienaars verteenwoordig.

En jy kan die Buffelsbaai Inwoners Vereniging (BIV) solank registreer as 'n party tot die ondersoek.

Groete

Jacques Malan
Voorsitter BIV
0824437047

DRAFT BASIC ASSESSMENT REPORT (DBAR) - THE PROPOSED DEVELOPMENT ON PORTION 76 (A PORTION OF PORTION 54) OF FARM 216 UITZICHT, KNYNSA, WESTERN CAPE | ECO ROUTE

REFERENCE: DFFE REFERENCE NUMBER: 14/12/16/3/3/1/3114 - PORTION 76 OF THE FARM UITZICHT, KNYNSA, WESTERN CAPE

COMMENTS AND OBJECTIONS SUBMITTED TO THE DBAR, IN MY PERSONAL CAPACITY AND ON BEHALF OF UITZICHT BEACH PTY (LTD), THE OWNER OF THE ADJOINING PROPERTY, PORTION 39 OF THE FARM UITZICHT

In June 2006, DEA issued the following guidelines for the assessment of alternatives in EIA Assessments:

Guideline 5: Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations, 2006 June 2006

This document is Guideline 5: Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations, 2006. It provides a basic guide to the assessment of alternatives and impacts which are key components of an EIA process. The purpose of the document is to create a common understanding amongst the different role-players what is required in the assessment of alternatives and impacts and alternatives.

https://www.environment.co.za/wpcontent/uploads/2013/03/DEAT_EIA_Guideline5_Assessing_alternatives_and_impacts_NEMA_EIA_Environmental_Impact_Assesments.pdf

The primary objection to the DBAR is that the EAP has disregarded the above guidelines, in that she has failed to consider, include or investigate the reasonable and feasible location or site alternative, proposed by I&APs and by SANParks.

The alternatives included in the DBAR will be evaluated against the relevant guidelines, included hereunder:

ASSESSMENT OF ALTERNATIVES

2. ASSESSMENT OF ALTERNATIVES

2.1 THE OBJECTIVES OF ASSESSING ALTERNATIVES

The Regulations require that alternatives to a proposed activity be considered. Alternatives are different means of meeting the general purpose and need of a proposed activity.

Alternatives may include location or site alternatives, activity alternatives, process or technology alternatives, temporal alternatives or the no-go alternative. (The no-go alternative is the option of not undertaking the proposed activity or any of its alternatives. The no-go alternative also provides the baseline against which the impacts of other alternatives should be compared).

The identification, description, evaluation and comparison of alternatives are important for ensuring the objectivity of the assessment process.

In cases where there is no objective and thorough assessment of alternatives, the EIA process usually only confirms a chosen activity and the value of the assessments as an input to decision-making may be compromised. (own emphasis)

As will be seen from the evaluation of the **Comment and Response Report** below, there was no objective and thorough assessment of the alternative location or alternative site proposed by I&APs, but the proposed alternative was simply ignored, or sidestepped, by the EAP. The EAP did not provide a rational and considered response to the proposals for an alternative, she failed to include and investigate the proposed alternative site and merely confirmed the site proposed by the applicant. No reasons were provided for not including the alternative site.

Because of the persistent failure and/or refusal of the EAP to investigate the viable and reasonable alternative site proposed by I&APs, the integrity of the DBAR is compromised and should be rejected by the Decision Maker.

SANParks Comments: “SANParks could support development in the node where the Managers Cottage is proposed adjacent to Kerk Laan, as discussed on-site on 8 September 2020. It would be preferable if all is consolidated into one area (the area where the farm managers cottage is proposed) to minimise fragmentation of the landscape and impact on the sensitive fynbos environment.”

EAP Response: “Noted. The preferred development plan has been amended to exclude the construction of a farm manager’s residence in the northwestern corner of the property.

The development proposal entails the following:

- (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²).
- (ii) The construction of a new internal road to provide access to the southern portion of the property.”

The above alternative, proposed by SANParks, was reasonable and would allow the applicant to construct the main dwelling, while at the same time significantly minimising the negative environmental impact. It would also be significantly less costly for the applicant.

The EAP however, provided a nonsensical response, that did nothing to address the valid and motivated concerns with the applicant’s preferred site. The proposed site for the manager’s residence, that was located in the disturbed footprint, was supported by SANParks and most I&APs. The EAP however, removed the manager’s cottage, but inexplicably did not investigate the obvious alternative, namely that of constructing the main residence in the disturbed footprint, where the manager’s residence had originally been proposed.

The unsuitable preferred location for the main dwelling remains in place. The EAP irrationally did not consider and investigate the proposed alternative, or address the concerns at all. Instead of investigating the alternative, of locating the main house to the disturbed footprint, as supported by SANParks, for reasons best known to the EAP, the proposed site for the main dwelling remains in the location that was unacceptable to SANParks and most of the EAAPs.

The following comments by SANParks were met with the same nonsensical response.

SANParks: “Development adjacent to Kerk Laan. Developing the main house in a disturbed area adjacent to Kerk Laan will have the least negative impact on biodiversity and landscape functionality. Other advantages are that

the drilling equipment and construction vehicles will have easy access to the site via an existing road.”

EAP: “Noted. The preferred development plan has been amended to exclude the construction of a farm manager’s residence in the northwestern corner of the property.

The development proposal entails the following:

- (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²).
- (ii) The construction of a new internal road to provide access to the southern portion of the property.”

SANParks’ extremely important comments about the high fire risks associated with the proposed location, were met with another nonsensical response: “Noted”.

SANParks: “Fire management.

The landowners are members of the Southern Cape FPA. It is possible to make fire breaks to protect infrastructure at the landowner’s preferred location for the main house. However, Kerk Laan could act as a firebreak if it is widened and slashed. In a case of emergency, it would be less risky to evacuate people from Kerk Laan than from a fynbos corridor with tricky access for fire trucks. The Campbell Road and the new section of road that would need to be constructed from Campbell Road to preferred site would not be ideal roads for the Knysna Fire Department as their trucks would struggle to gain access easily to the house. However, Kerk Laan would be a much easier access point for fire trucks,

and this should be considered for fire safety in this fire-prone area. Conducting an ecological burn in future will also be more risky with infrastructure developed in the fire path. The June 2017 fire and the ecological burn executed on 15 May 2017, that slowed the fire down dramatically before it reached Brenton, is still fresh in our memories. A functional Fire Management Unit in the Knysna Sand Fynbos will be desirable as there will be future fires.”

SANParks provided additional compelling reasons as to why the main house should be located in the disturbed footprint, including biodiversity conservation, landscape functionality and fire management, and received the same nonsensical response:

SANParks: “In summary, from a biodiversity conservation, landscape functionality and integrated fire management perspective developing the main house adjacent to Kerk Laan is the preferred alternative for SANParks. Developing in the core of the Knysna Sand Fynbos Coastal Corridor will set a very bad precedent and contribute to a loss of biodiversity and landscape fragmentation. The properties on both sides of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023. SANParks will continue to object to the access road over the sand dunes”

EAP: “Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.

The development proposal entails the following:

- (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²).
- (ii) The construction of a new internal road to provide access to the southern portion of the property.”

The **Western Heads-Goukamma Conservancy (WHGC)** also supported the siting of the main dwelling in the disturbed footprint, for reasons of minimising the visual impact and minimising loss or damage to the critically endangered Knysna Sand Fynbos, and received the same nonsensical response.

The only concern that was addressed by the EAP was, that the zoning scheme does not permit a second dwelling within a kilometre of the sea, but the environmental concerns were simply ignored. The EAP referred to the repealed zoning scheme and seemed to be unaware of the Knysna Municipality Zoning Scheme By-law that was adopted on 29 June, 2020.

WHGC: “The visual impact of a large house on the primary dune will be highly detrimental to the residents of Buffalo Bay, Brenton-on-Sea, and other Uitzicht properties. The natural beauty of the 5 km unspoilt beach (one of the finest in South Africa) would be defaced and there would be a loss of “sense of place”. Furthermore, there would be adverse impacts on tourism and property values.

The Heritage Statement concluded that is evident portion 76/216 is only barely visible in the distance from the road leading to and from Brenton-on- Sea. Consequently, the proposed development will have no visual impact on the aesthetic value of the affected area. On heritage grounds, due to the entire absence of heritage resources or themes in and around 76/216, the proposed development will have negligible to no impact on the visual or aesthetic heritage value of the area.

Furthermore the Zoning Scheme does not permit any additional dwelling unit within 1 km of the high water mark of the sea, unless such unit is attached to the main house and does not exceed a floor area of 60m². Since the entire property falls within 1km of the high water mark of the sea the additional unit will have to be attached to the main house and is restricted to a maximum of 60m².”

EAP: “Noted. The Application area is also zoned "Agriculture Zone I" and "Agriculture" is a primary land use right in this zoning category. The proposal is to exercise the primary land use rights of the property, (i.e., construction of a farmhouse (Main dwelling unit). The dwelling unit complies with the definition of “dwelling unit” as per the Section 8 Zoning Scheme Regulations, 1988.”

The proposal below, to relocate the main dwelling to the disturbed footprint, was again met with the same nonsensical response:

WHGC: “The main dwelling, together with the attached additional unit should be located as close as possible to the existing public road, to minimise damage to the Knysna Sand Fynbos.”

EAP: “Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.

The development proposal entails the following:

- (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²).
- (ii) The construction of a new internal road to provide access to the southern portion of the property.”

In response to the comment, that alternative locations for the main dwelling were not considered, the EAP again provided the same nonsensical response, but did not address the issue, or explain her failure to consider the alternative site.

WHGC: “Alternatives have not been considered only two alternatives are considered, both of which would cause unacceptable and illegal environmental damage. An alternative that does not cause such damage has not been evaluated – namely that the main dwelling, together with the attached additional unit should be situated as close as possible to the access road on the northern boundary of the property. This alternative would destroy less than 1 000 m² of sensitive vegetation instead of over 8 000 m².”

EAP : “Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.

The development proposal entails the following:

- (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²).
- (ii) The construction of a new internal road to provide access to the southern portion of the property.

In response to my comment, that the main dwelling should be constructed near the existing road, the same nonsensical response is forthcoming.”

Susan Campbell: “This is totally unacceptable. The only acceptable alternative is to build main dwelling and manager's cottage near the existing road. I have registered.”

EAP: “Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.

The development proposal entails the following:

- (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²).
- (ii) The construction of a new internal road to provide access to the southern portion of the property.”

The following guidelines were also not followed by the EAP:

2.3 THE SELECTION OF ALTERNATIVES

*The Regulations indicate that alternatives that are considered in an assessment process be reasonable and feasible must be provided with an opportunity of providing inputs into the process of formulating alternatives. **Once a full range of potential alternatives has been identified, the alternatives that could be reasonable and feasible should be formulated as activity alternatives for further consideration during the basic assessment or scoping and EIA process (Own emphasis). The number of alternatives that are selected for assessment should not be set arbitrarily, but should be determined by the range of potential alternatives that could be reasonable and feasible and should include alternatives that are real alternatives to the proposed activity.** The process of selecting alternatives should be clearly documented. The assessment of alternatives should, where possible, be done in a way that feeds back into the planning or design of the activity, thereby optimising the positive aspects and minimising the negative aspects that are highlighted during the assessment*

process. The assessment process should also be iterative where necessary to reflect the optimal formulation of alternatives. In instances where it is clear that such an interactive and iterative process has been followed in the development of a preferred alternative, it may be appropriate to terminate the assessment of other alternatives, excluding the no-go alternative, that have been considered and assessed in such a process during the course of the assessment. In order to justify the termination of the assessment, or further assessment of any alternative, it is, however, important to document the interactions and iterations properly. It should be noted that the no-go alternative may sometimes not be a “real” or “implementable” alternative (for example, where the capacity of a sewage pipeline has to be increased to cope with current demand). It should, however remain the default option and must always be included to provide the baseline for assessment of the impacts of other alternatives and also to illustrate the implications of not authorising the activity.

I&APs proposed a reasonable and feasible alternative site for the main dwelling. This was the same site that the applicant initially proposed for the “Manager’s Cottage”, yet this was not included as an alternative to be investigated and no reason was provided by the EAP.

The EAP also ignored the guideline below:

2.4 THE ASSESSMENT OF ALTERNATIVE

The assessment of alternatives should follow the impact assessment process described in the next section and should, as a minimum, include the following: v the consideration of the no-go alternative as a baseline scenario (even in cases where the no-go alternative is not a realistic alternative); v a comparison of the selected alternatives; and v the providing of reasons for the elimination of an alternative. Where alternative locations or sites are identified as alternatives, the features of each location or site should be investigated to the same level of detail for the purposes of the comparative assessment of the alternatives. The comparative assessment should at least include the following aspects : v capital and operating costs; v direct, indirect and cumulative impacts; v mitigation measures; v physical, legal or institutional constraints; and compliance with policy and legal requirements.

The alternative site proposed by I&APs was not included for assessment, there was no comparative assessment whatsoever between alternatives proposed by the applicant and the alternative proposed by I&APs. The objectivity of the EAP should be questioned and the DBAR should be rejected on these grounds.

NEED AND DESIRABILITY

The DBAR also fell short of complying with the guidelines for assessing need and desirability below:

2.2 NEED AND DESIRABILITY OF THE PROJECT

In order to ensure that the assessment of alternatives is appropriate, it is important to develop a clear definition of the need and desirability for the proposed activity. This definition of need and desirability will help to set the context of the activity and enable the determination of appropriate alternatives to the proposed activity. It will also help the competent authority to assess the implications of the different alternatives, including the reasonableness of the no-go alternative, in a context of the risks and benefits of the proposed activity. Without a proper description of the need and desirability for a proposed activity, it is difficult for a competent authority to make an informed decision.

The DBAR failed to meet the following requirements:

No motivation for the need and desirability of the proposed development, in the context of the preferred location, as opposed to the alternative proposed by I&APs, is provided.

The DBAR acknowledges that “**Need and desirability**” should be determined by considering the broader community’s needs, as opposed to the personal desire of the applicant, and societal interests, as reflected in a credible IDP, SDF for the area, however in the assessment, the personal desire of the applicant overrides the needs of the society.

The preferred site is not supported by the SDF and is contrary to the needs of the broader community. All the adjoining properties fall within the expansion zone for, and are in the process of being incorporated into, the Garden Route National Park.

Portion 40 has already been incorporated into the National Park, and Portions 39, 75, 74, 71, 72 and 111 are in the process of being incorporated.

The area is demarcated as a Critical Biodiversity Area 1 in the SDF, which should be maintained in a natural or near natural state with no further loss of natural habitat.

In the DBAR the following misleading information is provided:

DBAR: “According to the Knysna SDF the application area is earmarked as rural cluster or node as described in paragraph 6.1.2.a (IV)2.”

RESPONSE: This is misleading and incorrect. The area is not included in the rural hamlets - these are existing forestry or holiday settlements. Buffels Bay and Brenton on Sea, are included as coastal settlements, but Uitzicht is not included.

The following guidelines in the SDF are applicable to the property: These have all but been disregarded in the DBAR, or only lip service has been paid to the guidelines.

3.4.1.2 Spatial Proposals

(b) Conservation Estate Expansion The objective of the GRNP expansion plan is to conserve the diverse terrestrial and aquatic ecosystems of the GRNP on a landscape scale through adaptive, collaborative and innovative management approaches. Specifically, the identified priority expansion areas area aimed at conserving the endemic, critically endangered and listed threatened Knysna Sand Fynbos and Garden Route Shale Fynbos ecosystems. These areas are identified from a biodiversity conservation, social, economic, tourism and/or a management perspective that would need to be managed as part of the National Park in order to ensure the long term viability of the park. This zone aims to ensure the long-term persistence of biodiversity, within and around the park, on which the long-term survival of the park depends.

This includes areas important to both biodiversity pattern (especially reasonably intact high priority natural habitats) and processes (ecological linkages, catchments, intact hydrological systems (surface and groundwater).

The following applicable policies have also not been taken into account in determining the preferred footprint.

3.4.1.3 Spatial policies and policy guidelines

Policy A In coastal zones, river- wetland-estuary catchments, critical biodiversity areas and veld fire risk areas, land use must be effectively managed to secure environmental resources, systems and ecosystem services, mitigate the risk of natural disasters to life and property and improve climate resilience

A2 Protect and maintain the functionality of biodiversity areas

(iii). Use the latest landscape-wide Western Cape Biodiversity Spatial Plan 2017 Critical Biodiversity Area data and mapping as a primary informant in determining suitability for new development and appropriate development. In the rural context, this should be considered alongside the Spatial Planning Categories presented in the WCG's Rural Development Guidelines. Refer to Figure 8 and Figure 9 for a summary of the Critical Biodiversity categories and associated land use management objectives.

A3Manage land use and development along the coastline in a sustainable and precautionary manner.

(i). Coastal sensitivities must be integrated into all applicable planning decisions within the coastal region, in order to protect existing property, infrastructure and ecology and ensure that only responsible and sustainable development takes place in areas with a high risk of inundation, coastal erosion and destructive storm surges.

No further development should take place seaward of the Coastal Management Line (setback line) as demarcated in this MSDF outside of priority development areas identified in section 3.4.1 of this MSDF and delineated by the Protected Areas, sensitive biodiversity in terms of the Western Cape Biodiversity Spatial Plan, 2017), steep coastal cliffs/ primary dunes and a 5 msl contour.

Contrary to the clear guidelines above, the preferred site is located on a primary dune and it has not been determined whether it is located seaward of the Coastal Management Line.

A5 Maintain the integrity of the Garden Route landscape.

View sheds over scenic landscapes and features must be safeguarded.

(i). Valuable view corridors and vistas, undeveloped ridge lines and cultural landscapes should not be compromised by development or the cumulative impact of development that detracts from the public experience of viewing these assets.

The assessment in the DBAR of “Need” is irrational and disingenuous:

Having correctly stated that the land use policy of the municipality and the SDF need to be consulted to determine “need” and that the priorities of society are also relevant, the following absurd assessment is made:

DBAR:: “The landowner would like to construct his dwelling house to reside in, whilst also conducting an agricultural activity. The need for accommodation is considered a basic need. Considering the current decline in bee populations and their critical importance to the ecosystem, it can be asserted that there exists a pressing need for this agricultural pursuit. There exists a distinct necessity for the proposal, which is relevant not only to the landowner but also to the wider public.”

COMMENT: The assessment that there is a “distinct necessity for the proposal” and the reasons provided therefore, are ludicrous. The landowner does not need accommodation as stated.

The shareholders of the landowner are Medical Doctors, who reside in Pretoria. The one shareholder owns a holiday home in Brenton. In truth, there is no need for accommodation, but rather a desire for a holiday home, on the part of the shareholders.

It is also disingenuous to state that the landowner wants to live there to become a beekeeper. The landowner’s shareholders are Medical Doctors and not beekeepers.

The argument that there is a pressing need for beekeeping is misinformed. The area already has as many beehives as it can currently sustain.

There are *bona fide* beekeepers waiting for an opportunity to have their hives in the area.

However, even if the landowners have a pressing need and desire to become beekeepers, there is no reason why they cannot reside in a dwelling, in the disturbed footprint, and pursue their beekeeping ambitions from that location.

The DBAR provides misleading information regarding the assessment of the desirability of the proposed site.

DBAR: “The subject property is currently zoned “Agriculture Zone I” in terms of the Section 8 Zoning Scheme Regulations (1988). The landowners intend to exercise their existing land use rights by utilising the property for agricultural activities and by constructing a dwelling house, as permitted by the specified scheme. The entire application area is earmarked as a Critical Biodiversity Area, and therefore the application must be made to obtain Environmental authorisation. The proposal was specifically designed for the best practicable environmental solution with the least disturbance.

The proposal is in line with the applicable policy documentation (Western Cape Provincial SDF, Western Cape Rural Development Guidelines, Eden SDF, Knysna SDF and the Knysna IDP) meaning that it is in line with the spatial proposal and vision for the area whilst complying to the development guidelines for the current proposal.

Therefore, the approval of this application would not compromise the integrity of the applicable policy documents agreed to by the relevant authorities.

It can, therefore, be concluded that the proposal can be regarded as desirable.

The above boxes for need and desirability can be ticked. The proposed development will not have a detrimental impact as it is in line with all planning legislation and consistent with the applicable spatial planning policies.”

COMMENT: This is again completely misleading, as the landowners are not farmers, but want to construct a holiday home.

Repealed zoning regulations are referred to, and it is incorrectly stated that it is in line with applicable policies.

FIRE RISK

When fire-risk is assessed, the DBAR again misleads:

DBAR: “This development is categorized as low-risk and falls within Group 2: residential areas (residential zone 1). In these designated areas, the gross floor area of dwelling houses, including any associated outbuildings, is typically expected to range between 100 square meters and 200 square meters, in accordance with the "Guidelines for Human Settlement Planning and Design.

The pool, with a capacity of 160 kilolitres (kl), shall serve as the primary reservoir for fire extinguishing purposes.

Should the boreholes be equipped with power supplied by on-site generators, these boreholes may be classified as supplementary on-site storage capacity.”

COMMENT: It is stated that the development is low risk. Nothing can be further from the truth. The main dwelling will be accessed via a long and steep road and fire trucks will find it hard to get there.

The road will also make emergency evacuation, in the case of fire, extremely dangerous.

The structures will be located in one of the most high-risk locations, namely surrounded by fynbos, and on a vegetated dune.

The disturbed site is much safer, as it is easier to access and evacuate from.

BENEFITS V NEGATIVE IMPACT

When weighing the benefits versus the negative impact, the DBAR is again misleading:

DBAR: “Will the benefits of the proposed land use/development outweigh the negative impacts of it?

The construction of the primary residential dwelling (Main dwelling) exerts a negligible impact on the surrounding environment, thereby safeguarding the natural beauty of the area and preserving vital ecological corridors.”

COMMENT: This assessment is patently false, as the significant negative impacts, caused by the disturbance and fragmentation of the landscape associated with the road and the huge dwelling, together with the negative visual impact, far outweigh the benefits that will accrue only to the landowners.

NO-GO ALTERNATIVE

The DBAR considers the No-Go Alternative, even though not a single I&AP proposed such, but inexplicably fails to consider the obvious alternative, requested by almost all I&APs, namely to relocate the main dwelling to the disturbed footprint.

The DBAR does not consider the alternative proposed by almost all I&APS and the outrageous statement, that the area chosen for the main dwelling, is the area that would have the least environmental impact, makes a mockery of what is supposed to be an independent assessment of the anticipated environmental impacts of the development.

DBAR: “Details of the alternatives considered

The sizes of the footprints of the farm manager’s house and the main residential dwelling house were options considered for alternatives. The proposed areas to construct the houses were carefully evaluated after consideration of all specialist reports and areas chosen where the least negative impacts on the receiving environment can be expected.

The applicant has chosen to exclude the development of the farm manager’s residence due to concerns regarding its environmental impact and the existing building restrictions that are in place.”

COMMENT: The area chosen for the main dwelling has by far the most negative environmental impact. Furthermore, it is misleadingly stated that the manager’s residence was excluded, due to concerns regarding its environmental impact.

This is totally irrational, as the site proposed for the manager’s residence would have by far the least impact and was proposed by most I&APS and SANParks as the alternative site for the main dwelling that would have the least environmental impact.

For the reasons above the Decision Maker is requested to reject the DBAR, alternatively to ensure that the alternative site proposed by SANParks and most of the I&APs is included and assessed, and that a full visual impact assessment of both sites be conducted.

SUBMITTED BY SUSAN CAMPBELL ON THIS 7TH DAY OF APRIL 2025.

Re: PORTION 76 (A PORTION OF PORTION 54) OF THE FARM UITZICHT 216

From <bianca@ecoroute.co.za>

Date Wed 02/04/2025 16:03

To Breda Lombard <breda@bredalombard.co.za>

Cc admin@ecoroute.co.za <admin@ecoroute.co.za>

Good afternoon, Ms Lombard.

We hereby acknowledge receipt of your email and comments.

Thank you for your attention to this matter,

Should you require any information please do not hesitate to contact me.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

EcoRoute



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From: Breda Lombard <breda@bredalombard.co.za>

Sent: Wednesday, April 2, 2025 3:49 PM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>

Subject: RE: PORTION 76 (A PORTION OF PORTION 54) OF THE FARM UITZICHT 216



BREDA LOMBARD TOWN PLANNERS 1991-1992

Good afternoon Bianca

1. Attached our correspondence BL/BHOA dated 2 April 2025.
2. Kindly acknowledge receipt.

Regards

BREDA LOMBARD

PROF TOWN PLANNER

(REG NO. A/700 /1992)

Directions to our office: [Drop pin](#)

T: +27 11 327 3310

C: 083 601 2353

E: breda@bredalombard.co.za

38 Bompas Road Dunkeld
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From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Sent: Tuesday, 18 March 2025 10:17

To: Breda Lombard <breda@bredalombard.co.za>

Cc: admin@ecoroute.co.za

Subject: Re: PORTION 76 (A PORTION OF PORTION 54) OF THE FARM UITZICHT 216

Good morning, Breda.

I trust that this email finds you well.

I hereby acknowledge receipt of your email.

The link to the relevant documentation available on the website is as follows:

www.ecoroute.co.za/node/107

Thank you for your attention to this matter.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

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From: Breda Lombard <breda@bredalombard.co.za>

Sent: Monday, March 10, 2025 1:45 PM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>

Subject: RE: PORTION 76 (A PORTION OF PORTION 54) OF THE FARM UITZICHT 216



BREDA LOMBARD TOWN PLANNERS 1991 1992

Good afternoon

1. Attached our correspondence reference BL/BHOA dated 10 March 2025.
2. **Kindly forward the draft basic assessment report, inclusive of annexures.**
3. We will thereafter comment on the contents of the draft report.
4. Kindly acknowledge receipt of this e-mail.

Regards

BREDA LOMBARD

PROF TOWN PLANNER

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The EAP
Eco Route Environmental Consultancy
P.O. Box 1252
SEDFIELD
6573

Attention: Ms Bianca Gilfillan

Tel: 064 691 4394

Email: bianca@ecoroute.co.za

RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE DRAFT BASIC ASSESSMENT FOR THE PROPOSED DEVELOPMENT ON PORTION 76 (A PORTION OF PORTION 54) OF FARM 216, UITZICHT, KNYSNA, WESTERN CAPE

Good Day,

Your request for comment from the Sub-directorate: Coastal Management on the above-mentioned draft basic assessment report received on 06 March 2025, refers.

1. CONTEXT

- 1.1. The Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("NEM: ICMA") is a Specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"). The NEM: ICMA sets out to manage the nation's coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment. In terms of Section 38 of the NEM: ICMA, the Department of Environmental Affairs and Development Planning ('the Department') is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the "Management of public launch sites in the coastal zone (GN No. 497, 27 June 2014) "Public Launch Site Regulations".

- 1.2. The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme ("PCMP"). The Western Cape Provincial Coastal Management Programme ("WC: PCMP 2022-2027) is a five (5) year strategic document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the Province. This WC: PCMP 2022-2027 was adopted by the Provincial MEC for Local Government, Environmental Affairs and Development Planning on 19 May 2023 and available upon request.
- 1.3. A key priority of the PCMP is the Estuary Management Programme, which is implemented in accordance with the NEM: ICMA and the National Estuarine Management Protocol ("NEMP"). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The Department is in the process of approving a series of Estuarine Management Plans.
- 1.4. The facilitation of public access to the coast is an objective of the NEM: ICMA as well as a Priority in the WC: PCMP 2022-2027. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 ("PCASP") and commissioned coastal access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NEM: ICMA. The PCASP as well as the coastal access audits are available upon request.

2. COMMENT

- 2.1 The sub-directorate: Coastal Management ("SD: CM") has reviewed the information as specified above and have the following commentary:
 - 2.1.1. The proposal entails the construction of a main dwelling house to be situated in the southwestern corner of Farm 76/216 as well as the construction of a new internal road to provide access to the southern portion of the property.
 - 2.1.2. The applicant has considered all critical biodiversity and ecological support areas in accordance with the to the Western Cape Biodiversity Spatial Plan (2023) and proposed mitigation measures as stipulated in the draft EMPr to address environmental concerns are both appropriate and practical and should be strictly adhered to.
 - 2.1.3. The applicant adequately considered Farm 76/216 in relation to the Coastal Protection Zone ("CPZ") as defined in Section 16 of the NEM: ICMA and the purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes, including the risk of sea level risks.

- 2.1.4. Be advised Farm 76/216 is located landward of the Garden Route District's Coastal Management Line ("CML"). The technical delineation of the CML was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk flooding, wave run-up modelling, *inter alia* and was delineated in conjunction with and supported by organs of state. The principal purpose of the CML is to protect coastal public property, private property, and public safety; to protect the coastal protection zone; and to preserve the aesthetic value of the coastal zone. The use of CMLs is of particular importance in response to the effects of climate change, as it involves both the quantification of risks and pro-active planning for future development. The SD: CM notes the subject property is unlikely to be impacted by coastal processes due to its elevation, however it is essential that the applicant obtains comments from SANParks on the proposed development.
- 2.1.5. Be advised that the location of the proposed development is located within the littoral active zone ('LAZ') as defined in the NEM: ICMA and it should be noted that any activities within this area that does not support natural coastal processes may result in erosion. The NEM: ICMA regards the LAZ to be a dynamic system where the free movement of sand must not be interfered with. It is essential that the competent authority not only considers the impact(s) the proposal and its associated activities will have on the receiving environment, but also the impact(s) that environment. As such the SD: CM proposes that the proposed dwelling be located in the north-western part of Farm 76/216 outside of the LAZ.
- 2.1.6. The applicant must be informed that they may not create any formal or informal pathways/walkways from their property to the coast outside their property boundaries with any future development on the subject property and any activities on Farm 76/216 may in no way impede on the general public's ability to access coastal public property.
- 2.1.7. Based on the information provided, the SD: CM acknowledges the EMPr that proposes to mitigate impacts on the environmental sensitivities applicable to the proposed development and associated infrastructure on Farm 76/216. However, the SD: CM does not support the proposed location of the dwelling within the littoral active zone, and as such suggests that the applicant either position the proposed dwelling as per Alternative Layout 2 or elsewhere outside the LAZ on Farm 76/216.

3. The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: *"...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment..."* together with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.
4. The SD: CM reserves the right to revise or withdraw its comments and request further information from you based on any information that may be received.

Yours faithfully

**leptieshaam
Bekko**

Digitally signed by
leptieshaam Bekko
Date: 2025.04.11 10:47:38
+02'00'

leptieshaam Bekko
CONTROL ENVIRONMENTAL OFFICER
SUB-DIRECTORATE: COASTAL MANAGEMENT
DATE: 11 April 2025



REFERENCE: 4/10/2/K50B/UITZICHT 216/76, KNYSNA

DATE: 24 MARCH 2025

ECOROUTE ENVIRONMENTAL CONSULTANCY

PO Box 9187

GEORGE

6530

Attention: Ms C. Leslie

RE: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE

Reference is made to the above mentioned Draft Basic Assessment Report made available to Breede-Olifants Catchment Management Agency (BOCMA) for comments.

The following are BOCMA comments relating to Draft Basic Assessment Report for proposed development of a residential dwelling on Portion 76 of the Farm Uitzicht 216, which should be adhered to:

1. The Breede-Olifants Catchment Management Agency has reviewed the Draft Basic Assessment Report & Aquatic Compliance Statement and has no objections. Based on the findings of the Aquatic Compliance Statement section 21(c) and (i) water uses are not triggered by the proposed development, therefore no water use authorisation required in terms of the National Water Act, (Act No. 36 of 1998) for these water uses.
2. The abstraction of groundwater from the borehole(s) for domestic use is regarded as Schedule 1 water use. However, if the amount of water to be abstracted exceeds Schedule 1 limits it will trigger water use(s) in terms of section 21(a) of the National Water Act, 1998 (Act No. 36 of 1998), which refers to taking water from a water resource and must be authorised.
3. Please note that harvesting of rainwater and storage in tanks does not trigger a water use, thus it does not require an authorisation.
4. Please note that NO water shall be derived from any water resource and used on Portion 76 of Farm Uitzicht 216 for any purposes, without prior approval by means of a water use authorisation in terms of section 22 of the National Water Act, 1998 (Act No. 36 of 1998).



5. For off-grid sanitation facilities, it is recommended to dispose domestic wastewater into conservancy tank serving no more than 50 households, that must be emptied on regular basis. Sceptic tanks/french drains are not recommended as they are likely to impact on groundwater resources.
6. Please note that no treated or untreated wastewater/effluent shall be disposed to the environment or discharged into a water resource or even used to irrigate without a water use authorisation.
7. All reasonable measures shall have to be taken to prevent the potential pollution of the groundwater resources due to the proposed onsite sanitation facilities i.e. a service provider must be appointed to remove domestic wastewater from conservancy/sceptic tanks.
8. Please note that according to the General Authorisation Government Gazette No. 36820 Notice 665 of 2013; a person who stores wastewater in terms of this authorisation must submit a registration form for registration of the water use before commencement of storage if more than 1000 cubic metres are stored for disposal or if more than 500 cubic metres are stored for re-use.
9. Should water and sewage collection services be provided by the municipality in the near future, there must be an agreement in place between the property owner and the municipality and service charges must be paid directly to the municipality.
10. As required by section 22 of the National Water Act, 1998 (Act No. 36 of 1998), a Water Use Authorisation is required prior to commencement with any water use activity contemplated in section 21 of National Water Act. Moreover, commencement with any water use activity without an authorisation as required by section 22 of National Water Act constitutes an offence in terms of section 151(1) (a) of the National Water Act. In terms of section 151(2) of the National Water Act, any person who contravenes is guilty of an offence and liable, on first conviction to a fine or an imprisonment of a period not exceeding five years or both such a fine and imprisonment.
11. In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of National Water Act that is associated with the proposed development.
12. Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.
13. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.
14. Should you wish to apply for a water use authorisation for unregistered water uses triggered by the proposed activities, you may apply electronically by logging onto the Department of Water and Sanitation (DWS) website at <http://www.dws.gov.za/e-WULAAS>.
15. Should you have further enquiries, the office can be contacted or alternatively contact Mr. SI Ndlovu at the above-mentioned contact number or on sndlovu@bocma.co.za



Yours faithfully,

pp *A. Jan van Staden*

MR. JAN VAN STADEN
CHIEF EXECUTIVE OFFICER (ACTING)

Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

From <bianca@ecoroute.co.za>
Date Wed 09/04/2025 08:58
To Megan Simons <msimons@capenature.co.za>
Cc AnneLise Vlok <avlok@capenature.co.za>

Good morning, Megan.

No problem.

Thank you for the comments.

Best regards

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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From: Megan Simons <msimons@capenature.co.za>
Sent: Tuesday, April 8, 2025 9:37 PM
To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Cc: AnneLise Vlok <avlok@capenature.co.za>
Subject: RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Dear Bianca,

I trust this email finds you well.

My apology for the slight delay in submitting CapeNature's comments and any inconvenience this may have caused. Kindly see attached comments and please let me know if you require anything else from CapeNature.

Kind regards,

Megan Simons
Land Use Scientist – Landscape East
Conservation Operations: Conservation Intelligence



tel +27 87 087 3060 | fax +27 44 802 5313 |
email msimons@capenature.co.za | postal Private Bag X6546, George, 6530
physical 4th Floor, York Park Building, York Street, George, 6530
www.capenature.co.za

From: admin@ecoroute.co.za <admin@ecoroute.co.za>
Sent: Thursday, 06 March 2025 14:21
To: asam@bocma.co.za; rmphahlele@bocma.co.za; Megan Simons <msimons@capenature.co.za>; Keith Spencer <kspencer@capenature.co.za>; AbrahamsN@nra.co.za; Dekockr@nra.co.za; FPA | Manager <managerfpa@gmail.com>; Vanessa Weyer <vanessa.weyer@sanparks.org>; environment@caa.co.za
Cc: bianca@ecoroute.co.za; janet@ecoroute.co.za
Subject: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

CAUTION: This is an external email and may be malicious. Please take care when clicking links or opening attachments. If in any doubt, Report the Message.

Dear State Department,

Kindly find below link to the Draft BAR and relevant appendices.

<https://we.it/i-n4gdnfQtUo>

A 30-day public participation will be held from **06/03/2025 – 07/04/2025**. Please submit your comments to the EAP undersigned in this time.

Should you have an issue accessing the link above, please visit our website to view all documents: www.ecoroute.co.za/node/107

ECO-ROUTE ENVIRONMENTAL CONSULTANCY

EIA PROCESS



Notification of Public Participation:

Proposed Development on Portion 76 (A Portion of Portion 54) of Farm 216, Uitzicht, Knysna, Western Cape

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998), the National Environmental Management Act: Environmental Impact Assessment Regulations 2014, as amended, of a 30-day Public Participation Process to be undertaken under the authority of the Department of Environmental Affairs and Development Planning (DEA&DP) reference: 14/12/16/3/3/1/3114.

The Public Participation Process will run from 06 March 2025 – 7 April 2025

The following EIA Listed Activities are applicable:

Government Notice No. R324 (Listing Notice 3): Listed Activity 4
Government Notice No. R324 (Listing Notice 3): Listed Activity 12

A Draft Basic Assessment Report and relevant appendices will be sent via email to all registered Interested and Affected Parties/ I&APs for public review and comment. Alternatively, all relevant documents may be accessed via our website during the public participation period: www.ecoroute.co.za

In addition, a hardcopy will be placed at the New Horizons Public Library for I&APs without access to internet.

Should you wish to comment on the Draft report, gain further information regarding the project or wish to register as an Interested and Affected Party please contact the Environmental Assessment Practitioner (details below).

Please provide written comments with your name, contact details and an indication of any direct business, financial, personal, or other interest which you may have in the development.

Environmental Assessment Practitioner: Bianca Gilfillan (EAPASA Reg 2023/7929)

P.O. Box 1252, Sedgefield, 6573
Email: bianca@ecoroute.co.za/ admin@ecoroute.co.za
Tel: 064 691 4394
www.ecoroute.co.za

Kind regards,

Carina Leslie
Personal Assistant/Admin
Office: 064 691 4394
www.ecoroute.co.za



Eco Route
Environmental Consultancy

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Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Date Fri 04/04/2025 09:48

To Susan Campbell <sucam@mweb.co.za>

Cc janet@ecoroute.co.za <janet@ecoroute.co.za>; admin@ecoroute.co.za <admin@ecoroute.co.za>

 4 attachments (2 MB)

Uitzicht 216 Ptn 76.kml; Preferred Alternative_Export.kml; Appendix C - Site Photographs (1).pdf; 20180521_104529.jpg;

Good morning, Ms Campbell.

Thank you for the email.

For individuals who may not be familiar with the site, I have included a Google Earth image along with the preferred layout and accompanying photographs to provide a comprehensive overview. This material will enable all stakeholders to visualize the site effectively and attain a clearer understanding of its configuration. The image is designed to be self-explanatory and should offer ample context.

If you have any further questions, please contact me.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

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From: Susan Campbell <sucam@mweb.co.za>

Sent: Thursday, April 3, 2025 6:18 PM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Subject: RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good Afternoon Bianca

Thank you for your email.

Would it be possible to arrange a site visit with interested parties to enable those parties who do not know the proposed sites to submit informed comments?

KInd regards

Susan

From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Sent: Wednesday, 02 April 2025 11:47
To: Susan Campbell <sucam@mweb.co.za>
Cc: admin@ecoroute.co.za; pagtrust@mweb.co.za; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebe@knysna.gov.za>; andre@architectsetc.com; johan@paradisefound.co.za; jacques@jacquesdmalan.com; janet@ecoroute.co.za
Subject: Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good morning, Ms Campbell.

I trust that this email finds you well.

Thank you for your email dated 19 March 2025.

In order to enhance the effectiveness of our input, it would be highly beneficial to receive any pertinent questions and concerns in written format. This approach will allow for a more thorough examination of the issues, enabling Eco Route to provide a well-considered and detailed response. Additionally, it will ensure that all relevant aspects are adequately addressed, minimising the risk of overlooking critical details during a live discussion.

Written communication will also facilitate better collaboration with specialists, where necessary, to provide accurate and insightful feedback. We believe this structured approach will contribute to a more constructive and meaningful engagement process for the project.

Thank you for your attention to this matter.

Should you require any information please do not hesitate to contact me.

Best regards

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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From: Susan Campbell <sucam@mweb.co.za>
Sent: Wednesday, March 19, 2025 1:28 PM
To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>; johan@paradisefound.co.za

<johan@paradisefound.co.za>; 'Jacques malan' <jacques@jacquesdmalan.com>

Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebe@knysna.gov.za>; andre@architectsetc.com <andre@architectsetc.com>; 'Johan Labuschagne' <johan@paradisefound.co.za>

Subject: RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good Afternoon Bianca

Would it be possible to arrange a formal site visit for IAAPs before we have to submit comments?

It would assist us to have on-site information relating to the proposed footprints, as well as the access road.

Kind regards

Susan

From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Sent: Tuesday, 18 March 2025 12:45

To: johan@paradisefound.co.za; 'Jacques malan' <jacques@jacquesdmalan.com>

Cc: admin@ecoroute.co.za; pagtrust@mweb.co.za; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebe@knysna.gov.za>; 'Susan Campbell' <sucam@mweb.co.za>

Subject: Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good afternoon, Johan.

Thank you for the email.

We acknowledge your confirmation as an Interested and Affected Party (I&AP) as outlined in Janet's email dated 22 February. We apologise for any oversight in notifying you and sincerely appreciate your correspondence.

We have received your request for a 30-day period to compile and submit your response, effective from the date of your receipt of the notice. We would like to confirm that the comment period for submitting your comments is extended to April 18, 2025.

Please be assured that you will be included in all future communications concerning this matter.

Please let us know if there is anything further we can assist with.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

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any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

From: johan@paradisefound.co.za <johan@paradisefound.co.za>
Sent: Tuesday, March 18, 2025 12:04 PM
To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>; 'Jacques malan' <jacques@jacquesdmalan.com>
Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebel@knysna.gov.za>; 'Susan Campbell' <sucam@mweb.co.za>
Subject: RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Thank you Bianca,
For some reason I have also not been notified - representing the Western Heads Goukamma Conservancy.
We have been confirmed by e-mail by Janet on 22 February as I&AP.

Please note that we require 30 days from notice to compile our response.

Kind regards
Johan

Johan Labuschagne
Cell +27 83 635 0479
e-mail: johan@paradisefound.co.za
6 Greenhill Lane, Knysna 6571, Garden Route, South Africa

From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Sent: Tuesday, 18 March 2025 10:07 AM
To: Jacques malan <jacques@jacquesdmalan.com>
Cc: admin@ecoroute.co.za; pagtrust@mweb.co.za; Vera Carstens <vcarstens0@gmail.com>; Roelof Feenstra <roelof@feenstrainc.co.za>; Henrico Knoesen <henrico@knoesen.com>; Hilton Stroebe <hstroebel@knysna.gov.za>; Susan Campbell <sucam@mweb.co.za>; johan@paradisefound.co.za
Subject: Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Goeie more, Jacques.

Baie dankie vir die epos.

Die link vir al die dokumentasie op die webtuiste is soos volg:

www.ecoroute.co.za/node/107

[Draft Basic Assessment Report - The Proposed Development on Portion 76 \(A Portion of Portion 54\) of Farm 216 Uitzicht, Knysna, Western Cape | Eco Route](#)

Portion 76 of the Farm 216 is situated within 1.5 km from Brenton on Sea Residential Area, Knysna Western Cape and the Southern boundary borders the Brenton Beach. The property is 21.01 hectares in extent. The entire property is classed as Critical Biodiversity Area (CBA) which is defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.

Groete

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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From: jacques malan <jacques@jacquesdmalan.com>
Sent: Tuesday, March 18, 2025 9:43 AM
To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; Vera Carstens <vcarstens0@gmail.com>; Roelof Feenstra <roelof@feenstrainc.co.za>; Henrico Knoesen <henrico@knoesen.com>; Hilton Stroebel <hstroebel@knysna.gov.za>; Susan Campbell <sucam@mweb.co.za>; johan@paradisefound.co.za <johan@paradisefound.co.za>
Subject: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Hallo Bianca

Stuur asb volledige dokumentasie na my toe oor die bostaande openbare deelname proses. Ek wil dringend daarna kyk.

Ek is betrokke by die Buffelsbaai Inwonersvereniging wat omtrent driekwart van die eienaars verteenwoordig.

En jy kan die Buffelsbaai Inwoners Vereniging (BIV) solank registreer as 'n party tot die ondersoek.

Groete

Jacques Malan
Voorsitter BIV
0824437047

RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

From BC Admin <bcadmin@dffe.gov.za>

Date Tue 25/03/2025 12:52

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>; janet@ecoroute.co.za <janet@ecoroute.co.za>

Cc MMatlala Rabothata <MRABOTHATA@dffe.gov.za>; Lindiwe Victoria Dlamini <LVDlamini@dffe.gov.za>; Nompumelelo Lekalakala <NLekalakala@dffe.gov.za>

Dear Sir/Madam

DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation on the 06 March 2025 to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs M Rabothata and Ms Lindiwe Dlamini (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers.

Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dffe.gov.za for attention of Mr Seoka Lekota.

Kind regards,

Lindiwe Victoria Dlamini

Directorate: Biodiversity Mainstreaming and EIA

Branch: Biodiversity and Conservation

473 Steve Biko Road|Private Bag X477|Pretoria|001

Cell: 0606295852|Email: lvdlamini@dffe.gov.za

Website: www.environment.gov.za

From: admin@ecoroute.co.za <admin@ecoroute.co.za>

Sent: Thursday, 06 March 2025 14:18

To: Bathandwa Ncube <BNcube@dffe.gov.za>; Lydia Kutu <LKutu@dffe.gov.za>; Danie Swanepoel <Danie.Swanepoel@westerncape.gov.za>; OCEIA <OCEIA@dffe.gov.za>; OCEIA <OCEIA@dffe.gov.za>; Tabisile Mhlana <tmhlana@dffe.gov.za>; Rueben Molale <RMolale@dffe.gov.za>; Nathan.Jacobs@westerncape.gov.za; Noluvo.Toto@westerncape.gov.za; Stephanie.barnardt@westerncape.gov.za; 'Vanessa Stoffels' <Vanessa.Stoffels@westerncape.gov.za>; Azni.November@westerncape.gov.za; Dirk.Prinsloo@westerncape.gov.za; RobertsJ@dwa.gov.za; 'Cor Van der Walt' <Cor.VanderWalt@westerncape.gov.za>; 'Brandon Layman' <Brandon.Layman@westerncape.gov.za>; Melanie Koen <Mkoen@dffe.gov.za>; Innocent Mapogole <imapogole@dffe.gov.za>; leptieshaam Bekko <leptieshaam.Bekko@westerncape.gov.za>; Mercia J Liddle <Mercia.Liddle@westerncape.gov.za>; Hilda.Hayward@westerncape.gov.za; Ryan.Apolles@westerncape.gov.za; BC Admin <bcadmin@dffe.gov.za>; KMathetja@dffe.gov.za; MMatlala Rabothata <MRABOTHATA@dffe.gov.za>; melvin.schwartz@dalrrd.gov.za

Cc: bianca@ecoroute.co.za; janet@ecoroute.co.za

Subject: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Dear State Department,

Kindly find below link to the Draft BAR and relevant appendices.

<https://we.itl/i-n4gdnfQitUo>

A 30-day public participation will be held from **06/03/2025 – 07/04/2025**. Please submit your comments to the EAP undersigned in this time.

Should you have an issue accessing the link above, please visit our website to view all documents: www.ecoroute.co.za/node/107

ECO-ROUTE ENVIRONMENTAL CONSULTANCY

EIA PROCESS



Notification of Public Participation:

**Proposed Development on Portion 76 (A Portion of Portion 54) of Farm 216,
Uitzicht, Knysna, Western Cape**

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998), the National Environmental Management Act: Environmental Impact Assessment Regulations 2014, as amended, of a 30-day Public Participation Process to be undertaken under the authority of the Department of Environmental Affairs and Development Planning (DEA&DP) reference: 14/12/16/3/3/1/3114.

The Public Participation Process will run from 06 March 2025 – 7 April 2025

The following EIA Listed Activities are applicable:

Government Notice No. R324 (Listing Notice 3): Listed Activity 4

Government Notice No. R324 (Listing Notice 3): Listed Activity 12

A Draft Basic Assessment Report and relevant appendices will be sent via email to all registered Interested and Affected Parties/ I&APs for public review and comment. Alternatively, all relevant documents may be accessed via our website during the public participation period: www.ecoroute.co.za

In addition, a hardcopy will be placed at the New Horizons Public Library for I&APs without access to internet.

Should you wish to comment on the Draft report, gain further information regarding the project or wish to register as an Interested and Affected Party please contact the Environmental Assessment Practitioner (details below).

Please provide written comments with your name, contact details and an indication of any direct business, financial, personal, or other interest which you may have in the development.

Environmental Assessment Practitioner: Bianca Gilfillan (EAPASA Reg 2023/7929)

P.O. Box 1252, Sedgefield, 6573

Email: bianca@ecoroute.co.za/ admin@ecoroute.co.za

Tel: 064 691 4394

www.ecoroute.co.za

Kind regards,

Carina Leslie

Personal Assistant/Admin

Office: 064 691 4394

www.ecoroute.co.za



Eco Route
Environmental Consultancy

Re: DBAR COMMENTS FOR THE PROPOSED DEVELOPMENT ON PORTION 76 (A PORTION OF PORTION 54) OF FARM 216 UITZICHT, KNYNSA, WESTERN CAPE

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Date Mon 14/04/2025 15:49

To MMatlala Rabothata <MRABOTHATA@dffe.gov.za>

Good afternoon, MMatlala Rabothata

We hereby acknowledge receipt of your email and comments.

Thank you for your attention to this matter.

Should you require any information, please do not hesitate to contact me.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

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From: MMatlala Rabothata <MRABOTHATA@dffe.gov.za>

Sent: Monday, April 14, 2025 3:43 PM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Subject: DBAR COMMENTS FOR THE PROPOSED DEVELOPMENT ON PORTION 76 (A PORTION OF PORTION 54) OF FARM 216 UITZICHT, KNYNSA, WESTERN CAPE

Dear Ms. Gilfillan,

Kindly find the attached comments from Directorate: Biodiversity Conservation for your attention and implementation.

Regards

Ms Mmatlala Rabothata

Department of Forestry Fisheries and the Environment

Environment House

473 Steve Biko Road

Arcadia

PRETORIA

0083

Tel: 012 399 9174

Job 19: "But as for me, I know that my Redeemer lives

Re: Objection to Uitsicht 76

From Tanja Meyburgh <tanja@tanjameyburgh.co.za>
Date Tue 01/04/2025 16:56
To bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Thank you Bianca, I will do that as soon as its complete

On 01 Apr 2025, at 16:55, bianca@ecoroute.co.za wrote:

Good afternoon, Tanja.

Thank you for the email.

Please send the correspondence to me, as I need to include it as part of the Basic Assessment Report.

Thank you.

Best regards

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute
<Outlook-p0gowjos.png>

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From: Tanja Meyburgh <tanja@tanjameyburgh.co.za>
Sent: Tuesday, April 1, 2025 3:33 PM
To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Subject: Objection to Uitsicht 76

Hi Bianca

Please can you assist me with where I should send my objection to uitsicht portion 76 in Knsyna municipal area. I filled in something in the public participation on the ecoroute page thinking it as not the same thing as an objection and now I'm not sure what to do since I sent that in, but what to do a more forma objection.

Can you please advise me where to send my objection.
Thanks,

Tanja Meyburgh

Re: Beswaar Buffelsbaai Inwoners vereniging: Gedeelte 76 van die plaas Uitzicht NR 216

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Date Mon 07/04/2025 15:30

To Vera Carstens <vcarstens0@gmail.com>; admin@ecoroute.co.za <admin@ecoroute.co.za>

Cc 'jacques malan' <jacques@jacquesdmalan.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>

Good afternoon, Vera

We hereby acknowledge receipt of your email and comments.

Thank you for your attention to this matter.

Should you require any information, please do not hesitate to contact me.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

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From: Vera Carstens <vcarstens0@gmail.com>

Sent: Monday, April 7, 2025 3:24 PM

To: admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Cc: 'jacques malan' <jacques@jacquesdmalan.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>

Subject: Beswaar Buffelsbaai Inwoners vereniging: Gedeelte 76 van die plaas Uitzicht NR 216

Middag Bianca,

Aangeheg is briewe van Feenstra Inc en ook van Jacques Malan (Voorsitter van die Buffelsbaai Inwonersvereniging) om beswaar aan te teken teen die ontwikkelingsvoorstel van gedeelte 76 van plaas Uitzicht nr 216.

Groete

Vera Carstens

Namens Jacques Malan

RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

From Roelof Feenstra <roelof@feenstrainc.co.za>

Date Wed 02/04/2025 15:32

To bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Afternoon, noted thank you. Regards

Roelof Feenstra

FEENSTRA INC.

Prokureurs, Transportbesorgers, Notarisse en Handelsmerk Prokureurs
Attorneys, Conveyancers, Notaries and Trademark Attorneys

Dorpstraat 6 / 6 Dorp Street Stellenbosch 7600

Posbus / PO Box 1029 Stellenbosch 7599

Tel: 021 883 8012

Email: roelof@feenstrainc.co.za

From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Sent: Wednesday, April 02, 2025 3:22 PM

To: Roelof Feenstra <roelof@feenstrainc.co.za>

Cc: janet@ecoroute.co.za; admin@ecoroute.co.za

Subject: Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good afternoon, Roelof.

Thank you for your email.

The extension was granted to the Western Heads Goukamma Conservancy due to the fact that Mr Johan Labuschagne was not notified at the commencement of the Public Participation Process (PPP). Consequently, this extension is only applicable to the Western Heads Goukamma Conservancy to provide them the 30-day comment period for their input as per the NEMA regulations.

Kindly be advised that the BIV was informed when the PPP commenced.

Thank you for your attention to this matter.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

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From: Roelof Feenstra <roelof@feenstrainc.co.za>

Sent: Wednesday, April 2, 2025 12:02 PM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Subject: Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Dear Madam, we have noted the extension granted to the Western Heads Conservancy. Will this also apply to the Buffelsbaai Inwoners Vereeniging who is considering a comment and whom the writer represents. Kinly advise. Regards

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From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Sent: Wednesday, April 2, 2025 11:46:55 AM

To: Susan Campbell <sucam@mweb.co.za>

Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; 'Vera Carstens' <vcarstens0@gmail.com>; Roelof Feenstra <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebe@knysna.gov.za>; andre@architectsetc.com <andre@architectsetc.com>; johan@paradisefound.co.za <johan@paradisefound.co.za>; jacques@jacquesdmalan.com <jacques@jacquesdmalan.com>; janet@ecoroute.co.za <janet@ecoroute.co.za>

Subject: Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good morning, Ms Campbell.

I trust that this email finds you well.

Thank you for your email dated 19 March 2025.

In order to enhance the effectiveness of our input, it would be highly beneficial to receive any pertinent questions and concerns in written format. This approach will allow for a more thorough examination of the issues, enabling Eco Route to provide a well-considered and detailed response. Additionally, it will ensure that all relevant aspects are adequately addressed, minimising the risk of overlooking critical details during a live discussion.

Written communication will also facilitate better collaboration with specialists, where necessary, to provide accurate and insightful feedback. We believe this structured approach will contribute to a more constructive and meaningful engagement process for the project.

Thank you for your attention to this matter.

Should you require any information please do not hesitate to contact me.

Best regards

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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From: Susan Campbell <sucam@mweb.co.za>
Sent: Wednesday, March 19, 2025 1:28 PM
To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>; johan@paradisefound.co.za <johan@paradisefound.co.za>; 'jacques malan' <jacques@jacquesdmalan.com>
Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebe@knysna.gov.za>; andre@architectsetc.com <andre@architectsetc.com>; 'Johan Labuschagne' <johan@paradisefound.co.za>
Subject: RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good Afternoon Bianca

Would it be possible to arrange a formal site visit for IAAPs before we have to submit comments?

It would assist us to have on-site information relating to the proposed footprints, as well as the access road.

Kind regards

Susan

From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Sent: Tuesday, 18 March 2025 12:45
To: johan@paradisefound.co.za; 'jacques malan' <jacques@jacquesdmalan.com>
Cc: admin@ecoroute.co.za; pagtrust@mweb.co.za; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebe@knysna.gov.za>; 'Susan Campbell' <sucam@mweb.co.za>
Subject: Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good afternoon, Johan.

Thank you for the email.

We acknowledge your confirmation as an Interested and Affected Party (I&AP) as outlined in Janet's email dated 22 February. We apologise for any oversight in notifying you and sincerely appreciate your correspondence.

We have received your request for a 30-day period to compile and submit your response, effective from the date of your receipt of the notice. We would like to confirm that the comment period for submitting your comments is extended to April 18, 2025.

Please be assured that you will be included in all future communications concerning this matter.

Please let us know if there is anything further we can assist with.

Best regards

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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From: johan@paradisefound.co.za <johan@paradisefound.co.za>
Sent: Tuesday, March 18, 2025 12:04 PM
To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>; 'Jacques malan' <jacques@jacquesdmalan.com>
Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebe@knysna.gov.za>; 'Susan Campbell' <sucam@mweb.co.za>
Subject: RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Thank you Bianca,
For some reason I have also not been notified - representing the Western Heads Goukamma Conservancy.
We have been confirmed by e-mail by Janet on 22 February as I&AP.

Please note that we require 30 days from notice to compile our response.

Kind regards
Johan

Johan Labuschagne
Cell +27 83 635 0479
e-mail: johan@paradisefound.co.za
6 Greenhill Lane, Knysna 6571, Garden Route, South Africa

From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Sent: Tuesday, 18 March 2025 10:07 AM
To: Jacques malan <jacques@jacquesdmalan.com>
Cc: admin@ecoroute.co.za; pagtrust@mweb.co.za; Vera Carstens <vcarstens0@gmail.com>; Roelof Feenstra <roelof@feenstrainc.co.za>; Henrico Knoesen <henrico@knoesen.com>; Hilton Stroebe <hstroebe@knysna.gov.za>; Susan Campbell <sucam@mweb.co.za>; johan@paradisefound.co.za
Subject: Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Goeie more, Jacques.

Baie dankie vir die epos.

Die link vir al die dokumentasie op die webtuiste is soos volg:

www.ecoroute.co.za/node/107

Draft Basic Assessment Report - The Proposed Development on Portion 76 (A Portion of Portion 54) of Farm 216 Uitzicht, Knysna, Western Cape | Eco Route

Portion 76 of the Farm 216 is situated within 1.5 km from Brenton on Sea Residential Area, Knysna Western Cape and the Southern boundary borders the Brenton Beach. The property is 21.01 hectares in extent. The entire property is classed as Critical Biodiversity Area (CBA) which is defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.

www.ecoroute.co.za

Groete

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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From: jacques malan <jacques@jacquesdmalan.com>

Sent: Tuesday, March 18, 2025 9:43 AM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; Vera Carstens <vcarstens0@gmail.com>; Roelof Feenstra <roelof@feenstrainc.co.za>; Henrico Knoesen <henrico@knoesen.com>; Hilton Stroebeel <hstroebel@knysna.gov.za>; Susan Campbell <sucam@mweb.co.za>; johan@paradisefound.co.za <johan@paradisefound.co.za>

Subject: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Hallo Bianca

Stuur asb volledige dokumentasie na my toe oor die bostaande openbare deelname proses. Ek wil dringend daarna kyk.

Ek is betrokke by die Buffelsbaai Inwonersvereniging wat omtrent driekwart van die eienaars verteenwoordig.

En jy kan die Buffelsbaai Inwoners Vereniging (BIV) solank registreer as 'n party tot die ondersoek.

Groete

Jacques Malan
Voorsitter BIV
0824437047

Re: SANParks Comments DBAR, Uitzicht 216, Port 76

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Date Mon 07/04/2025 15:14
To Vanessa Weyer <Vanessa.Weyer@sanparks.org>; 'Admin' <admin@ecoroute.co.za>; 'Janet Ebersohn' <janet@ecoroute.co.za>
Cc Pat Bopape <Pat.Bopape@sanparks.org>; Elmonique Petersen <Elmonique.Petersen@sanparks.org>; msimons@capenature.co.za <msimons@capenature.co.za>; 'Danie Swanepoel' <Danie.Swanepoel@westerncape.gov.za>; Caren George <Caren.George@westerncape.gov.za>; 'Pamela Booth' <pbooth@knysna.gov.za>; 'Hennie Smit' <hsmit@knysna.gov.za>; Johan Labuschagne <johan@paradisefound.co.za>

Good afternoon, Vanessa.

We hereby acknowledge receipt of your email and comments.

Thank you for your attention to this matter.

Should you require any information, please do not hesitate to contact me.

Best regards

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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From: Vanessa Weyer <Vanessa.Weyer@sanparks.org>
Sent: Monday, April 7, 2025 3:07 PM
To: 'Admin' <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>; 'Janet Ebersohn' <janet@ecoroute.co.za>
Cc: Pat Bopape <Pat.Bopape@sanparks.org>; Elmonique Petersen <Elmonique.Petersen@sanparks.org>; msimons@capenature.co.za <msimons@capenature.co.za>; 'Danie Swanepoel' <Danie.Swanepoel@westerncape.gov.za>; Caren George <Caren.George@westerncape.gov.za>; 'Pamela Booth' <pbooth@knysna.gov.za>; 'Hennie Smit' <hsmit@knysna.gov.za>; Johan Labuschagne <johan@paradisefound.co.za>
Subject: SANParks Comments DBAR, Uitzicht 216, Port 76

<
Dear Bianca,

Please find attached SANParks comments for:

DRAFT BASIC ASSESSMENT, PROPOSED DEVELOPMENT, UITZICHT 216, PORTION 76, KNYSNA, WESTERN CAPE
DFFE Reference: 14/12/16/3/3/1/3114

Kind regards,
Dr Vanessa Weyer
Environmental Management (University of Pretoria)
Reg. EAP (EAPASA) & Reg. Pr.Sci.Nat. (SACNASP)



Escape
AGULHAS NATIONAL PARK

WWW.SANPARKS.ORG



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Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Date Wed 02/04/2025 11:47

To Susan Campbell <sucam@mweb.co.za>

Cc admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebel@knysna.gov.za>; andre@architectsetc.com <andre@architectsetc.com>; johan@paradisefound.co.za <johan@paradisefound.co.za>; jacques@jacquesdmalan.com <jacques@jacquesdmalan.com>; janet@ecoroute.co.za <janet@ecoroute.co.za>

Good morning, Ms Campbell.

I trust that this email finds you well.

Thank you for your email dated 19 March 2025.

In order to enhance the effectiveness of our input, it would be highly beneficial to receive any pertinent questions and concerns in written format. This approach will allow for a more thorough examination of the issues, enabling Eco Route to provide a well-considered and detailed response. Additionally, it will ensure that all relevant aspects are adequately addressed, minimising the risk of overlooking critical details during a live discussion.

Written communication will also facilitate better collaboration with specialists, where necessary, to provide accurate and insightful feedback. We believe this structured approach will contribute to a more constructive and meaningful engagement process for the project.

Thank you for your attention to this matter.

Should you require any information please do not hesitate to contact me.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

EcoRoute



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From: Susan Campbell <sucam@mweb.co.za>

Sent: Wednesday, March 19, 2025 1:28 PM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>; johan@paradisefound.co.za

<johan@paradisefound.co.za>; 'jacques malan' <jacques@jacquesdmalan.com>

Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebe@knysna.gov.za>; andre@architectsetc.com <andre@architectsetc.com>; 'Johan Labuschagne' <johan@paradisefound.co.za>

Subject: RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good Afternoon Bianca

Would it be possible to arrange a formal site visit for IAAPs before we have to submit comments?

It would assist us to have on-site information relating to the proposed footprints, as well as the access road.

Kind regards

Susan

From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Sent: Tuesday, 18 March 2025 12:45

To: johan@paradisefound.co.za; 'jacques malan' <jacques@jacquesdmalan.com>

Cc: admin@ecoroute.co.za; pagtrust@mweb.co.za; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebe@knysna.gov.za>; 'Susan Campbell' <sucam@mweb.co.za>

Subject: Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good afternoon, Johan.

Thank you for the email.

We acknowledge your confirmation as an Interested and Affected Party (I&AP) as outlined in Janet's email dated 22 February. We apologise for any oversight in notifying you and sincerely appreciate your correspondence.

We have received your request for a 30-day period to compile and submit your response, effective from the date of your receipt of the notice. We would like to confirm that the comment period for submitting your comments is extended to April 18, 2025.

Please be assured that you will be included in all future communications concerning this matter.

Please let us know if there is anything further we can assist with.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

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any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

From: johan@paradisefound.co.za <johan@paradisefound.co.za>
Sent: Tuesday, March 18, 2025 12:04 PM
To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>; 'jacques malan' <jacques@jacquesdmalan.com>
Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroeel' <hstroebel@knysna.gov.za>; 'Susan Campbell' <sucam@mweb.co.za>
Subject: RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Thank you Bianca,
For some reason I have also not been notified - representing the Western Heads Goukamma Conservancy.
We have been confirmed by e-mail by Janet on 22 February as I&AP.

Please note that we require 30 days from notice to compile our response.

Kind regards
Johan

Johan Labuschagne
Cell +27 83 635 0479
e-mail: johan@paradisefound.co.za
6 Greenhill Lane, Knysna 6571, Garden Route, South Africa

From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Sent: Tuesday, 18 March 2025 10:07 AM
To: jacques malan <jacques@jacquesdmalan.com>
Cc: admin@ecoroute.co.za; pagtrust@mweb.co.za; Vera Carstens <vcarstens0@gmail.com>; Roelof Feenstra <roelof@feenstrainc.co.za>; Henrico Knoesen <henrico@knoesen.com>; Hilton Stroeel <hstroebel@knysna.gov.za>; Susan Campbell <sucam@mweb.co.za>; johan@paradisefound.co.za
Subject: Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Goeie more, Jacques.

Baie dankie vir die epos.

Die link vir al die dokumentasie op die webtuiste is soos volg:

www.ecoroute.co.za/node/107

[Draft Basic Assessment Report - The Proposed Development on Portion 76 \(A Portion of Portion 54\) of Farm 216 Uitzicht, Knysna, Western Cape | Eco Route](#)

Portion 76 of the Farm 216 is situated within 1.5 km from Brenton on Sea Residential Area, Knysna Western Cape and the Southern boundary borders the Brenton Beach. The property is 21.01 hectares in extent. The entire property is classed as Critical Biodiversity Area (CBA) which is defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.

Groete

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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From: jacques malan <jacques@jacquesdmalan.com>
Sent: Tuesday, March 18, 2025 9:43 AM
To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; Vera Carstens <vcarstens0@gmail.com>; Roelof Feenstra <roelof@feenstrainc.co.za>; Henrico Knoesen <henrico@knoesen.com>; Hilton Stroebel <hstroebel@knysna.gov.za>; Susan Campbell <sucam@mweb.co.za>; johan@paradisefound.co.za <johan@paradisefound.co.za>
Subject: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Hallo Bianca

Stuur asb volledige dokumentasie na my toe oor die bostaande openbare deelname proses. Ek wil dringend daarna kyk.

Ek is betrokke by die Buffelsbaai Inwonersvereniging wat omtrent driekwart van die eienaars verteenwoordig.

En jy kan die Buffelsbaai Inwoners Vereniging (BIV) solank registreer as 'n party tot die ondersoek.

Groete

Jacques Malan
Voorsitter BIV
0824437047

Re: Comments Draft Basic Assessment Report 76 Uitzicht

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Date Mon 07/04/2025 12:57

To Susan Campbell <sucam@mweb.co.za>

Good afternoon, Susan.

We hereby acknowledge receipt of your email and comments.

Thank you for your attention to this matter.

Should you require any information, please do not hesitate to contact me.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

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From: Susan Campbell <sucam@mweb.co.za>

Sent: Monday, April 7, 2025 12:53 PM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Subject: Comments Draft Basic Assessment Report 76 Uitzicht

Good Day Bianca

Attached please find my comments to the DBAR.

Kind regards

Susan Campbell

ECO-ROUTE ENVIRONMENTAL CONSULTANCY

EIA PROCESS



Notification of Public Participation:

**Proposed Development on Portion 76 (A Portion of Portion 54) of Farm 216,
Uitzicht, Knysna, Western Cape**

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998), the National Environmental Management Act: Environmental Impact Assessment Regulations 2014, as amended, of a 30-day Public Participation Process to be undertaken under the authority of the Department of Environmental Affairs and Development Planning (DEA&DP) reference: 14/12/16/3/3/1/3114.

The Public Participation Process will run from 06 March 2025 – 7 April 2025

The following EIA Listed Activities are applicable:

Government Notice No. R324 (Listing Notice 3): Listed Activity 4
Government Notice No. R324 (Listing Notice 3): Listed Activity 12

A Draft Basic Assessment Report and relevant appendices will be sent via email to all registered Interested and Affected Parties/ I&APs for public review and comment. Alternatively, all relevant documents may be accessed via our website during the public participation period: www.ecoroute.co.za

Should you wish to comment on the Draft report, gain further information regarding the project or wish to register as an Interested and Affected Party please contact the Environmental Assessment Practitioner (details below).

Please provide written comments with your name, contact details and an indication of any direct business, financial, personal, or other interest which you may have in the development.

Environmental Assessment Practitioner: Bianca Gilfillan (EAPASA Reg 2023/7929)

P.O. Box 1252, Sedgefield, 6573

Email: bianca@ecoroute.co.za/ admin@ecoroute.co.za

Tel: 064 691 4394

www.ecoroute.co.za

ECO-ROUTE ENVIRONMENTAL CONSULTANCY

EIA PROCESS



Notification of Public Participation:

**Proposed Development on Portion 76 (A Portion of Portion 54) of Farm 216,
Uitzicht, Knysna, Western Cape**

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998), the National Environmental Management Act: Environmental Impact Assessment Regulations 2014, as amended, of a 30-day Public Participation Process to be undertaken under the authority of the Department of Environmental Affairs and Development Planning (DEA&DP) reference: 14/12/16/3/3/1/3114.

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A Draft Basic Assessment Report and relevant appendices will be sent via email to all registered Interested and Affected Parties/ I&APs for public review and comment. Alternatively, all relevant documents may be accessed via our website during the public participation period: www.ecoroute.co.za

Should you wish to comment on the Draft report, gain further information regarding the project or wish to register as an Interested and Affected Party please contact the Environmental Assessment Practitioner (details below).

Please provide written comments with your name, contact details and an indication of any direct business, financial, personal, or other interest which you may have in the development.

Environmental Assessment Practitioner: Bianca Gilfillan (EAPASA Reg 2023/7929)

P.O. Box 1252, Sedgefield, 6573

Email: bianca@ecoroute.co.za/ admin@ecoroute.co.za

Tel: 064 691 4394

www.ecoroute.co.za

54 York Street,
George
Western Cape
6529

PO Box 12,
George,
Western Cape
6530

Tel: 044 803 1300
Fax: 086 555 6303
E-mail: info@gardenroute.gov.za
www.gardenroute.gov.za

OFFICE OF THE MUNICIPAL MANAGER

Enquiries:	L Herwels
Reference:	18/3/4/1
Date:	20 March 2025

Eco -Route Environmental Consultancy
Po Box 1252
Sedgefield
6573

Per E-mail

Attention Bianca Gilfillan

**PROPOSED DEVELOPMENT ON PORTION 76 OF FARM 216 UITZICHT KNYSNA
WESTERN CAPE**

Your letter under reference 14/12/16/3/3/1/3114 concerning the above mentioned have reference:

The office subjected to the following conditions has no objection to the proposed activity.

- Ensure that no Municipal Health Nuisance occurs during the construction of the premises.
- The borehole water to be treated before utilizing the water as potable water to ensure compliance with SANS 241:2015 (Specifications for drinking water).
- This office recommends that the planned septic tank be replaced with a conservancy tank and the planned access road consider the position of the conservancy tank.

Re: Objection to the Proposed Development of Portion 76 (A Portion of Portion 54) of Farm 216 Uitzicht, Knysna, Western Cape. As set out in the Draft Basic Assessment Report by Eco Route. D

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Date Mon 07/04/2025 08:28
To Tanja Meyburgh <tanja@tanjameyburgh.co.za>
Cc Dave Edge <orachrysops@gmail.com>; Tiffany <pa@tanjameyburgh.co.za>; admin@ecoroute.co.za <admin@ecoroute.co.za>; Janet <janet@ecoroute.co.za>

Good morning, Tanja.

We hereby acknowledge receipt of your email and objection.

Thank you for your attention to this matter.

Should you require any information please do not hesitate to contact me.

Best regards

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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From: Tanja Meyburgh <tanja@tanjameyburgh.co.za>
Sent: Friday, April 4, 2025 3:24 PM
To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Cc: Dave Edge <orachrysops@gmail.com>; Tiffany <pa@tanjameyburgh.co.za>
Subject: Re: Objection to the Proposed Development of Portion 76 (A Portion of Portion 54) of Farm 216 Uitzicht, Knysna, Western Cape. As set out in the Draft Basic Assessment Report by Eco Route. D

Dear Bianca

Herewith my objection as owner and director of Meyburgh Property Holdings LTD, the owner of portion 74 and 75 Uitsicht, Knysna.

Please confirm receipt.

Thank-you,

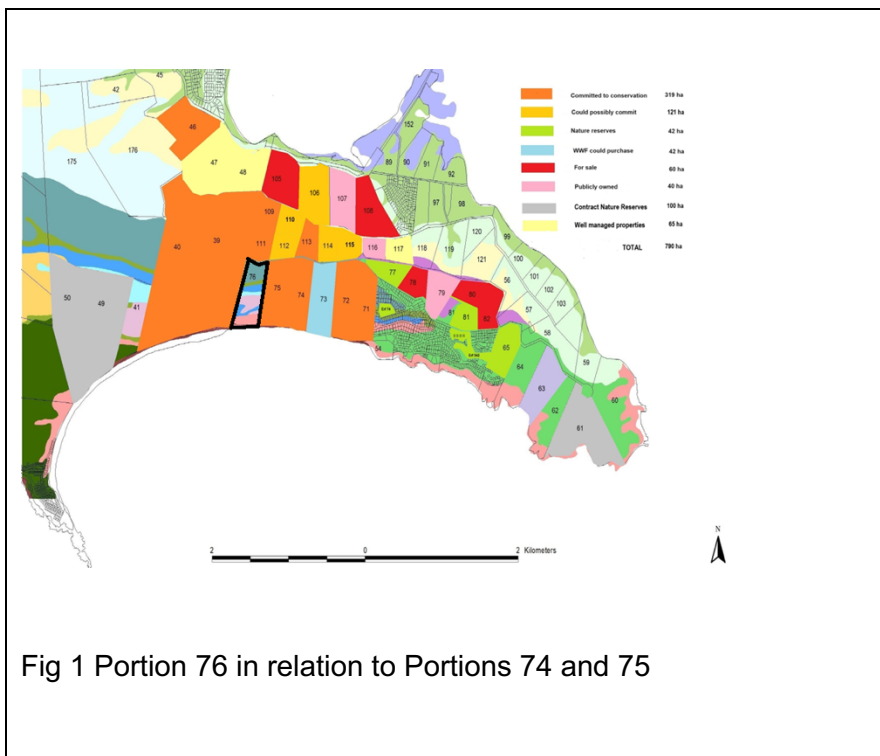
Tanja Meyburgh

To: Eco Route
Attention: Bianca
By email: bianca@ecoroute.co.za

Re: Objection to the Proposed Development of Portion 76 (A Portion of Portion 54) of Farm 216 Uitzicht, Knysna, Western Cape. As set out in the Draft Basic Assessment Report by Eco Route.

I hereby object to the proposed development and support the objections submitted by the Western Heads Gougamma Conservancy and SANParks in this regard. I am owner of the portion 74 and 75 Uitsicht which I bought with the sole intention of supporting the intention to save this sensitive ecological for his environmental value and as a natural ecologically pristine area for generations to come

Portion 76 falls within an exceptionally sensitive biodiversity area as per SANBI Biodiversity classification, and is a core conservation area. I share a boundary with portion Uitsicht portion 75 and both the portions 74 and 75 look directly onto the dunes where the intended development is proposed. We also share an access road which runs on the Northern boundary of both my properties. Portion 74 and 75 are already committed to be included into SANparks due to their important conservation value.



Objections:

1. **Main house:** The location and size of the footprint of the main dwelling which will be developed in the sensitive dune area. All of the other dwellings in the area are located near the municipal or provincial roads to prevent disturbance of new roads cutting into the landscape creating an even larger footprint of disturbance. All the dwellings in the area are on much smaller footprints and the suggested footprint for those in SANparks is a maximum of 300m², which is what most properties will adhere to. There are no other buildings on the beachfront in the area, which means that this house would not only ruin the existing aesthetics of this important Tourist and ecological attraction, but will set a

precedent for future development which will have devastating effects on the ecology of the dune. SANparks has suggested an alternative location of a residence in the Northern Boundary which minimises the footprint, does not disrupt the connectivity of the ecological corridor, and minimises the aesthetic impact of the road and dwelling in a pristine wilderness landscape. The size and layout of this house is furthermore not in line with a domestic dwelling and I have concerns that this will be used or applied for commercial use in future. Commercial use would mean increased traffic and pollution for the whole area as access runs through the middle of all the portions.

2. **Internal Road:** the footprint and disturbance to the fynbos is increased by locating the dwelling site on the dunes. This can be mitigated by building the dwelling closer to existing roads. This road will require excavations due to the steep descent of the land which will be an eyesore and disturb the landscape and ecology. The report does not adequately represent the impact of this road.
3. **Access road:** the access road to portion 76 runs along the northern boundary of both portion 74 and 75. It is a road that has not been reinforced and is a dust, farm road which will not tolerate large trucks or larger building machinery. I anticipate damage to the integrity of my northern borders as well as those of my neighbours, with the number and type of vehicles that will be needed to access a development of this size. Nothing is mentioned of who will be responsible for the maintenance and repair of this road and how damage will be minimised. Furthermore there are no overtaking or turning points for vehicles on this road, and this can only be achieved through encroaching on other properties such as mine at portion 74 and 75 and the neighbours.
4. **Ecology:** no mention has been made of the surrounding areas, the plan already in place to create an ecological corridor along these properties or any of the context of this development. The impact on the surrounding area is massive both in noise, light, sound pollution of a natural conservation environment, and disturbance to the ecological corridor and movement of critical species and animals in the area. This property and its development does not exist in isolation of the larger landscape and development plan pictured below.
5. **Aesthetics:** This is a false statement in the BAR page 100:
*"As is evident portion 76/216 is **only barely visible** in the distance from the road leading to and from Brenton-on-Sea. Consequently, the **proposed development will have no visual impact on the aesthetic value of the affected area**. On heritage grounds, due to the entire absence of heritage resources or themes in and around 76/216, the proposed development will have negligible to no impact on the visual or aesthetic heritage value of the area."*

This is an image taken from the main road viewpoint from Belvedere to Brenton (mentioned in the above statement) with the Dune of the proposed site and how it fits into the area on the left of the image. Currently there is no development along this beach from Brenton on Sea up to Buffels Bay village. The proposed development on the dune on Portion 76 is visible and aesthetically devastating to both portion 74 and 75's proposed residence sites on the northern boundaries as well as many other properties in the area, including the ones above me and public access areas such as this viewpoint and beach.



I do not dispute the owner's primary land use right to a residence, however object to the proposed site location of the main residence, the proposed residence size and the proposed internal road (due to site selection on the dune). The objections are based primarily on the level of biodiversity loss, ecosystem fragmentation and aesthetic impact that can be avoided.

Your sincerely

Tanja Meyburgh
Owner and Director: Meyburgh Property Holdings (LTD)
Portion 74 and 75 Uitzicht Farm.
7 Suddie Close, Zwaasnwyk, 7945, Cape Town
info@tanjameyburgh.co.za
0832182668

physical 4th Floor, York Park Building,
York Street, George, 6530
website www.capenature.co.za
enquiries Megan Simons
telephone 087 087 3060
email msimons@capenature.co.za
Reference LE14/2/6/1/6/4/216-76_Residential_Uitzicht
date 08 April 2025

Eco Route Environmental Consultancy,
P.O. Box 1252,
Sedgefield,
6573

Attention: Ms Bianca Gilfillan
By email: bianca@ecoroute.co.za

Dear Ms Bianca Gilfillan

**THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED
DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF THE
FARM 216 UITZICHT, KNYSNA LOCAL MUNICIPALITY, WESTERN CAPE.**

CapeNature would like to thank you for the opportunity to review the above report. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application. CapeNature wishes to make the following comments:

The property is within the Knysna National Lake Area Protected Environment¹. At the time of the assessment the 2017 Western Cape Biodiversity Spatial Plan (Pool-Stanvliet *et al.* 2017)² was used to inform the study. The entire property was mapped as Critical Biodiversity Area (CBA 1: Terrestrial).

The property does not have any aquatic features but is within the National Strategic Water Source Area (SWAS) for surface water for the Outeniqua region and serves as a water source protection for the Knysna Estuary and Watercourse protection for South Eastern Coastal Belt. Furthermore, the property is within the Coastal Protection Zone and has coastal habitat.

The fine-scale map described the vegetation as Moist Dune Fynbos, Goukamma Dune Thicket, Arid Dune Fynbos, Brenton Dune Fynbos, Primary Dune Slack Fynbos, Primary Dune & Cliff Fynbos, and Foredune (Vlok 2005)³. According to the National Biodiversity Assessment (Skowno *et al.* 2018)⁴ the vegetation units are Knysna Sand Fynbos which is listed as **Critically**

¹ National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003). Regulations for the proper administration of the Knysna Protected Environment. 2009. Government Gazette No. 32797

² Pool-Stanvliet, R., Duffell-Canham, A., Pence, G. & Smart, R. 2017. The Western Cape Biodiversity Spatial Plan Handbook. Stellenbosch: CapeNature.

³ Vlok JHJ. 2005. The natural vegetation of the Western Heads (Knysna), notes on its ecological sensitivity and proposed future development. Unpublished report.

⁴ Skowno, A. L., Poole, C. J., Raimondo, D. C., Sink, K. J., Van Deventer, H., Van Niekerk, L., Harris, L. R., Smith-Adao, L. B., Tolley, K. A., Zengeya, T. A., Foden, W. B., Midgley, G. F. and Driver, A. 2019. National Biodiversity Assessment 2018: The status of South Africa's ecosystems and biodiversity. Synthesis Report. Pretoria, South Africa. 214 pp.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Mr Mervyn Burton, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Mr Paul Slack

Endangered (NEM:BA, 2022)⁵ and Goukamma Dune Thicket which is **Least Concerned** (SANBI 2022)⁶.

The Knysna Sand Fynbos is a narrowly distributed vegetation with high rates of habitat loss of which plantations were the primary pressure on this ecosystem together with cropping and alien invasions (SANBI 2022). Only 21% of the natural extent remains and this is a poorly protected ecosystem. The high rates of habitat loss over the past 28 years (and still ongoing) places this ecosystem at risk of collapsing which makes it crucial to conserve and manage the remaining areas that are still natural.

Following a review of the proposed development, CapeNature has the following comments:

1. The 2017 Western Cape Biodiversity Spatial Plan has been replaced by the 2023 Western Cape Biodiversity Spatial Plan. The latter mapped the property as being within the Knysna National Lake Area Protected Environment which is managed by SANParks (CapeNature 2024)⁷. This is also consistent with the Register of Protected Areas of which the Department of Forestry, Fisheries, and Environment are the data custodians.
2. The current alternatives and layouts are within the most sensitive area of the property. The property has coastal habitat and foredunes. The foredunes are important “building blocks” which ensures the stability of the more inland dune systems. Furthermore, the preferred development layout is within steep areas and within the dunes. Housing developments on dunes are destroying these sensitive ecosystems and adds additional strain on dune systems (Cadman 2016)⁸. Furthermore, the dune system is highly sensitive and will become mobile and will move again when it is disturbed. In addition, the property has a high soil erodibility factor and removing vegetation might destabilise the soil which could result in land slipping. **CapeNature objects to the preferred and alternative development layouts to the south of the property.**
3. It is understood that the property is within the Western Heads Knysna Sand Fynbos Coastal Corridor and within the expansion/ buffer area of SANParks. The property is also within the National Protected Areas Expansion Strategy (NPAES) which aims is to achieve cost effective protected area expansion for improved ecosystem representation, ecological sustainability and resilience to climate change. It establishes protected area targets, identifies priority areas for expansion, and provides recommendations on strategies to accomplish these objectives (South Africa’s National Protected Area Expansion Strategy, 2018)⁹.
 - 3.1. In addition, the Western Cape Protected Area Expansion Strategy¹⁰ (WCPAES) outlines several criteria for expanding protected areas of which CBA is a core criterion. The property meets following criteria of the WCPAES:

Threatened ecosystems: *Critically Endangered (Knysna Sand Fynbos);*
Under-protected ecosystems and strategic landscapes: *Poorly protected;*
Essential habitat for priority species: *SCCs (fauna and flora), primary dune and foredunes (east-west running dune systems);*
Strategic Water Source Areas: *Outeniqua SWSA for surface water; and*

⁵ National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004). The Revised National List of Ecosystems that are Threatened and in need of protection. 2022. Government Gazette No. 47526

⁶ Government of South Africa (2022) South African Red List of Terrestrial Ecosystems: assessment details and ecosystem descriptions. Technical Report #7664, SANBI Pretoria, South Africa.

⁷ CapeNature. 2024. 2023 Western Cape Biodiversity Spatial Plan and Guidelines. Unpublished Report

⁸ Cadman, M. (ed.). 2016. Fynbos Forum Ecosystem Guidelines for Environmental Assessment in the Western Cape, Edition 2. Fynbos Forum, Cape Town.

⁹ South Africa’s National Protected Area Expansion Strategy. (2018). National Protected Area Expansion Strategy for South Africa: 2018-2028. Department of Environmental Affairs.

¹⁰ CapeNature. (2025). *Draft 2024 Western Cape Protected Areas Expansion Strategy*. Unpublished report. Cape Town, South Africa.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Mr Mervyn Burton, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Mr Paul Slack

Climate change and connectivity corridors: the property is within the Knysna Lakes PE, within the Western Heads Knysna Sand Fynbos coastal corridor and within the expansion footprint of the Garden Route National Park.

- 3.2. As this area is of national importance, we would encourage the landowner to form part of the SANParks expansion strategy. It is also understood that the adjacent properties (i.e., 216/39&111&75) will be proclaimed as Contract National Parks. Including this property will further strengthen this corridor as this will connect to the World Heritage Site to the west and the Knysna Estuary to the East.
4. The property is within a SWSA which is of national importance and their ecological functioning must be protected and maintained (Le Maitre *et al.* 2018)¹¹. Furthermore, the SWSA is a key component of Ecological Infrastructure providing critical services such as maintaining biodiversity conservation (corridor movement of both fauna and flora) and climate management (resilience to climate change). CapeNature would support the inclusion of this property within the current stewardship mechanism in the area.
5. The current preferred alternative is within the Primary Dune Slack Fynbos and Arid Dune Fynbos (Vlok 2005). Once soil erosion occurs in the latter vegetation it can be rapid and challenging to manage once the vegetation has been disturbed. The Primary Dune Slack may be restricted to this area. Furthermore, in the SA vegetation map the vegetation is Least Concerned however in the Terrestrial and Plant report the botanical specialist established that several plant SCCs were confirmed to occur on site. Other SCCs had a very high and high probability of occurring on site. Thus, the entire property has many rare and sensitive species.
 - 5.1. The Brenton Dune Fynbos vegetation would correspond to the botanist's Invaded valley bush and N-facing Strandveld-Fynbos vegetation which is across the centre of the property. This unit according to the fine-scale map is restricted to the area. This unit has two rare and threatened plant species, *Pentasthesis barbata* ssp. *orientalis* and *Satyrium princeps*. Table 12 from the Terrestrial and Plant Assessment report indicated that the latter SCC was found on site. Furthermore, *Erica glumaeiflora*, which was also found by the botanist, is a characteristic species of this unit.
 - 5.2. The Terrestrial Biodiversity Sensitivity was confirmed as Very High and the Terrestrial Plant Species as High. Based on the impact assessment the specialist recommended alternative 4 as the most acceptable layout which is only one dwelling in the northern corner of the property.
6. The landowner has the right to apply for one dwelling based on his/her primary right but not an additional building. Furthermore, the position of the dwelling should be in the least sensitive area and preferably within an already disturbed area. Thus, if the applicant wishes to have two dwellings **the development footprint of 3000m², which is not supported by CapeNature**, should be significantly reduced and the developments should be next to each other. In other words, cluster the units in areas that minimises the visual impact and within existing footprints. Considering that alternative 4 is within the highly sensitive **Critically Endangered** Knysna Sand Fynbos.
7. The property last burned during the 2017 Knysna fires and the risks and vulnerability layers of CapeFarm Mapper indicate that the property has an extreme risk for wildfire. In terms of section 12 (1) and 2 (a) of National Veld and Forest Act¹² adequate firebreak must be prepared and maintained around the property to reasonably prevent the spread

¹¹ Le Maitre, DC., Walsdorff, A., Cape, L., SeyAler, H., Audouin, M, Smith-Adao, L., Nel, J.A., Holland, M. and Witthüser, K. 2018. Strategic Water Source Areas: Management Framework and Implementation Guidelines for Planners and Managers. WRC Report No. TT 754/2/18. Pretoria: Water Research Commission.

¹² National Veld and Forest Act 1998 (Act 101 of 1998) Government Gazette: 19515

The Western Cape Nature Conservation Board trading as **CapeNature**

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of unwanted fires in the area. Additionally, the Fynbos Forum guidelines mention that the impacts of housing developments must be minimised, buildings should be clustered within fire-free zones and protected with firebreaks. The Fynbos Forum guidelines also state “firebreaks must be cleared within the development footprint of the housing estate, not in the adjacent veld” (Cadman 2016)¹³. We recommend that the owner, if not registered yet, apply for membership with the Southern Cape Fire Protection Association (SCFPA).

8. The impact of the internal road should account for both the construction phase and its long-term effects, including the recovery rate of the vegetation. It is important to consider that construction vehicles are large, and edge effects are likely to occur.
9. CapeNature reminds the applicant of Section 28 of National Environmental Management Act (NEMA) (Act 104 of 1998 as amended) (Duty of Care) that states the following:

“Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.”

Any action that causes wilful degradation of the environment may therefore constitute a breach of this Duty of Care and the penal provisions of NEMA will apply.

In conclusion, including the property in SANParks’ expansion mechanism will help protect the sensitive dune systems, SCC, ensuring the ongoing survival and functionality of this ecosystem, and maintaining of landscape connectivity and would be supported by CapeNature. Considering the sensitivity of the area and due to the site having critical biodiversity and the presence of the last remaining Knysna Sand Fynbos vegetation and restricted fine-scale vegetation, **CapeNature strongly object to the current proposed development layout and alternatives and the 3000m² which is within the most sensitive part of the property.** The dwelling/s should be clustered within existing footprints and the development footprint must be significantly reduced to ensure the conservation of the natural landscape.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely,



Megan Simons
For: Manager (Conservation Intelligence)

¹³ Cadman, M. (ed.). 2016. Fynbos Forum Ecosystem Guidelines for Environmental Assessment in the Western Cape, Edition 2. Fynbos Forum, Cape Town.

The Western Cape Nature Conservation Board trading as **CapeNature**

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Re: PORTION 76 (A PORTION OF PORTION 54) OF THE FARM UITZICHT 216

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Date Tue 18/03/2025 10:16

To Breda Lombard <breda@bredalombard.co.za>

Cc admin@ecoroute.co.za <admin@ecoroute.co.za>

Good morning, Breda.

I trust that this email finds you well.

I hereby acknowledge receipt of your email.

The link to the relevant documentation available on the website is as follows:

www.ecoroute.co.za/node/107

Thank you for your attention to this matter.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

EcoRoute



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The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination, or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

From: Breda Lombard <breda@bredalombard.co.za>

Sent: Monday, March 10, 2025 1:45 PM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>

Subject: RE: PORTION 76 (A PORTION OF PORTION 54) OF THE FARM UITZICHT 216



BREDA LOMBARD TOWN PLANNERS

Good afternoon

1. Attached our correspondence reference BL/BHOA dated 10 March 2025.
2. **Kindly forward the draft basic assessment report, inclusive of annexures.**
3. We will thereafter comment on the contents of the draft report.
4. Kindly acknowledge receipt of this e-mail.

Regards

BREDA LOMBARD

PROF TOWN PLANNER

(REG NO. A/700 /1992)

Directions to our office: [Drop pin](#)

T: +27 11 327 3310

C: 083 601 2353

E: breda@bredalombard.co.za

38 Bompas Road Dunkeld
Johannesburg
SOUTH AFRICA

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REF: BL/BHOA

10 March 2025

Eco-Route Environmental Consultancy
P O Box 1252
SEDFIELD
6573

ATTENTION: BIANCA GILFILLAN

PER E-MAIL
bianca@ecoroute.co.za

Dear Bianca

PORTION 76 (A PORTION OF PORTION 54) OF THE FARM UITZICHT 216.

1. We refer to the attached notice in respect of the public participation process.
2. Breda Lombard Town Planners represent the Belvidere Homeowners Association (**BHOA**).
3. The BHOA is a pro-active association that manages Belvidere Estate.
4. The BHOA is also involved in the Western Heads / Goukamma conservancy initiatives.
5. Kindly register the BHOA as an interested and affected party.

...2/

6. **Contact information for the process:**

- Breda Lombard Town Planners
- 38 Bompas Road
- DUNKELD
- 2196
- E-mail: breda@bredalombard.co.za
- Landline: 011 327 3310

7. **Kindly acknowledge receipt. We are awaiting the draft report.**

Yours faithfully

BREDA LOMBARD TOWN PLANNERS



S VAN B LOMBARD

PROF TOWN PLANNER (REG NO. A/700/1992)

cc: BELVIDERE HOMEOWNERS' ASSOCIATION EXECUTIVE COMMITTEE

ECO-ROUTE ENVIRONMENTAL CONSULTANCY

EIA PROCESS



Notification of Public Participation:

**Proposed Development on Portion 76 (A Portion of Portion 54) of Farm 216,
Uitzicht, Knysna, Western Cape**

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998), the National Environmental Management Act: Environmental Impact Assessment Regulations 2014, as amended, of a 30-day Public Participation Process to be undertaken under the authority of the Department of Environmental Affairs and Development Planning (DEA&DP) reference: 14/12/16/3/3/1/3114.

The Public Participation Process will run from 06 March 2025 – 7 April 2025

The following EIA Listed Activities are applicable:

Government Notice No. R324 (Listing Notice 3): Listed Activity 4
Government Notice No. R324 (Listing Notice 3): Listed Activity 12

A Draft Basic Assessment Report and relevant appendices will be sent via email to all registered Interested and Affected Parties/ I&APs for public review and comment. Alternatively, all relevant documents may be accessed via our website during the public participation period: www.ecoroute.co.za

Should you wish to comment on the Draft report, gain further information regarding the project or wish to register as an Interested and Affected Party please contact the Environmental Assessment Practitioner (details below).

Please provide written comments with your name, contact details and an indication of any direct business, financial, personal, or other interest which you may have in the development.

Environmental Assessment Practitioner: Bianca Gilfillan (EAPASA Reg 2023/7929)

P.O. Box 1252, Sedgefield, 6573

Email: bianca@ecoroute.co.za/ admin@ecoroute.co.za

Tel: 064 691 4394

www.ecoroute.co.za

Re: PORTION 76 (A PORTION OF PORTION 54) OF THE FARM UITZICHT 216

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Date Tue 18/03/2025 10:16

To Breda Lombard <breda@bredalombard.co.za>

Cc admin@ecoroute.co.za <admin@ecoroute.co.za>

Good morning, Breda.

I trust that this email finds you well.

I hereby acknowledge receipt of your email.

The link to the relevant documentation available on the website is as follows:

www.ecoroute.co.za/node/107

Thank you for your attention to this matter.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

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Sent: Monday, March 10, 2025 1:45 PM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>

Subject: RE: PORTION 76 (A PORTION OF PORTION 54) OF THE FARM UITZICHT 216



BREDA LOMBARD TOWN PLANNERS

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2. **Kindly forward the draft basic assessment report, inclusive of annexures.**
3. We will thereafter comment on the contents of the draft report.
4. Kindly acknowledge receipt of this e-mail.

Regards

BREDA LOMBARD

PROF TOWN PLANNER

(REG NO. A/700 /1992)

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Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Date Tue 18/03/2025 10:07

To jacques malan <jacques@jacquesdmalan.com>

Cc admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; Vera Carstens <vcarstens0@gmail.com>; Roelof Feenstra <roelof@feenstrainc.co.za>; Henrico Knoesen <henrico@knoesen.com>; Hilton Stroebel <hstroebel@knysna.gov.za>; Susan Campbell <sucam@mweb.co.za>; johan@paradisefound.co.za <johan@paradisefound.co.za>

Goeie more, Jacques.

Baie dankie vir die epos.

Die link vir al die dokumentasie op die webtuiste is soos volg:

www.ecoroute.co.za/node/107

Draft Basic Assessment Report - The Proposed Development on Portion 76 (A Portion of Portion 54) of Farm 216 Uitzicht, Knysna, Western Cape | Eco Route

Portion 76 of the Farm 216 is situated within 1.5 km from Brenton on Sea Residential Area, Knysna Western Cape and the Southern boundary borders the Brenton Beach. The property is 21.01 hectares in extent. The entire property is classed as Critical Biodiversity Area (CBA) which is defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.

www.ecoroute.co.za

Groete

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

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From: jacques malan <jacques@jacquesdmalan.com>

Sent: Tuesday, March 18, 2025 9:43 AM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; Vera Carstens <vcarstens0@gmail.com>; Roelof Feenstra <roelof@feenstrainc.co.za>; Henrico Knoesen <henrico@knoesen.com>; Hilton Stroebel <hstroebel@knysna.gov.za>; Susan Campbell <sucam@mweb.co.za>; johan@paradisefound.co.za <johan@paradisefound.co.za>

Subject: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Hallo Bianca

Stuur asb volledige dokumentasie na my toe oor die bostaande openbare deelname proses. Ek wil dringend daarna kyk.

Ek is betrokke by die Buffelsbaai Inwonersvereniging wat omtrent driekwart van die eienaars verteenwoordig.

En jy kan die Buffelsbaai Inwoners Vereniging (BIV) solank registreer as 'n party tot die ondersoek.

Groete

Jacques Malan
Voorsitter BIV
0824437047

Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Date Tue 18/03/2025 12:45

To johan@paradisefound.co.za <johan@paradisefound.co.za>; 'jacques malan' <jacques@jacquesdmalan.com>

Cc admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebel@knysna.gov.za>; 'Susan Campbell' <sucam@mweb.co.za>

Good afternoon, Johan.

Thank you for the email.

We acknowledge your confirmation as an Interested and Affected Party (I&AP) as outlined in Janet's email dated 22 February. We apologise for any oversight in notifying you and sincerely appreciate your correspondence.

We have received your request for a 30-day period to compile and submit your response, effective from the date of your receipt of the notice. We would like to confirm that the comment period for submitting your comments is extended to April 18, 2025.

Please be assured that you will be included in all future communications concerning this matter.

Please let us know if there is anything further we can assist with.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

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From: johan@paradisefound.co.za <johan@paradisefound.co.za>

Sent: Tuesday, March 18, 2025 12:04 PM

To: bianca@ecoroute.co.za <bianca@ecoroute.co.za>; 'jacques malan' <jacques@jacquesdmalan.com>

Cc: admin@ecoroute.co.za <admin@ecoroute.co.za>; pagtrust@mweb.co.za <pagtrust@mweb.co.za>; 'Vera Carstens' <vcarstens0@gmail.com>; 'Roelof Feenstra' <roelof@feenstrainc.co.za>; 'Henrico Knoesen' <henrico@knoesen.com>; 'Hilton Stroebe' <hstroebel@knysna.gov.za>; 'Susan Campbell'

<sucam@mweb.co.za>

Subject: RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Thank you Bianca,
For some reason I have also not been notified - representing the Western Heads Goukamma Conservancy.
We have been confirmed by e-mail by Janet on 22 February as I&AP.

Please note that we require 30 days from notice to compile our response.

Kind regards
Johan

Johan Labuschagne
Cell +27 83 635 0479
e-mail: johan@paradisefound.co.za
6 Greenhill Lane, Knysna 6571, Garden Route, South Africa

From: bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Sent: Tuesday, 18 March 2025 10:07 AM
To: jacques malan <jacques@jacquesdmalan.com>
Cc: admin@ecoroute.co.za; pagtrust@mweb.co.za; Vera Carstens <vcarstens0@gmail.com>; Roelof Feenstra <roelof@feenstrainc.co.za>; Henrico Knoesen <henrico@knoesen.com>; Hilton Stroebeel <hstroebeel@knysna.gov.za>; Susan Campbell <sucam@mweb.co.za>; johan@paradisefound.co.za
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www.ecoroute.co.za/node/107

[Draft Basic Assessment Report - The Proposed Development on Portion 76 \(A Portion of Portion 54\) of Farm 216 Uitzicht, Knysna, Western Cape | Eco Route](#)

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www.ecoroute.co.za

Groete

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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Subject: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Hallo Bianca

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Ek is betrokke by die Buffelsbaai Inwonersvereniging wat omtrent driekwart van die eienaars verteenwoordig.

En jy kan die Buffelsbaai Inwoners Vereniging (BIV) solank registreer as 'n party tot die ondersoek.

Groete

Jacques Malan
Voorsitter BIV
0824437047

7 April 2025

Bianca Gilfillan
Eco Route Environmental Consultancy
P.O. Box 1252
Sedgefield, 6573

Per email:
admin@ecoroute.co.za
bianca@ecoroute.co.za
janet@ecoroute.co.za

**RE: SANPARKS COMMENTS, DRAFT BASIC ASSESSMENT,
PROPOSED DEVELOPMENT, UITZICHT 216, PORTION 76,
KNYSNA, WESTERN CAPE**

DDFE Reference: 14/12/16/3/3/1/3114

Uitzicht 216 Portion 76 is situated: (1) within the Buffer Zone of the Garden Route National Park (GRNP); (2) within the Knysna Protected Environment (KPE) with the KPE Development Control Area (DCA) extending some 50m into the lower southern section of Portion 76; (3) with the Coastal Management Line (CML) extending for between 70 to 100m in places into the lower southern section. The CML was included in the Knysna Spatial Development Framework, is shown on the Knysna GIS Viewer, and the Western Cape DEA&DP Coastal Management Map Viewer. Risks associated with developing in this area are known and have been published; and (4) within the Coastal Protection Zone (CPZ), as designated in terms of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008) (NEM: ICMA). The CPZ is established to manage, regulate, and restrict the use of land that is adjacent to coastal public property, or that plays a significant role in the coastal ecosystem (**Figs. 1 & 2**).

The high-water mark runs adjacent to the property's southern boundary, and 20-, 50- and 100-Year Erosion Risk Lines have been mapped in proximity (**Fig. 2**).

Two foredunes traverse the lower southern section of the property, which run east-west. Slopes are steep on either side of these foredunes, with many areas classified with a Slope Percentage Class of >30% (**Figs. 3 & 4**).

As the property falls within the KPE, Critical Biodiversity Areas (CBAs) are not mapped in the 2023 Western Cape Biodiversity Spatial Plan (WCBSP), Biodiversity Spatial Plan Map (BSP Map), as adopted on the 13 December 2024 (Gazette Extraordinary 9017).

lai-lais/richtersveld transfrontier

addo elephant

agulhas

augrabies falls

bontebok

camdeboo

golden gate highlands

karoo

kgalagadi transfrontier

knysna

kruger

mapungubwe

marakele

meerkat

mokala

mountain zebra

namaqua

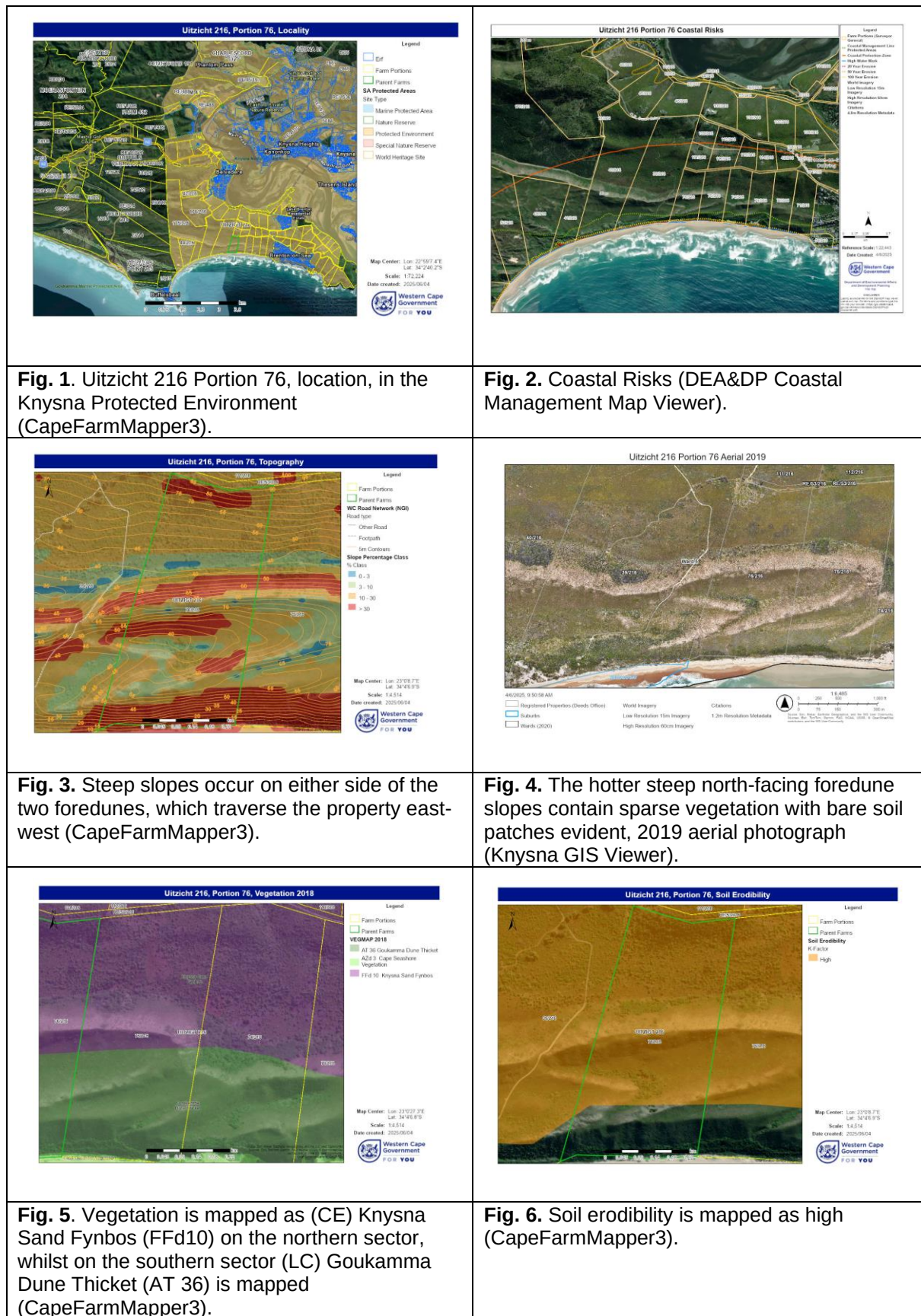
table mountain

tankwa karoo

tsitsikamma

west coast

wilderness



Vegetation is mapped by Mucina and Rutherford, 2006¹ and revised by SANBI, 2018², as (CE) Knysna Sand Fynbos (FFd10) on the northern sector, whilst on the southern sector (LC) Goukamma Dune Thicket (AT 36) is mapped (**Fig. 5**).

Portion 76 is mapped as having a high soil erodibility K-Factor (**Fig. 6**) and an Extreme Veldfire Risk (CapeFarmMapper3).

The property falls within SANParks' protected area expansion footprint and Land Inclusion Plan for the GRNP. It falls within the Western Heads Knysna Sand Fynbos Coastal Corridor, which is the subject of a collaborative conservation initiative being supported by SANParks, CapeNature, Knysna Municipality, the Table Mountain Fund, WWF, the Western Heads Goukamma Conservancy (WHGC), and landowners.

Due to the extremely high conservation value of this corridor, and the threatened loss of the last remaining (CE) Knysna Sand Fynbos, WWF purchased three properties which SANParks manages (Portions 71, 72 and 40) (**Fig. 7**). Several other landowners in this corridor have committed their properties to conservation stewardship and are in various stages of Contract National Park (CNP) commitment. These properties include Portions 46, 39, 74, 75, 106, 109, 111, and 113 (**Fig. 7**). A Contract National Park is an area of privately owned land that is declared as a National Park - landowners retain ownership of their property but commit the property to formal conservation for 99 years and co-manage the property with SANParks. In return, the landowner may derive financial incentives.



Fig. 7. SANParks Contract National Park commitment properties (in various stages of commitment).

¹ Mucina, L. and Rutherford, M.C. (editors) 2006. Vegetation map of South Africa, Lesotho and Swaziland: an illustrated guide. Strelitzia 19, South African National Biodiversity Institute, Pretoria.

² South African National Biodiversity Institute 2018 Final Vegetation Map of South Africa, Lesotho and Swaziland [Vector] 2018.

In summary, some 334ha has been committed to formal CNP conservation (in various stages of the commitment process), a legacy which will extend for 99 years, to benefit future generations. Other properties in the corridor are further under conservation, either privately or with CapeNature stewardship agreements in place, totalling some 154ha. Therefore, approx. 500ha (i.e., 28%) of the last remaining 1750ha of (CE) Knysna Sand Fynbos on the Western Heads is under conservation protection or planned to be conserved. Further concerted efforts to secure the remaining two thirds is required. Achieving a conservation outcome on this property is important to SANParks, and to other key role-players in the area, that have invested considerable time, resources and finances towards conservation in the Western Heads Knysna Sand Fynbos corridor.

The property is zoned Agricultural Zone I, falls outside the Urban Edge, and is 21ha in extent. The Applicant is Midnight Storm Investments 180(Pty) Ltd. The property is vacant, has never been developed previously, and is considered in pristine condition.

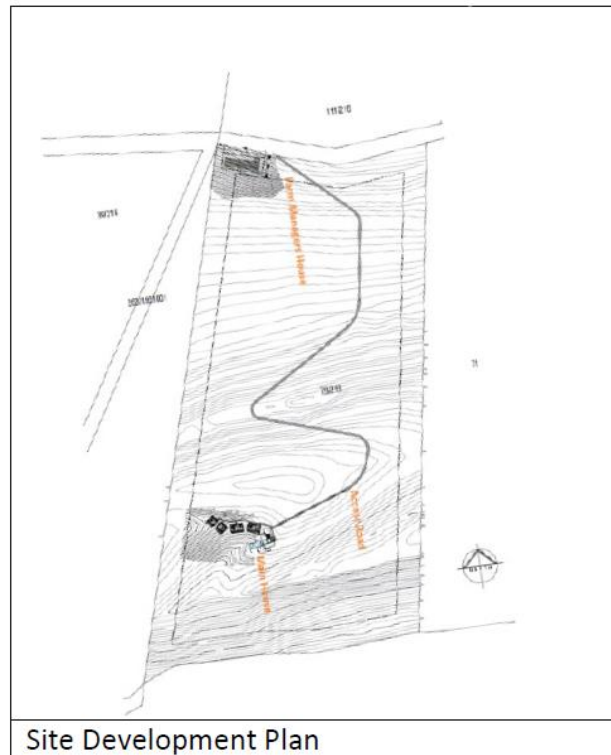
SANParks has provided comments on earlier development applications for Portion 76, key points as extracted include:

(1) Draft Basic Assessment, Objection, 1 October 2020.

The proposal is to exercise the primary land use rights of the property, (i.e. construction of a main farmhouse and farm manager's house). The development proposal entails the following:

- (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²).
- (ii) The construction of one farm manager's house in the north-western corner of the property (600m²).
- (iii) The construction of a new internal road to provide access to the southern portion of the property.

The proposed development is approximately 8 765m² in size. SANParks representatives visited the site on 8 September 2020.



SANParks objects to the proposal for the following reasons:

1. Site Development Plan footprint. The property is in the GRNP potential expansion footprint, as reflected in the approved GRNP Management Plan, and in a CBA in terms of the Western Cape Biodiversity Spatial Plan 2017. SANParks disagrees with the statement below that the areas chosen for development was to have the least negative impact on the environment. The proposed Site Development Plan (6 bed main dwelling with pool, farm managers house and access route) will have an unnecessary significantly negative impact on biodiversity conservation, the sense of place of the area and transform and fragment the Knysna Sand Fynbos Coastal Corridor.
2. Biodiversity Stewardship or long-term conservation outcomes were not discussed in the DBAR. The conservation of the vegetation on the property is of national importance. Without a commitment to consent to the declaration of the property as part of the GRNP or with a Biodiversity Stewardship agreement with CapeNature in place, SANParks will continue to object to the proposed development.
3. Land use rights. SANParks takes note that Marike Vreken urban and environmental planners were appointed to apply for the required land use rights from Knysna Municipality. From the information provided there was no mention of rezoning the natural portion of the property to Open Space Zone III. Further discussion in this regard is required to ensure a long-term conservation outcome. Relaxation of the building line adjacent to Kerk Laan could be supported.

SANParks could support development in the node where the Managers Cottage is proposed adjacent to Kerk Laan, as discussed on-site on 8 September 2020. It would be preferable if all development is consolidated into one area (the area where the farm managers cottage is

proposed) to minimise fragmentation of the landscape and impact on the sensitive fynbos environment.

The applicant should be reminded that the main objective of Priority Natural Areas and CBAs is to maintain it in a natural or near natural state, with no further loss of natural habitat. Only low impact, biodiversity sensitive land uses are appropriate. The property is currently pristine and was not previously developed.

SANParks request to meet with the landowners to discuss a way forward that can benefit biodiversity conservation and allow for low impact development without the need for a road over the pristine dunes. The current proposal will set a very bad precedent for potential development of other properties in the Knysna Sand Fynbos Coastal Corridor. The properties on both side of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023.

(2) Draft Basic Assessment, Follow-up Comment, 26 January 2021.

SANParks objected to the proposed development on 1 October 2020. A site visit with the landowners and EAP took place on 4 January 2021. Key points discussed:

1. Proposed footprint of the main house. The landowners were not willing to change the proposed footprint of the main house to a position adjacent to Kerk Laan. They were willing to move the house to reduce visual impact in the level area behind the frontal dune.
2. Proposed road over the sand dunes. SANParks continue to object to the construction of a road over the sand dunes. The landowners indicated that their preferred option is to use Susan Campbell's road for access. They could use Kerk Laan and access via the gate and use the steep section of the Campbell road. The proposed option to use the Campbell road will reduce the negative impact on biodiversity but will necessitate a new section of road to be constructed on the Campbell property and over Portion 76.

3. Maretha Alant met with Susan Campbell. Ms Campbell is opposed to providing access for the proposed development over her land.
4. Footpath to the beach. Portion 76 of Farm Uitzicht 216 has a steep gradient to the beach and a footpath is not proposed in the BAR.
5. Drilling for water required. The proposal is that water will be supplied by a borehole. Bringing drilling equipment to the proposed site for the main house will have a negative impact on biodiversity. Previous attempts to drill for water in the area (Investec) yielded poor return.
6. Contract National Park footprint. The property is in the priority protected area expansion footprint, in the Western Heads coastal ecological corridor, that can potentially link the Goukamma Nature Reserve with the Knysna Estuary. The property was included in the South African National Parks Land Inclusion Plan for the period 2020 – 2023 for the Garden Route National Park (GRNP). The landowners may be interested in incorporating the property into the GRNP but more information is required from SANParks. SANParks will further engage with the landowners when our draft documents are in place.



Proposed location of main house in flat area with high biodiversity value



Area for the proposed main house in foreground



SANParks continue to object to the construction of a road over the sand dunes



Portion 76 of Farm Uitzicht 216 has a steep gradient to the beach and a footpath is not proposed in the BAR.



Susan Campbell's road

A follow up fieldtrip with SANParks and the Southern Cape Fire Protection Association (FPA) present took place on 9 January 2021. Key points discussed:

- Development adjacent to Kerk Laan. Developing the main house in a disturbed area adjacent to Kerk Laan will have the least negative impact on biodiversity and landscape functionality. Other advantages are that the drilling equipment and construction vehicles will have easy access to the site via an existing road.
- Development in the low lying area, over the two sand dunes or using the Campbell road, will compromise landscape functionality and set a bad precedent. It will create fragmentation of a pristine coastal corridor.



Disturbed area adjacent to Kerk Laan suitable for development

- Fire management. The landowners are members of the Southern Cape FPA. It is possible to make fire breaks to protect infrastructure at the landowners preferred location for the main house. However, Kerk Laan could act as a firebreak if it is widened and slashed. In a case of emergency, it would be less risky to evacuate people from Kerk Laan than in a fynbos corridor with tricky access for fire trucks. The Campbell road and the new section of road that would need to be constructed from Campbell road to preferred site would not be ideal roads for the Knysna Fire Department as their trucks would struggle to gain access easily to the house. However, Kerk Laan would be a much easier access point for fire trucks and this should be considered for fire safety in this fire-prone area. Conducting an ecological burn in future will also be more risky with infrastructure developed in the fire path. The June 2017 fire and the ecological burn executed on 15 May 2017, that slowed the fire down dramatically before it reached Brenton, is still fresh in our memories. A functional Fire Management Unit in the Knysna Sand Fynbos will be desirable as there will be future fires.
- Conservation value of property. More than 50% of the property contains Knysna Sand Fynbos and the entire property is a Critical Biodiversity Area (CBA). Although the Kerk Laan area is located in Knysna Sand Fynbos the transformation footprint can be limited with a good Site Development Plan and the current landscape functionality corridor will be maintained. Knysna Sand Fynbos type hosts threatened plant species and five threatened butterfly taxa (Mecenero *et al.* 2013), including CE taxa *Orachrysops niobe* (Brenton Blue) and *Thestor brachycerus* and is poorly protected. The original extent of Knysna Sand Fynbos was 15 355 ha. The remaining natural extent is 1 478 ha (9.6%) and the Western Cape target is 3 531ha (23%). The Knysna Sand Fynbos asset is in deficit. Knysna Sand Fynbos is not only endemic to the Western Cape, but it is also confined to a very specific and limited geographical area along the Garden Route coast (only found from the coastal flats from Wilderness, generally to the north of the system of lakes, several patches around the Knysna Lagoon, with more isolated patches eastwards to the Robberg peninsula near Plettenberg Bay). There is excellent landscape heterogeneity on the property.

In summary, from a biodiversity conservation, landscape functionality and integrated fire management perspective developing the main house adjacent to Kerk Laan is the preferred alternative for SANParks. Developing in the core of the Knysna Sand Fynbos Coastal Corridor will set a very bad precedent and contribute to a loss of biodiversity and landscape fragmentation. The properties on both side of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023. SANParks will continue to object to the access road over the sand dunes.

Due to SANParks ongoing CNP work in the corridor, SANParks is familiar with the property, and has visited it and adjacent properties several times over the years (**Figs. 8 & 9**).



Fig. 8. View from neighboring Uitzicht 216, Portion 39 towards landward foredune on Portion 76.



Fig. 9. View from neighboring Uitzicht 216, Portion 39 towards seaward foredune on Portion 76, showing valley between the two foredunes.

The current development proposal as extracted from the Draft Basic Assessment Report (DBAR), EcoRoute Environmental Practitioners, January 2025, entails:

Proposed Development:



The **preferred alternative**: The development proposal entails the following:

- (i) The construction of one (x1) main dwelling house to be situated in the southwestern corner of the property (3000m²).
- (ii) The construction of a new internal road to provide access to the southern portion of the property.

The Main Dwelling House

The primary dwelling unit will be situated in the south-western portion of the property consisting of the following inter-leading room's ±3000m²:

- 6 Bedrooms.
- Open plan living area consisting of the kitchen, lounge area, dining area, kitchen, bar, scullery, bathroom and wine cellar.
- Open deck and swimming pool.

The Internal Road

The internal road will be 830 meters in length. The road surface area will be 2.5 meters wide and the disturbed area for construction of the road varies between 4 to 5.5 meters wide. The internal road is to access the southwestern side of the property.



Alternative 1: The development proposal entails the following:

- (iii) The construction of one (x1) main dwelling house to be situated in the southwestern corner of the property (4000m²).
- (iv) The construction of one (x1) farm manager's house in the northwestern corner of the property (1200m²).

- (v) The construction of a new internal road to provide access to the southern portion of the property.

Note: Inconsistencies with naming of alternatives occurs throughout the documents provided. Text refers to Alternative 1 yet plans refer to this alternative as Alternative 2. This is very confusing for readers.

The Farm Manager's House

The Dwelling house to be situated in the north-western corner will encroach the prescribed 30m building line, and therefore an application must be made for a permanent departure for the relaxation of the northern and western building lines.

The main reason why the house encroaches on the prescribed building line is to prevent unnecessary disturbance of sensitive, pristine fynbos. The proposed footprint in the building line area is an existing transformed area, and consists of the following:

- Ground Floor: 600m²
- First Floor: 400m²
- Footprint: 600m²
- Disturbance area: 1200m²

The No Go Alternative

The proposed redevelopment of Portion 76 of the Farm Uitzicht 216 will remain unutilised and vacant, thereby restricting the landowner's ability to exercise their right to construct a residential dwelling.

Servicing:

Electricity

There is currently **no electrical infrastructure** present on the farm or in the adjacent road reserve to the north. It is advisable to consider the installation of a solar power facility in this location.

Solar plant

Solar plant

Type and system

The solar plant will be developed as an off-grid installation, utilizing solar energy to supply the load during daylight hours while recharging the batteries at night. Furthermore, grid-tied photovoltaic inverters may be integrated into this micro-grid configuration through AC coupling, should the energy demand surpass the generation capacity.

Plant location

It is advisable to consider the installation of a **roof-mounted solar power system on the roofs of both the main residence and the adjacent outbuilding units**, should there be a requirement for increased energy generation capacity. The northern-facing roof of the main residence, which has an approximate area of 46 square meters, is capable of accommodating approximately 23 solar panels, providing a total capacity of 7 kilowatts.

Plant capacity

The proposed system is designed with a capacity of 15 kWh, while the anticipated peak consumption is estimated to reach 30 kWh per day.

Water Reticulation

The applicant proposes to supply water for the development by means of the following:

- **Installing boreholes – an application for a water licence will have to be submitted to Breede- Gouritz Catchment Management Agency.**
- A substantial proportion of the water demand will be addressed through the collection of rainwater. The aggregate roof area totals 842 m² and given the average annual rainfall of 500 mm in the Knysna region, this system is estimated to supply approximately 421 kilolitres (kl) of rainwater. It is important to note that this rainwater collection will only meet around 87% of the total water demand.
- The main building will make provision for 110kl rainwater/borehole storage.

Water Reticulation

The proposed development lacks a bulk water network and will **serve as holiday accommodation for a maximum of twelve people, assumed to be occupied for 200 days a year.**

Water demand is 480,000 litres (480 kilolitres) annually. Rainwater collection from 842 square meters of roof space will provide about 421,000 litres (421 kilolitres), covering 87% of the demand. To make up for the shortfall, boreholes will be drilled, which can also serve as storage when powered by on-site generators. The main building will have a storage capacity of 110 kilolitres.

Fire

This development is **categorized as low-risk and falls within Group 2: residential areas (residential zone 1).** In these designated areas, the gross floor area of dwelling houses, including any associated outbuildings, is typically expected to range between 100 square meters and 200 square meters, in accordance with the "Guidelines for

Sewer Reticulation

At this time, municipal bulk sewer services are not available in this area. Following consultation with the Technical Department of Knysna Municipality, it has been determined that the implementation of **septic tanks with soakaways** is a viable option for managing effluent in this locality.

The above information was obtained from the Engeolab desktop investigation, Geophysical investigation & Feasibility Assessment into groundwater abstraction dated October 2018 and the Civil Services Report dated 2018.

Internal Stormwater

The stormwater will not be accumulated or concentrated at any point but will be allowed to drain naturally over the sandy surface. Care will be taken when designing the access road to ensure that stormwater is properly addressed, according to SUDS principles.

Point 1: Development on the Foredunes and within a Coastal Risk Area Coastal Protection Zone

The CPZ is defined in Section 16 of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008) (NEM: ICMA). The Western Cape DEA&DPs, “Western Cape Provincial Coastal Management Programme 2022 – 2027”, further summarises aspects of the CPZ as follows.

Feature	Constituents	Characteristics/Purpose
The Coastal Protection Zone	▪ Sensitive coastal areas, as declared in terms of Section 21 of the Environment Conservation Act (Act No. 73 of 1989); ▪ Any part of the littoral active zone that is not coastal public property; ▪ Any coastal protected area, or part of such area, which is not coastal public property. ▪ Any rural land situated wholly or partially within one kilometre of the High-Water Mark (HWM) which is zoned as agricultural or undetermined; ▪ Any urban land unit that is situated completely or partly within 100 metres of the HWM; ▪ Any coastal wetland, lake, lagoon or dam which is situated completely or partially within a land unit situated within 1000 metres of the HWM that was zoned for agricultural or undetermined use, or is within 100 metres of the HWM in urban areas; ▪ Any part of the seashore which is not coastal public property (including all privately owned land below the HWM); ▪ Any Admiralty Reserve which is not coastal public property; and ▪ Any land that would be inundated (submerged or covered) by a 1:50 year flood or storm event (this includes flooding caused by both rainstorms and rough seas).	▪ To protect the ecological integrity, natural character, and the economic, social and aesthetic value of the neighbouring coastal public property; ▪ To avoid increasing the effect or severity of natural hazards ▪ To protect people, property and economic activities from the risks and threats which may arise from dynamic coastal processes such as wave and wind erosion, coastal storm surges, flooding and sea-level rise. ▪ To maintain the natural functioning of the littoral active zone. ▪ To maintain the productivity of the coastal zone; and ▪ To allow authorities to perform rescue and clean-up operations.

8	Implementation of land use legislation in coastal protection zone	Section 62 of the NEM: ICMA obliges any organ of state that is implementing any legislation that regulates the planning or development of land, in a manner that conforms to the principles of cooperative governance contained in Chapter 3 of the Constitution, apply that legislation in relation to land in the coastal protection zone in a way that gives effect to the purposes for which the protection zone is established as set out in Section 17 of the NEM: ICMA. Furthermore, SPLUMA requires that a land use scheme must comply with environmental legislation.
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Uitzicht 216, Portion 76 falls entirely in the CPZ (Fig.2), therefore careful environmentally sensitive decision-making must be made for any proposed development on this property.

As the property falls within the 1km high-water-mark, this has further implications for agricultural worker accommodation, in terms of the Knysna Municipality: Zoning Scheme By-law, 29 June 2020:

“agricultural worker accommodation”

Land use description: “*agricultural worker accommodation*” means accommodation provided for bona fide agricultural workers, including accommodation for labourers and farm managers, as determined by the Municipality based on the extent of the bona fide agricultural activities on the land unit.

Development parameters:

The development parameters applicable to “*agriculture*” apply with the following additional development parameters:

- (a) the number of units must be reasonably connected to the bona fide agricultural activities on the land unit; and
- (b) no agricultural worker accommodation may be erected within 1 km of the high-water mark of the sea or a tidal river.

Confirmation on the allowance of a second dwelling for a farm manager must be sought from the Knysna Municipality.

Garden Route National Park Coastal Management Line

The Coastal Management Line for the Garden Route National Park was established in GNR. No. 3668, 14 July 2023, in terms of NEM: ICMA. Section 4 describes development risk management measures applicable for new infrastructure seaward of the CML and existing infrastructure in areas at risk to dynamic coastal process. The new and existing infrastructure provisions are what is being applied to SANParks infrastructure. SANParks encourages that these measures be applied to private property adjacent to SANParks land. It must be noted that several properties which border Portion 76, are Contract National Park committed properties, which will legally be declared as part of the park.

The CML extends for between 70 to 100m in places into the lower southern section of Portion 76.

Knysna Protected Environment Development Control Area

SANParks is responsible for the Proper Administration of the Knysna Protected Environment (KPE) (GN 1175 of 2009) Regulations, and for the authorisation of any development (as defined in the Regulations) in the DCA, as per Section 8. The KPE DCA extends 50m from the high-water mark into Portion 76 (Fig 2), and as such SANParks’ authorisation is required for any development to proceed in this area.

As per Section 9 and 10 of the KPE Regulations SANParks may request additional studies to be undertaken, should it be deemed that these are required.

Dune Stability, Coastal Erosion & Climate Change Resilience

SANParks does not support and objects to any development and infrastructure on the two foredunes situated in the southern section of Portion 76.

The stability of the foredunes is a concern. Dune slumping on the seaward foredune of Portion 72 has recently occurred (2023 – 2024) (Fig. 10), and blowouts are evident on Portion 73 and 74 (Fig. 11). These dune areas could be deemed littoral active zones, being unstable and dynamic because of natural processes.

Conserving the seaward foredune and ensuring that it remains free from development is a necessary climate change resilience strategy. Any development on this active foredune would be at risk as coastal erosion impacts intensify in the future with climate change. It would be difficult to defend such development from coastal erosion, given the unstable steep dune slopes, erodibility, and slumping potential. The effects of climate change are already being experienced along this stretch of coast (Fig. 12).



Fig. 10. Recent dune slumps (2023-2024) evident on the seaward foredune, Portion 72.

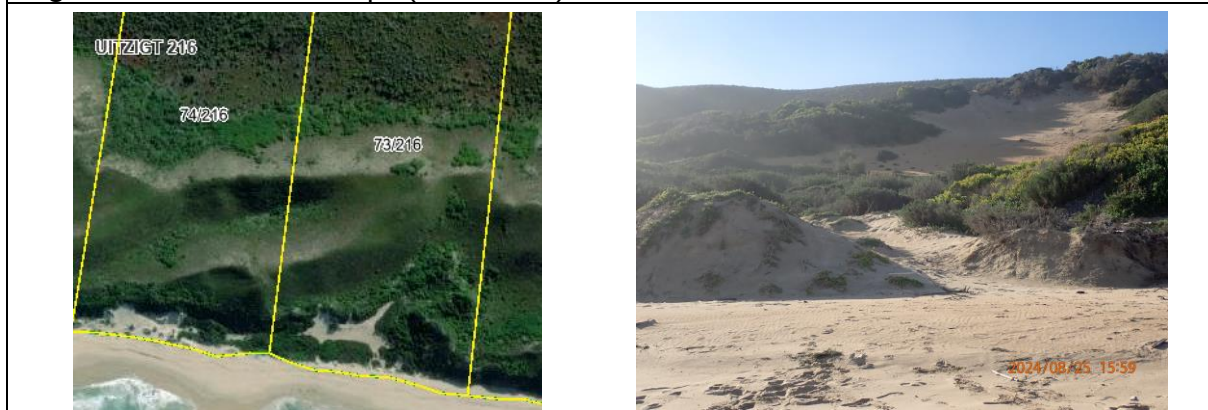


Fig. 11. Two blowouts are evident on the seaward foredune, Portions 73 & 74.

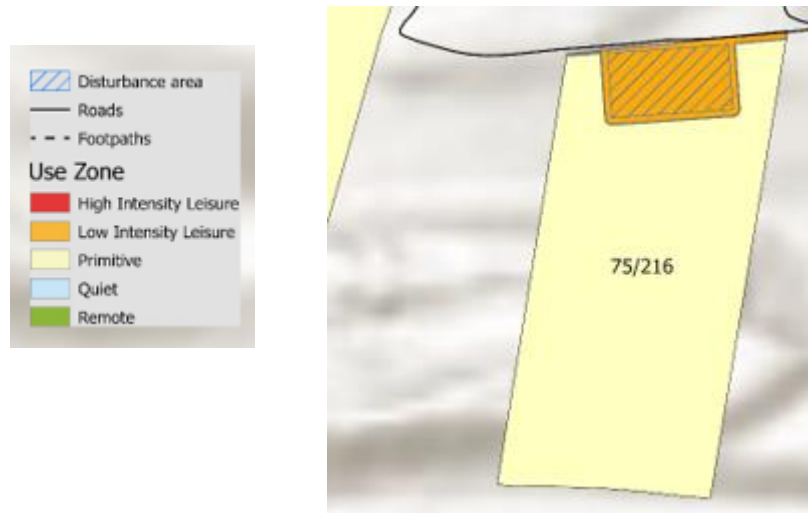


Fig.12. September 2023 storm surge, which washed away the Brenton on Sea beach walkway.

Point 2: Knysna Sand Fynbos Corridor: Development Options Supported

As stated, several adjoining and adjacent properties are in various stages of SANParks CNP stewardship commitment with landowners. Many of these landowners have intentions to exercise their primary development rights, which SANParks supports. Part of the CNP process involves formulating a Property Operational Plan for co-management with SANParks and the landowner. A component of this is the drafting of a Zonation Plan, based on park zonation principals, as the property is eventually declared as part of the park. The Zonation Plan sets out which portions of the property may be developed, and what activities may take place in the various areas of the property.

SANParks' position for properties situated seaward of Church Street is to allow only a development area situated directly adjacent to Church Street, in which a primary dwelling is permitted, and if approved by the Knysna Municipality, a second managers house may be permitted, however this must be placed in this same development area. No development is supported lower down the property, and on the foredunes, and no roads may be constructed through the property to the foredunes. Approved hiking paths, a beach access path, and a small sea viewing deck of approximately 25m² maximum may be permitted. An example of a Zonation Plan, which was prepared for the previous landowner of Portion 75 is as follows:



SANParks supports a clustered layout approach for dwelling/s and infrastructure placement. A diffuse layout approach that fragments the landscape is not supported. This approach is applied throughout the corridor. The only exception to this position, is Portion 39, which has a road constructed across the foredunes and a dwelling situated behind the seaward foredune. It must however be noted that Portion 39 has been owned by the same landowners since 1972, and the road was formalised from 1980 to 1990, and the dwelling was pre-existing, prior to the EIA Regulations, which were enacted in 1997. The dwelling burnt down in the 2017 fires and municipal approval was attained to re-build it. SANParks will not support any new developments of this nature in the corridor.

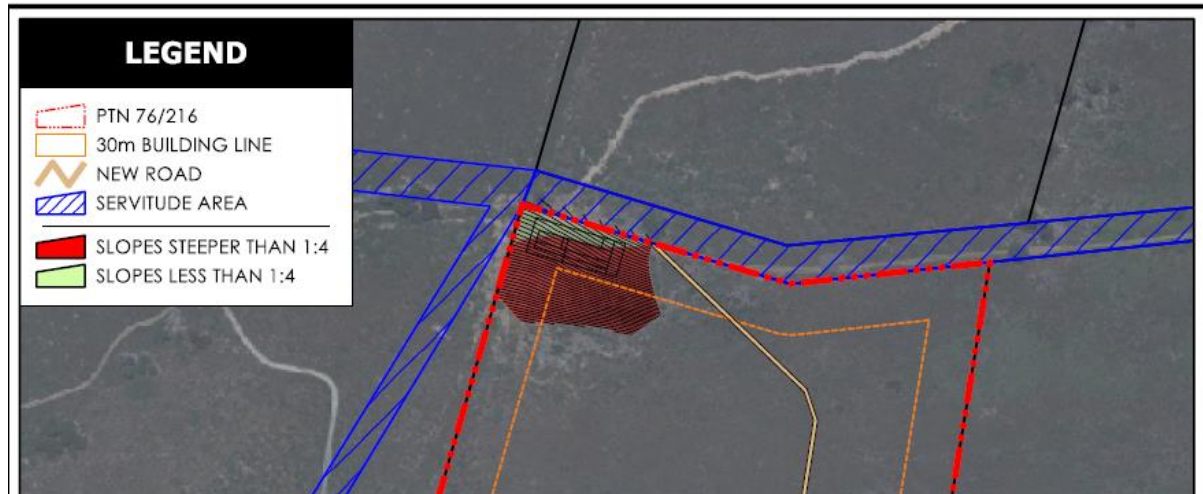
SANParks' position is not only based on the need to prevent landscape fragmentation and biodiversity loss, and support landscape connectivity and functioning, but is further intended to retain tranquillity and a sense of place across the conservation corridor.

Therefore, based on the above, SANParks does not support and objects to the preferred layout. SANParks does not support the construction of a road across the foredunes and the construction of a house on the foredunes. Further, the disturbance/ building footprint areas suggested (main dwelling approx. 3000m², and road approx. 4565m², total 7565m²) are excessive and underestimated.

Likewise, SANParks does not support Alternative 2. This alternative would have a greater negative impact, as disturbance/ building footprint areas are greater (main dwelling approx. 4000m², farm managers house 1200m², and road approx. 4565m², total 9765m²) with two disturbance areas proposed on the northern and southern section of the property, with a road access the foredunes.

It is unclear whether the areas provided refer to building footprint area or to disturbance areas. If referring to a building footprint area, the actual disturbance area may in fact be double/ triple. No area calculations have been provided for embankments, water tanks, garages, storage areas, vegetable gardens etc.

SANParks will only support development close to Church Street, as extracted from Alternative 2 layout below:



Point 3: Infrastructure

Water

Should the landowner require borehole water the following should be noted:

In terms of the National water Act, 1998 (Act No. 36 of 1998), Revision of General Authorisations for the Taking and Storing of Water, GNR. No 40243, 2 September 2016, Section 2.3; a Water Use License (WUL) may be required due to the property being situated within 500m from the high-water mark of the ocean.

Section 2.3 states the following exclusions from General Authorisations:

2.3. Geographical area and water resources to which the authorisation applies

Except where stated differently in the notice this authorisation applies to all land and all water resources in South Africa, subject to the following exclusions:

1. No water that is taken in terms of this authorisation may be taken within a 500 metre radius from the boundary (delineated edge) of a wetland, pan or estuary.
2. No groundwater that is taken in terms of this authorisation may be taken within a 500 metre radius from the boundary of a wetland or estuary, within a 100 metre radius from the delineated riparian edge of a water course or a state dam, within a 500 metre radius of a state dam wall or within 500 metres from the high-water mark of the ocean.

Further a WUL may be required, if water demand for the primary supply is >1kl/da/ha (>1kl/day/ha which is permitted for general usage). Confirmation from the relevant Competent Authority should be sought.

Sewerage

SANParks is not in support of septic tanks. Cleaner environmentally friendly options should be investigated.

Electricity

SANParks supports the use of solar panels, however these should be positioned so as not to face east/ west to minimise glare and reflections. Similarly glare from windows should be minimised.

Point 4: Alien Invasive Species and Fire Management

The landowner's attention is drawn to the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEM:BA) Alien and Invasive Species Regulations, 25 September 2020, where a landowner is legally responsible for the removal of alien vegetation on their property. SANParks requests sight of the required Invasive Species Control Plan (ISCP), and clarity on whether this has been submitted to and approved by the Department of Forestry Fisheries and the Environment (DFFE). SANParks seeks confirmation on whether alien clearing if any has occurred on the property.

Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. SANParks requires clarity on whether the landowner is a member of the Southern Cape Fire Protection Association (SCFPA), and whether the necessary legally required firebreaks, agreements and/or exemptions are in place.

SANParks stands firm on previous comments made regarding fire.

- **Fire management.** The landowners are members of the Southern Cape FPA. It is possible to make fire breaks to protect infrastructure at the landowners preferred location for the main house. However, Kerk Laan could act as a firebreak if it is widened and slashed. In a case of emergency, it would be less risky to evacuate people from Kerk Laan than in a fynbos corridor with tricky access for fire trucks. The Campbell road and the new section of road that would need to be constructed from Campbell road to preferred site would not be ideal roads for the Knysna Fire Department as their trucks would struggle to gain access easily to the house. However, Kerk Laan would be a much easier access point for fire trucks and this should be considered for fire safety in this fire-prone area. Conducting an ecological burn in future will also be more risky with infrastructure developed in the fire path. The June 2017 fire and the ecological burn executed on 15 May 2017, that slowed the fire down dramatically before it reached Brenton, is still fresh in our memories. A functional Fire Management Unit in the Knysna Sand Fynbos will be desirable as there will be future fires.

Point 5: Summary and Way Forward

In summary, SANParks does not support and objects to the Preferred and Alternative layouts. SANParks does not support the construction of a road across the foredunes and the construction of a house on the foredunes. SANParks will only support a disturbance area directly adjacent to Church Street, where a primary dwelling and managers house if permitted by the Knysna Municipality may be constructed.

This is in line with SANParks position for development in the Western Heads Knysna Sand Fynbos corridor, which is being applied to directly adjacent and neighbouring properties to Portion 76, which are under CNP stewardship commitment, in various phases of commitment. SANParks will not deviate from this position.

The lower southern section of Portion 76 is considered particularly sensitive: the CML extends some 70 to 100m in; the high-water-mark adjoins the southern property boundary; dune stability, coastal erosion, and climate change resilience are concerns; the property in its entirety falls within the CPZ; and the KPE Development Control Area extends 50m into the property. Authorisation of any development in the Development Control Area is required from SANParks as per Section 8 of the KPE Regulations.

In terms of infrastructure: a Water Use License may be required due to the property being situated within 500m of the high-water mark of the ocean; SANParks is not in support of septic tanks; and solar panels and windows must be positioned to reduce glare.

SANParks requests sight of the required Invasive Species Control Plan, and clarity on whether this has been submitted to and approved by the Department of Forestry Fisheries and the Environment. SANParks seeks confirmation on whether alien clearing if any has occurred on the property.

Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. SANParks requires clarity on whether the landowner is a member of the Southern Cape Fire Protection Association, and whether the necessary legally required firebreaks, agreements and/or exemptions are in place. In terms of fire management, development close to Church Street is more desirable than development lower down the property and on the foredunes.

Should the landowner wish to place Portion 76 into CNP stewardship with SANParks, the property would qualify, and the landowner could benefit from financial incentives. SANParks is willing to provide information and have further discussions should the landowner be interested.

It is requested that SANParks' full comments letter be included in the body of the Draft Basic Assessment Report, and not only in a Comments and Responses table.

SANParks reserves the right to revise initial comments if additional information becomes available.

Yours sincerely



Dr Vanessa Weyer
Principal Planner
SANParks Garden Route National Park

CC:	André Riley	SANParks
	Pat Bopape	SANParks
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	Arnelle Collison	SANParks
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	Danie Swanepoel	WC DEADP
	Caren George	WC DEADP
	Pam Booth	Knysna Municipality
	Hennie Smit	Knysna Municipality
	Johan Labuschagne	WHGC



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

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Reference: Farm Uitzigt 216, Knysna Residential Development

Enquiries: Ms M Rabothata

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Eco Route Environmental Consultancy
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PER E-MAIL

Dear Ms. Gilfillan

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT ON PORTION 76 (A PORTION OF PORTION 54) OF FARM 216 UITZICHT, KNYNSA, WESTERN CAPE

The Directorate: Biodiversity Conservation reviewed and evaluated the aforementioned report.

Based on the information provided in the report, the terrestrial biodiversity sensitivity of this site is classified as Very High due to a significant area of remaining natural vegetation, specifically Knysna Sand Fynbos, which is Critically Endangered (CR) and located north of the large barrier dune. This area faces threats from invasive species, particularly pines. The southern section consists of sensitive habitat, characterized by a strandveld-fynbos mosaic with thicket patches in fire refugia, including dune bases and crests. Additionally, the site is designated as a Critical Biodiversity Area 1 (CBA1) and serves as an important ecological corridor along the coastline. It is rated as High for terrestrial plant species sensitivity, as it hosts several Species of Conservation Concern (SCC), with notable spatial variation in their distribution across the site.

Approximately 5 kilometres from the site are several protected areas, including the Brenton Blue Butterfly Special Nature Reserve, established in July 2003 for a Critically Endangered species (CR PE). Other nearby protected areas include the Skuilte and Featherbed Private Nature Reserves, Pledge Nature Reserve, and Goukamma Provincial Nature Reserve, along with its Marine Protected Area.



Batho pele- putting people first



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COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT ON PORTION 76 (A PORTION OF PORTION 54) OF FARM 216 UITZICHT, KNYNSA, WESTERN CAPE

Notwithstanding the above, the following recommendations must be considered in the final report:

- SANParks and CapeNature must be consulted, and their comments be considered and included in the final report.
- DFFE Directorate: Protected Areas Planning and Management Effectiveness must be added to the key stakeholder list and be consulted for comments at email: mamudau@dfre.gov.za for attention of **Ms. Mashudu Mudau**. In addition, the comments must be obtained from the reserves management authority.
- Prevent the loss and fragmentation of vegetation communities and the CBA areas in the vicinity of the study area. Developments are not permitted on CBA irreplaceable.
- The Alien Invasive Plant Species Management Plan and Rehabilitation Plan must be developed and submitted as part of the final report to mitigate habitat degradation due to erosion and alien plant invasion.
- The BAR must comply with "Procedures to be followed for the assessment and minimum criteria for reporting of identified environmental themes in terms of section 24(5) (a) and (h) of the National Environmental Management Act, 1998, when applying for Environmental authorisation.
- No detailed biodiversity study has been done for rare and threatened plants and animals, as is required in the legislation. The Terrestrial Biodiversity Assessment study which is underway must be submitted with the final report for review.

All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for attention of **Mr Seoka Lekota**.

Yours faithfully



Mr. Seoka Lekota
Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Forestry, Fisheries & the Environment
Date:09/04/2025

7 April 2025

Bianca Gilfillan
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Per email:
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**RE: SANPARKS COMMENTS, DRAFT BASIC ASSESSMENT,
PROPOSED DEVELOPMENT, UITZICHT 216, PORTION 76,
KNYSNA, WESTERN CAPE**

DFFE Reference: 14/12/16/3/3/1/3114

Uitzicht 216 Portion 76 is situated: (1) within the Buffer Zone of the Garden Route National Park (GRNP); (2) within the Knysna Protected Environment (KPE) with the KPE Development Control Area (DCA) extending some 50m into the lower southern section of Portion 76; (3) with the Coastal Management Line (CML) extending for between 70 to 100m in places into the lower southern section. The CML was included in the Knysna Spatial Development Framework, is shown on the Knysna GIS Viewer, and the Western Cape DEA&DP Coastal Management Map Viewer. Risks associated with developing in this area are known and have been published; and (4) within the Coastal Protection Zone (CPZ), as designated in terms of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008) (NEM: ICMA). The CPZ is established to manage, regulate, and restrict the use of land that is adjacent to coastal public property, or that plays a significant role in the coastal ecosystem (**Figs. 1 & 2**).

The high-water mark runs adjacent to the property's southern boundary, and 20-, 50- and 100-Year Erosion Risk Lines have been mapped in proximity (**Fig. 2**).

Two foredunes traverse the lower southern section of the property, which run east-west. Slopes are steep on either side of these foredunes, with many areas classified with a Slope Percentage Class of >30% (**Figs. 3 & 4**).

As the property falls within the KPE, Critical Biodiversity Areas (CBAs) are not mapped in the 2023 Western Cape Biodiversity Spatial Plan (WCBSP), Biodiversity Spatial Plan Map (BSP Map), as adopted on the 13 December 2024 (Gazette Extraordinary 9017).

lai-lais/richtersveld transfrontier

addo elephant

agulhas

augrabies falls

bontebok

camdeboo

golden gate highlands

karoo

kgalagadi transfrontier

knysna

kruger

mapungubwe

marakele

meerkat

mokala

mountain zebra

namaqua

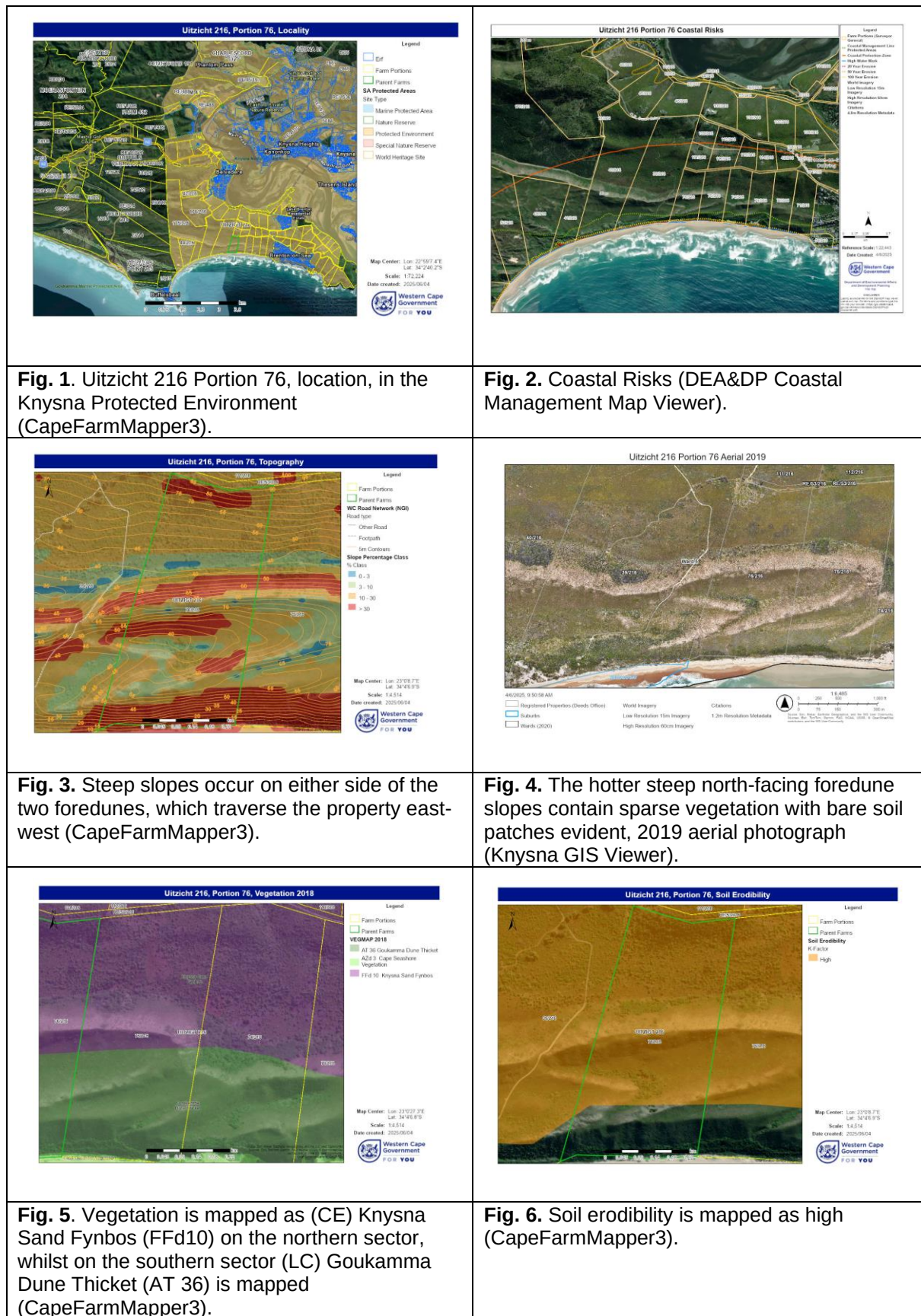
table mountain

tankwa karoo

tsitsikamma

west coast

wilderness



Vegetation is mapped by Mucina and Rutherford, 2006¹ and revised by SANBI, 2018², as (CE) Knysna Sand Fynbos (FFd10) on the northern sector, whilst on the southern sector (LC) Goukamma Dune Thicket (AT 36) is mapped (**Fig. 5**).

Portion 76 is mapped as having a high soil erodibility K-Factor (**Fig. 6**) and an Extreme Veldfire Risk (CapeFarmMapper3).

The property falls within SANParks' protected area expansion footprint and Land Inclusion Plan for the GRNP. It falls within the Western Heads Knysna Sand Fynbos Coastal Corridor, which is the subject of a collaborative conservation initiative being supported by SANParks, CapeNature, Knysna Municipality, the Table Mountain Fund, WWF, the Western Heads Goukamma Conservancy (WHGC), and landowners.

Due to the extremely high conservation value of this corridor, and the threatened loss of the last remaining (CE) Knysna Sand Fynbos, WWF purchased three properties which SANParks manages (Portions 71, 72 and 40) (**Fig. 7**). Several other landowners in this corridor have committed their properties to conservation stewardship and are in various stages of Contract National Park (CNP) commitment. These properties include Portions 46, 39, 74, 75, 106, 109, 111, and 113 (**Fig. 7**). A Contract National Park is an area of privately owned land that is declared as a National Park - landowners retain ownership of their property but commit the property to formal conservation for 99 years and co-manage the property with SANParks. In return, the landowner may derive financial incentives.



Fig. 7. SANParks Contract National Park commitment properties (in various stages of commitment).

¹ Mucina, L. and Rutherford, M.C. (editors) 2006. Vegetation map of South Africa, Lesotho and Swaziland: an illustrated guide. Strelitzia 19, South African National Biodiversity Institute, Pretoria.

² South African National Biodiversity Institute 2018 Final Vegetation Map of South Africa, Lesotho and Swaziland [Vector] 2018.

In summary, some 334ha has been committed to formal CNP conservation (in various stages of the commitment process), a legacy which will extend for 99 years, to benefit future generations. Other properties in the corridor are further under conservation, either privately or with CapeNature stewardship agreements in place, totalling some 154ha. Therefore, approx. 500ha (i.e., 28%) of the last remaining 1750ha of (CE) Knysna Sand Fynbos on the Western Heads is under conservation protection or planned to be conserved. Further concerted efforts to secure the remaining two thirds is required. Achieving a conservation outcome on this property is important to SANParks, and to other key role-players in the area, that have invested considerable time, resources and finances towards conservation in the Western Heads Knysna Sand Fynbos corridor.

The property is zoned Agricultural Zone I, falls outside the Urban Edge, and is 21ha in extent. The Applicant is Midnight Storm Investments 180(Pty) Ltd. The property is vacant, has never been developed previously, and is considered in pristine condition.

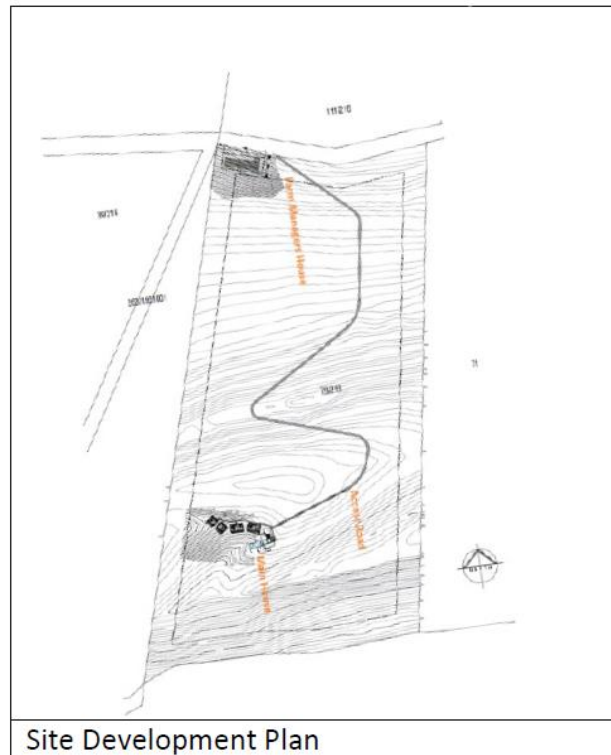
SANParks has provided comments on earlier development applications for Portion 76, key points as extracted include:

(1) Draft Basic Assessment, Objection, 1 October 2020.

The proposal is to exercise the primary land use rights of the property, (i.e. construction of a main farmhouse and farm manager's house). The development proposal entails the following:

- (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²).
- (ii) The construction of one farm manager's house in the north-western corner of the property (600m²).
- (iii) The construction of a new internal road to provide access to the southern portion of the property.

The proposed development is approximately 8 765m² in size. SANParks representatives visited the site on 8 September 2020.



SANParks objects to the proposal for the following reasons:

1. Site Development Plan footprint. The property is in the GRNP potential expansion footprint, as reflected in the approved GRNP Management Plan, and in a CBA in terms of the Western Cape Biodiversity Spatial Plan 2017. SANParks disagrees with the statement below that the areas chosen for development was to have the least negative impact on the environment. The proposed Site Development Plan (6 bed main dwelling with pool, farm managers house and access route) will have an unnecessary significantly negative impact on biodiversity conservation, the sense of place of the area and transform and fragment the Knysna Sand Fynbos Coastal Corridor.
2. Biodiversity Stewardship or long-term conservation outcomes were not discussed in the DBAR. The conservation of the vegetation on the property is of national importance. Without a commitment to consent to the declaration of the property as part of the GRNP or with a Biodiversity Stewardship agreement with CapeNature in place, SANParks will continue to object to the proposed development.
3. Land use rights. SANParks takes note that Marike Vreken urban and environmental planners were appointed to apply for the required land use rights from Knysna Municipality. From the information provided there was no mention of rezoning the natural portion of the property to Open Space Zone III. Further discussion in this regard is required to ensure a long-term conservation outcome. Relaxation of the building line adjacent to Kerk Laan could be supported.

SANParks could support development in the node where the Managers Cottage is proposed adjacent to Kerk Laan, as discussed on-site on 8 September 2020. It would be preferable if all development is consolidated into one area (the area where the farm managers cottage is

proposed) to minimise fragmentation of the landscape and impact on the sensitive fynbos environment.

The applicant should be reminded that the main objective of Priority Natural Areas and CBAs is to maintain it in a natural or near natural state, with no further loss of natural habitat. Only low impact, biodiversity sensitive land uses are appropriate. The property is currently pristine and was not previously developed.

SANParks request to meet with the landowners to discuss a way forward that can benefit biodiversity conservation and allow for low impact development without the need for a road over the pristine dunes. The current proposal will set a very bad precedent for potential development of other properties in the Knysna Sand Fynbos Coastal Corridor. The properties on both side of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023.

(2) Draft Basic Assessment, Follow-up Comment, 26 January 2021.

SANParks objected to the proposed development on 1 October 2020. A site visit with the landowners and EAP took place on 4 January 2021. Key points discussed:

1. Proposed footprint of the main house. The landowners were not willing to change the proposed footprint of the main house to a position adjacent to Kerk Laan. They were willing to move the house to reduce visual impact in the level area behind the frontal dune.
2. Proposed road over the sand dunes. SANParks continue to object to the construction of a road over the sand dunes. The landowners indicated that their preferred option is to use Susan Campbell's road for access. They could use Kerk Laan and access via the gate and use the steep section of the Campbell road. The proposed option to use the Campbell road will reduce the negative impact on biodiversity but will necessitate a new section of road to be constructed on the Campbell property and over Portion 76.

3. Maretha Alant met with Susan Campbell. Ms Campbell is opposed to providing access for the proposed development over her land.
4. Footpath to the beach. Portion 76 of Farm Uitzicht 216 has a steep gradient to the beach and a footpath is not proposed in the BAR.
5. Drilling for water required. The proposal is that water will be supplied by a borehole. Bringing drilling equipment to the proposed site for the main house will have a negative impact on biodiversity. Previous attempts to drill for water in the area (Investec) yielded poor return.
6. Contract National Park footprint. The property is in the priority protected area expansion footprint, in the Western Heads coastal ecological corridor, that can potentially link the Goukamma Nature Reserve with the Knysna Estuary. The property was included in the South African National Parks Land Inclusion Plan for the period 2020 – 2023 for the Garden Route National Park (GRNP). The landowners may be interested in incorporating the property into the GRNP but more information is required from SANParks. SANParks will further engage with the landowners when our draft documents are in place.



Proposed location of main house in flat area with high biodiversity value



Area for the proposed main house in foreground



SANParks continue to object to the construction of a road over the sand dunes



Portion 76 of Farm Uitzicht 216 has a steep gradient to the beach and a footpath is not proposed in the BAR.



Susan Campbell's road

A follow up fieldtrip with SANParks and the Southern Cape Fire Protection Association (FPA) present took place on 9 January 2021. Key points discussed:

- Development adjacent to Kerk Laan. Developing the main house in a disturbed area adjacent to Kerk Laan will have the least negative impact on biodiversity and landscape functionality. Other advantages are that the drilling equipment and construction vehicles will have easy access to the site via an existing road.
- Development in the low lying area, over the two sand dunes or using the Campbell road, will compromise landscape functionality and set a bad precedent. It will create fragmentation of a pristine coastal corridor.



Disturbed area adjacent to Kerk Laan suitable for development

- Fire management. The landowners are members of the Southern Cape FPA. It is possible to make fire breaks to protect infrastructure at the landowners preferred location for the main house. However, Kerk Laan could act as a firebreak if it is widened and slashed. In a case of emergency, it would be less risky to evacuate people from Kerk Laan than in a fynbos corridor with tricky access for fire trucks. The Campbell road and the new section of road that would need to be constructed from Campbell road to preferred site would not be ideal roads for the Knysna Fire Department as their trucks would struggle to gain access easily to the house. However, Kerk Laan would be a much easier access point for fire trucks and this should be considered for fire safety in this fire-prone area. Conducting an ecological burn in future will also be more risky with infrastructure developed in the fire path. The June 2017 fire and the ecological burn executed on 15 May 2017, that slowed the fire down dramatically before it reached Brenton, is still fresh in our memories. A functional Fire Management Unit in the Knysna Sand Fynbos will be desirable as there will be future fires.
- Conservation value of property. More than 50% of the property contains Knysna Sand Fynbos and the entire property is a Critical Biodiversity Area (CBA). Although the Kerk Laan area is located in Knysna Sand Fynbos the transformation footprint can be limited with a good Site Development Plan and the current landscape functionality corridor will be maintained. Knysna Sand Fynbos type hosts threatened plant species and five threatened butterfly taxa (Mecenero *et al.* 2013), including CE taxa *Orachrysops niobe* (Brenton Blue) and *Thestor brachycerus* and is poorly protected. The original extent of Knysna Sand Fynbos was 15 355 ha. The remaining natural extent is 1 478 ha (9.6%) and the Western Cape target is 3 531ha (23%). The Knysna Sand Fynbos asset is in deficit. Knysna Sand Fynbos is not only endemic to the Western Cape, but it is also confined to a very specific and limited geographical area along the Garden Route coast (only found from the coastal flats from Wilderness, generally to the north of the system of lakes, several patches around the Knysna Lagoon, with more isolated patches eastwards to the Robberg peninsula near Plettenberg Bay). There is excellent landscape heterogeneity on the property.

In summary, from a biodiversity conservation, landscape functionality and integrated fire management perspective developing the main house adjacent to Kerk Laan is the preferred alternative for SANParks. Developing in the core of the Knysna Sand Fynbos Coastal Corridor will set a very bad precedent and contribute to a loss of biodiversity and landscape fragmentation. The properties on both side of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023. SANParks will continue to object to the access road over the sand dunes.

Due to SANParks ongoing CNP work in the corridor, SANParks is familiar with the property, and has visited it and adjacent properties several times over the years (**Figs. 8 & 9**).



Fig. 8. View from neighboring Uitzicht 216, Portion 39 towards landward foredune on Portion 76.



Fig. 9. View from neighboring Uitzicht 216, Portion 39 towards seaward foredune on Portion 76, showing valley between the two foredunes.

The current development proposal as extracted from the Draft Basic Assessment Report (DBAR), EcoRoute Environmental Practitioners, January 2025, entails:

Proposed Development:



The **preferred alternative**: The development proposal entails the following:

- (i) The construction of one (x1) main dwelling house to be situated in the southwestern corner of the property (3000m²).
- (ii) The construction of a new internal road to provide access to the southern portion of the property.

The Main Dwelling House

The primary dwelling unit will be situated in the south-western portion of the property consisting of the following inter-leading room's ±3000m²:

- 6 Bedrooms.
- Open plan living area consisting of the kitchen, lounge area, dining area, kitchen, bar, scullery, bathroom and wine cellar.
- Open deck and swimming pool.

The Internal Road

The internal road will be 830 meters in length. The road surface area will be 2.5 meters wide and the disturbed area for construction of the road varies between 4 to 5.5 meters wide. The internal road is to access the southwestern side of the property.



Alternative 1: The development proposal entails the following:

- (iii) The construction of one (x1) main dwelling house to be situated in the southwestern corner of the property (4000m²).
- (iv) The construction of one (x1) farm manager's house in the northwestern corner of the property (1200m²).

- (v) The construction of a new internal road to provide access to the southern portion of the property.

Note: Inconsistencies with naming of alternatives occurs throughout the documents provided. Text refers to Alternative 1 yet plans refer to this alternative as Alternative 2. This is very confusing for readers.

The Farm Manager's House

The Dwelling house to be situated in the north-western corner will encroach the prescribed 30m building line, and therefore an application must be made for a permanent departure for the relaxation of the northern and western building lines.

The main reason why the house encroaches on the prescribed building line is to prevent unnecessary disturbance of sensitive, pristine fynbos. The proposed footprint in the building line area is an existing transformed area, and consists of the following:

- Ground Floor: 600m²
- First Floor: 400m²
- Footprint: 600m²
- Disturbance area: 1200m²

The No Go Alternative

The proposed redevelopment of Portion 76 of the Farm Uitzicht 216 will remain unutilised and vacant, thereby restricting the landowner's ability to exercise their right to construct a residential dwelling.

Servicing:

Electricity

There is currently **no electrical infrastructure** present on the farm or in the adjacent road reserve to the north. It is advisable to consider the installation of a solar power facility in this location.

Solar plant

Solar plant

Type and system

The solar plant will be developed as an off-grid installation, utilizing solar energy to supply the load during daylight hours while recharging the batteries at night. Furthermore, grid-tied photovoltaic inverters may be integrated into this micro-grid configuration through AC coupling, should the energy demand surpass the generation capacity.

Plant location

It is advisable to consider the installation of a **roof-mounted solar power system on the roofs of both the main residence and the adjacent outbuilding units**, should there be a requirement for increased energy generation capacity. The northern-facing roof of the main residence, which has an approximate area of 46 square meters, is capable of accommodating approximately 23 solar panels, providing a total capacity of 7 kilowatts.

Plant capacity

The proposed system is designed with a capacity of 15 kWh, while the anticipated peak consumption is estimated to reach 30 kWh per day.

Water Reticulation

The applicant proposes to supply water for the development by means of the following:

- **Installing boreholes – an application for a water licence will have to be submitted to Breede- Gouritz Catchment Management Agency.**
- A substantial proportion of the water demand will be addressed through the collection of rainwater. The aggregate roof area totals 842 m² and given the average annual rainfall of 500 mm in the Knysna region, this system is estimated to supply approximately 421 kilolitres (kl) of rainwater. It is important to note that this rainwater collection will only meet around 87% of the total water demand.
- The main building will make provision for 110kl rainwater/borehole storage.

Water Reticulation

The proposed development lacks a bulk water network and will **serve as holiday accommodation for a maximum of twelve people, assumed to be occupied for 200 days a year.**

Water demand is 480,000 litres (480 kilolitres) annually. Rainwater collection from 842 square meters of roof space will provide about 421,000 litres (421 kilolitres), covering 87% of the demand. To make up for the shortfall, boreholes will be drilled, which can also serve as storage when powered by on-site generators. The main building will have a storage capacity of 110 kilolitres.

Fire

This development is **categorized as low-risk and falls within Group 2: residential areas (residential zone 1).** In these designated areas, the gross floor area of dwelling houses, including any associated outbuildings, is typically expected to range between 100 square meters and 200 square meters, in accordance with the "Guidelines for

Sewer Reticulation

At this time, municipal bulk sewer services are not available in this area. Following consultation with the Technical Department of Knysna Municipality, it has been determined that the implementation of **septic tanks with soakaways** is a viable option for managing effluent in this locality.

The above information was obtained from the Engeolab desktop investigation, Geophysical investigation & Feasibility Assessment into groundwater abstraction dated October 2018 and the Civil Services Report dated 2018.

Internal Stormwater

The stormwater will not be accumulated or concentrated at any point but will be allowed to drain naturally over the sandy surface. Care will be taken when designing the access road to ensure that stormwater is properly addressed, according to SUDS principles.

Point 1: Development on the Foredunes and within a Coastal Risk Area Coastal Protection Zone

The CPZ is defined in Section 16 of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008) (NEM: ICMA). The Western Cape DEA&DPs, “Western Cape Provincial Coastal Management Programme 2022 – 2027”, further summarises aspects of the CPZ as follows.

Feature	Constituents	Characteristics/Purpose
The Coastal Protection Zone	▪ Sensitive coastal areas, as declared in terms of Section 21 of the Environment Conservation Act (Act No. 73 of 1989); ▪ Any part of the littoral active zone that is not coastal public property; ▪ Any coastal protected area, or part of such area, which is not coastal public property. ▪ Any rural land situated wholly or partially within one kilometre of the High-Water Mark (HWM) which is zoned as agricultural or undetermined; ▪ Any urban land unit that is situated completely or partly within 100 metres of the HWM; ▪ Any coastal wetland, lake, lagoon or dam which is situated completely or partially within a land unit situated within 1000 metres of the HWM that was zoned for agricultural or undetermined use, or is within 100 metres of the HWM in urban areas; ▪ Any part of the seashore which is not coastal public property (including all privately owned land below the HWM); ▪ Any Admiralty Reserve which is not coastal public property; and ▪ Any land that would be inundated (submerged or covered) by a 1:50 year flood or storm event (this includes flooding caused by both rainstorms and rough seas).	▪ To protect the ecological integrity, natural character, and the economic, social and aesthetic value of the neighbouring coastal public property; ▪ To avoid increasing the effect or severity of natural hazards ▪ To protect people, property and economic activities from the risks and threats which may arise from dynamic coastal processes such as wave and wind erosion, coastal storm surges, flooding and sea-level rise. ▪ To maintain the natural functioning of the littoral active zone. ▪ To maintain the productivity of the coastal zone; and ▪ To allow authorities to perform rescue and clean-up operations.

8	Implementation of land use legislation in coastal protection zone	Section 62 of the NEM: ICMA obliges any organ of state that is implementing any legislation that regulates the planning or development of land, in a manner that conforms to the principles of cooperative governance contained in Chapter 3 of the Constitution, apply that legislation in relation to land in the coastal protection zone in a way that gives effect to the purposes for which the protection zone is established as set out in Section 17 of the NEM: ICMA. Furthermore, SPLUMA requires that a land use scheme must comply with environmental legislation.
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Uitzicht 216, Portion 76 falls entirely in the CPZ (Fig.2), therefore careful environmentally sensitive decision-making must be made for any proposed development on this property.

As the property falls within the 1km high-water-mark, this has further implications for agricultural worker accommodation, in terms of the Knysna Municipality: Zoning Scheme By-law, 29 June 2020:

“agricultural worker accommodation”

Land use description: “*agricultural worker accommodation*” means accommodation provided for bona fide agricultural workers, including accommodation for labourers and farm managers, as determined by the Municipality based on the extent of the bona fide agricultural activities on the land unit.

Development parameters:

The development parameters applicable to “*agriculture*” apply with the following additional development parameters:

- (a) the number of units must be reasonably connected to the bona fide agricultural activities on the land unit; and
- (b) no agricultural worker accommodation may be erected within 1 km of the high-water mark of the sea or a tidal river.

Confirmation on the allowance of a second dwelling for a farm manager must be sought from the Knysna Municipality.

Garden Route National Park Coastal Management Line

The Coastal Management Line for the Garden Route National Park was established in GNR. No. 3668, 14 July 2023, in terms of NEM: ICMA. Section 4 describes development risk management measures applicable for new infrastructure seaward of the CML and existing infrastructure in areas at risk to dynamic coastal process. The new and existing infrastructure provisions are what is being applied to SANParks infrastructure. SANParks encourages that these measures be applied to private property adjacent to SANParks land. It must be noted that several properties which border Portion 76, are Contract National Park committed properties, which will legally be declared as part of the park.

The CML extends for between 70 to 100m in places into the lower southern section of Portion 76.

Knysna Protected Environment Development Control Area

SANParks is responsible for the Proper Administration of the Knysna Protected Environment (KPE) (GN 1175 of 2009) Regulations, and for the authorisation of any development (as defined in the Regulations) in the DCA, as per Section 8. The KPE DCA extends 50m from the high-water mark into Portion 76 (Fig 2), and as such SANParks’ authorisation is required for any development to proceed in this area.

As per Section 9 and 10 of the KPE Regulations SANParks may request additional studies to be undertaken, should it be deemed that these are required.

Dune Stability, Coastal Erosion & Climate Change Resilience

SANParks does not support and objects to any development and infrastructure on the two foredunes situated in the southern section of Portion 76.

The stability of the foredunes is a concern. Dune slumping on the seaward foredune of Portion 72 has recently occurred (2023 – 2024) (**Fig. 10**), and blowouts are evident on Portion 73 and 74 (**Fig. 11**). These dune areas could be deemed littoral active zones, being unstable and dynamic because of natural processes.

Conserving the seaward foredune and ensuring that it remains free from development is a necessary climate change resilience strategy. Any development on this active foredune would be at risk as coastal erosion impacts intensify in the future with climate change. It would be difficult to defend such development from coastal erosion, given the unstable steep dune slopes, erodibility, and slumping potential. The effects of climate change are already being experienced along this stretch of coast (**Fig. 12**).



Fig. 10. Recent dune slumps (2023-2024) evident on the seaward foredune, Portion 72.

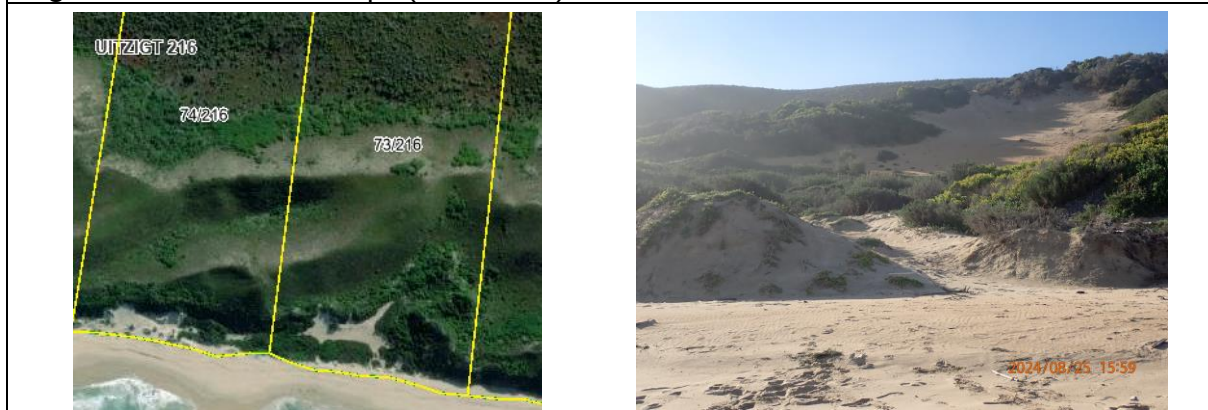


Fig. 11. Two blowouts are evident on the seaward foredune, Portions 73 & 74.

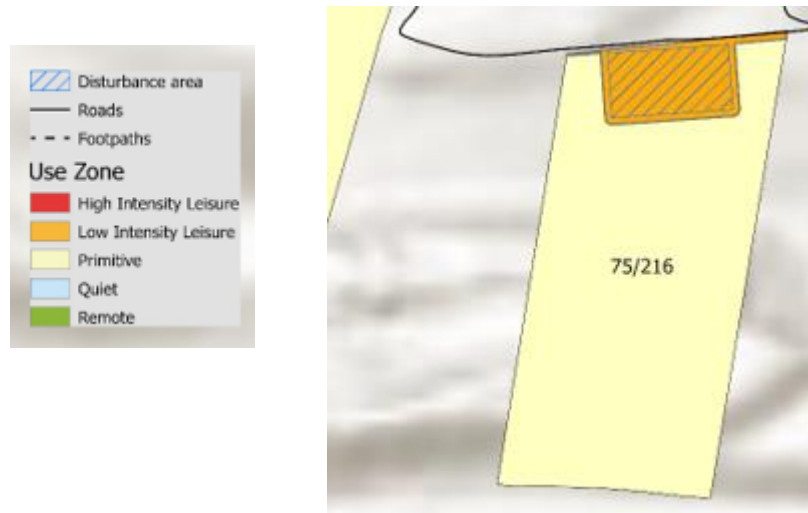


Fig.12. September 2023 storm surge, which washed away the Brenton on Sea beach walkway.

Point 2: Knysna Sand Fynbos Corridor: Development Options Supported

As stated, several adjoining and adjacent properties are in various stages of SANParks CNP stewardship commitment with landowners. Many of these landowners have intentions to exercise their primary development rights, which SANParks supports. Part of the CNP process involves formulating a Property Operational Plan for co-management with SANParks and the landowner. A component of this is the drafting of a Zonation Plan, based on park zonation principals, as the property is eventually declared as part of the park. The Zonation Plan sets out which portions of the property may be developed, and what activities may take place in the various areas of the property.

SANParks' position for properties situated seaward of Church Street is to allow only a development area situated directly adjacent to Church Street, in which a primary dwelling is permitted, and if approved by the Knysna Municipality, a second managers house may be permitted, however this must be placed in this same development area. No development is supported lower down the property, and on the foredunes, and no roads may be constructed through the property to the foredunes. Approved hiking paths, a beach access path, and a small sea viewing deck of approximately 25m² maximum may be permitted. An example of a Zonation Plan, which was prepared for the previous landowner of Portion 75 is as follows:



SANParks supports a clustered layout approach for dwelling/s and infrastructure placement. A diffuse layout approach that fragments the landscape is not supported. This approach is applied throughout the corridor. The only exception to this position, is Portion 39, which has a road constructed across the foredunes and a dwelling situated behind the seaward foredune. It must however be noted that Portion 39 has been owned by the same landowners since 1972, and the road was formalised from 1980 to 1990, and the dwelling was pre-existing, prior to the EIA Regulations, which were enacted in 1997. The dwelling burnt down in the 2017 fires and municipal approval was attained to re-build it. SANParks will not support any new developments of this nature in the corridor.

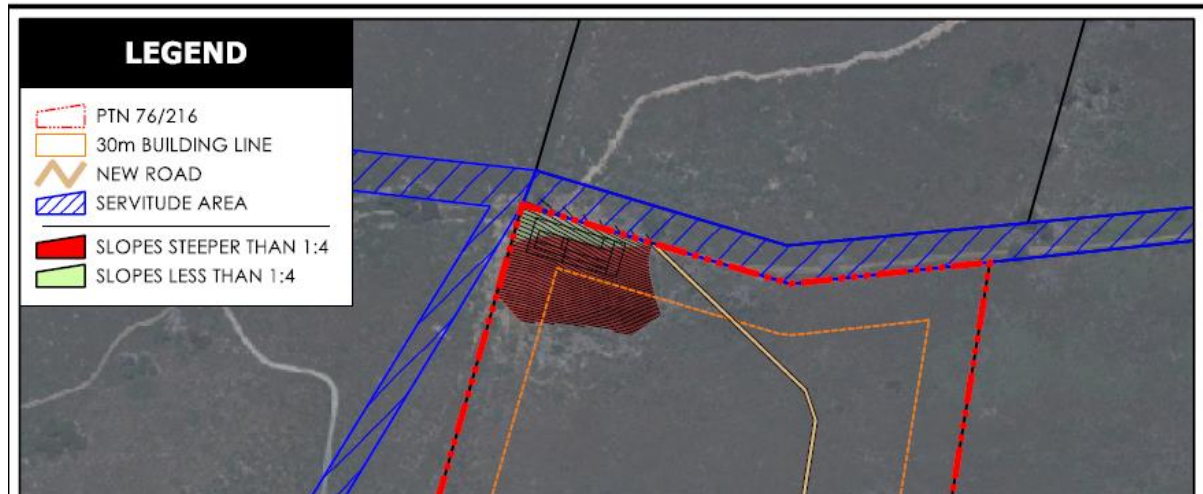
SANParks' position is not only based on the need to prevent landscape fragmentation and biodiversity loss, and support landscape connectivity and functioning, but is further intended to retain tranquillity and a sense of place across the conservation corridor.

Therefore, based on the above, SANParks does not support and objects to the preferred layout. SANParks does not support the construction of a road across the foredunes and the construction of a house on the foredunes. Further, the disturbance/ building footprint areas suggested (main dwelling approx. 3000m², and road approx. 4565m², total 7565m²) are excessive and underestimated.

Likewise, SANParks does not support Alternative 2. This alternative would have a greater negative impact, as disturbance/ building footprint areas are greater (main dwelling approx. 4000m², farm managers house 1200m², and road approx. 4565m², total 9765m²) with two disturbance areas proposed on the northern and southern section of the property, with a road access the foredunes.

It is unclear whether the areas provided refer to building footprint area or to disturbance areas. If referring to a building footprint area, the actual disturbance area may in fact be double/ triple. No area calculations have been provided for embankments, water tanks, garages, storage areas, vegetable gardens etc.

SANParks will only support development close to Church Street, as extracted from Alternative 2 layout below:



Point 3: Infrastructure

Water

Should the landowner require borehole water the following should be noted:

In terms of the National water Act, 1998 (Act No. 36 of 1998), Revision of General Authorisations for the Taking and Storing of Water, GNR. No 40243, 2 September 2016, Section 2.3; a Water Use License (WUL) may be required due to the property being situated within 500m from the high-water mark of the ocean.

Section 2.3 states the following exclusions from General Authorisations:

2.3. Geographical area and water resources to which the authorisation applies

Except where stated differently in the notice this authorisation applies to all land and all water resources in South Africa, subject to the following exclusions:

1. No water that is taken in terms of this authorisation may be taken within a 500 metre radius from the boundary (delineated edge) of a wetland, pan or estuary.
2. No groundwater that is taken in terms of this authorisation may be taken within a 500 metre radius from the boundary of a wetland or estuary, within a 100 metre radius from the delineated riparian edge of a water course or a state dam, within a 500 metre radius of a state dam wall or within 500 metres from the high-water mark of the ocean.

Further a WUL may be required, if water demand for the primary supply is >1kl/da/ha (>1kl/day/ha which is permitted for general usage). Confirmation from the relevant Competent Authority should be sought.

Sewerage

SANParks is not in support of septic tanks. Cleaner environmentally friendly options should be investigated.

Electricity

SANParks supports the use of solar panels, however these should be positioned so as not to face east/ west to minimise glare and reflections. Similarly glare from windows should be minimised.

Point 4: Alien Invasive Species and Fire Management

The landowner's attention is drawn to the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEM:BA) Alien and Invasive Species Regulations, 25 September 2020, where a landowner is legally responsible for the removal of alien vegetation on their property. SANParks requests sight of the required Invasive Species Control Plan (ISCP), and clarity on whether this has been submitted to and approved by the Department of Forestry Fisheries and the Environment (DFFE). SANParks seeks confirmation on whether alien clearing if any has occurred on the property.

Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. SANParks requires clarity on whether the landowner is a member of the Southern Cape Fire Protection Association (SCFPA), and whether the necessary legally required firebreaks, agreements and/or exemptions are in place.

SANParks stands firm on previous comments made regarding fire.

- **Fire management.** The landowners are members of the Southern Cape FPA. It is possible to make fire breaks to protect infrastructure at the landowners preferred location for the main house. However, Kerk Laan could act as a firebreak if it is widened and slashed. In a case of emergency, it would be less risky to evacuate people from Kerk Laan than in a fynbos corridor with tricky access for fire trucks. The Campbell road and the new section of road that would need to be constructed from Campbell road to preferred site would not be ideal roads for the Knysna Fire Department as their trucks would struggle to gain access easily to the house. However, Kerk Laan would be a much easier access point for fire trucks and this should be considered for fire safety in this fire-prone area. Conducting an ecological burn in future will also be more risky with infrastructure developed in the fire path. The June 2017 fire and the ecological burn executed on 15 May 2017, that slowed the fire down dramatically before it reached Brenton, is still fresh in our memories. A functional Fire Management Unit in the Knysna Sand Fynbos will be desirable as there will be future fires.

Point 5: Summary and Way Forward

In summary, SANParks does not support and objects to the Preferred and Alternative layouts. SANParks does not support the construction of a road across the foredunes and the construction of a house on the foredunes. SANParks will only support a disturbance area directly adjacent to Church Street, where a primary dwelling and managers house if permitted by the Knysna Municipality may be constructed.

This is in line with SANParks position for development in the Western Heads Knysna Sand Fynbos corridor, which is being applied to directly adjacent and neighbouring properties to Portion 76, which are under CNP stewardship commitment, in various phases of commitment. SANParks will not deviate from this position.

The lower southern section of Portion 76 is considered particularly sensitive: the CML extends some 70 to 100m in; the high-water-mark adjoins the southern property boundary; dune stability, coastal erosion, and climate change resilience are concerns; the property in its entirety falls within the CPZ; and the KPE Development Control Area extends 50m into the property. Authorisation of any development in the Development Control Area is required from SANParks as per Section 8 of the KPE Regulations.

In terms of infrastructure: a Water Use License may be required due to the property being situated within 500m of the high-water mark of the ocean; SANParks is not in support of septic tanks; and solar panels and windows must be positioned to reduce glare.

SANParks requests sight of the required Invasive Species Control Plan, and clarity on whether this has been submitted to and approved by the Department of Forestry Fisheries and the Environment. SANParks seeks confirmation on whether alien clearing if any has occurred on the property.

Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. SANParks requires clarity on whether the landowner is a member of the Southern Cape Fire Protection Association, and whether the necessary legally required firebreaks, agreements and/or exemptions are in place. In terms of fire management, development close to Church Street is more desirable than development lower down the property and on the foredunes.

Should the landowner wish to place Portion 76 into CNP stewardship with SANParks, the property would qualify, and the landowner could benefit from financial incentives. SANParks is willing to provide information and have further discussions should the landowner be interested.

It is requested that SANParks' full comments letter be included in the body of the Draft Basic Assessment Report, and not only in a Comments and Responses table.

SANParks reserves the right to revise initial comments if additional information becomes available.

Yours sincerely



Dr Vanessa Weyer
Principal Planner
SANParks Garden Route National Park

CC:	André Riley	SANParks
	Pat Bopape	SANParks
	Elmonique Petersen	SANParks
	Jessica Hayes	SANParks
	Arnelle Collison	SANParks
	Marthan Theart	SANParks
	Megan Simons	CapeNature
	Danie Swanepoel	WC DEADP
	Caren George	WC DEADP
	Pam Booth	Knysna Municipality
	Hennie Smit	Knysna Municipality
	Johan Labuschagne	WHGC

Application Acknowledgement [CA Reference Number: 14/12/16/3/3/1/3292]

From neas-noreply@kznsshf.gov.za <neas-noreply@kznsshf.gov.za>

Date Mon 01/06/2026 12:04

To bianca@ecoroute.co.za <bianca@ecoroute.co.za>



logo

Dear Peach Andre,

We are pleased to inform you that your application and consultation report has been received and acknowledged.

NEAS Reference Number: DEA/EIA/0003398/2026

CA Reference Number: 14/12/16/3/3/1/3292

Officer Name: Zamalanga Langa, Nyiko Nkosi

Acknowledgement Letter: [Download File](#)

If you have any questions or need help, please contact our support team.

14/12/16/3/3/1/3292

From Ephron Maradwa <EMaradwa@dfpe.gov.za>

Date Mon 01/06/2026 11:38

To bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Cc Zama Langa <ZLANGA@dfpe.gov.za>; Salome Mambane <SMAMBANE@dfpe.gov.za>

Good day.

14/12/16/3/3/1/3292

ACKNOWLEDGEMENT OF RECEIPT OF THE DRAFT BASIC ASSESSMENT REPORT FOR ENVIRONMENTAL AUTHORISATION FOLLOWING A BASIC ASSESSMENT PROCESS FOR PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE PROVINCE.

The Department confirms having received the Draft Basic Assessment Report for Environmental Authorisation for the abovementioned project on 01 June 2026. You have submitted these documents to comply with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended.

Kindly note that your application for Environmental Authorisation falls within the ambit of an application applied for in terms of Part 2 of Chapter 4 of the EIA Regulations, 2014, as amended. You are therefore referred to Regulation 19 of the EIA Regulations, 2014 as amended.

Please take note of Regulation 40(3) of the EIA Regulations, 2014, as amended, which states that potential Interested & Affected Parties, including the Competent Authority, may be provided with an opportunity to comment on reports and plans contemplated in Regulation 40(1) of the EIA Regulations, 2014, as amended, prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the Competent Authority.

Note that in terms of Regulation 45 of the EIA Regulations, 2014, as amended, this application will lapse if the applicant fails to meet any of the time-frames prescribed in terms of these Regulations, unless an extension has been granted by the Department in terms of Regulation 3(7) of the EIA Regulations, 2014, as amended.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Kindly quote the abovementioned reference number in any future correspondence in respect of the application.

EIA Applications

Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Please note that this email is for the receipt and processing of online applications only, and is not monitored for responses. All queries must be directed to EIAAdmin@dfpe.gov.za.

-

You are advised that this mailbox has a 48 hour response time.

Please note that this mailbox has a 5mb mail limit. No zip files are to be attached in any email.



Batho pele – putting people first

The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and/or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

Application Acknowledgement [CA Reference Number: 14/12/16/3/3/1/3292]

From neas-noreply@kznsshf.gov.za <neas-noreply@kznsshf.gov.za>

Date Mon 01/06/2026 12:05

To bianca@ecoroute.co.za <bianca@ecoroute.co.za>



logo

Dear Bianca Gilfillan,

We are pleased to inform you that your application and consultation report has been received and acknowledged.

NEAS Reference Number: DEA/EIA/0003398/2026

CA Reference Number: 14/12/16/3/3/1/3292

Officer Name: Zamalanga Langa, Nyiko Nkosi

Acknowledgement Letter: [Download File](#)

If you have any questions or need help, please contact our support team.

Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Ref number: 14/12/16/3/3/1/3185 (PREVIOUS) - Draft Basic Assessment Report - Proposed Development of a Residential Dwelling on Portion 76 of the Farm Uitzicht, Knysna, Western Cape

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>
Date Tue 23/06/2026 10:32
To Henrico Knoesen <henrico@knoesen.com>
Cc 'Jessica' <jessica@ecoroute.co.za>; 'janet' <janet@ecoroute.co.za>; admin@ecoroute.co.za <admin@ecoroute.co.za>

Good day, Mr Knoesen.

Thank you for your email and for the clarification.

Thank you for your continued participation in the process.

Best regards

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



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From: Henrico Knoesen <henrico@knoesen.com>
Sent: Tuesday, June 23, 2026 10:12
To: admin@ecoroute.co.za <admin@ecoroute.co.za>
Cc: 'bianca@ecoroute.co.za' <bianca@ecoroute.co.za>; 'Jessica' <jessica@ecoroute.co.za>; 'janet' <janet@ecoroute.co.za>
Subject: RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Ref number: 14/12/16/3/3/1/3185 (PREVIOUS) - Draft Basic Assessment Report - Proposed Development of a Residential Dwelling on Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good day Bianca

I trust that this e-mail finds you well!

Please be advised that all members of the Buffalo Bay Residents Association (Buffelsbaai Inwoners- Vereniging- BIV) are now members of the Western Heads- Goukamma Conservancy (WHGC). Accordingly, BIV will not submit separate comments and or objections regarding this matter and will instead support and align itself with any comments and or objections submitted by WHGC.

Kind regards

Henrico Knoesen

For and on behalf of BIV

From: admin@ecoroute.co.za <admin@ecoroute.co.za>

Sent: Thursday, May 28, 2026 10:48 AM

Cc: 'bianca@ecoroute.co.za' <bianca@ecoroute.co.za>; 'Jessica' <jessica@ecoroute.co.za>; 'janet' <janet@ecoroute.co.za>

Subject: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Ref number: 14/12/16/3/3/1/3185 (PREVIOUS) - Draft Basic Assessment Report - Proposed Development of a Residential Dwelling on Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good day,

A 30-day public participation will be held from **28/05/2026 - 29/06/2026.**

Kindly find below the link to the DRAFT Basic Assessment Report and relevant appendices.

[Draft Basic Assessment Report - The Proposed Development on Portion 76 \(A Portion of Portion 54\) of Farm 216 Uitzicht, Knysna, Western Cape - DFFE Ref no: 14/12/16/3/3/1/3185 | Eco Route](#)

Please submit your comments to the EAP undersigned in this email within 30 days of this notice (i.e., on or before 29 June 2026).

Thank you for your participation in this process.

Kind regards,

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

EcoRoute



Fw: Confirmation of Correspondence Received

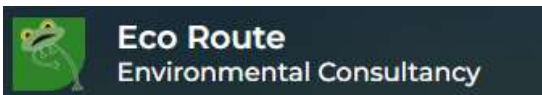
From admin@ecoroute.co.za <admin@ecoroute.co.za>
Date Wed 10/06/2026 14:54
To 'bianca@ecoroute.co.za' <bianca@ecoroute.co.za>

Hi Bianca,

FYI.

Kind regards,

Carina Leslie
Personal Assistant/Admin
Office: 064 691 4394
www.ecoroute.co.za



From: rekords@gardenroute.gov.za <rekords@gardenroute.gov.za>
Sent: Wednesday, 10 June 2026 12:12
To: admin@ecoroute.co.za <admin@ecoroute.co.za>
Subject: Confirmation of Correspondence Received

Dear BIANCA GILFILLAN,

With reference to your request titled -
NOTIFICATION OF PUBLIC PARTICIPATION - DFFE REF NUMBER: 14/12/16/3/3/1/3185 (PREVIOUS) -
DRAFT BASIC ASSESSMENT REPORT - PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON
PORTION 76 OF THE FARM UITZICHT, KNYSNA, WESTERN CAPE dated 2026-05-28.

Your request was distributed.
File Reference 18/3/4/4
Record Reference 47497403
To follow-up this request please contact us on 044 8031300.

Kind Regards

GARDEN ROUTE DISTRICT MUNICIPALITY

Admin2@edendm.co.za

Tel: |

''''

Emergency Communications: 044 805 5071

Ethics and Fraud Hotline: 0800 116 616

[<http://www.gardenroute.gov.za><<https://www.gardenroute.gov.za>>]www.gardenroute.gov.za<<https://www.gardenroute.gov.za>>

[<http://www.visitgardenrouteandkleinkaroo.com><<https://www.visitgardenrouteandkleinkaroo.com>>]www.visitgardenrouteandkleinkaroo.com<<https://www.visitgardenrouteandkleinkaroo.com>>

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<<https://www.linkedin.com/company/13991149/admin/>>

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Fw: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Ref number: 14/12/16/3/3/1/3185 (PREVIOUS) - Draft Basic Assessment Report - Proposed Development of a Residential Dwelling on Portion 76 of the Farm Uitzicht, Knysna, Western Cape

From: Stephanie Barnardt <Stephanie.Barnardt@westerncape.gov.za>

Sent: Sunday, 31 May 2026 08:16

To: admin@ecoroute.co.za <admin@ecoroute.co.za>

Subject: RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Ref number: 14/12/16/3/3/1/3185 (PREVIOUS) - Draft Basic Assessment Report - Proposed Development of a Residential Dwelling on Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good day,

Please use this email as confirmation that the previous comment remains valid and amendments are generally in accordance.
Therefore, HWC's previous comments still stand.

Kind regards,

Stephanie-Anne Barnardt-Delport
Specialist Heritage Officer

Department of Cultural Affairs and Sport
Protea Assurance Building Greenmarket Square, Cape Town
Contact Number: 021 483 3315
Website: www.hwc.org.za / www.westerncape.gov.za

Need to make an application to HWC?

HWC has migrated its applications to SAHRIS



Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Ref number: 14/12/16/3/3/1/3185 (PREVIOUS) - Draft Basic Assessment Report - Proposed Development of a Residential Dwelling on Portion 76 of the Farm Uitzicht, Knysna, Western Cape

From bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Date Thu 18/06/2026 10:21

To BC Admin <bcadmin@dffe.gov.za>

Cc Khuliso KKP. Khomari <kkhomari@dffe.gov.za>; Portia Makitla <PMakitla@dffe.gov.za>; Mthokozese Nsizwane <MNsizwane@dffe.gov.za>; BC Admin <bcadmin@dffe.gov.za>

Good day.

I trust that this email finds you well.

Please see the WeTransfer link for the documentation: <https://we.tl/t-rxMauTkQFevAbYa2>

Thank you for your attention to this matter.

Best regards

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

EcoRoute



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From: admin@ecoroute.co.za <admin@ecoroute.co.za>

Sent: Wednesday, June 17, 2026 09:20

To: 'bianca@ecoroute.co.za' <bianca@ecoroute.co.za>

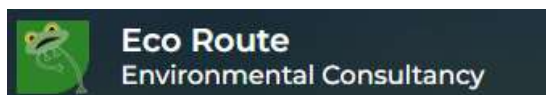
Subject: Fw: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Ref number: 14/12/16/3/3/1/3185 (PREVIOUS) - Draft Basic Assessment Report - Proposed Development of a Residential Dwelling on Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Hi Bianca,

Please see below.

Kind regards,

Carina Leslie
Personal Assistant/Admin
Office: 064 691 4394
www.ecoroute.co.za



From: Khuliso KKP. Khomari <KKhomari@dffe.gov.za>
Sent: Wednesday, 17 June 2026 09:00
To: admin@ecoroute.co.za <admin@ecoroute.co.za>
Cc: Portia Makitla <PMakitla@dffe.gov.za>; Mthokozese Nsizwane <MNsizwane@dffe.gov.za>; BC Admin <badmin@dffe.gov.za>
Subject: RE: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Ref number: 14/12/16/3/3/1/3185 (PREVIOUS) - Draft Basic Assessment Report - Proposed Development of a Residential Dwelling on Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Dear Sir/Madam

-
RE: Department of Forestry Fisheries and the Environment Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation on the 28th of May 2026 for review and comment on the project mentioned in the subject line.

Kindly note that the project has been allocated to Ms P Makitla and Mr Mthokozese Nsizwane (Copied in this email).

Note, all Public Participation Process documents related to Biodiversity EIA review and Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation by email: BCAdmin@dffe.gov.za for attention of Mr Seoka Lekota.

Regards,
Ms Khuliso Khomari

Directorate: Biodiversity Conservation
Sub-Directorate: Policy Development Mainstreaming EIA
Email: KKhomari@dffe.gov.za
Cell: 076 741 6937
Website: www.environment.gov.za
National Department of Forestry, Fisheries and the Environment
Environment House, 473 Steve Biko, Arcadia, Pretoria, 0083



From: admin@ecoroute.co.za <admin@ecoroute.co.za>
Sent: Thursday, May 28, 2026 10:34 AM
To: Bathandwa Ncube <BNcube@dffe.gov.za>; Lydia Kutu <LKutu@dffe.gov.za>; Zama Langa <ZLANGA@dffe.gov.za>; Thivhulawi Nethononda <TNETHONONDA@dffe.gov.za>;

christina.mokoena@dffe.gov.za; Salome Mambane <SMAMBANE@dffe.gov.za>; Danie Swanepoel <Danie.Swanepoel@westerncape.gov.za>; OCEIA <OCEIA@dffe.gov.za>; Tabisile Mhlana <tmhlana@dffe.gov.za>; Rueben Molale <RMolale@dffe.gov.za>; OCEIA@environment.co.za; nathan.jacobs@westerncape.gov.za; 'Noluvo Toto' <noluvo.toto@westerncape.gov.za>; Stephanie Barnardt <stephanie.barnardt@westerncape.gov.za>; Azni.November@westerncape.gov.za; Dirk.Prinsloo@westerncape.gov.za; Vanessa Stoffels <vanessa.stoffels@westerncape.gov.za>; 'Roberts John (BVL)' <robertsj@dws.gov.za>; Cor.VanderWalt@westerncape.gov.za; Brandon.Layman@westerncape.gov.za; Melanie Koen <Mkoen@dffe.gov.za>; Innocent Mapokgole <imapokgole@dffe.gov.za>; leptieshaam Bekko <leptieshaam.Bekko@westerncape.gov.za>; Mercia J Liddle <Mercia.Liddle@westerncape.gov.za>; Hilda.Hayward@westerncape.gov.za; Ryan.Apolles@westerncape.gov.za; coastalenquiries@westerncape.gov.za; BC Admin <bcadmin@dffe.gov.za>; Kmathetja@dffe.gov.za; MMatlala Rabothata <MRABOTHATA@dffe.gov.za>; Melvin.Schwartz@dalrrd.gov.za; mark.lakay@pgwc.gov.za; Lyle.Martin@westerncape.gov.za

Cc: 'Andrepeach' <andrepeach@lantic.net>; hansswartinc@gmail.com; 'bianca@ecoroute.co.za' <bianca@ecoroute.co.za>; 'Jessica' <jessica@ecoroute.co.za>; 'janet' <janet@ecoroute.co.za>

Subject: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Ref number: 14/12/16/3/3/1/3185 (PREVIOUS) - Draft Basic Assessment Report - Proposed Development of a Residential Dwelling on Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good day,

A 30-day public participation will be held from **28/05/2026 - 29/06/2026.**

Kindly find below the link to the DRAFT Basic Assessment Report and relevant appendices.

[Draft Basic Assessment Report - The Proposed Development on Portion 76 \(A Portion of Portion 54\) of Farm 216 Uitzicht, Knysna, Western Cape - DFFE Ref no: 14/12/16/3/3/1/3185 | Eco Route](#)

Please submit your comments to the EAP undersigned in this email within 30 days of this notice (i.e., on or before 29 June 2026).

Thank you for your participation in this process.

Kind regards,

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute





Reference: W11/4/1 Fax Number: +27 (0) 21 910 1966
Date: 25 June 2026 Direct Line: +27 (0) 21 957 4600
Email: NtuliV@nra.co.za Website: www.nra.co.za

Ms. Bianca Gilfillan
ECO ROUTE ENVIRONMENTAL CONSULTANCY
PO Box 1252
Sedgefield
6573

Dear Ms. Bianca Gilfillan

NATIONAL ROUTE 2 SECTION 8: DRAFT BASIC ASSESSMENT REPORT - THE PROPOSED DEVELOPMENT ON PORTION 76 (A PORTION OF PORTION 54) OF FARM 216 UITZICHT, KNYSNA, WESTERN CAPE - DFFE REF NO: 14/12/16/3/3/1/3185

Thank you for your email dated 28 May 2026.

It is noted that Portion 76 of the Farm 216 (A Portion of Portion 54) Of Farm 216 Uitzicht, Knysna is situated within 1.5 km from Brenton on Sea Residential Area and sits more than 3km away from the N2 in Knysna Municipality, Western Cape and the southern boundary borders the Brenton Sea. The property measures 21.01 hectares in extent.

The South African National Roads Agency SOC Limited (SANRAL) has no jurisdiction.

Yours faithfully

Vuyo Wandile Ntuli

STATUTORY CONTROL OFFICER

ID: 32514939

Fw: Comments for the Draft BAR for Proposed Development on Portion 76 (A Portion of Portion 54) of Farm Uitzicht 216, Knysna

From admin@ecoroute.co.za <admin@ecoroute.co.za>
Date Tue 23/06/2026 13:07
To 'bianca@ecoroute.co.za' <bianca@ecoroute.co.za>

 1 attachment (67 KB)
UITZICHT 216_76 KNYSNA COMMENTS.pdf;

Hi Bianca,

Please see below.

Kind regards,

Carina Leslie
Personal Assistant/Admin
Office: 064 691 4394
www.ecoroute.co.za



Eco Route
Environmental Consultancy

From: Sbonelo Ndlovu <sndlovu@bocma.co.za>
Sent: Tuesday, 23 June 2026 13:02
To: Admin <admin@ecoroute.co.za>
Cc: Andiswa Sam <ASam@bocma.co.za>
Subject: Comments for the Draft BAR for Proposed Development on Portion 76 (A Portion of Portion 54) of Farm Uitzicht 216, Knysna

Good day Bianca

I trust that you are well.

Herewith please find attached comments for the draft BAR for proposed development on Portion 76 (A Portion of Portion 54) of Farm Uitzicht 216, Knysna.

Kindly note that these comments are advisory and they are based on the information that was reviewed.

Should you have any urgent queries please do not hesitate to contact me.

Kind Regards,

SBONELO NDLOVU
WATER USE OFFICER

BREDE-OLIFANTS CATCHMENT MANAGEMENT AGENCY: GEORGE

DIV: Water Resource Management **SUB-CO:** Water Use Regulation

CONTACT: Tel: 023 346 8031 | Cell: 083 667 8083 | Email: sndlovu@bocma.co.za

PHYSICAL ADDRESS: 101 York Street | Unit 302 | George | 6530

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BREDE-OLIFANTS
CATCHMENT MANAGEMENT AGENCY

Lord give me endless knowledge and wisdom - AKA

29 June 2026

Bianca Gilfillan
Eco Route Environmental Consultancy
P.O. Box 1252
Sedgefield, 6573

Per email:

admin@ecoroute.co.za

bianca@ecoroute.co.za

janet@ecoroute.co.za

**RE: SANPARKS COMMENTS, DRAFT BASIC ASSESSMENT,
THIRD PUBLIC PARTICIPATION PROCESS, PROPOSED
DEVELOPMENT, UITZICHT 216, PORTION 76, KNYSNA,
WESTERN CAPE**

DFFE Reference Nos:

14/12/16/3/3/1/3114 - 6 March 2025, First Interested and Affected Parties (IAPs) Circulation

14/12/16/3/3/1/3185 - 11 November 2025, Second IAPs Circulation

14/12/16/3/3/1/3185 (Previous) - 28 May 2026, Third IAPs Circulation

SANParks has conducted numerous site visits and provided several comments on this application, which include:

1. Draft Basic Assessment report (DBAR), 1 October 2020 - not supported by SANParks.
2. DBAR, 28 January 2021, follow-up comment - not supported by SANParks.
3. DBAR (DFFE Ref. No. 14/12/16/3/3/1/3114), 7 April 2025 (**Annexure 1**).

Preferred and Alternative layouts were not supported by SANParks. SANParks only supported a disturbance area directly adjacent to Church Street.

It is understood that Eco Route applied for a time extension to submit this application to DFFE, however due to not meeting timeframes and submission processes, the application lapsed, necessitating the re-submission of a new application, with a new application number being issued.

4. DBAR (DFFE Ref. No. 14/12/16/3/3/1/3185), 9 December 2025 (**Annexure 2**).

lai-lais/richtersveld transfrontier

addo elephant

agulhas

augrabies falls

bontebok

camdeboo

golden gate highlands

karoo

kgalagadi transfrontier

knysna

kruger

mapungubwe

marakele

meerkat

mokala

mountain zebra

namaqua

table mountain

tankwa karoo

tsitsikamma

west coast

wilderness

The Preferred Alternative was not supported by SANParks. SANParks supported a small disturbance area directly adjacent to Church Street, with road access directly from the existing Church Street Road servitude.

The current application is a DBAR (DFFE Ref No. 14/12/16/3/3/1/3185 (Previous)), Eco Route, April 2026.

It is unclear why the application is being re-submitted for a third time, with a time lapse evident from the last DBAR which was circulated to IAPs of the 11 November 2025 to the current DBAR which was circulated to IAPs on 28 May 2026, i.e., approx. 7 months' later. SANParks seeks clarity on any extensions that may have been requested and granted by DFFE and the validity thereof. It is unclear if this is now a new application. Clarity is sought.

Key aspects of the current application are as extracted below.

Proposed Development Description

The proposed development comprises the construction of a single main dwelling in the south-western portion of the property, identified as the preferred layout based on the integrated specialist assessment and alternatives analysis. The development remains intentionally limited in extent and is proposed as a single residential development node with associated access and services, while the majority of the property remains undeveloped and in a natural state.

Main Dwelling

- A single-storey structure of approximately 1000 m² (including covered verandas and integrated garage), downscaled from the previously proposed 3000 m².
- Designed in a low-profile, contemporary coastal style, using earth-toned, non-reflective materials to blend with the natural dune landscape.
- Positioned to minimise ecological disturbance and visual intrusion, in accordance with visual, botanical, and geotechnical recommendations.

Access

- Access to the site will be via the existing servitude from Kerk Laan, with an internal access road linking the servitude to the dwelling footprint.
- The access route will follow natural contours to reduce the need for cut-and-fill and minimise vegetation clearance.

Water Supply

- The development will be self-sufficient in water supply, relying primarily on rainwater harvesting from roof surfaces.
- Rainwater harvesting and on-site storage will be provided as part of the development. The final tank configuration and associated footprint form part of the total assessed development footprint and will be confirmed in the detailed civil and services design.
- Borehole abstraction will only be used as a supplementary source, subject to licensing by the Breede-Gouritz Catchment Management Agency (CMA).

Wastewater Management

- On-site sanitation will be provided by means of an engineered on-site wastewater solution. The final position, design and footprint of the septic tank and soakaway system, or other approved on-site sanitation alternative, will be informed by the detailed civil design and geotechnical input and will form part of the total development footprint assessed in this BAR.

Stormwater Management

- Runoff will be managed through infiltration-based measures such as:
 - Rainwater tanks
 - Permeable driveway surfaces

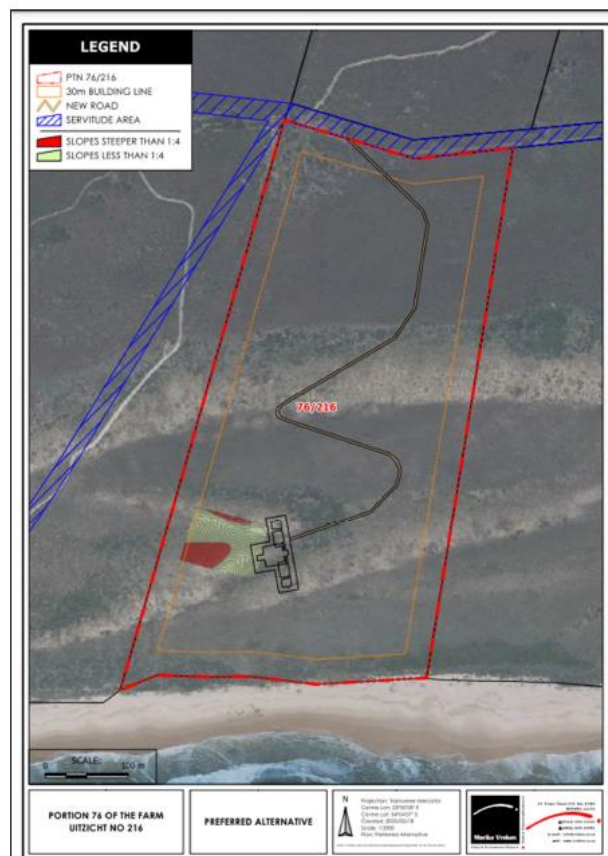
- Swales and soakaways, where applicable
- No subsoil drains are required along roads but are recommended behind retaining walls if used.

Landscaping

- Only indigenous vegetation will be used to:
 - Maintain ecological integrity
 - Reduce fire risk
 - Ensure the visual integration of the development with the surrounding landscape
- No disturbance will occur beyond the demarcated development footprint.
- Construction Footprint
- The total construction disturbance area will not exceed 0.25 ha (2 500 m²) for the principal built footprint and immediate construction platform. Where associated service infrastructure, road disturbance, tanks, sanitation infrastructure, and ancillary construction areas are required, these must remain within the clearly demarcated and authorised disturbance envelope shown on the final approved layout and engineering drawings.
- The layout was selected to avoid sensitive vegetation types and reduce fragmentation of natural habitats.

The preferred development layout has not been amended as part of this resubmission. The property remains within a highly sensitive coastal and biodiversity context, and the BAR recognises the need to consider the Garden Route District Municipality Integrated Coastal Management Plan, the broader Coastal Protection Zone, the Knysna Protected Environment, and specialist findings relating to dune stability, biodiversity sensitivity and visual impact. Should any additional specialist studies be required by the competent authority, the Draft BAR will be amended only to include such specialist information, clarification or supporting detail, where required, without introducing a revised layout.

Aerial Plan of the proposed activity (1000m²)



Internal Road

The proposal entails the construction of a new internal road to provide access to the southern part of the property. The internal road will be 830 meters in length. The road surface area will be 2.5 meters wide and the disturbed area for construction of the road varies between 4 to 5.5 meters wide.

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Recommendations

Earthworks

Excavations up to 3 meters deep are classified as "Soft" per SABS1200D. Sidewalls become unstable at angles over 30 degrees, so they should be battered or supported with retaining walls. The soil beneath the topsoil is generally suitable for backfilling in various applications but must be approved by the engineer before use.

The proposed dwelling site has a moderate slope of about 1:5 and will require significant earthworks for level platforms. The access road also has steep terrain, necessitating earthworks and retaining walls for the box cut.

Total road disturbance area is stated as 830m x 5.5m, i.e., 4565m². No allowance has been made for retaining structures which will be necessary.

Construction Disturbance area; >2500m² (unclear if this refers to building or disturbance footprint)

Total Disturbance therefore is >7065m²

The conclusion and recommendations stated on pg. 174 and 175 are contradictory and confusing. Mention is made of a "preferred alternative of a main dwelling in the south-western portion", then later it is recommended that the "development be located within the northern portion of the property adjacent to Kerk Laan".

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Section I

1. Conclusion and Recommendations

- Based on the findings of the specialist studies and the alternatives analysis, the preferred alternative is the siting of one main dwelling in the south-western portion of Portion 76. This location avoids the transformation of Critically Endangered Knysna Sand Fynbos, limits visual exposure, and aligns with the less sensitive Goukamma Dune Thicket vegetation type.
- Alternative 2 (farm manager's house included) was rejected as it expands the footprint unnecessarily and infringes on sensitive areas.
- Alternative 3 (northern location, as per SANParks' suggestion) was found to be not viable due to the permanent and irreplaceable loss of Critically Endangered vegetation, contravening national legislation (NEM: BA, 2022 list) and WCBSP objectives.
- The No-Go Alternative does not meet the landowner's basic residential needs and does not provide a reasonable and balanced outcome.
- Accordingly, the south-western siting is recommended as the only defensible option."

Recommended Development Location (Northern Portion)

The EAP therefore recommends that the proposed development be located within the northern portion of the property, adjacent to Kerk Laan. This alternative is considered the most environmentally responsible and lowest-risk option and is aligned with both specialist findings and key concerns raised during the public participation process.

It is acknowledged that development within the northern portion may require a relaxation of the applicable building line in terms of the relevant municipal planning framework and zoning scheme. Should this alternative be pursued, the necessary land use planning approvals will be obtained from the competent authority prior to construction.

SANParks points which were raised in SANParks' comments of 7 April 2025 (**Annexure 1**) and 9 December 2025 (**Annexure 2**) stand.

SANParks will not support any form of development on the foredune, nor any road access over the foredune to such development. SANParks will only support a small disturbance area adjacent to Church Street, with road access directly from the existing Church Street road servitude. This conforms with SANParks position for other development applications along Church Street, where several landowners have committed to Contract National Park (CNP) with SANParks and are in various phases of the CNP declaration process.

The damage and destruction to the foredune; the loss of sensitive critically endangered fynbos vegetation; and the negative impacts on the Knysna Sand Fynbos Corridor (the subject of a concerted conservation effort by several role-players in the region) are considered significant and high. The sensitivity of the proposed development site is graphically evident from drone photographs which were taken in June 2026 of the Brenton Knysna Sand Fynbos Corridor, to aid fire and alien vegetation management in the corridor (**Fig. 1, 2 & 3**).



Fig. 1. View of Brenton Knysna Sand Fynbos Corridor looking west, from Uitzicht 216 Portion 76. This is further a fire corridor, which runs east to west to the CapeNature Goukamma Nature Reserve (Source: SANParks).

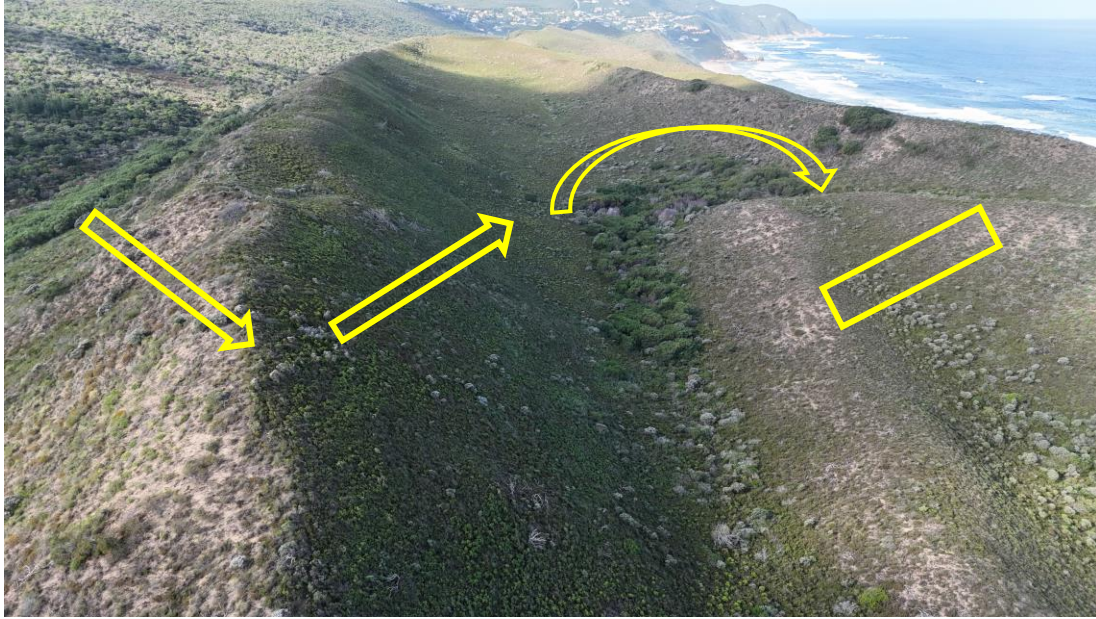


Fig. 2. Approximation of disturbance of foredune by proposed access road and dwelling (Source: SANParks).



Fig. 3. Corresponding orientation of the Preferred Layout (Source: DBAR (DFFE Ref No. 14/12/16/3/3/1/3185 (Previous)), Eco Route, April 2026).

Further, **Fig. 4** illustrates that the proposed road access to the dwelling over the foredunes will traverse two steep slope areas, i.e., going up and over the dune where slopes are $>30\%$. The northern slope of this dune is sparsely vegetated due to a north facing aspect, erosion on this slope is highly likely. Embankments and retaining structures will be necessary, which will increase disturbance footprint areas, and loss of vegetation.

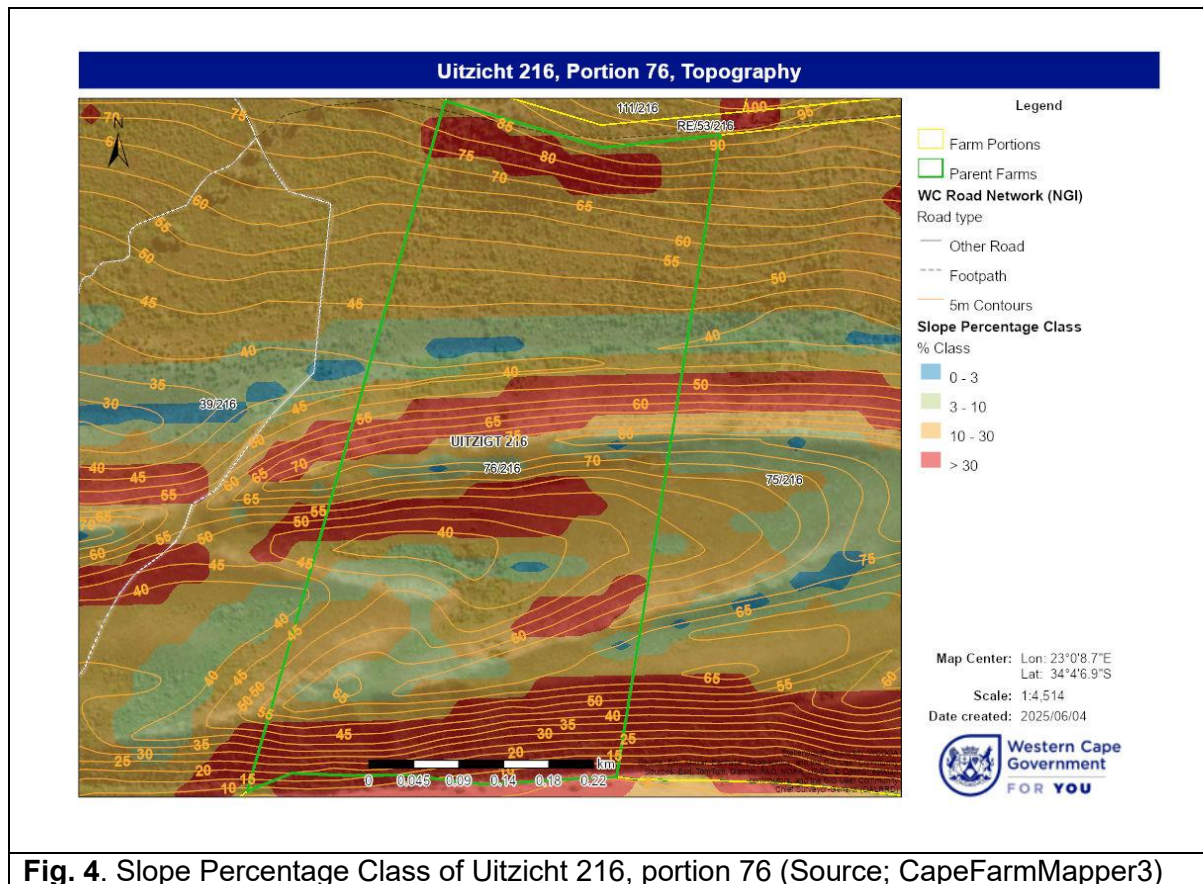


Fig. 4. Slope Percentage Class of Uitzicht 216, portion 76 (Source; CapeFarmMapper3)

Benefits from the proposed development in its preferred location (in the south-western corner of the property) will only benefit the Applicant, with no benefits, only a loss to society and future generations. SANParks cannot support any development on the foredune, particularly when other alternatives, i.e. developing adjacent to Church Street in the north-eastern corner, in an already disturbed area are possible, which will allow primary development rights. SANParks will support a building line relaxation in this area to allow the development closer to Church Street.

SANParks' full comment letters, including **Annexure 1 and 2**, should be included in the body of the Final Basic Assessment Report, not only in a Comments and Responses report/ table. Evidence of this should be provided to SANParks.

SANParks reserves the right to revise comments if additional information becomes available.

Yours sincerely

Dr Vanessa Weyer
Principal Planner
SANParks Garden Route National Park

CC:	Victor Mokoena	SANParks
	Lwazi Khuzwayo	SANParks
	Elmonique Petersen	SANParks
	Jessica Hayes	SANParks
	Arnelle Collison	SANParks
	Marthan Theart	SANParks
	Jeff Manual	SANParks
	Carlo van Tonder	CapeNature
	Mashudu Mudau	DFFE
	Nyiko Nkosi	DFFE
	Danie Swanepoel	WC DEADP
	Caren George	WC DEADP
	Jan Coetzee	WWF
	Franci Gresse	WWF
	Philip Hendricks	Knysna Municipality
	Mulalo Musekene	Knysna Municipality
	Hennie Smit	Knysna Municipality
	Shaun Madumbo	Knysna Municipality
	Johan Labuschagne	WHGC

Attachments:

Annexure 1: SANParks comments, DBAR (DFFE Ref. No. 14/12/16/3/3/1/3114), 7 Apr 2025.

Annexure 2: SANParks comments, DBAR (DFFE Ref. No. 14/12/16/3/3/1/3185), 9 Dec 2025.

OFFICE OF THE MUNICIPAL MANAGER

Enquiries:	L Herwels
Reference:	18/3/4/1
Date:	27 May 2026

Eco route
Po Box 1252
Sedgefield
6573

Per E-mail

Attention Bianca Gilfillan

**COMMENT ON PROPOSED DEVELOPMENT OF PRIMARY DWELLING AND ACCES ROAD
ON PORTION 79 OF FARM 205 RUYGTEVALLEY, SEDGEFIELD WESTERN CAPE**

Your letter and Basic Assessment Report under DFFE reference 14/12/16/3/3/1/3235 concerning the above mentioned have reference:

The office subjected to the following conditions has no objection to the proposed activity.

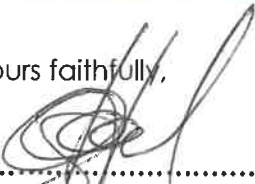
- Ensure that no Municipal Health Nuisance occurs during the development of the dwelling and self-catering tourist accommodation.
- Standby generators to be position and operated without causing a Nuisance.
- The water tanks filled by rainwater to be marked as non-potable if not treated, should the water be used as potable water the water must comply with SANS241 :2015 Specifications for Drinking water.
- The conservancy tank to be positioned so that it is easily accessible and does not cause a Municipal Health nuisance. The area around the conservancy tank be banded to ensure all spillages can be contained and treated.

- This office takes note of the recycling, responsible person, management and monitoring of waste. All waste to be safely stored and secured ensure that the area is animal proof.
- The premises will operate as a self-catering tourist accommodation in terms of Garden Route District Municipality Municipal Health By-Law (2018) the premises must be in possession of Certificate for Accommodation Establishment.
- Please visit our office in 24A Queen street Knysna or alternatively contact the office on 044 3827214 for an application for the above-mentioned certificate

We hereby kindly request that the above recommendations be incorporated into the Environmental management Program.

For more information feel free to contact Mr. L Herwels on 044 3827214 or lindon@edendm.co.za

Yours faithfully,



LG HERWELS

ENVIRONMENTAL HEALTH PRACTITIONER



**MONDE STRATU
MUNICIPAL MANAGER**

physical 4th Floor, York Park Building, York Street,
George, 6530
website www.capenature.co.za
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telephone 087 087 6085
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reference LE14/2/6/1/6/4/76-216_Resid-
dwelling_Uitsigt_20260629

Bianca Gilfillan
Eco Route Environmental Consultancy
46 President Steyn Street
The Island
Sedgefield
6573
By email: admin@ecoroute.co.za

Dear Ms Gilfillan

RE: Draft Basic Assessment Report - Proposed Development of a Residential Dwelling on Portion 76 of the Farm Uitzicht, Knysna, Western Cape Province
DEA&DP Reference: 14/12/16/3/3/1/3185

CapeNature would like to thank you for the opportunity to comment on the above report. Please note that our comments only pertain to biodiversity related impacts and not to the overall desirability of the application. Our comments are as follows:

1. CapeNature's comments on a previous application for the development of a residential dwelling on the property (letter dated 8 April 2025) still have reference.
2. CapeNature notes that the number of units has been reduced to a single dwelling with a footprint of 1000m², located in the southwestern corner of the property.
3. CapeNature strongly objects to the proposal to locate the main dwelling in the southwest, due to the extreme sensitivity of the dune system habitat and associated species.
4. CapeNature stands by our previous comment that the unit must be moved to the disturbed area in the northern section of the property. This is close to an existing access road, which will facilitate evacuation in the event of a major fire. Clustering this development in the north with the developments on nearby properties will not only provide better protection for infrastructure from wildfires, but will also allow ecological processes to continue unhindered and obviate the need for an internal access road. It will thus have the lowest environmental impact in terms of habitat sensitivity and habitat loss.

5. Given that the vegetation in the northern part of the property is Critically Endangered, CapeNature strongly recommends that the proposed total footprint of 1000m² is further reduced to ensure maximum protection of the natural landscape.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Kind regards



(Dr) Marianne de Villiers

Manager, Landscape Conservation Intelligence (East)



WESTERN HEADS-GOUKAMMA CONSERVANCY
NPO: 285-693
81 TULBAGH STREET
KNYSNA 6571
<https://westernheadsgoukamma.co.za>

Attention: Bianca Gilfillan, Eco Route Environmental Consultancy

By email: admin@ecoroute.co.za, bianca@ecoroute.co.za, janet@ecoroute.co.za

Draft Basic Assessment Report (DBAR) – The Proposed Development on Portion 76 of Farm 216 Uitzicht, Knysna, Western Cape – Dated 27 March 2026.

DFFE Reference number:

- 14/12/16/3/3/1/3114 - 6 March 2025 Notice to IPA's
- 14/12/16/3/3/1/3185 - 11 November 2025 Notice to IPA's

Comments and Objections to the above DBAR by the Western Heads Goukamma Conservancy (registered with CapeNature 2004), hereinafter referred to as WHGC

- WHGC is supported by the **Table Mountain Fund (TMF)**, a subsidiary of **WWF South Africa**, (WWFSA) in a project to conserve and restore the Critically Endangered **Knysna Sand Fynbos** (FFd10).
- The WHGC also works closely with **SANParks** in its Park Expansion objective, by facilitating **Contractual National Park (CNP)** agreements between landowners and SANParks.

Structure of this document

This document addresses the above referenced DBAR, following the section headings and page numbering employed by the applicant.

SECTION B – Property description (pp 14–15)

The applicant states that (p. 14):

“The entire property is mapped as a Critical Biodiversity Area (CBA) in terms of the Western Cape Biodiversity Spatial Plan (WCBSP, 2017; 2023 update). A CBA is defined as an area in a natural condition that is essential to meet biodiversity targets for species, ecosystems, ecological processes or critical ecological infrastructure. The management objective for CBAs is to maintain them in a natural or near-natural state, with no further loss of natural habitat permitted. Where degradation has occurred, rehabilitation is encouraged, and only low impact, biodiversity sensitive land uses are considered appropriate”.

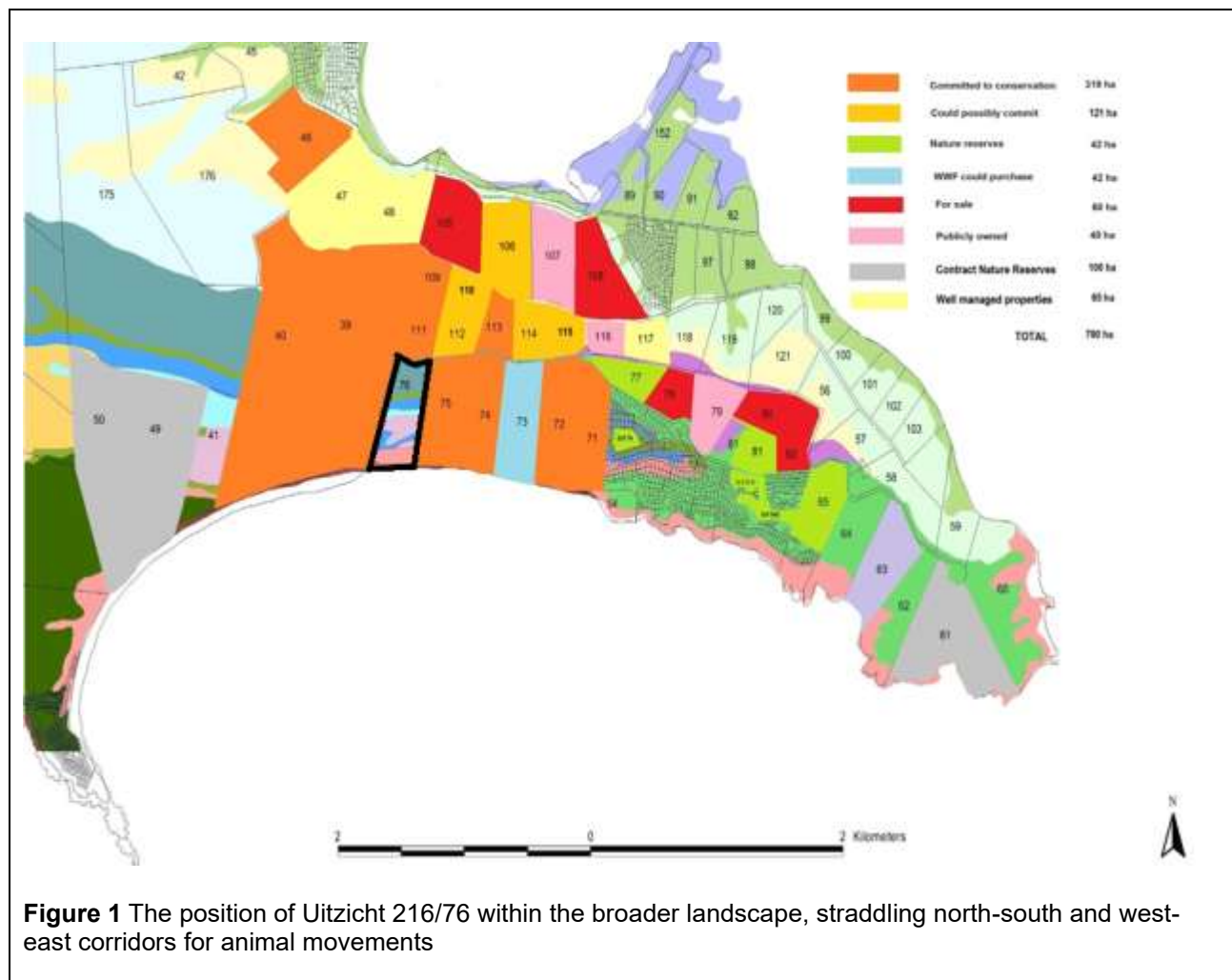
WHGC submits that the applicant, in addition to not taking full cognisance of the above, has not considered the property in its full landscape, biodiversity, ecological and human context and this has resulted in a fatally flawed, confusing and incomplete development proposal, for the reasons given below:

Landscape context

Uitzicht 216/76 is situated within an exceptionally sensitive **Critical Biodiversity Area 1 (CBA 1)**, which has the highest conservation, aesthetic and tourism value not only for the residents of Knysna, but also for the region. This property is immediately adjacent to the SANParks CNP properties Uitzicht 216/39, 40, 74, 75 and 111 (Fig. 1).

This CBA 1 itself is of enormous regional and national conservation importance because:

- It contains the largest remaining contiguous extent of the Critically Endangered Knysna Sand Fynbos (FFd 10) vegetation type.
- It is within the expansion footprint of the **Garden Route National Park (GRNP)**, and already contains over 300 ha of Contract National Parks (Protected Areas).
- It is a natural scenic area as per the **National Heritage Resources Act (NHRA)**, and will provide future growth of tourism activities, which will benefit all the inhabitants of the Breton Peninsula and the whole Knysna area.
- It has the highest conservation status (Core1b) for spatial planning purposes in the Knysna and **Western Cape Spatial Development Framework (WCSPDF)**.



- It is within the **Coastal Protection Zone (CPZ)** defined by the **Coastal Management Act 24 of 2008 (CMA)**.

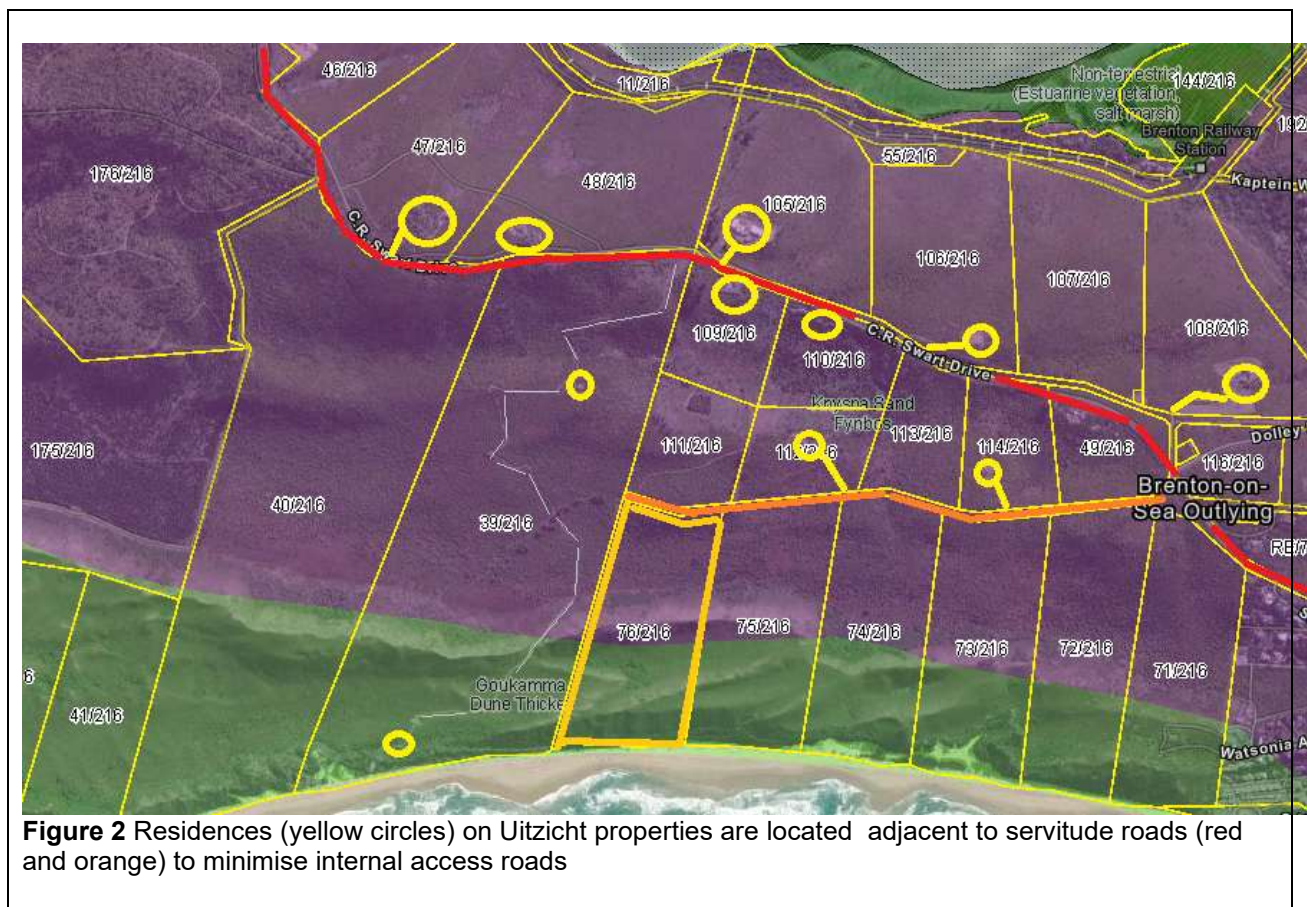
- It has been the subject of extensive and costly conservation and restoration efforts by the WHGC, TMF, WWF, SANParks, CapeNature and conservation sensitive landowners in the CBA.

These conservation and restoration efforts have included:

- Encouraging the owners of Uitzicht properties to become SANParks CNPs
- Purchase of three large properties by the WWFSA and declaration of CNPs
- Alien clearing & rehabilitation programmes funded by the TMF and WWFSA
- Expert botanical surveys to record the plant species within the CBA.
- Implementation of a coordinated fire management programme to protect dwellings from fire and restore a natural fire regimes through periodical ecological burns, guided by the **Southern Cape Fire Protection Agency (SCFPA)** .

Location of existing Uitzicht residences in relation to servitude roads

Existing residences on all Uitzicht 216 properties are located as close as possible to municipal or provincial roads to prevent further fragmentation and disturbance by linear infrastructure such as internal roads (Fig. 2). The only exception (Uitzicht 216/39) has a historical road which was in existence when the current owners acquired the land in the early 1970s and runs along a registered public servitude that eventually leads to the coast. Uitzicht 216/39 (90 ha) also has a small dwelling close to the coast, which is a wooden structure between the primary and secondary dunes with an estimated disturbance footprint of 600 m². This dwelling is not visible from the beach, Buffalo Bay, Brenton on Sea, or any public roads.



There are therefore no visible buildings on the primary sand dunes between Brenton on Sea and Buffalo Bay. This natural and unspoiled beach is an international tourist attraction and one of the crown jewels of Knysna's many natural attractions, which drive its tourism industry, possibly second only to the famous Knysna Heads.

Objection 1

The WHGC submits that the DBAR does not address adequately the landscape context of the proposed property development:

- Uitzicht 216-76 is surrounded by protected areas (CNPs)
- damage to the sensitive vegetation has been minimised, with small dwellings positioned close to the existing servitude road (Kerkstraat)
- visual impact is minimal

SECTION C – Location of activities (pp. 14–17)

This section of the DBAR only shows the preferred Alternative1, which includes **linear infrastructure (an internal road)**, which is covered below in section G, and found to be excessive and not supported in a **CBA Core 1 SPC** in terms of the **Western Cape Land Use Planning Guidelines Rural Areas 2019 (WCLUPGRA)**.

SECTION D – Scope of proposed activities (pp. 17-24)

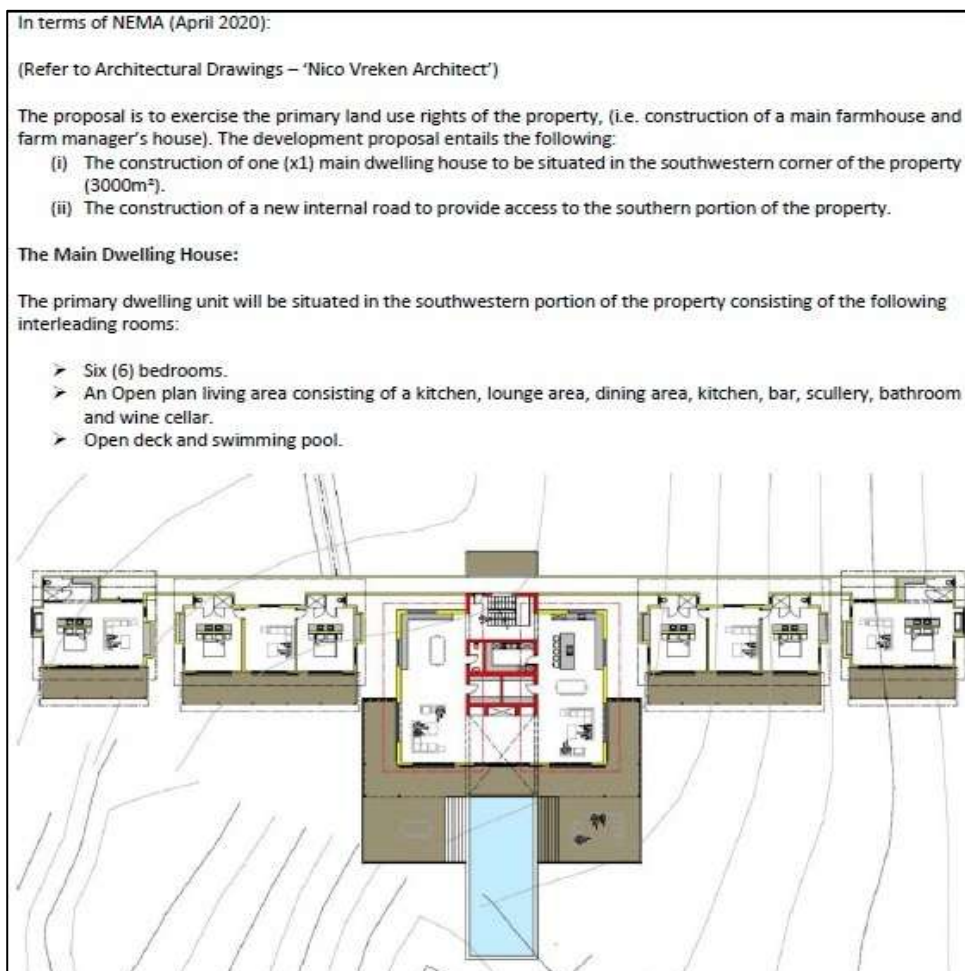


Figure 3 – Architectural plan of the proposed main dwelling (Appendix 3B)

Primary dwelling - disturbance footprint and profiles

It is not clear from the Section D of the DBAR whether the layout of preferred main dwelling proposed for the south-western corner of the site is as per Fig. 3 (above – 3500 m²) and as shown on pp. 17 & 18, or for a much smaller dwelling (1000 m²). Are the m² just for the building, or does this area include for disturbance during construction, parking areas, a swimming pool, water storage, utility areas sewerage disposal facilities, topsoil storage areas, and so on? In order to assess the visual impact of this dwelling details such as elevations, sections, 3D views, floor levels, or external views from different angles are necessary.

The WCLUPGRA 2019 guidance for a CBA Core 1 area requires a "small low-density footprint" and an "appropriate scale and form".

Manager's dwelling

- Only one dwelling is allowed if the property is within 1 km from the shoreline according to the CMA.
- If the property is zoned Agriculture 1 only one dwelling is allowed unless actively farming (Manager's house).
- We therefore support the applicant's decision not to apply for a second dwelling.

Objection 2

The WHGC therefore requests that section D is redrafted, with full details of the main dwelling and any supporting infrastructure. Details of the various alternatives, including siting the main dwelling in the north west corner of the property close to Kerkstraat, should also be shown so that the disturbance areas are clear.

Internal road

Access to Portion 76 of the Farm Uitzicht 216 (DBAR p. 19):

- A short internal driveway will be constructed, providing access from the existing servitude road Kerkstraat to the dwelling footprint.
- The driveway will follow the natural contours of the site to minimise cut-and-fill, erosion risk, and vegetation clearance.

Need for an internal road

- The need for an internal road is the result of an illogical and flawed site selection process, as described under **Section G** below. Furthermore, information provided in the DBAR on the true extent and impact of this internal road is ambiguous. The DBAR (p. 45) specifies the road as being **830m long** and 2.5 m wide with a construction disturbance of 4m to 5.5m wide.
- The Civil Services Report does not credibly calculate the total disturbance footprint of the road and retaining structures. It can be deduced from DBAR pages 45 & 48 that the **disturbance area and loss of biodiversity from the internal road alone is calculated between 4150 to 4600 m²**. However, this does not adequately allow for the required retaining walls to stabilise the mobile sand on the steep slopes and hairpin bends, particularly on the highly unstable slopes of the Arid Dune Fynbos described by Vlok (2005) (see Section E below). It also omits the need for installing a stormwater drainage system to prevent erosion. The reference to a 2.5m wide surface area of the road is therefore an attempt to conceal the true extent of the

disturbance required to build it. The Geotechnical Test Report itself specifies the need for “significant earth works and retaining walls” as well as “an additional 2-meter disturbance envelope surrounds all proposed roads”. (DBAR page 77).

5.3 ROADS

There is an existing road network servicing this area, all roads leading to the road reserve are tarred and of good quality. The dirt track along the road reserve will need to be upgraded.

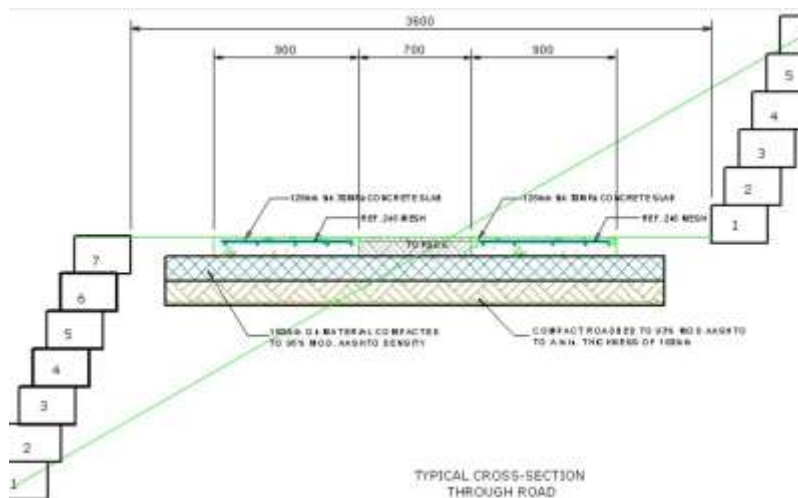


Figure 4 – Road construction details from Appendix D12 Civil Services Report

- Reinforced concrete strip roads (Fig. 4 above) are environmentally harmful, and except on steep slopes the internal road should be built of natural materials like the road on Uitzicht 216/39.
- Will this internal road be sufficiently strong and wide enough to support heavy construction equipment which has a large turning circle?
- The internal road traverses a steep second primary dune with a >50% gradient to reach the main dwelling in the southwest part of the property. Appendix D12 Civil Services Report (p. 13) shows the volume of soil to be removed & added. Fig. 4 also shows the ground stabilising blocks needed due to the extreme gradient of the road over the second primary dune.
- There is no consideration of the impact of an estimated 4 000 ton topsoil excavation (Appendix D12 Civil Services Report) during road construction. The majority of this soil needs to be removed and some potentially stored for back fill. This 4 000 ton or 2282 m³ of soil will require over 400 loads of 10 ton trucks that hold a high environmental risk component. It will also place huge pressure on the farm road which is the only access to the site (see Fig. 4 “the dirt track along the road reserve will need to be upgraded”).
- Amongst the environmental impacts of the proposed internal road even after it is built will be:
 - disruption & fragmentation of the vital east-west ecological corridor for animals
 - stimulation of alien plant growth in the disturbance area
 - roadkill of animals from heavy vehicle traffic during construction and later passage of clients to and from what appears to be a “boutique hotel” on the primary dune
- Aesthetic Impact of the road, which will be visible from CR Swart Drive, Brenton on Sea and Buffalo Bay.

Objection 3

The WHGC therefore objects to the proposed internal road based on:

- It is only needed because of an incorrect choice of site for the main dwelling (see Section G)
- its illegality in terms of WCLUPGRA 2019 guidelines pertaining to Core 1 SPC (see p. 68 of Appendix D7 – No internal road is allowed to go through a CBA.
- the unacceptably high biodiversity loss of vegetation during construction of the road
- the fragmentation of the Critically Endangered Knysna Sand Fynbos
- the probability of animals being run over by vehicles on the internal road
- the unacceptable aesthetic impact of the internal road (visible from the Brenton Road).

SECTION E – Environmental considerations and Botanical report (Appendix A7)

Vegetation sub types Jan Vlok's 2005 Report (Appendix 1)

- *Moist Dune Fynbos* - south facing, steep in places
- *Goukamma Dune Thicket* – bottom of primary dune only
- *Arid Dune Fynbos* – north facing, very steep, extends up to summit. Very sandy, erodes rapidly if vegetation is removed.
- *Brenton Dune Fynbos* - south facing, none in Goukamma Nature Reserve (GNR). Must be conserved.
- *Primary Dune Slack Fynbos* – Only occurs on parabolic dunes on the Brenton peninsula (none in GNR). Main dwelling cannot be built in this vegetation.
- *Primary Dune & Cliff Fynbos* South facing, very steep, continues down to foredune.
- *Foredune* can be eroded by storm surges and sea level rise, causing slumping of the entire southern slope of *Primary Dune & Cliff Fynbos*.

Appendix D7

Refer to Appendix D7 – dated 22 July 2024 (Bianke Fouché)

“Impact Assessment for the Proposed Development of Dwelling(s) on Portion 76/216 Uitzicht Farm, Knysna”.

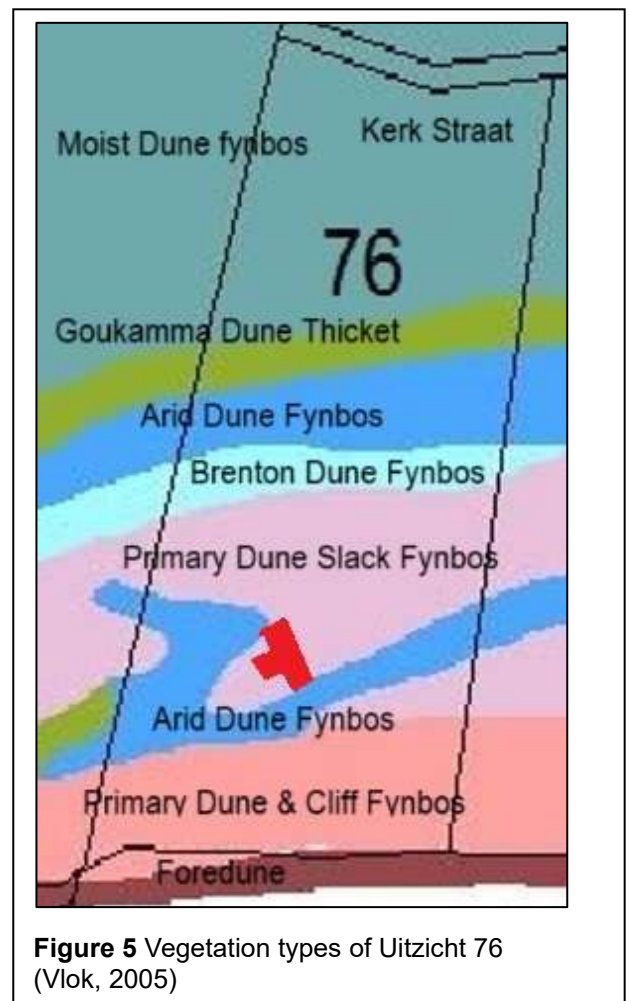
Vegetation types on Uitzicht 216-76

Section 3.1 (pp. 14–21)

- Note that SANBI have issued a new VegMap (2024), which includes a new vegetation type Goukamma Strandveld, (FS13), replacing Goukamma Dune Thicket which has not yet been formally assessed for its threat status, although it appears nearly as threatened as Knysna Sand Fynbos (pp. 19–21).
- The description of this new vegetation type FS13 (Cowling *et al.*) is attached as Appendix 2. It is noteworthy that only 8.6% of this newly described vegetation type is formally protected.

Section 5.1 (pp. 24–27; Fig. 11, Table 2 photos)

- Fig. 11 also depicts the vegetation in the southern part of the property as mostly “Strandveld-fynbos”, and not as “Dune thicket”. The “Invaded valley bush” mostly consists of indigenous bushes, but also some invasive alien trees (*Acacia cyclops*), which could easily be removed.



Species of Conservation Concern (SCCs)

Section 5.2 (pp. 27–28; Figs 12 & 13)

- A botanical site inspection on 11 October 2023 revealed 9 plant SCCs, which are recorded on a map (Fig. 12) and photographs (Fig. 13).
- Many of the SCC records were in the southern part of the property, proving that this “Least Concern” vegetation contains numerous SCC plants, some within or close to the favoured development footprint.
- The botanist describes the assumptions and limitations of such a short survey in Section 3.3 (p. 15) and in Section 5.4 (p. 30) and states that more SCCs are probably present.

Site sensitivity verification

Section 6.1 (p. 34) Terrestrial biodiversity

- The sensitivity of the terrestrial biodiversity theme for the site is confirmed as **Very High** as the site contains:
- A significant area of remaining natural vegetation of a CR vegetation type (Knysna Sand Fynbos) north of the large barrier dune on the site, which is threatened by invasive plants, especially pines.
- The southern section of the site is also sensitive habitat, characterised by a strandveld-fynbos mosaic with thicket patches in fire refugia on the site (i.e., the base of dunes, and some sections on the dune crests).
- Furthermore, the whole site is a CBA1, and forms part of an area that serves an important corridor function along the coastline.

Section 6.2 (p. 34) Botanical biodiversity

- The site sensitivity in terms of the terrestrial plant species theme is confirmed as **High***
- The site is home to several SCC*.
- There is some spatial heterogeneity over the site in terms of the distribution of the SCC found.

Comments

* Table 3 (pp. 31–33) lists 6 confirmed; 1 Likely confirmed; 3 Very High; 16 High; and 11 Medium. This is more than “several” and the sensitivity is possibly Very High.

These Very High and High sensitivities mean that it is of critical importance to minimise the disturbance area of all activities during construction and operations.

Objection 4

Insufficient emphasis has been placed on the environmental sensitivity of the southern section of the site, and specifically the importance of the whole site being CBA1.

SECTION F – Need and desirability

Exercising primary rights

- ‘Dwelling unit’ means a self-contained interleading group of rooms with not more than one kitchen, used only for the living accommodation and housing of a single family, together with such outbuildings as are ordinarily used therewith.
- The Coastal Management Act – within 1km from shoreline only one dwelling is allowed.
- Knysna zoning scheme only allows for one dwelling unit per erf for Agriculture 1 properties unless there are substantial farming activities.

- The WHGC supports the applicant's entitlement to exercise its primary rights for a property zoned for Agriculture 1, provided that the footprint of the single dwelling does not exceed 1000 m² and is not sited in the south western part of the property, which would need a lengthy and environmentally destructive access road

SECTION G – Alternatives considered (pp. 45–57)

The applicant's states that the development aims to "exercise the owner's primary land use rights for Agriculture Zone I properties to a residence (dwelling)". The entire property is classed as a CBA 1, and this places constraints on what is allowed from an environmental perspective, as below and elsewhere in this submission.

Western Cape Land Use Planning Guidelines Rural Areas (WCLUPGRA 2019)

WCLUPGRA (2019) classified the Western Heads CBA as Core 1 SPC. The DBAR wrongly refers (p. 36) to the superseded legislation "Draft Western Cape Rural Development Guidelines (2009)".

Relevant factors from WCLUPGRA 2019 pertaining to Core 1 SPC (CBA) that need to be considered are summarised as follows:

4.1.2 GUIDELINES ON LAND USE AND ACTIVITIES IN THE CORE 1 SPC

- *human impact must be restricted to ensure that there is no further loss of natural habitat*
- *structures associated with activities in Core Areas should preferably be located in neighbouring Buffer areas*
- *structures should preferably be located on disturbed footprints*
- *"Appropriate form and scale"*
 - *aesthetic qualities of the receiving environment must be the factor determining the appropriate scale and form of the proposed development*
 - *small low density footprints, appropriate technology and design concepts should be encouraged (e.g. Enviro-loos, temporary structures, green architecture and use of natural resources)*
 - *structures to achieve least impact*
- *Land uses that should not be located in Core 1*
 - *linear infrastructure of any sort that will cause significant loss of habitat and/or disrupts the connectivity of ecological corridors*



Figure 6 – Alternative 3

These guidelines specifically exclude the construction of an internal road (linear infrastructure), and therefore the only place a dwelling can be is as close as possible to the existing road along the northern boundary (Kerkstraat – Fig. 3), which for some reason the applicant has not given any attention to, despite it being advocated for by SANParks in written and verbal exchanges. This would minimise the project footprint, reduce the fire risk, limit landscape fragmentation, and result in a much lower (< 1 000 m²) transformation of the property.

The DBAR illogically provides three (3) site plan alternative layouts (pp. 45–57), two of which include an internal road, which is not permitted, and one of which includes using the Uitzicht 216/39 existing road, which the owner of this property has refused to entertain, The DBAR therefore does

not provide a layout with the main dwelling close to Kerkstraat, which would obviate the need for an internal road. The DBAR then gives the conclusion (pp. 55–57) that the preferred alternative is a 1 000 m² main dwelling in the southwestern section of the property. The alternative of placing the main dwelling close to Kerkstraat is ruled out because there would be a loss of 1 000 m² of Knysna Sand Fynbos. This assumption does not take any account of the loss of Knysna Sand Fynbos for the internal road (c. 4 500 m²) or the opportunity to place the dwelling in an already degraded (alien infested) area along Kerkstraat so that much less than 1 000 m² would be lost. The DBAR's Preferred Alternative is therefore to site a smaller main dwelling in the southwestern corner, ignoring the fact that an internal road is not allowed under the WCLUPGRA 2019 guidelines pertaining to Core 1 SPC, and that the vegetation in the south of the property is also of Very High– High sensitivity (see the discussion in Section E above).

The DBAR's Preferred Alternative is in direct conflict with the finding of Confluent Environmental's botanical & ecological expert, Bianke Fouché, (author of Appendix D7 dated 22 July 2024). She specifically concluded that the Preferred Alternative in the DBAR of placing the main dwelling in the southern part of the property and building a long internal road was not supported, because of the high to very high sensitivity of the vegetation and the many SCC plants confirmed present at that site. She further stated that Alternative 3, with one dwelling in the north-western corner of the property, is the most acceptable layout for the proposed dwelling on the property *“preferable because it minimises project footprint, reduces fire risk, limits landscape fragmentation, and results in less than 1% transformation of the property, compared to over 2% for other options”*. Appendix D7:

Therefore, the selection of the preferred location by the DBAR is irrational and ignores the recommendation of their own botanical consultant, and the applicant needs to be interrogated as to why Alternative 3 (Fig. 6) is not being considered, and the Preferred Alternative is to site the main dwelling in the southwestern part of the property.

Comparative Table of Disturbance footprints in m²

	Preferred Alternative 1	Alternative 2 (use 216/39 road)	Alternative 3 (two dwellings)	Alternative 4 (least impact)
Primary dwelling	3000	3000	4000	1200
Road	4565	500	4565	200
Manager's House	0	0	1200	0
Water Pipeline/s	415	600	600	200
Total*	7 980 m²	4 100 m²	10 365 m²	1 600 m²
% of total property	4.0%	2.0%	5.2%	0.8%

*These totals exclude unknown disturbances e.g. water tanks, internal road retaining walls and water aspects, primary residence parking area, etc.

Objection 5

Consequently the WHGC objects to the DBAR's Preferred Alternative and supports Alternative 3, which was also supported by SANParks, CapeNature, several other I & APs and the applicant's own biodiversity experts because:

- No internal road will be needed, with its huge biodiversity and visual impacts
- No main dwelling on the primary dune with significant biodiversity loss and visual impacts
- Main dwelling will be in an already disturbed area, as the legislation favours
- shorter water pipeline from boreholes, which might not be needed anyway

SECTION H – Details of the public participation process (PPP)

The notices and advertisements seem to have been dealt with properly, and most of the I & APs are listed in Appendix G.

The issues raised by the I & APs and responses given in the DBAR are summarised below:

Issues raised by I & APs	Responses in DBAR
1) Solar energy preferred to Escom supply	Solar energy is being used
2) Relaxation of 30m boundary line for manager's not acceptable	No manager's house
3) Box cuts on road over primary dune will need retaining wall supports – must be vegetated to reduce visual impacts	See geotechnical report
4) Internal road to be concrete strip construction – essential areas, more natural designs across the valley	See geotechnical report limited to
5) Church Street is unmaintained sand road – cannot support construction vehicles	Road will be upgraded
6) Building on primary dunes will affect biodiversity and ecological functioning	No response
7) SANParks – Uitzicht 76 is in buffer zone of GRNP	Noted
8) Knysna Sand Fynbos coastal corridor fragmented	Noted
9) Critically Endangered Knysna Sand Fynbos is present	Noted
10) Critical Biodiversity Area – only biodiversity sensitive land uses	Noted
11) Preferred development plan has disturbance area of 8 765 m ²	No response
12) How will swimming pool backwash be disposed of	To septic tanks or recycle
13) No access to beach down steep primary dune	Noted
14) How will drilling equipment get to the site?	Will use small drilling m/cs
15) Impact of drilling for water not discussed in BAR	Being evaluated
16) Significant harm to biodiversity, alters character of landscape and fragments the coastal corridor	Noted
17) Conserving CR vegetation types nationally important	Accepted but not all CR
18) Stewardship with CapeNature or SANParks essential	Under consideration
19) Development close to Church Street preferred	Refuse to consider this
20) Creates a bad precedent for future developments	Noted
21) Fire risk to a house on the primary dunes, House near Church Street easier to access	Noted
22) Large construction operations raise security concerns	No response
23) Coastal Management Act - main dwelling within 100m of high tide mark is environmentally sensitive	No response
24) The preferred main dwelling looks like a boutique hotel or B&B – is this the real intention?	Noted
25) Usage of the manager's dwelling to be detailed	No manager's house
26) Rare plants in the road reserve could be harmed	Ignored
27) Bee farming not economically feasible < 1 hive per ha	No bee farming

28) Forestry to comment on land-use application to KM	Pending
29) Send more recent plant list to DFFE for comment	Sent to DFFE
30) Exact locations of forest/ thicket patches needed	Sent to DFFE
31) For preferred alternative 4.3% of CBA disturbed	Noted
32) 2005 Vlok report identified 16 vegetation types – 7 in pristine condition occur on Uitzicht 76	Insists that vegetation is Least Threatened
33) EAP has classified all vegetation in the southern part of property as Goukamma Dune Fynbos, disregarding Vlok 2005 report	No change – need to contest this
34) No biodiversity study done for threatened plants and Animals	Animals Very High Sensitivity
35) Uitzicht 76 between two SANParks CNPs	Noted
36) Primary dune has special and sensitive vegetation removal will cause erosion	Their experts have assessed and this and say it can be done
37) Is a 2.5m wide road sufficient for construction vehicles - steep climbs and hairpin bends	Claim that 2.5 m road is wide enough
38) Soakaway from septic tanks used to treat sewerage will possibly leak into borehole water - probably brackish anyway	Will carefully design the system to prevent leakage
39) Large house on primary dune negatively impacts view for residents of Buffalo Bay, Brenton-on-Sea and Uitzicht, defacing natural beauty of the pristine beach and affecting tourism and property values	The Heritage Statement said the impacts will be small
40) Why a 3000 m ² house when stands in Brenton on Sea are only 1000 m ² ?	There are six bedrooms all on one level
41) Knysna zoning scheme only allows one dwelling for unless substantial farming activity – beekeeping does not qualify	No manager's house Agriculture 1,
42) Coastal Management Act – up to 1 km from shoreline only one dwelling is permitted.	No manager's house
43) Only two alternatives considered whereas the least environmentally harmful alternative 4 is ignored. EAP must state why this option was not considered.	Noted

Objection 6

Out of 43 issues raised by the I & APs, 4 elicited “No response” and 12 elicited “Noted”. Some feedback was given on the other 25 issues, in most cases unsatisfactorily.

The WHGC's submission on 10th December 2025 was not referred to.

The WHGC objects to the incomplete PPP and asks that the EAP fully responds to all the issues raised, as well as all the new ones.

SECTION I – Natural Heritage Resources and visual impact assessments (VIA)

- 1) The DBAR exclusively relies upon “Appendix D1 Heritage Impact Statement (HIA)” for visual impact assessments (VIA). However, the DBAR (p. 84) clearly states that the Appendix D1 should not be regarded as an HIA, but as a scoping report that offers supplementary information.

- 2) The requirement for a full VIA as per “DEADP WC Visual Guideline” is triggered as the area is classified as a “Protected area with significant visual qualities”.
- 3) Furthermore, the following legislation specifically applies to the study area, as per the Garden Route Environmental Management Framework, the Knysna Spatial Development Framework (SDF), SANParks Contractual National Park agreements and the Coastal Management Act (CMA):
 - Areas with protection status, such as national parks or nature reserves;
 - Areas with proclaimed heritage sites or scenic routes;
 - Areas with intact wilderness qualities, or pristine ecosystems;
 - Areas of important tourism or recreation value;
 - Areas with important vistas or scenic corridors
- 4) The quantum of the development also necessitates an appropriate VIA because the size and scale of the current proposal is very large (>7000 m² disturbance), with a high risk that the development will detract from the natural rural characteristics of the area and significantly change its sense of place, possibly causing environmentally aware residents to move elsewhere.
- 5) It is important to note that critical details required for a VIA are not provided in the DBAR. The available information of the main dwelling is high level and lacks important detail, e.g. scale, form and bulk. No architectural drawings or 3D were provided or considered for any the different options. Important details of the internal road are also not available to be considered in a VIA.
- 6) Consequently, for assessment of the visual impact, the DBAR just states that the site is “*barely visible in the distance*” and that the “*proposed development is barely visible in the distance*”, and refers to Appendix D1 Fig. 18, stating that the proposed development will have no visual impact on the aesthetic value of the affected area.



Appendix D1 Figure 18 – Views from C R Swart road looking towards the study area that is not readily visible from the road unless you stop at a lookout point from where 216/76 is also barely visible in the distance

- 7) None of the photos provided are from highly impacted positions on the tourist route, populated places as well as the farm residences located within proximity of the site, e.g. Whale Viewpoint, Angels Leap Viewpoint or the Brenton Beach. The photos in Appendix D1 are therefore not a true reflection of the visual impact of the development.

- 8) The DBAR has also failed to consider the visual impact from Buffalo Bay. The impact will be significant, in terms of the proposed enormous main dwelling, during daylight hours as well as the significant light pollution at night.
- 9) The DBAR states and concludes that *“Consequently, the proposed development will have no visual impact on the aesthetic value of the affected area.”* and rate the Visual impact as Low (BAR page 109 and EMPr p19-20)
- 10) The DBAR is also silent regarding the visual impact of the internal road. The internal road will be fitted with lights as well as have prominent features such as *“significant earth works and retaining walls”* (Geotechnical Test Report)



Figure 7 – Google Earth map showing visibility of the proposed site and road from a major tourist road, Brenton and Buffalo Bay beaches, populated places and farm residences located in proximity to the site.

Key aspects for VIA have not been made available

No report was presented that appropriately evaluates the Visual Impact of the development (residences and road) as per requirements of “DEADP WC Visual Guideline”

- the project's physical aspects (form, scale, and bulk) on the landscape and receptors.
- the visual impact from various required locations: tourist route, beach (tourist place), populated places, homesteads (farm residences) located within proximity of the site
- as per required VIA criteria, such as the nature, extent, duration, intensity, probability, and significance of the impacts.
- propose and evaluate potential mitigation measures to minimize or avoid the negative visual impacts, such as landscaping, screening, or altering the design of the development.
- the visual impact of the road and the main dwelling from Buffels Bay
- light pollution at night.

Objection 7

The WHGC therefore objects to the DBAR’s assessment and the conclusion that the development “has no visual impact on the aesthetic value of the affected area” as it relies on the conclusions and

statements as per “Appendix D1 Heritage Impact Statement” that, by own admission, was not intended as a VIA; nor does it comply to the Western Cape's Guidelines for Involving Visual and Aesthetic Specialists in EIA Processes (CSIR 2005).

(Ref Oberholzer, B. 2005. *Guideline for involving visual and aesthetic specialists in EIA processes: Edition 1*. CSIR Report No ENV-S-C 2005 053 F. Republic of South Africa, Provincial Government of the Western Cape, Department of Environmental Affairs and Development Planning, Cape Town)

Objection 8

Objection to water drilling being without high environmental risk

The environmental risk and impact of Borehole Development have not been considered in the BAR and EMP. There three (3) major impacts to be addressed:

- Movement of heavy drilling equipment to remote locations over sensitive vegetation has a high-risk to cause severe damage to the endangered vegetation. The steep slopes and sandy soil conditions of the site provide challenges for movement of heavy equipment without damaging the ecosystem
- The use of **Drilling fluids** as per Appendix D3 and D10 “This is done by flushing drill fluids, fines and debris from the borehole on completion of drilling. The method used is that of plunging and surging”
- **Estimated 830m Long water connection pipelines required** as the Proposed Locations of the Boreholes are far from the proposed Main Residence. The water pipelines will require excavation of 100-80cm wide and 50cm deep with respective disturbance and fragmentation impacts. The estimate disturbance footprint of the water pipeline/s could be between 830sqm to 664sqm



Figure 8 Planned Boreholes are close to the Northern border and far from the proposed Main Residence on the Southeast border. Ref Proposed Locations of the Boreholes - Appendix D3 & D10 Geotechnical Report - Page 31

The regulator is requested to request appropriate assessment and mitigation to prevent irreparable damage to the CBA 1.

Access to Portion 76 of the Farm Uitzicht 216:

Access is obtained from the Northern portion of the property from an existing servitude road that runs along the boundary of the property. The current access will remain in place



The existing public access road is shown on the General Plan (SG 6783/1951) and is indicated as a public access servitude (Kerk Laan), measuring 60 Cape Feet wide (i.e. 18,891m wide). Kerk Laan forms the northern boundary of the application area.

Ref EMPr page 11

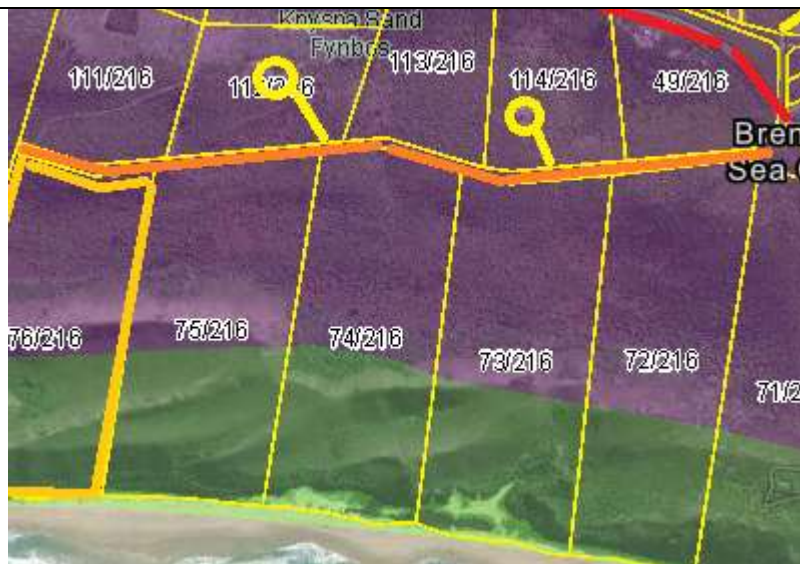


Figure 8

Access to the northern boundary of Portion 76 is obtained from an existing servitude road called Kerkstraat that is 1.5km in length (Fig. 8). Kerkstraat provides access to Portions 111, 112, 113, 114, 72, 73, 74, 75 and 76, is a 1500m long inobtrusive, narrow jeep track dirt road, that is

located within the very sensitive area. Very high biodiversity is located in the road servitude and adjacent properties.

Per the “section 5.2 page 4 - Appendix D12 Civil Services Report”, Kerkstraat “needs to be upgraded to support the extensive construction as proposed. Kerkstraat will have to be able to handle freight requirements in excess of **400 x 10 ton truck loads**, as estimated from only the internal road building requirements.

There are valid concerns regarding the potential environmental impact on Kerkstraat and adjacent CBA1 properties associated with the quantum of proposed construction.

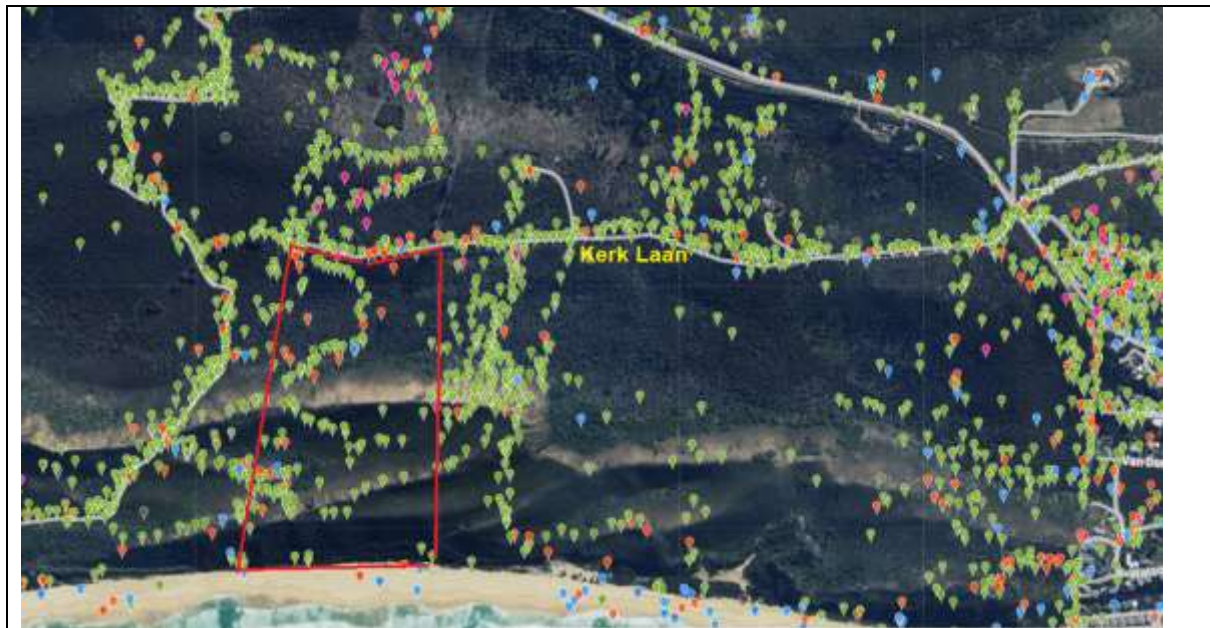


Figure 9 – Kerkstraat’s Botanical Value as per iNaturalist. Rare geophytic orchids, *Brunsvigia*, and *Haemanthus* are found in the road reserve

These concerns were voiced by various stakeholders in pre-BAR as per “Appendix F Comments and Response Report” regarding the sensitivity of Kerkstraat and potential requirement for an EA has been brushed aside by statements:

“Noted. The details will be communicated once the plans have been finalised” Ref Page 25 and 28 Appendix F Comments and Response Report

The BAR does not offer any details of the potential freight requirements and subsequent upgrades required to support the development. It is undisputed that Kerkstraat will need to be upgraded to support the proposed development. Widening and resurfacing the road will highly likely trigger an EIA.

Objection 9

The WHGC objects to unquantified “upgrading” of Kerkstraat as it is located in CBA1 and the environmental impact has not been assessed

Objection 10

Objection to missing and ambiguous details provided in the DBAR, EMPr and Appendices

Important Information is missing or ambiguous in the BAR, EMPr and application Appendices. A full synopsis of missing / ambiguous information is provided in the **Objection Appendix XXX**

Below is a list of key missing or ambiguous aspects:

- Internal road Disturbance footprint
 - No definite disturbance information provided, only vague 830m long with between 4.5-5.5m
 - Missing information regarding volume of soil to be excavated, removed and replaced with imported aggregate
 - What will happen to the “Topsoil” that contains the very important seed bank
 - Water
- Internal road visual impact
 - This was also highlighted by SANParks in their previous comments
- Water pipeline disturbance footprint
- Location and footprint of the 110kl water storage tanks estimated as disturbance of 200sqm (22 x 5kl tanks)
- Septic tank and soak away location and disturbance footprint
- Access to beach: no boardwalk or footpath was proposed to the beach
 - *“The applicant is assessing the option of including beach access in their considerations”* page 5 Appendix F Comments and Response Report
- Backwash from swimming pool as Fynbos is not a good receiving environment for the backwash
 - The proposed solution was a proposal to feed it to the septic tank that will only serve to destroy the septic tank biotics
- Backwash from swimming pool was not considered in the DBAR. Fynbos is not a good receiving environment for the backwash.

It is recommended that the backwash water from a swimming pool be disposed of appropriately by directing it into the sanitary sewer system. Proper disposal practices are essential to ensure compliance with environmental regulations and to maintain public health standards. To clarify backwash water and return it safely to the pool is an option being considered.
- No consideration was given to the Long-term conservation plans for this property that falls in a very sensitive CBA1

Objection 12

Lack of “Duty of Care” of a CBA from the Applicant

The Applicant (owners) has **not done any Invasive Alien Clearing** since obtaining the property in 2017. Various Environmental studies as attachments to the BAR have pointed out since 2017 the threat of the invasive species to the CBA 1 and the importance to remove it. The WHGC perceives this as a “Lack of Duty of Care” as per NEMA. Alien vegetation from the property is spreading onto neighbouring CBA1 properties.

Conclusion

The WHGC does not dispute the owner’s primary land use right to a residence.

However, the WHGC objects to the illogical selection of the proposed Site location as well as the enormous building footprint.

The WHGC is extremely concerned about the high environmental impact of the proposed internal road that is required to access the proposed site.

The WHGC's objections are based primarily due to illogical conclusions in the BAR that resulted in unnecessary large & severe biodiversity loss, ecosystem fragmentation and aesthetic/visual impact.

Various Stakeholders have pointed out a very feasible and low environmental impact location on the northern boundary; however, this Option was not evaluated or presented by several versions of the DBAR.

The WHGC requests that the Regulator considers the comprehensiveness of the due process and proposals in the DBAR specific to:

- a. **The selection of the proposed location (preferred location) of the primary residence and required internal road**, as it has the highest ecological and aesthetic impact of all the alternatives, due to the need for an internal road. This is in direct conflict with the finding of the botanical and ecological expert, Confluent Environmental Pty (Ltd), Ms. Bianke Fouché, Specialist Plant Species. The expert specifically concluded that the Preferred Alternative was not supported by and Terrestrial Biodiversity Report, 22 July 2024, who stated that Alternative 4, the one dwelling in the north-western corner of the property, is the most acceptable layout for the proposed dwelling on the property. **Therefore, the selection of the preferred location by the BAR is irrational** from an environmental impact perspective. It appears that the selection was made based on the desire of the owner to have the primary residence as close to the beach as possible. This location has the highest biodiversity loss and ecological impact.
- b. **The evaluation of all the "site alternatives" for the primary residence that ignores the obvious option of locating the structures in the disturbed footprint on the "northern boundary"**. Also to consider that the presented site alternatives are practically identical and simply ignore the low ecological impact site alternative.
- c. **The large building footprint size** of the "residence" that is excessive due to a "spread-out design". Considering the proposed **residence of >3000sqm is excessive**, especially bearing in mind the requirement to minimise disturbance in a CBA.
- d. The absence of building designs, levels and building aesthetics that are key attributes required for a Visual Impact Assessment. This is compounded by the fact that proposed location is very visible from various public and tourist locations.
- e. **The significant Visual impact that was discounted by the BAR.**
- f. **the BAR's conclusion of an "ignorable visual impact" of the proposed site relying on a scoping document and without the required a Visual Impact Assessment (VIA).**
- g. **The BAR's illogical conclusion** that the preferred location of the primary residence and required internal road **will not set a precedent or change the character this** untouched area. The WHGC point out that the WCSPF guidelines was not considered, and the proposal will result in the **first and only primary residence** on the primary dune between Benton and Buffels Bay.
- h. **The various key specifications and terms that are ambiguous or missing in the BAR and EMPr that could result in an ambiguous EA and Environmental management** E.g. building footprint, disturbance footprint, key aesthetic details of the proposed building, internal road exact path and total disturbance footprint, 110kl water storage tanks and supply pipeline disturbance footprints, Septic Tank & Soak away location and footprint, the management (use, removal and storage) of topsoil & subsoil from proposed substantial site and road excavations.
- i. **The unquantified "upgrading" of Kerklaan with high risk of severe environmental impact as it currently is a "low key" road in a CBA1 and conservation area.**

The site is confirmed as CBA 1 with a Very High Sensitivity as per Appendix D5 "Terrestrial Biodiversity SSV" and surrounded by CBA 1 properties that are in a Contractual National Park agreement that aims to protect this critical endangered habitat.

Please note:

- The WHGC request that this comments document be included in its entirety of the DBAR Report and not only in a Comments & Responses report.
- The WHGC reserves the right to revise its initial comments and to request further information based on any additional information that may be received.

Your sincerely



pp/ Johan Labuschagne

Date: 29th June 2026

Chairman – Western Heads Goukamma Conservancy

Johan@paradisefound.co.za

Cell 0836350479

Appendix

TABLE 4.1: Land-use guidelines for protected areas and Critical Biodiversity Areas. Spatial layers can be viewed in CapeFarmMapper and on SANBI BGIS (continued).

Map category	Desired management objective	General guidelines	Specific guidelines
Critical Biodiversity Area 1: Terrestrial & Forest	Maintain in a natural or near-natural state, with no further loss of habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land-uses are appropriate.	- Biodiversity loss and land-use change in verified CBAs should not be permitted. Unauthorised land-use change or degradation by neglect or ignorance must be monitored as a matter of priority. - Ideally, conservation management activities should be the primary land-use in all Biodiversity Priority Areas, or they should at least be managed in ways that have no negative impact on species, ecosystems, or ecosystem services. - Conservation efforts should focus on conserving Species of Conservation Concern and populations of keystone species and species responsible for pollination and seed dispersal.	- Ideally, developments should be avoided in these areas. If they cannot be avoided, it must be shown that the mitigation hierarchy has been applied. If the impact cannot be avoided or reduced to a residual low significance, a biodiversity offset may be considered as a last resort. - The features behind a site being identified as a CBA must be fully investigated. Some areas may appear degraded but still be important for water or ecological connectivity for example. - Relevant specialist studies must form part of a Basic Assessment or the Scoping and EIA process for all land-use applications in these areas, using the services of an experienced and locally knowledgeable biodiversity expert who is registered with the South African Council for Natural Scientific Professions (SACNASP). - Applications for land-use of any kind should be referred to the Land-use and Conservation Planning team at CapeNature

Ref: WC biodiversity spatial plan 2023 page 46

Western Cape Land Use Planning Guidelines Rural Areas

TABLE 1: CATEGORIES ON THE BIODIVERSITY SPATIAL PLAN MAP AND THEIR RECOMMENDED CORRESPONDING SPATIAL PLANNING CATEGORY

		WCBSP MAP CATEGORY						
		PROTECTED AREAS PA	CRITICAL BIODIVERSITY AREA 1 (TERRESTRIAL/AQUATIC) CBA 1	CRITICAL BIODIVERSITY AREA 2 (DEGRADED) CBA 2	ECOLOGICAL SUPPORT AREA 1 (TERRESTRIAL/AQUATIC) ESA 1	ECOLOGICAL SUPPORT AREA 2 ESA 2	OTHER NATURAL AREAS (NATURAL TO NEAR-NATURAL/DEGRADED) ONA	NO NATURAL REMAINING NNR
SPATIAL PLANNING CATEGORY	CORE 1	●	●					
	CORE 2			●	●			
	BUFFER 1						●	
	BUFFER 2					●	●	
	AGRICULTURE							●
	SETTLEMENT							●

TABLE 1: CATEGORIES ON THE BIODIVERSITY SPATIAL PLAN MAP AND THEIR RECOMMENDED CORRESPONDING SPATIAL PLANNING CATEGORY

4.1 GUIDELINES FOR THE CORE 1 SPC

4.1.1 DESCRIPTION AND OBJECTIVE

Core 1 Areas are those parts of the rural landscape required to meet targets/thresholds for **biodiversity patterns or ecological processes** (i.e. Protected Areas and Critical Biodiversity Areas). These include habitats classified as highly irreplaceable, critically endangered, or endangered terrestrial (land), aquatic (rivers, wetlands and estuaries) and marine habitats.

These also include areas currently not yet exhibiting high levels of biodiversity loss, but which should be **protected and restored**, in order to ensure biodiversity pattern and ecological process targets/thresholds can be met, in the most efficient way possible. It also includes essential biological corridors vital to sustain their functionality.

Three components of the rural landscape as mapped by the Western Cape Biodiversity Spatial Plan, make up Core 1 Areas, with the following management objectives:

- **Protected Area** in terms of National Environment Management: Protected Areas Act (NEM: PAA): Must be kept in a natural state, with a management plan focused on maintaining or improving the state of biodiversity.
- **Critical Biodiversity Area 1: Terrestrial:** Maintain in a natural or near-natural state with no further loss of natural habitat.
- **Critical Biodiversity Area 1: Aquatic:** Keep natural, with no further loss of habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land-uses are appropriate.

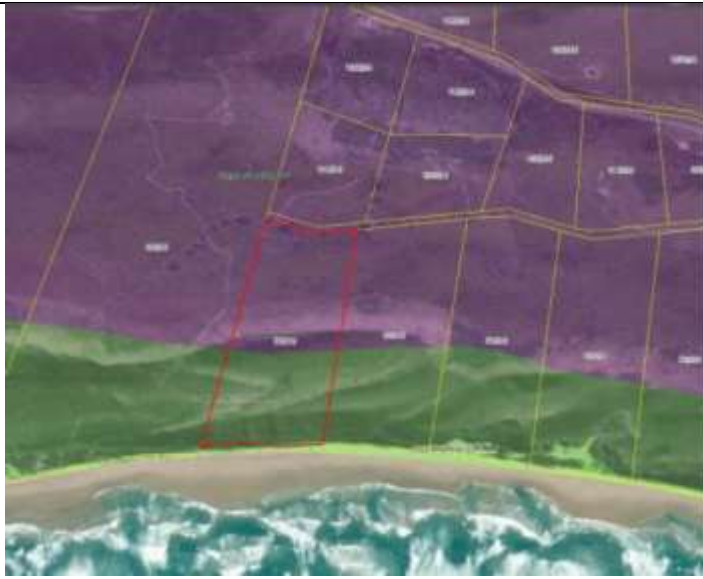
The Core 1 SPC:

- Identifies which parts of the rural landscape are of highest conservation importance, and if they are currently protected or not.
- Informs expansion of the Protected Area network through a Protected Area Expansion Strategy.
- Delineates areas that must be maintained in, or restored to, a natural state in order to sustain biodiversity patterns and processes and the functionality of eco-system services.
- Identifies areas of land that could serve as biodiversity offset receiving areas.
- In combination with Core 2 Areas, spatially defines the 'core' of the rural landscape's ecological network.

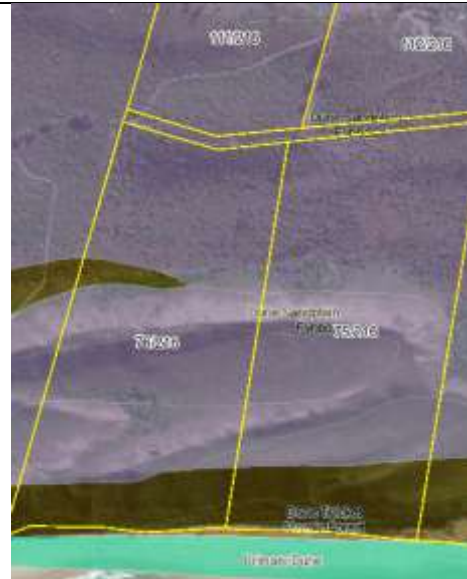
4.1.2 GUIDELINES ON LAND USE AND ACTIVITIES IN THE CORE 1 SPC

What kinds of activities?

- Essentially Core areas are 'no-go' areas from a development perspective. Accordingly, human impact must be restricted to ensure that there is no further loss of natural habitat.
- Conservation management activities, such as alien clearing, research and environmental education should be encouraged.
- Subject to stringent controls the following biodiversity-compatible land uses (i.e. those of very low impact) may be accommodated in Core 1 areas:



2018 Vegetation Map: Knysna Sand Fynbos and Goukamma Dune Thicket



Vlok Vegetation Map: Wilderness Forest- Thicket, Sedgefield Sandplain Fynbos



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447· Pretoria · 0001· Environment House ·473 Steve Biko Road, Arcadia, Pretoria

EDMS Reference: 274791

Enquiries: Ms. Tabisile Mhlana

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Ms Bianca Gilfillan

EcoRoute Environmental Consultancy

P.O. Box 1252

Sedgefield

6573

Tel: 0791895060

Email Address: bianca@ecoroute.co.za

Dear Ms Gilfillan

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF FARM 216, UITZICHT, KNYSNA

The Department of Forestry, Fisheries, and the Environment (DFFE), Branch Oceans & Coasts (O&C), appreciates the opportunity granted to comment on the Draft Basic Assessment Report (BAR) for the Proposed Residential Dwelling on Portion 76 of Farm 216 Uitzicht, Knysna. This Branch has provided recommendations in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICM Act").

The Branch O&C has the mandate to ensure the holistic management of the coast and estuarine areas as an integrated system and promote coordinated coastal management. It ensures that the ecological integrity, natural character, and economic, social, and aesthetic value of coastal zones are maintained to ensure that people, properties, and economic activities are protected against the impacts of dynamic coastal processes.

Guided by the principles of integrated coastal management, this Branch promotes developments that promote socially justified sharing of benefits derived from a resource-rich coastal area and strives to ensure that the principles of sustainable development are upheld.

Based on the submitted Draft BAR, the Branch presents the comments stipulated below for consideration. Please note the **recommendations for your consideration**:

1. The report states that the preferred dwelling footprint has been relocated inland and is approximately 120–140 m landward of the High-Water Mark (HWM), thereby avoiding direct development on the primary

dune system and aligning with the Garden Route Integrated Coastal Management Plan (ICMP). This is supported from a coastal management perspective as it indicates that the applicant adequately considered Farm 76/216 in relation to the Coastal Protection Zone ("CPZ") as defined in Section 16 of the NEM: ICM Act and the purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes, including the risk of sea level risks.

2. The Branch O&C recommends that the HWM, the coastal management lines, and the location of the conservancy tank be clearly shown on all final site development plans; all the associated infrastructure, such as the conservancy tank and borehole, should remain outside sensitive coastal process areas, and no future expansion of the development footprint towards the dune system should be permitted.
3. The property occurs entirely within a Critical Biodiversity Area (CBA) and forms part of an important coastal ecological corridor associated with the Knysna Protected Environment and Garden Route coastal ecosystem network. Although the preferred alternative avoids the Critically Endangered Knysna Sand Fynbos in the northern portion of the property, the proposed development still fragments an otherwise largely intact coastal landscape.
4. The applicant should consider entering discussions with SANParks regarding long-term biodiversity stewardship and conservation mechanisms over the remainder of the property. Ensure that all areas outside the approved development footprint are formally protected from future development and implement invasive alien clearing as a priority management action. Vegetation clearing should be limited to the development footprint only.
5. The proposed use of a conservancy tank and borehole abstraction requires careful management in a coastal environment characterised by highly permeable sandy soils. It is important to have detailed specifications such as the capacity of the wastewater treatment system, separation distances between boreholes and wastewater infrastructure, monitoring requirements for groundwater quality, and contingency measures should contamination be detected.
6. The draft BAR does not clearly address whether future private access routes, pathways, or boardwalks to the beach are envisaged, nor how the beach will be accessed. It is recommended that no private beach access infrastructure be authorised as part of this application and that any future beach access proposal be subject to separate environmental assessment and authorisation processes, as any pedestrian access through sensitive dune vegetation is prohibited unless specifically authorised.
7. The applicant is reminded that the ICM Act advocates for reasonable coastal access to the coastal and estuarine resources. Therefore, the applicant must take note of the provisions of Section 13 of the ICM Act which states that *"(1) Subject to this Act and any other applicable legislation, any natural person in the Republic – (a) has a right of reasonable access to the coastal public property; and (b) is entitled to use and enjoy coastal public property, provided such use – (i) does not adversely affect the rights of members of the public to use and enjoy the coastal public property; (ii) does not hinder the State in the performance of its duty to protect the environment; and (iii) does not cause adverse effect. (1A) Subject to subsections (2) and (3), no person may prevent access to coastal public property."* During the

construction and operational phase, the applicant should ensure that the public can safely use and enjoy the coastal zone.

8. The applicant should remain cognisant of Sections 14 and 15 of the ICMA, namely: Section 14 – Position of the high-water mark *(1) No person may replace the high-water mark curvilinear boundary with a straight-line boundary in terms of section 34 of the Land Survey Act. (5) If the high-water mark is landward of a straight line boundary of a coastal land unit when this Act took effect, or the high-water mark moves landward of a straight line boundary of a coastal land unit due to the erosion of the coast, sea-level rise or other causes, the owner of that coastal land unit— (a) loses ownership of any portion of that coastal land unit that is situated below the high-water mark to the extent that such land unit becomes coastal public property; and (b) is not entitled to compensation from the State for that loss of ownership, unless the movement of the high-water mark was caused by an intentional or negligent act or omission by an organ of state and was a reasonably foreseeable consequence of that act or omission.*
9. Section 15 - Measures affecting erosion and accretion *(1) No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or such other coastal public property, or of land adjacent to coastal public property, unless the erosion is caused by an intentional act or omission of that organ of state or other person. (2) No person may construct, maintain or extend any structure, or take other measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided for in this Act, the National Environmental Management Act or any other specific environmental management Act.*
10. Section 63 of the ICM Act states that when environmental authorization for coastal activities is applied for in terms of Chapter 5 of the National Environmental Management Act, the competent authority must take into account all relevant factors, including whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and protecting those areas, the socio-economic impact of the proposed activities and the likely effects of coastal processes on the developmental proposal.
11. The applicant is reminded of the Duty of Care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: “...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorized by law or cannot reasonably be avoided or stopped, to minimize and rectify such pollution or degradation of the environment...” together with Section 58 of the NEM: ICMA which refers to one’s duty to avoid causing adverse effects on the coastal environment.
12. The applicant is reminded that no person may discharge effluent that originates from a source on land into coastal waters and/or dump any waste or other material at sea without authorization from the Minister.

Kindly note that the Branch Oceans & Coasts reserves the right to revise its comments and request further information based on any additional information received. All correspondence, documentation, and/or requests (hard copy and an electronic copy) should be submitted to our office via email to

OCEIA@dfre.gov.za / or **Physical Address: Department of Forestry, Fisheries & the Environment (DFFE), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.**

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Peter', written over the closing 'Sincerely,'.

Mr Ryan Peter
Director: Coastal Development & Coordination
Department of Forestry, Fisheries & the Environment
Date: 08/07/2026

09 July 2026

Bianca Gilfillan
Eco Route Environmental Consultancy
P.O. Box 1252
Sedgefield
6573

Per email: admin@ecoroute.co.za
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janet@ecoroute.co.za

**COMMENTS ON DRAFT BASIC ASSESSMENT FOR PROPOSED DEVELOPMENT OF
PORTION 76 OF FARM UITZICHT NO 216, KNYSNA, WESTERN CAPE (DFFE Ref:
14/12/16/3/3/1/3114 & 14/12/16/3/3/1/3185)**

1. Our comments on the above-mentioned application, dated 11 December 2025 (Annexure A), are hereby referenced and remain fully applicable to the current application.
2. WWF South Africa (WWF-SA) has a strong interest in the protection of sensitive ecosystems and threatened ecological areas and works closely with conservation partners, including SANParks, to safeguard South Africa's unique biodiversity and the critical ecosystem services upon which both people and nature depend.
3. WWF-SA supports and aligns itself with the comments submitted by SANParks on 29 June 2026 and cannot support the authorisation of the preferred layout alternative proposed by the EAP and landowner. This position is based on the exceptional environmental sensitivity of the site, including the presence of Critically Endangered Knysna Sand Fynbos, the property's location within an important biodiversity corridor, and the proposed disturbance of a highly sensitive, dynamic and inherently unstable foredune system.
4. WWF-SA does, however, support the alternative development option located immediately adjacent to Church Street/Kerk Laan, with direct access from the existing



road servitude, as this option is situated within an already disturbed area and would substantially reduce impacts on sensitive biodiversity and ecological processes.

5. In WWF-SA's view, approval of the landowner's preferred alternative would set an undesirable precedent for development within highly sensitive biodiversity areas and could result in the incremental loss and degradation of critical ecosystems that are the subject of ongoing conservation efforts.
6. WWF therefore cannot support the authorisation of the preferred layout alternative proposed by the EAP and landowner and unequivocally endorses the comments submitted by SANParks on 29 June 2026.

Sincerely,

ANGUS BURNS

LEAD: AREA BASED CONSERVATION

12 December 2025

Bianca Gilfillan
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P.O. Box 1252
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6573

Per email: admin@ecoroute.co.za
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janet@ecoroute.co.za

**COMMENTS ON DRAFT BASIC ASSESSMENT FOR PROPOSED DEVELOPMENT OF
PORTION 76 OF FARM UITZICHT NO 216, KNYSNA, WESTERN CAPE (DFFE Ref:
14/12/16/3/3/1/3114 & 14/12/16/3/3/1/3185)**

1. WWF South Africa (WWF-SA) hereby wish to confirm its registration as an Interested and Affected Party (I&AP) in accordance with the Environmental Impact Assessment (EIA) Regulations of the National Environment Management Act No. 107 of 1998 (NEMA) for the above-mentioned prospecting application for environmental authorization.
2. WWF-SA has a strong interest in protecting sensitive ecosystems and threatened ecological areas and work closely with conservation partners such as SANParks to ensure the protection of South Africa's unique biodiversity and the critical ecosystem services it provides to all South Africans.
3. In recognition of the critical importance of conserving the unique and highly sensitive biodiversity occurring within the Knysna Sand Fynbos Coastal Corridor, WWF-SA owns several properties that are in the process of being declared part of the Garden Route National Park (GRNP).

PROPOSED DEVELOPMENT SITE CONTEXT

4. Ptn 76 of Farm Uitzicht No 216 is located in the Knysna Sand Fynbos Coastal Corridor, as well as the protected area expansion footprint of the GRNP. This corridor focusses



specifically on the conservation of the critically endangered Knysna Sand Fynbos, one of South Africa's most threatened ecosystems, with 83% of its original 15,000 ha already transformed by plantations, agriculture, and urban development.

5. For this reason, the entire property is classified as a Critical Biodiversity Area (CBA) in terms of the 2023 Western Cape Biodiversity Spatial Plan (adopted on 13 December 2024, Gazette Extraordinary No 9017) and National Environmental Management: Protected Areas Act (Act No. 57 of 2003; NEM: PAA).
6. The lower southern section of the property is traversed by two foredunes that are highly sensitive, dynamic, and inherently unstable systems, continuously shaped by coastal processes such as wind and wave action. These dunes are prone to slumping and blowouts due to their steep slopes (greater than 30%) and highly erodible soils, meaning any disturbance significantly accelerates erosion and destabilization. Importantly, they serve a critical climate change resilience function by acting as natural buffers against storm surges and sea-level rise; disturbing them compromises this protective role and increases long-term risks to infrastructure and ecosystems. Recognizing their ecological importance, these areas are designated as part of the Coastal Protection Zone under the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008), which legally regulates land use adjacent to coastal public property to safeguard vital coastal ecosystems.
7. Site visits conducted by SANParks confirmed the sensitivity of the property in terms of the above-mentioned aspects, as well as its excellent ecological condition.

COMMENT ON PROPOSED DEVELOPMENT

8. It is noted that the southern section of the property comprises Least Threatened Goukamma Dune Thicket and the northern section Critically Endangered Knysna Sand Fynbos. The property borders Kerk Laan and includes a previously disturbed area in the northwestern corner, which SANParks has identified as acceptable for development.
9. As noted on page 20 of 173, Section 2(4)(a) of the National Environmental Management Act (Act No. 107 of 1998; NEMA) requires that the disturbance of ecosystems and loss of biodiversity be avoided, or where unavoidable, minimized and remedied. In this case, the landowner has the opportunity to completely avoid disturbing a critically endangered vegetation type by building in the disturbed section. However, the landowner and EAP have disregarded this option and instead proposed a "preferred development alternative" that would:
 - a. destroy critically endangered vegetation; and
 - b. permanently disturb a highly unstable coastal area prone to erosion.
10. This conclusion is reinforced by the fact that the recommendation of the biodiversity and plant species specialist has been ignored. According to the Specialist Plant Species and



Terrestrial Biodiversity Report (dated 22 July 2024), Alternative 4 (one dwelling in the northwestern corner of the property) is the most acceptable layout, while Alternative 1 (preferred by the EAP and landowner) and Alternative 3 would likely trigger offsets due to residual impacts that cannot be mitigated.

11. Furthermore, the proposal disregards the objectives of the 2023 Western Cape Biodiversity Spatial Plan, which seeks to maintain Priority Natural Areas and Critical Biodiversity Areas in a natural or near-natural state, with no further loss of habitat.
12. In our view, approving the landowner's preferred alternative would set a dangerous precedent, placing critical ecosystems at risk.
13. WWF therefore cannot support the authorisation of the preferred layout alternative proposed by the EAP and landowner and unequivocally endorses the comments submitted by SANParks on 9 December 2025 and the Western Heads Goukamma Conservancy on 10 December 2025.

Sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

ANGUS BURNS
LEAD: AREA BASED CONSERVATION

7 April 2025

Bianca Gilfillan
Eco Route Environmental Consultancy
P.O. Box 1252
Sedgefield, 6573

Per email:
admin@ecoroute.co.za
bianca@ecoroute.co.za
janet@ecoroute.co.za

**RE: SANPARKS COMMENTS, DRAFT BASIC ASSESSMENT,
PROPOSED DEVELOPMENT, UITZICHT 216, PORTION 76,
KNYSNA, WESTERN CAPE**

DDFE Reference: 14/12/16/3/3/1/3114

Uitzicht 216 Portion 76 is situated: (1) within the Buffer Zone of the Garden Route National Park (GRNP); (2) within the Knysna Protected Environment (KPE) with the KPE Development Control Area (DCA) extending some 50m into the lower southern section of Portion 76; (3) with the Coastal Management Line (CML) extending for between 70 to 100m in places into the lower southern section. The CML was included in the Knysna Spatial Development Framework, is shown on the Knysna GIS Viewer, and the Western Cape DEA&DP Coastal Management Map Viewer. Risks associated with developing in this area are known and have been published; and (4) within the Coastal Protection Zone (CPZ), as designated in terms of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008) (NEM: ICMA). The CPZ is established to manage, regulate, and restrict the use of land that is adjacent to coastal public property, or that plays a significant role in the coastal ecosystem (**Figs. 1 & 2**).

The high-water mark runs adjacent to the property's southern boundary, and 20-, 50- and 100-Year Erosion Risk Lines have been mapped in proximity (**Fig. 2**).

Two foredunes traverse the lower southern section of the property, which run east-west. Slopes are steep on either side of these foredunes, with many areas classified with a Slope Percentage Class of >30% (**Figs. 3 & 4**).

As the property falls within the KPE, Critical Biodiversity Areas (CBAs) are not mapped in the 2023 Western Cape Biodiversity Spatial Plan (WCBSP), Biodiversity Spatial Plan Map (BSP Map), as adopted on the 13 December 2024 (Gazette Extraordinary 9017).

lai-lais/richtersveld transfrontier

addo elephant

agulhas

augrabies falls

bontebok

camdeboo

golden gate highlands

karoo

kgalagadi transfrontier

knysna

kruger

mapungubwe

marakele

meerkat

mokala

mountain zebra

namaqua

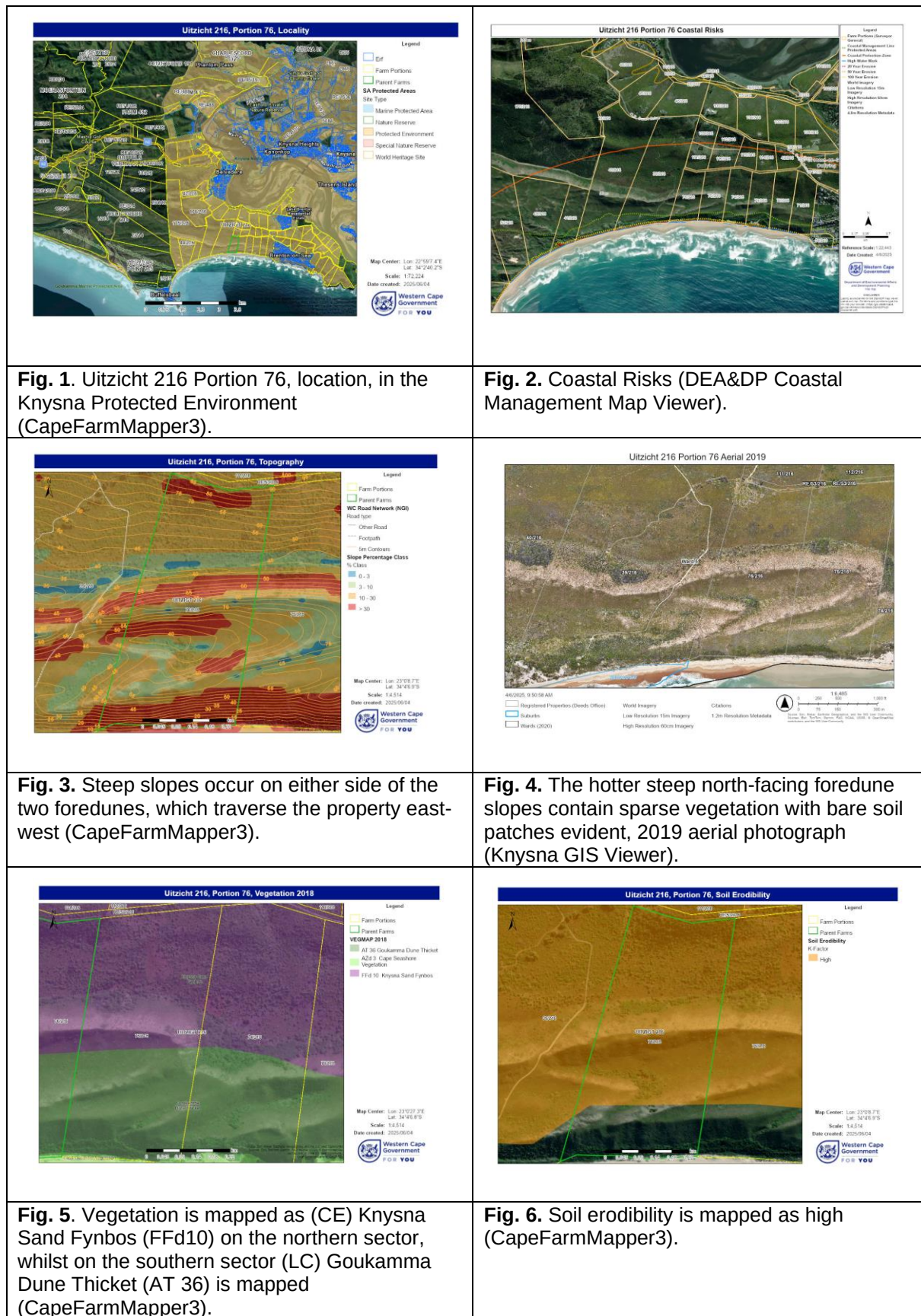
table mountain

tankwa karoo

tsitsikamma

west coast

wilderness



Vegetation is mapped by Mucina and Rutherford, 2006¹ and revised by SANBI, 2018², as (CE) Knysna Sand Fynbos (FFd10) on the northern sector, whilst on the southern sector (LC) Goukamma Dune Thicket (AT 36) is mapped (**Fig. 5**).

Portion 76 is mapped as having a high soil erodibility K-Factor (**Fig. 6**) and an Extreme Veldfire Risk (CapeFarmMapper3).

The property falls within SANParks' protected area expansion footprint and Land Inclusion Plan for the GRNP. It falls within the Western Heads Knysna Sand Fynbos Coastal Corridor, which is the subject of a collaborative conservation initiative being supported by SANParks, CapeNature, Knysna Municipality, the Table Mountain Fund, WWF, the Western Heads Goukamma Conservancy (WHGC), and landowners.

Due to the extremely high conservation value of this corridor, and the threatened loss of the last remaining (CE) Knysna Sand Fynbos, WWF purchased three properties which SANParks manages (Portions 71, 72 and 40) (**Fig. 7**). Several other landowners in this corridor have committed their properties to conservation stewardship and are in various stages of Contract National Park (CNP) commitment. These properties include Portions 46, 39, 74, 75, 106, 109, 111, and 113 (**Fig. 7**). A Contract National Park is an area of privately owned land that is declared as a National Park - landowners retain ownership of their property but commit the property to formal conservation for 99 years and co-manage the property with SANParks. In return, the landowner may derive financial incentives.



Fig. 7. SANParks Contract National Park commitment properties (in various stages of commitment).

¹ Mucina, L. and Rutherford, M.C. (editors) 2006. Vegetation map of South Africa, Lesotho and Swaziland: an illustrated guide. Strelitzia 19, South African National Biodiversity Institute, Pretoria.

² South African National Biodiversity Institute 2018 Final Vegetation Map of South Africa, Lesotho and Swaziland [Vector] 2018.

In summary, some 334ha has been committed to formal CNP conservation (in various stages of the commitment process), a legacy which will extend for 99 years, to benefit future generations. Other properties in the corridor are further under conservation, either privately or with CapeNature stewardship agreements in place, totalling some 154ha. Therefore, approx. 500ha (i.e., 28%) of the last remaining 1750ha of (CE) Knysna Sand Fynbos on the Western Heads is under conservation protection or planned to be conserved. Further concerted efforts to secure the remaining two thirds is required. Achieving a conservation outcome on this property is important to SANParks, and to other key role-players in the area, that have invested considerable time, resources and finances towards conservation in the Western Heads Knysna Sand Fynbos corridor.

The property is zoned Agricultural Zone I, falls outside the Urban Edge, and is 21ha in extent. The Applicant is Midnight Storm Investments 180(Pty) Ltd. The property is vacant, has never been developed previously, and is considered in pristine condition.

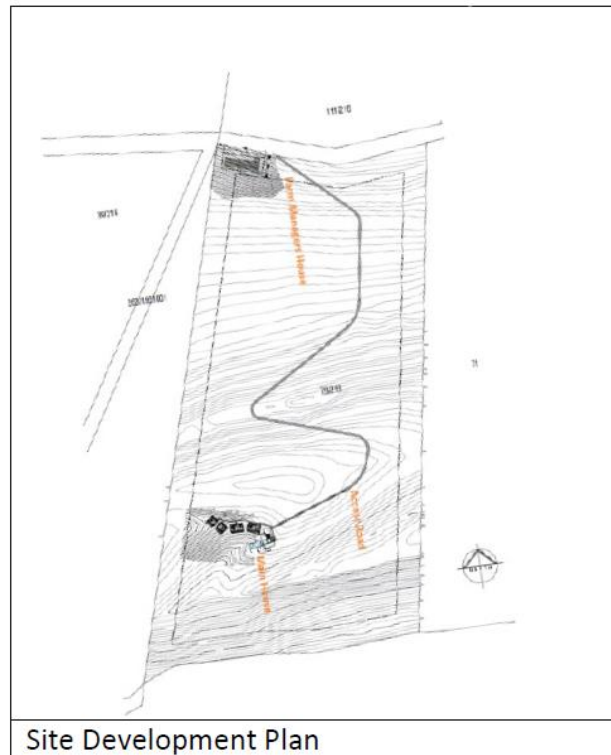
SANParks has provided comments on earlier development applications for Portion 76, key points as extracted include:

(1) Draft Basic Assessment, Objection, 1 October 2020.

The proposal is to exercise the primary land use rights of the property, (i.e. construction of a main farmhouse and farm manager's house). The development proposal entails the following:

- (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²).
- (ii) The construction of one farm manager's house in the north-western corner of the property (600m²).
- (iii) The construction of a new internal road to provide access to the southern portion of the property.

The proposed development is approximately 8 765m² in size. SANParks representatives visited the site on 8 September 2020.



SANParks objects to the proposal for the following reasons:

1. Site Development Plan footprint. The property is in the GRNP potential expansion footprint, as reflected in the approved GRNP Management Plan, and in a CBA in terms of the Western Cape Biodiversity Spatial Plan 2017. SANParks disagrees with the statement below that the areas chosen for development was to have the least negative impact on the environment. The proposed Site Development Plan (6 bed main dwelling with pool, farm managers house and access route) will have an unnecessary significantly negative impact on biodiversity conservation, the sense of place of the area and transform and fragment the Knysna Sand Fynbos Coastal Corridor.
2. Biodiversity Stewardship or long-term conservation outcomes were not discussed in the DBAR. The conservation of the vegetation on the property is of national importance. Without a commitment to consent to the declaration of the property as part of the GRNP or with a Biodiversity Stewardship agreement with CapeNature in place, SANParks will continue to object to the proposed development.
3. Land use rights. SANParks takes note that Marike Vreken urban and environmental planners were appointed to apply for the required land use rights from Knysna Municipality. From the information provided there was no mention of rezoning the natural portion of the property to Open Space Zone III. Further discussion in this regard is required to ensure a long-term conservation outcome. Relaxation of the building line adjacent to Kerk Laan could be supported.

SANParks could support development in the node where the Managers Cottage is proposed adjacent to Kerk Laan, as discussed on-site on 8 September 2020. It would be preferable if all development is consolidated into one area (the area where the farm managers cottage is

proposed) to minimise fragmentation of the landscape and impact on the sensitive fynbos environment.

The applicant should be reminded that the main objective of Priority Natural Areas and CBAs is to maintain it in a natural or near natural state, with no further loss of natural habitat. Only low impact, biodiversity sensitive land uses are appropriate. The property is currently pristine and was not previously developed.

SANParks request to meet with the landowners to discuss a way forward that can benefit biodiversity conservation and allow for low impact development without the need for a road over the pristine dunes. The current proposal will set a very bad precedent for potential development of other properties in the Knysna Sand Fynbos Coastal Corridor. The properties on both side of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023.

(2) Draft Basic Assessment, Follow-up Comment, 26 January 2021.

SANParks objected to the proposed development on 1 October 2020. A site visit with the landowners and EAP took place on 4 January 2021. Key points discussed:

1. Proposed footprint of the main house. The landowners were not willing to change the proposed footprint of the main house to a position adjacent to Kerk Laan. They were willing to move the house to reduce visual impact in the level area behind the frontal dune.
2. Proposed road over the sand dunes. SANParks continue to object to the construction of a road over the sand dunes. The landowners indicated that their preferred option is to use Susan Campbell's road for access. They could use Kerk Laan and access via the gate and use the steep section of the Campbell road. The proposed option to use the Campbell road will reduce the negative impact on biodiversity but will necessitate a new section of road to be constructed on the Campbell property and over Portion 76.

3. Maretha Alant met with Susan Campbell. Ms Campbell is opposed to providing access for the proposed development over her land.
4. Footpath to the beach. Portion 76 of Farm Uitzicht 216 has a steep gradient to the beach and a footpath is not proposed in the BAR.
5. Drilling for water required. The proposal is that water will be supplied by a borehole. Bringing drilling equipment to the proposed site for the main house will have a negative impact on biodiversity. Previous attempts to drill for water in the area (Investec) yielded poor return.
6. Contract National Park footprint. The property is in the priority protected area expansion footprint, in the Western Heads coastal ecological corridor, that can potentially link the Goukamma Nature Reserve with the Knysna Estuary. The property was included in the South African National Parks Land Inclusion Plan for the period 2020 – 2023 for the Garden Route National Park (GRNP). The landowners may be interested in incorporating the property into the GRNP but more information is required from SANParks. SANParks will further engage with the landowners when our draft documents are in place.



Proposed location of main house in flat area with high biodiversity value



Area for the proposed main house in foreground



SANParks continue to object to the construction of a road over the sand dunes



Portion 76 of Farm Uitzicht 216 has a steep gradient to the beach and a footpath is not proposed in the BAR.



Susan Campbell's road

A follow up fieldtrip with SANParks and the Southern Cape Fire Protection Association (FPA) present took place on 9 January 2021. Key points discussed:

- Development adjacent to Kerk Laan. Developing the main house in a disturbed area adjacent to Kerk Laan will have the least negative impact on biodiversity and landscape functionality. Other advantages are that the drilling equipment and construction vehicles will have easy access to the site via an existing road.
- Development in the low lying area, over the two sand dunes or using the Campbell road, will compromise landscape functionality and set a bad precedent. It will create fragmentation of a pristine coastal corridor.



Disturbed area adjacent to Kerk Laan suitable for development

- Fire management. The landowners are members of the Southern Cape FPA. It is possible to make fire breaks to protect infrastructure at the landowners preferred location for the main house. However, Kerk Laan could act as a firebreak if it is widened and slashed. In a case of emergency, it would be less risky to evacuate people from Kerk Laan than in a fynbos corridor with tricky access for fire trucks. The Campbell road and the new section of road that would need to be constructed from Campbell road to preferred site would not be ideal roads for the Knysna Fire Department as their trucks would struggle to gain access easily to the house. However, Kerk Laan would be a much easier access point for fire trucks and this should be considered for fire safety in this fire-prone area. Conducting an ecological burn in future will also be more risky with infrastructure developed in the fire path. The June 2017 fire and the ecological burn executed on 15 May 2017, that slowed the fire down dramatically before it reached Brenton, is still fresh in our memories. A functional Fire Management Unit in the Knysna Sand Fynbos will be desirable as there will be future fires.
- Conservation value of property. More than 50% of the property contains Knysna Sand Fynbos and the entire property is a Critical Biodiversity Area (CBA). Although the Kerk Laan area is located in Knysna Sand Fynbos the transformation footprint can be limited with a good Site Development Plan and the current landscape functionality corridor will be maintained. Knysna Sand Fynbos type hosts threatened plant species and five threatened butterfly taxa (Mecenero *et al.* 2013), including CE taxa *Orachrysops niobe* (Brenton Blue) and *Thestor brachycerus* and is poorly protected. The original extent of Knysna Sand Fynbos was 15 355 ha. The remaining natural extent is 1 478 ha (9.6%) and the Western Cape target is 3 531ha (23%). The Knysna Sand Fynbos asset is in deficit. Knysna Sand Fynbos is not only endemic to the Western Cape, but it is also confined to a very specific and limited geographical area along the Garden Route coast (only found from the coastal flats from Wilderness, generally to the north of the system of lakes, several patches around the Knysna Lagoon, with more isolated patches eastwards to the Robberg peninsula near Plettenberg Bay). There is excellent landscape heterogeneity on the property.

In summary, from a biodiversity conservation, landscape functionality and integrated fire management perspective developing the main house adjacent to Kerk Laan is the preferred alternative for SANParks. Developing in the core of the Knysna Sand Fynbos Coastal Corridor will set a very bad precedent and contribute to a loss of biodiversity and landscape fragmentation. The properties on both side of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023. SANParks will continue to object to the access road over the sand dunes.

Due to SANParks ongoing CNP work in the corridor, SANParks is familiar with the property, and has visited it and adjacent properties several times over the years (**Figs. 8 & 9**).



Fig. 8. View from neighboring Uitzicht 216, Portion 39 towards landward foredune on Portion 76.



Fig. 9. View from neighboring Uitzicht 216, Portion 39 towards seaward foredune on Portion 76, showing valley between the two foredunes.

The current development proposal as extracted from the Draft Basic Assessment Report (DBAR), EcoRoute Environmental Practitioners, January 2025, entails:

Proposed Development:



The **preferred alternative**: The development proposal entails the following:

- (i) The construction of one (x1) main dwelling house to be situated in the southwestern corner of the property (3000m²).
- (ii) The construction of a new internal road to provide access to the southern portion of the property.

The Main Dwelling House

The primary dwelling unit will be situated in the south-western portion of the property consisting of the following inter-leading room's ±3000m²:

- 6 Bedrooms.
- Open plan living area consisting of the kitchen, lounge area, dining area, kitchen, bar, scullery, bathroom and wine cellar.
- Open deck and swimming pool.

The Internal Road

The internal road will be 830 meters in length. The road surface area will be 2.5 meters wide and the disturbed area for construction of the road varies between 4 to 5.5 meters wide. The internal road is to access the southwestern side of the property.



Alternative 1: The development proposal entails the following:

- (iii) The construction of one (x1) main dwelling house to be situated in the southwestern corner of the property (4000m²).
- (iv) The construction of one (x1) farm manager's house in the northwestern corner of the property (1200m²).

- (v) The construction of a new internal road to provide access to the southern portion of the property.

Note: Inconsistencies with naming of alternatives occurs throughout the documents provided. Text refers to Alternative 1 yet plans refer to this alternative as Alternative 2. This is very confusing for readers.

The Farm Manager's House

The Dwelling house to be situated in the north-western corner will encroach the prescribed 30m building line, and therefore an application must be made for a permanent departure for the relaxation of the northern and western building lines.

The main reason why the house encroaches on the prescribed building line is to prevent unnecessary disturbance of sensitive, pristine fynbos. The proposed footprint in the building line area is an existing transformed area, and consists of the following:

- Ground Floor: 600m²
- First Floor: 400m²
- Footprint: 600m²
- Disturbance area: 1200m²

The No Go Alternative

The proposed redevelopment of Portion 76 of the Farm Uitzicht 216 will remain unutilised and vacant, thereby restricting the landowner's ability to exercise their right to construct a residential dwelling.

Servicing:

Electricity

There is currently **no electrical infrastructure** present on the farm or in the adjacent road reserve to the north. It is advisable to consider the installation of a solar power facility in this location.

Solar plant

Solar plant

Type and system

The solar plant will be developed as an off-grid installation, utilizing solar energy to supply the load during daylight hours while recharging the batteries at night. Furthermore, grid-tied photovoltaic inverters may be integrated into this micro-grid configuration through AC coupling, should the energy demand surpass the generation capacity.

Plant location

It is advisable to consider the installation of a **roof-mounted solar power system on the roofs of both the main residence and the adjacent outbuilding units**, should there be a requirement for increased energy generation capacity. The northern-facing roof of the main residence, which has an approximate area of 46 square meters, is capable of accommodating approximately 23 solar panels, providing a total capacity of 7 kilowatts.

Plant capacity

The proposed system is designed with a capacity of 15 kWh, while the anticipated peak consumption is estimated to reach 30 kWh per day.

Water Reticulation

The applicant proposes to supply water for the development by means of the following:

- **Installing boreholes – an application for a water licence will have to be submitted to Breede- Gouritz Catchment Management Agency.**
- A substantial proportion of the water demand will be addressed through the collection of rainwater. The aggregate roof area totals 842 m² and given the average annual rainfall of 500 mm in the Knysna region, this system is estimated to supply approximately 421 kilolitres (kl) of rainwater. It is important to note that this rainwater collection will only meet around 87% of the total water demand.
- The main building will make provision for 110kl rainwater/borehole storage.

Water Reticulation

The proposed development lacks a bulk water network and will **serve as holiday accommodation for a maximum of twelve people, assumed to be occupied for 200 days a year.**

Water demand is 480,000 litres (480 kilolitres) annually. Rainwater collection from 842 square meters of roof space will provide about 421,000 litres (421 kilolitres), covering 87% of the demand. To make up for the shortfall, boreholes will be drilled, which can also serve as storage when powered by on-site generators. The main building will have a storage capacity of 110 kilolitres.

Fire

This development is **categorized as low-risk and falls within Group 2: residential areas (residential zone 1).** In these designated areas, the gross floor area of dwelling houses, including any associated outbuildings, is typically expected to range between 100 square meters and 200 square meters, in accordance with the "Guidelines for

Sewer Reticulation

At this time, municipal bulk sewer services are not available in this area. Following consultation with the Technical Department of Knysna Municipality, it has been determined that the implementation of **septic tanks with soakaways** is a viable option for managing effluent in this locality.

The above information was obtained from the Engeolab desktop investigation, Geophysical investigation & Feasibility Assessment into groundwater abstraction dated October 2018 and the Civil Services Report dated 2018.

Internal Stormwater

The stormwater will not be accumulated or concentrated at any point but will be allowed to drain naturally over the sandy surface. Care will be taken when designing the access road to ensure that stormwater is properly addressed, according to SUDS principles.

Point 1: Development on the Foredunes and within a Coastal Risk Area Coastal Protection Zone

The CPZ is defined in Section 16 of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008) (NEM: ICMA). The Western Cape DEA&DPs, “Western Cape Provincial Coastal Management Programme 2022 – 2027”, further summarises aspects of the CPZ as follows.

Feature	Constituents	Characteristics/Purpose
The Coastal Protection Zone	▪ Sensitive coastal areas, as declared in terms of Section 21 of the Environment Conservation Act (Act No. 73 of 1989); ▪ Any part of the littoral active zone that is not coastal public property; ▪ Any coastal protected area, or part of such area, which is not coastal public property. ▪ Any rural land situated wholly or partially within one kilometre of the High-Water Mark (HWM) which is zoned as agricultural or undetermined; ▪ Any urban land unit that is situated completely or partly within 100 metres of the HWM; ▪ Any coastal wetland, lake, lagoon or dam which is situated completely or partially within a land unit situated within 1000 metres of the HWM that was zoned for agricultural or undetermined use, or is within 100 metres of the HWM in urban areas; ▪ Any part of the seashore which is not coastal public property (including all privately owned land below the HWM); ▪ Any Admiralty Reserve which is not coastal public property; and ▪ Any land that would be inundated (submerged or covered) by a 1:50 year flood or storm event (this includes flooding caused by both rainstorms and rough seas).	▪ To protect the ecological integrity, natural character, and the economic, social and aesthetic value of the neighbouring coastal public property; ▪ To avoid increasing the effect or severity of natural hazards ▪ To protect people, property and economic activities from the risks and threats which may arise from dynamic coastal processes such as wave and wind erosion, coastal storm surges, flooding and sea-level rise. ▪ To maintain the natural functioning of the littoral active zone. ▪ To maintain the productivity of the coastal zone; and ▪ To allow authorities to perform rescue and clean-up operations.

8	Implementation of land use legislation in coastal protection zone	Section 62 of the NEM: ICMA obliges any organ of state that is implementing any legislation that regulates the planning or development of land, in a manner that conforms to the principles of cooperative governance contained in Chapter 3 of the Constitution, apply that legislation in relation to land in the coastal protection zone in a way that gives effect to the purposes for which the protection zone is established as set out in Section 17 of the NEM: ICMA. Furthermore, SPLUMA requires that a land use scheme must comply with environmental legislation.
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Uitzicht 216, Portion 76 falls entirely in the CPZ (Fig.2), therefore careful environmentally sensitive decision-making must be made for any proposed development on this property.

As the property falls within the 1km high-water-mark, this has further implications for agricultural worker accommodation, in terms of the Knysna Municipality: Zoning Scheme By-law, 29 June 2020:

“agricultural worker accommodation”

Land use description: “*agricultural worker accommodation*” means accommodation provided for bona fide agricultural workers, including accommodation for labourers and farm managers, as determined by the Municipality based on the extent of the bona fide agricultural activities on the land unit.

Development parameters:

The development parameters applicable to “*agriculture*” apply with the following additional development parameters:

- (a) the number of units must be reasonably connected to the bona fide agricultural activities on the land unit; and
- (b) no agricultural worker accommodation may be erected within 1 km of the high-water mark of the sea or a tidal river.

Confirmation on the allowance of a second dwelling for a farm manager must be sought from the Knysna Municipality.

Garden Route National Park Coastal Management Line

The Coastal Management Line for the Garden Route National Park was established in GNR. No. 3668, 14 July 2023, in terms of NEM: ICMA. Section 4 describes development risk management measures applicable for new infrastructure seaward of the CML and existing infrastructure in areas at risk to dynamic coastal process. The new and existing infrastructure provisions are what is being applied to SANParks infrastructure. SANParks encourages that these measures be applied to private property adjacent to SANParks land. It must be noted that several properties which border Portion 76, are Contract National Park committed properties, which will legally be declared as part of the park.

The CML extends for between 70 to 100m in places into the lower southern section of Portion 76.

Knysna Protected Environment Development Control Area

SANParks is responsible for the Proper Administration of the Knysna Protected Environment (KPE) (GN 1175 of 2009) Regulations, and for the authorisation of any development (as defined in the Regulations) in the DCA, as per Section 8. The KPE DCA extends 50m from the high-water mark into Portion 76 (Fig 2), and as such SANParks’ authorisation is required for any development to proceed in this area.

As per Section 9 and 10 of the KPE Regulations SANParks may request additional studies to be undertaken, should it be deemed that these are required.

Dune Stability, Coastal Erosion & Climate Change Resilience

SANParks does not support and objects to any development and infrastructure on the two foredunes situated in the southern section of Portion 76.

The stability of the foredunes is a concern. Dune slumping on the seaward foredune of Portion 72 has recently occurred (2023 – 2024) (**Fig. 10**), and blowouts are evident on Portion 73 and 74 (**Fig. 11**). These dune areas could be deemed littoral active zones, being unstable and dynamic because of natural processes.

Conserving the seaward foredune and ensuring that it remains free from development is a necessary climate change resilience strategy. Any development on this active foredune would be at risk as coastal erosion impacts intensify in the future with climate change. It would be difficult to defend such development from coastal erosion, given the unstable steep dune slopes, erodibility, and slumping potential. The effects of climate change are already being experienced along this stretch of coast (**Fig. 12**).



Fig. 10. Recent dune slumps (2023-2024) evident on the seaward foredune, Portion 72.

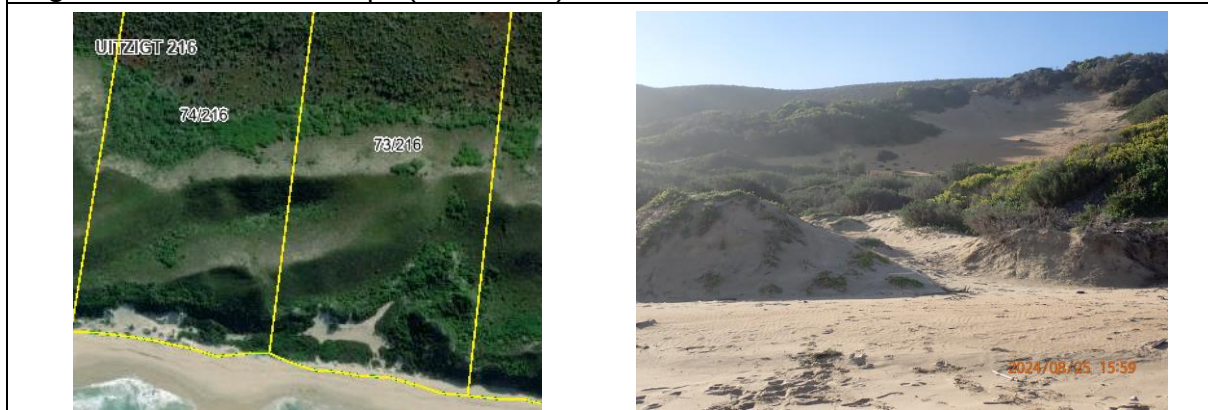


Fig. 11. Two blowouts are evident on the seaward foredune, Portions 73 & 74.

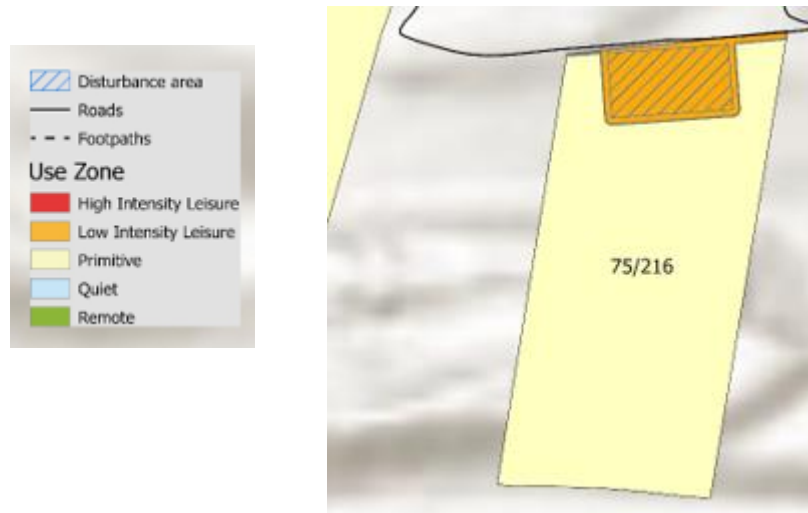


Fig.12. September 2023 storm surge, which washed away the Brenton on Sea beach walkway.

Point 2: Knysna Sand Fynbos Corridor: Development Options Supported

As stated, several adjoining and adjacent properties are in various stages of SANParks CNP stewardship commitment with landowners. Many of these landowners have intentions to exercise their primary development rights, which SANParks supports. Part of the CNP process involves formulating a Property Operational Plan for co-management with SANParks and the landowner. A component of this is the drafting of a Zonation Plan, based on park zonation principals, as the property is eventually declared as part of the park. The Zonation Plan sets out which portions of the property may be developed, and what activities may take place in the various areas of the property.

SANParks' position for properties situated seaward of Church Street is to allow only a development area situated directly adjacent to Church Street, in which a primary dwelling is permitted, and if approved by the Knysna Municipality, a second managers house may be permitted, however this must be placed in this same development area. No development is supported lower down the property, and on the foredunes, and no roads may be constructed through the property to the foredunes. Approved hiking paths, a beach access path, and a small sea viewing deck of approximately 25m² maximum may be permitted. An example of a Zonation Plan, which was prepared for the previous landowner of Portion 75 is as follows:



SANParks supports a clustered layout approach for dwelling/s and infrastructure placement. A diffuse layout approach that fragments the landscape is not supported. This approach is applied throughout the corridor. The only exception to this position, is Portion 39, which has a road constructed across the foredunes and a dwelling situated behind the seaward foredune. It must however be noted that Portion 39 has been owned by the same landowners since 1972, and the road was formalised from 1980 to 1990, and the dwelling was pre-existing, prior to the EIA Regulations, which were enacted in 1997. The dwelling burnt down in the 2017 fires and municipal approval was attained to re-build it. SANParks will not support any new developments of this nature in the corridor.

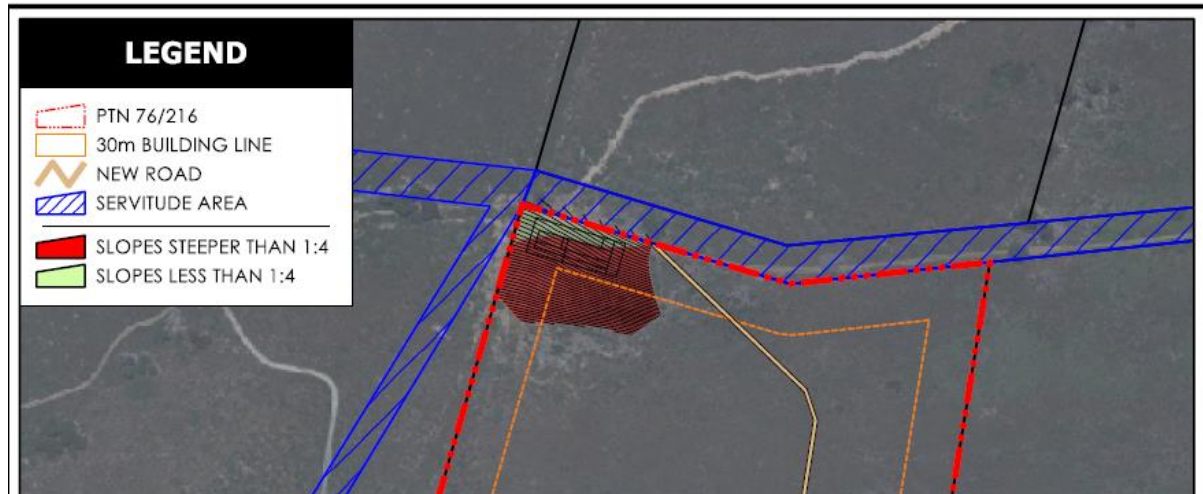
SANParks' position is not only based on the need to prevent landscape fragmentation and biodiversity loss, and support landscape connectivity and functioning, but is further intended to retain tranquillity and a sense of place across the conservation corridor.

Therefore, based on the above, SANParks does not support and objects to the preferred layout. SANParks does not support the construction of a road across the foredunes and the construction of a house on the foredunes. Further, the disturbance/ building footprint areas suggested (main dwelling approx. 3000m², and road approx. 4565m², total 7565m²) are excessive and underestimated.

Likewise, SANParks does not support Alternative 2. This alternative would have a greater negative impact, as disturbance/ building footprint areas are greater (main dwelling approx. 4000m², farm managers house 1200m², and road approx. 4565m², total 9765m²) with two disturbance areas proposed on the northern and southern section of the property, with a road access the foredunes.

It is unclear whether the areas provided refer to building footprint area or to disturbance areas. If referring to a building footprint area, the actual disturbance area may in fact be double/ triple. No area calculations have been provided for embankments, water tanks, garages, storage areas, vegetable gardens etc.

SANParks will only support development close to Church Street, as extracted from Alternative 2 layout below:



Point 3: Infrastructure

Water

Should the landowner require borehole water the following should be noted:

In terms of the National water Act, 1998 (Act No. 36 of 1998), Revision of General Authorisations for the Taking and Storing of Water, GNR. No 40243, 2 September 2016, Section 2.3; a Water Use License (WUL) may be required due to the property being situated within 500m from the high-water mark of the ocean.

Section 2.3 states the following exclusions from General Authorisations:

2.3. Geographical area and water resources to which the authorisation applies

Except where stated differently in the notice this authorisation applies to all land and all water resources in South Africa, subject to the following exclusions:

1. No water that is taken in terms of this authorisation may be taken within a 500 metre radius from the boundary (delineated edge) of a wetland, pan or estuary.
2. No groundwater that is taken in terms of this authorisation may be taken within a 500 metre radius from the boundary of a wetland or estuary, within a 100 metre radius from the delineated riparian edge of a water course or a state dam, within a 500 metre radius of a state dam wall or within 500 metres from the high-water mark of the ocean.

Further a WUL may be required, if water demand for the primary supply is >1kl/da/ha (>1kl/day/ha which is permitted for general usage). Confirmation from the relevant Competent Authority should be sought.

Sewerage

SANParks is not in support of septic tanks. Cleaner environmentally friendly options should be investigated.

Electricity

SANParks supports the use of solar panels, however these should be positioned so as not to face east/ west to minimise glare and reflections. Similarly glare from windows should be minimised.

Point 4: Alien Invasive Species and Fire Management

The landowner's attention is drawn to the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEM:BA) Alien and Invasive Species Regulations, 25 September 2020, where a landowner is legally responsible for the removal of alien vegetation on their property. SANParks requests sight of the required Invasive Species Control Plan (ISCP), and clarity on whether this has been submitted to and approved by the Department of Forestry Fisheries and the Environment (DFFE). SANParks seeks confirmation on whether alien clearing if any has occurred on the property.

Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. SANParks requires clarity on whether the landowner is a member of the Southern Cape Fire Protection Association (SCFPA), and whether the necessary legally required firebreaks, agreements and/or exemptions are in place.

SANParks stands firm on previous comments made regarding fire.

- **Fire management.** The landowners are members of the Southern Cape FPA. It is possible to make fire breaks to protect infrastructure at the landowners preferred location for the main house. However, Kerk Laan could act as a firebreak if it is widened and slashed. In a case of emergency, it would be less risky to evacuate people from Kerk Laan than in a fynbos corridor with tricky access for fire trucks. The Campbell road and the new section of road that would need to be constructed from Campbell road to preferred site would not be ideal roads for the Knysna Fire Department as their trucks would struggle to gain access easily to the house. However, Kerk Laan would be a much easier access point for fire trucks and this should be considered for fire safety in this fire-prone area. Conducting an ecological burn in future will also be more risky with infrastructure developed in the fire path. The June 2017 fire and the ecological burn executed on 15 May 2017, that slowed the fire down dramatically before it reached Brenton, is still fresh in our memories. A functional Fire Management Unit in the Knysna Sand Fynbos will be desirable as there will be future fires.

Point 5: Summary and Way Forward

In summary, SANParks does not support and objects to the Preferred and Alternative layouts. SANParks does not support the construction of a road across the foredunes and the construction of a house on the foredunes. SANParks will only support a disturbance area directly adjacent to Church Street, where a primary dwelling and managers house if permitted by the Knysna Municipality may be constructed.

This is in line with SANParks position for development in the Western Heads Knysna Sand Fynbos corridor, which is being applied to directly adjacent and neighbouring properties to Portion 76, which are under CNP stewardship commitment, in various phases of commitment. SANParks will not deviate from this position.

The lower southern section of Portion 76 is considered particularly sensitive: the CML extends some 70 to 100m in; the high-water-mark adjoins the southern property boundary; dune stability, coastal erosion, and climate change resilience are concerns; the property in its entirety falls within the CPZ; and the KPE Development Control Area extends 50m into the property. Authorisation of any development in the Development Control Area is required from SANParks as per Section 8 of the KPE Regulations.

In terms of infrastructure: a Water Use License may be required due to the property being situated within 500m of the high-water mark of the ocean; SANParks is not in support of septic tanks; and solar panels and windows must be positioned to reduce glare.

SANParks requests sight of the required Invasive Species Control Plan, and clarity on whether this has been submitted to and approved by the Department of Forestry Fisheries and the Environment. SANParks seeks confirmation on whether alien clearing if any has occurred on the property.

Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. SANParks requires clarity on whether the landowner is a member of the Southern Cape Fire Protection Association, and whether the necessary legally required firebreaks, agreements and/or exemptions are in place. In terms of fire management, development close to Church Street is more desirable than development lower down the property and on the foredunes.

Should the landowner wish to place Portion 76 into CNP stewardship with SANParks, the property would qualify, and the landowner could benefit from financial incentives. SANParks is willing to provide information and have further discussions should the landowner be interested.

It is requested that SANParks' full comments letter be included in the body of the Draft Basic Assessment Report, and not only in a Comments and Responses table.

SANParks reserves the right to revise initial comments if additional information becomes available.

Yours sincerely



Dr Vanessa Weyer
Principal Planner
SANParks Garden Route National Park

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9 December 2025

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**RE: SANPARKS COMMENTS, DRAFT BASIC ASSESSMENT,
SECOND PUBLIC PARTICIPATION CIRCULATION, PROPOSED
DEVELOPMENT, UITZICHT 216, PORTION 76, KNYSNA,
WESTERN CAPE**

DFFE Reference Nos:

14/12/16/3/3/1/3114 - 6 March 2025 Circulation to IAPs
14/12/16/3/3/1/3185 - 11 November 2025 Circulation to IAPs

Uitzicht 216 Portion 76 is situated: (1) within the Buffer Zone of the Garden Route National Park (GRNP); (2) within the Knysna Protected Environment (KPE) with the KPE Development Control Area (DCA) extending some 50m into the lower southern section of Portion 76; (3) with the Coastal Management Line (CML) extending for between 70 to 100m in places into the lower southern section. The CML was included in the Knysna Spatial Development Framework, is shown on the Knysna GIS Viewer, and the Western Cape DEA&DP Coastal Management Map Viewer. Risks associated with developing in this area are known and have been published; and (4) within the Coastal Protection Zone (CPZ), as designated in terms of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008) (NEM: ICMA). The CPZ is established to manage, regulate, and restrict the use of land that is adjacent to coastal public property, or that plays a significant role in the coastal ecosystem (**Figs. 1 & 2**).

The high-water mark runs adjacent to the property's southern boundary, and 20-, 50- and 100-Year Erosion Risk Lines have been mapped in proximity (**Fig. 2**).

Two foredunes traverse the lower southern section of the property, which run east-west. Slopes are steep on either side of these foredunes, with many areas classified with a Slope Percentage Class of >30% (**Figs. 3 & 4**).

lai-lais/richtersveld transfrontier

addo elephant

agulhas

augrabies falls

bontebok

camdeboo

golden gate highlands

karoo

kgalagadi transfrontier

knysna

kruger

mapungubwe

marakele

meerkat

mokala

mountain zebra

namaqua

table mountain

tankwa karoo

tsitsikamma

west coast

wilderness

Vegetation is mapped by Mucina and Rutherford, 2006¹ and as revised by SANBI, 2018², as Critically Endangered (CE) Knysna Sand Fynbos (FFd10) on the northern sector, whilst on the southern sector Least Concern (LC) Goukamma Dune Thicket (AT 36) is mapped (**Fig. 5**).

Portion 76 is mapped as having a high soil erodibility K-Factor (**Fig. 6**) and an Extreme Veldfire Risk (CapeFarmMapper3).

The property is in the protected area expansion footprint of the GRNP and in the Knysna Sand Fynbos Coastal Corridor, which is the subject of a conservation initiative being supported by SANParks, CapeNature, Table Mountain Fund, WWF, and the Western Heads Goukamma Conservancy (WHGC). Achieving a conservation outcome on this property is important to SANParks, due to its high conservation value.

Portion 76 is zoned Agricultural Zone I, falls outside the Urban Edge, and is 21ha in extent. The Applicant is Midnight Storm Investments 180 (Pty) Ltd. The property is vacant, has never been developed, and is considered in excellent condition.

SANParks has conducted numerous site visits over the years. The photographs below (**Figs. 7 - 12**) were taken during the most recent site visit of 26 June 2025, attended by: Dr. V. Weyer and Mr. T. Kgaphola (SANParks); Ms. N. Nkosi, Ms. M. Madau, and Ms. N. Mtshali (DFFE); Ms. J. Ebersohn and Mr. A. Tigelaar (Eco Route); and Dr. H. Swart and sons (landowners).

	
Fig. 7. View of previously disturbed sector of Uitzicht 216 Portion 76. Directly adjacent to Church Street, in the northern sector of the property. Alien invasive vegetation is present.	Fig. 8. View looking southwards onto the pristine foredune area, where the main dwelling is proposed. A construction <u>disturbance area of 2500m²</u> is proposed.

¹ Mucina, L. and Rutherford, M.C. (editors) 2006. Vegetation map of South Africa, Lesotho and Swaziland: an illustrated guide. Strelitzia 19, South African National Biodiversity Institute, Pretoria.

²South African National Biodiversity Institute (2006-2018). The Vegetation Map of South Africa, Lesotho and Swaziland, Mucina, L., Rutherford, M.C. and Powrie, L.W. (Editors), Online, <http://bgis.sanbi.org/Projects/Detail/186>, Version 2018.

	
Fig. 9. View of area on foredune where main dwelling is proposed.	Fig. 10. View from the top of the foredune looking towards Brenton on Sea.
	
Fig. 11. View from the top of the first foredune, looking northwards toward the second foredune. An access road is proposed over the foredune system to the building platform, though Critically Endangered Knysna Sand Fynbos.	Fig. 12. Close-up view of fynbos vegetation on the foredune.

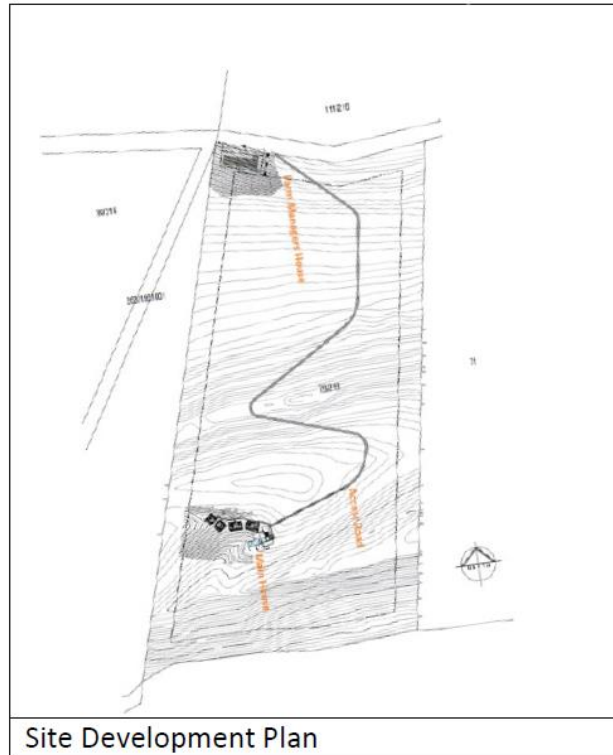
SANParks has commented on earlier development applications for Portion 76, key points as extracted include:

(1) Draft Basic Assessment, SANParks Objected - 1 October 2020

The proposal is to exercise the primary land use rights of the property, (i.e. construction of a main farmhouse and farm manager's house). The development proposal entails the following:

- (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²).
- (ii) The construction of one farm manager's house in the north-western corner of the property (600m²).
- (iii) The construction of a new internal road to provide access to the southern portion of the property.

The proposed development is approximately 8 765m² in size. SANParks representatives visited the site on 8 September 2020.



SANParks objects to the proposal for the following reasons:

1. Site Development Plan footprint. The property is in the GRNP potential expansion footprint, as reflected in the approved GRNP Management Plan, and in a CBA in terms of the Western Cape Biodiversity Spatial Plan 2017. SANParks disagrees with the statement below that the areas chosen for development was to have the least negative impact on the environment. The proposed Site Development Plan (6 bed main dwelling with pool, farm managers house and access route) will have an unnecessary significantly negative impact on biodiversity conservation, the sense of place of the area and transform and fragment the Knysna Sand Fynbos Coastal Corridor.
2. Biodiversity Stewardship or long-term conservation outcomes were not discussed in the DBAR. The conservation of the vegetation on the property is of national importance. Without a commitment to consent to the declaration of the property as part of the GRNP or with a Biodiversity Stewardship agreement with CapeNature in place, SANParks will continue to object to the proposed development.
3. Land use rights. SANParks takes note that Marike Vreken urban and environmental planners were appointed to apply for the required land use rights from Knysna Municipality. From the information provided there was no mention of rezoning the natural portion of the property to Open Space Zone III. Further discussion in this regard is required to ensure a long-term conservation outcome. Relaxation of the building line adjacent to Kerk Laan could be supported.

SANParks could support development in the node where the Managers Cottage is proposed adjacent to Kerk Laan, as discussed on-site on 8 September 2020. It would be preferable if all development is consolidated into one area (the area where the farm managers cottage is

proposed) to minimise fragmentation of the landscape and impact on the sensitive fynbos environment.

The applicant should be reminded that the main objective of Priority Natural Areas and CBAs is to maintain it in a natural or near natural state, with no further loss of natural habitat. Only low impact, biodiversity sensitive land uses are appropriate. The property is currently pristine and was not previously developed.

SANParks request to meet with the landowners to discuss a way forward that can benefit biodiversity conservation and allow for low impact development without the need for a road over the pristine dunes. The current proposal will set a very bad precedent for potential development of other properties in the Knysna Sand Fynbos Coastal Corridor. The properties on both side of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023.

(2) Draft Basic Assessment, Follow-up Comment, SANParks Objected - 28 January 2021

SANParks objected to the proposed development on 1 October 2020. A site visit with the landowners and EAP took place on 4 January 2021. Key points discussed:

1. Proposed footprint of the main house. The landowners were not willing to change the proposed footprint of the main house to a position adjacent to Kerk Laan. They were willing to move the house to reduce visual impact in the level area behind the frontal dune.
2. Proposed road over the sand dunes. SANParks continue to object to the construction of a road over the sand dunes. The landowners indicated that their preferred option is to use Susan Campbell's road for access. They could use Kerk Laan and access via the gate and use the steep section of the Campbell road. The proposed option to use the Campbell road will reduce the negative impact on biodiversity but will necessitate a new section of road to be constructed on the Campbell property and over Portion 76.
3. Maretha Alant met with Susan Campbell. Ms Campbell is opposed to providing access for the proposed development over her land.
4. Footpath to the beach. Portion 76 of Farm Uitzicht 216 has a steep gradient to the beach and a footpath is not proposed in the BAR.
5. Drilling for water required. The proposal is that water will be supplied by a borehole. Bringing drilling equipment to the proposed site for the main house will have a negative impact on biodiversity. Previous attempts to drill for water in the area (Investec) yielded poor return.
6. Contract National Park footprint. The property is in the priority protected area expansion footprint, in the Western Heads coastal ecological corridor, that can potentially link the Goukamma Nature Reserve with the Knysna Estuary. The property was included in the South African National Parks Land Inclusion Plan for the period 2020 – 2023 for the Garden Route National Park (GRNP). The landowners may be interested in incorporating the property into the GRNP but more information is required from SANParks. SANParks will further engage with the landowners when our draft documents are in place.



Proposed location of main house in flat area with high biodiversity value



Area for the proposed main house in foreground



SANParks continue to object to the construction of a road over the sand dunes



Portion 76 of Farm Uitzicht 216 has a steep gradient to the beach and a footpath is not proposed in the BAR.



Susan Campbell's road

A follow up fieldtrip with SANParks and the Southern Cape Fire Protection Association (FPA) present took place on 9 January 2021. Key points discussed:

- Development adjacent to Kerk Laan. Developing the main house in a disturbed area adjacent to Kerk Laan will have the least negative impact on biodiversity and landscape functionality. Other advantages are that the drilling equipment and construction vehicles will have easy access to the site via an existing road.
- Development in the low lying area, over the two sand dunes or using the Campbell road, will compromise landscape functionality and set a bad precedent. It will create fragmentation of a pristine coastal corridor.

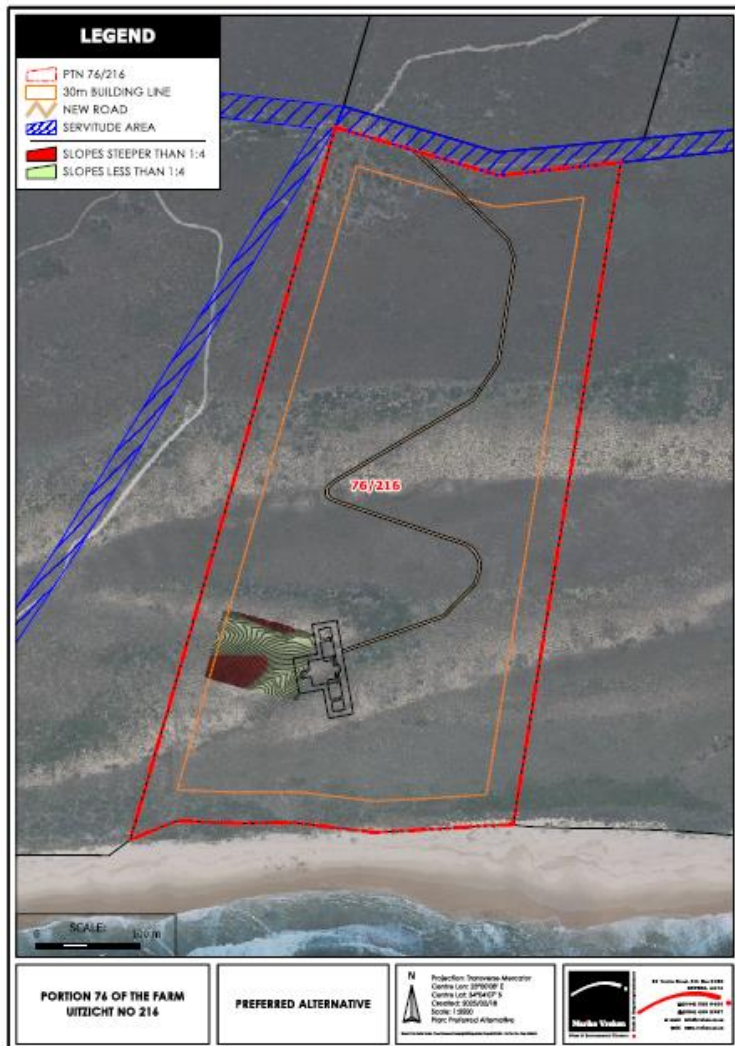


Disturbed area adjacent to Kerk Laan suitable for development

- **Fire management.** The landowners are members of the Southern Cape FPA. It is possible to make fire breaks to protect infrastructure at the landowners preferred location for the main house. However, Kerk Laan could act as a firebreak if it is widened and slashed. In a case of emergency, it would be less risky to evacuate people from Kerk Laan than in a fynbos corridor with tricky access for fire trucks. The Campbell road and the new section of road that would need to be constructed from Campbell road to preferred site would not be ideal roads for the Knysna Fire Department as their trucks would struggle to gain access easily to the house. However, Kerk Laan would be a much easier access point for fire trucks and this should be considered for fire safety in this fire-prone area. Conducting an ecological burn in future will also be more risky with infrastructure developed in the fire path. The June 2017 fire and the ecological burn executed on 15 May 2017, that slowed the fire down dramatically before it reached Brenton, is still fresh in our memories. A functional Fire Management Unit in the Knysna Sand Fynbos will be desirable as there will be future fires.
- **Conservation value of property.** More than 50% of the property contains Knysna Sand Fynbos and the entire property is a Critical Biodiversity Area (CBA). Although the Kerk Laan area is located in Knysna Sand Fynbos the transformation footprint can be limited with a good Site Development Plan and the current landscape functionality corridor will be maintained. Knysna Sand Fynbos type hosts threatened plant species and five threatened butterfly taxa (Mecenero *et al.* 2013), including CE taxa *Orachrysops niobe* (Brenton Blue) and *Thestor brachycerus* and is poorly protected. The original extent of Knysna Sand Fynbos was 15 355 ha. The remaining natural extent is 1 478 ha (9.6%) and the Western Cape target is 3 531ha (23%). The Knysna Sand Fynbos asset is in deficit. Knysna Sand Fynbos is not only endemic to the Western Cape, but it is also confined to a very specific and limited geographical area along the Garden Route coast (only found from the coastal flats from Wilderness, generally to the north of the system of lakes, several patches around the Knysna Lagoon, with more isolated patches eastwards to the Robberg peninsula near Plettenberg Bay). There is excellent landscape heterogeneity on the property.

In summary, from a biodiversity conservation, landscape functionality and integrated fire management perspective developing the main house adjacent to Kerk Laan is the preferred alternative for SANParks. Developing in the core of the Knysna Sand Fynbos Coastal Corridor will set a very bad precedent and contribute to a loss of biodiversity and landscape fragmentation. The properties on both side of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023. SANParks will continue to object to the access road over the sand dunes.

(3) Draft Basic Assessment (DFFE Ref. No. 14/12/16/3/3/1/3114), SANParks Objected – 7 April 2025 - Please refer to the full SANParks comment, 7 April 2025.



The preferred alternative: The development proposal entails the following:

- (i) The construction of one (x1) main dwelling house to be situated in the southwestern corner of the property (3000m²).
- (ii) The construction of a new internal road to provide access to the southern portion of the property.

The Main Dwelling House

The primary dwelling unit will be situated in the south-western portion of the property consisting of the following inter-leading room's $\pm 3000\text{m}^2$:

- 6 Bedrooms.
- Open plan living area consisting of the kitchen, lounge area, dining area, kitchen, bar, scullery, bathroom and wine cellar.
- Open deck and swimming pool.

The Internal Road

The internal road will be 830 meters in length. The road surface area will be 2.5 meters wide and the disturbed area for construction of the road varies between 4 to 5.5 meters wide. The internal road is to access the southwestern side of the property.



Alternative 1: The development proposal entails the following:

- (iii) The construction of one (x1) main dwelling house to be situated in the southwestern corner of the property (4000m²).
- (iv) The construction of one (x1) farm manager's house in the northwestern corner of the property (1200m²).

- (v) The construction of a new internal road to provide access to the southern portion of the property.

Note: Inconsistencies with naming of alternatives occurred throughout the documents. Text referred to Alternative 1 yet plans referred to this alternative as Alternative 2.

The Farm Manager's House

The Dwelling house to be situated in the north-western corner will encroach the prescribed 30m building line, and therefore an application must be made for a permanent departure for the relaxation of the northern and western building lines.

The main reason why the house encroaches on the prescribed building line is to prevent unnecessary disturbance of sensitive, pristine fynbos. The proposed footprint in the building line area is an existing transformed area, and consists of the following:

- Ground Floor: 600m²
- First Floor: 400m²
- Footprint: 600m²
- Disturbance area: 1200m²

The No Go Alternative

The proposed redevelopment of Portion 76 of the Farm Uitzicht 216 will remain unutilised and vacant, thereby restricting the landowner's ability to exercise their right to construct a residential dwelling.

Servicing:

Electricity

There is currently **no electrical infrastructure** present on the farm or in the adjacent road reserve to the north. It is advisable to consider the installation of a solar power facility in this location.

Solar plant

Type and system

The solar plant will be developed as an off-grid installation, utilizing solar energy to supply the load during daylight hours while recharging the batteries at night. Furthermore, grid-tied photovoltaic inverters may be integrated into this micro-grid configuration through AC coupling, should the energy demand surpass the generation capacity.

Plant location

It is advisable to consider the installation of a **roof-mounted solar power system on the roofs of both the main residence and the adjacent outbuilding units**, should there be a requirement for increased energy generation capacity. The northern-facing roof of the main residence, which has an approximate area of 46 square meters, is capable of accommodating approximately 23 solar panels, providing a total capacity of 7 kilowatts.

Plant capacity

The proposed system is designed with a capacity of 15 kWh, while the anticipated peak consumption is estimated to reach 30 kWh per day.

Water Reticulation

The applicant proposes to supply water for the development by means of the following:

- **Installing boreholes – an application for a water licence will have to be submitted to Breede- Gouritz Catchment Management Agency.**
- A substantial proportion of the water demand will be addressed through the collection of rainwater. The aggregate roof area totals 842 m² and given the average annual rainfall of 500 mm in the Knysna region, this system is estimated to supply approximately 421 kilolitres (kl) of rainwater. It is important to note that this rainwater collection will only meet around 87% of the total water demand.
- The main building will make provision for 110kl rainwater/borehole storage.

Water Reticulation

The proposed development lacks a bulk water network and will **serve as holiday accommodation for a maximum of twelve people, assumed to be occupied for 200 days a year.**

Water demand is 480,000 litres (480 kilolitres) annually. Rainwater collection from 842 square meters of roof space will provide about 421,000 litres (421 kilolitres), covering 87% of the demand. To make up for the shortfall, boreholes will be drilled, which can also serve as storage when powered by on-site generators. The main building will have a storage capacity of 110 kilolitres.

Fire

This development is **categorized as low-risk and falls within Group 2: residential areas (residential zone 1).** In these designated areas, the gross floor area of dwelling houses, including any associated outbuildings, is typically expected to range between 100 square meters and 200 square meters, in accordance with the "Guidelines for Human Settlement Planning and Design."

The pool, with a capacity of 160 kilolitres (kl), shall serve as the primary reservoir for fire extinguishing purposes. Should the boreholes be equipped with power supplied by on-site generators, these boreholes may be classified as supplementary on-site storage capacity.

Sewer Reticulation

At this time, municipal bulk sewer services are not available in this area. Following consultation with the Technical Department of Knysna Municipality, it has been determined that the implementation of **septic tanks with soakaways** is a viable option for managing effluent in this locality.

The above information was obtained from the Engeolab desktop investigation, Geophysical investigation & Feasibility Assessment into groundwater abstraction dated October 2018 and the Civil Services Report dated 2018.

Internal Stormwater

The stormwater will not be accumulated or concentrated at any point but will be allowed to drain naturally over the sandy surface. Care will be taken when designing the access road to ensure that stormwater is properly addressed, according to SUDS principles.

SANParks summary comments included:

In summary, SANParks does not support and objects to the Preferred and Alternative layouts. SANParks does not support the construction of a road across the foredunes and the construction of a house on the foredunes. SANParks will only support a disturbance area directly adjacent to Church Street, where a primary dwelling and managers house if permitted by the Knysna Municipality may be constructed.

This is in line with SANParks position for development in the Western Heads Knysna Sand Fynbos corridor, which is being applied to directly adjacent and neighbouring properties to Portion 76, which are under CNP stewardship commitment, in various phases of commitment. SANParks will not deviate from this position.

The lower southern section of Portion 76 is considered particularly sensitive: the CML extends some 70 to 100m in; the high-water-mark adjoins the southern property boundary; dune stability, coastal erosion, and climate change resilience are concerns; the property in its entirety falls within the CPZ; and the KPE Development Control Area extends 50m into the property. Authorisation of any development in the Development Control Area is required from SANParks as per Section 8 of the KPE Regulations.

In terms of infrastructure: a Water Use License may be required due to the property being situated within 500m of the high-water mark of the ocean; SANParks is not in support of septic tanks; and solar panels and windows must be positioned to reduce glare.

SANParks requests sight of the required Invasive Species Control Plan, and clarity on whether this has been submitted to and approved by the Department of Forestry Fisheries and the Environment. SANParks seeks confirmation on whether alien clearing if any has occurred on the property.

Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. SANParks requires clarity on whether the landowner is a member of the Southern Cape Fire Protection Association, and whether the necessary legally required firebreaks, agreements and/or exemptions are in place. In terms of fire management, development close to Church Street is more desirable than development lower down the property and on the foredunes.

Should the landowner wish to place Portion 76 into CNP stewardship with SANParks, the property would qualify, and the landowner could benefit from financial incentives. SANParks is willing to provide information and have further discussions should the landowner be interested.

It is requested that SANParks' full comments letter be included in the body of the Draft Basic Assessment Report, and not only in a Comments and Responses table.

Eco Route applied for an extension to submit this application to DFFE, however due to not meeting timeframes and submission processes, the application lapsed, necessitating the re-submission of a new application.

(4) The current application is a Draft Basic Assessment, DFFE Ref No. 14/12/16/3/3/1/3185, Eco Route, November 2025.

Key aspects of the application are as extracted below.

Proposed Development Description

The proposed development comprises the construction of a single main dwelling in the south-western portion of the property, identified as the most suitable location based on specialist input and alternatives assessment. The development is designed to be environmentally sensitive, maintaining the ecological character of the area.

Main Dwelling

- A single-storey structure of approximately 1000 m² (including covered verandas and integrated garage), downscaled from the previously proposed 3000 m².
- Designed in a low-profile, contemporary coastal style, using earth-toned, non-reflective materials to blend with the natural dune landscape.
- Positioned to minimise ecological disturbance and visual intrusion, in accordance with visual, botanical, and geotechnical recommendations.

Access

- Access to the site will be via the existing servitude from Kerk Laan, with a short internal driveway linking to the house.
- The access route will follow natural contours to reduce the need for cut-and-fill and minimise vegetation clearance.

Water Supply

- The development will be self-sufficient in water supply, relying primarily on rainwater harvesting from roof surfaces.
- A minimum rainwater storage capacity of 20 000 litres will be provided.
- Borehole abstraction will only be used as a supplementary source, subject to licensing by the Breede-Gouritz Catchment Management Agency (CMA).

Wastewater Management

- On-site sanitation will be provided via a septic tank and soakaway system, designed and located in accordance with the geotechnical report to avoid groundwater contamination.

Stormwater Management

- Runoff will be managed through infiltration-based measures such as:
 - Rainwater tanks
 - Permeable driveway surfaces
 - Swales and soakaways, where applicable
- No subsoil drains are required along roads but are recommended behind retaining walls if used.

Landscaping

- Only indigenous vegetation will be used to:
 - Maintain ecological integrity
 - Reduce fire risk
 - Ensure the visual integration of the development with the surrounding landscape
- No disturbance will occur beyond the demarcated development footprint.
- Construction Footprint
- The total construction disturbance area will not exceed 0.25 ha (2 500 m²), representing less than 1.2% of the property.
- The layout was selected to avoid sensitive vegetation types and reduce fragmentation of natural habitats.

Aerial Plan of the proposed activity (1000m²)



Road disturbance area:

$$830\text{m} \times 5.5\text{m} = 4565\text{m}^2$$

Construction Disturbance area:

>2500m² (unclear if this refers to building or disturbance footprint)

Total Disturbance = >7065m²

Description of project activity
The internal road will connect the northwestern side of the property to the southwest side of the property in order to gain access to the proposed construction of the main residential dwelling.
The internal road will be 830 meters in length. The road surface area will be 2.5 meters wide and

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disturbed area for construction of the road varies between 4 to 5.5 meters wide.

The Ecosystem Threat status indicates that the

Description of the scope of the proposed activity

In terms of NEMA (April 2020):

(Refer to Architectural Drawings – ‘Nico Vreken Architect’)

The applicant proposes to exercise the primary land use rights of Portion 76 of the Farm Uitzicht No. 216, Knysna Municipality, through the construction of a single primary dwelling (main farmhouse) within the south-western portion of the site. The development proposal has been refined to significantly reduce its environmental footprint.

Main Dwelling House (Preferred Alternative)

- A low-profile, single-storey structure, limited to a total built footprint of ±1 000 m², including covered verandas and an integrated garage.
- The design will reflect a contemporary coastal style, making use of non-reflective, earthy-toned materials to blend with the natural surroundings and reduce visual impact.

Access to Portion 76 of the Farm Uitzicht 216:

- A short internal driveway will be constructed, providing access from the existing servitude road off Kerk Laan to the dwelling footprint.
- The driveway will follow the natural contours of the site to minimise cut-and-fill, erosion risk, and vegetation clearance.

SANParks points which were raised in the previous comment of 7 April 2025 (attached) stand. SANParks does not support the Preferred Alternative. Points of concern previously raised are re-iterated and elaborated on below, with additional points added.

Point 1: Evaluation of Alternatives by Specialists

The Eco Route DBA report concludes on pg. 52 & 53:

Alternative 3: Main Dwelling in the Northern Portion

Alternative 3 shifts the main dwelling house to the northern portion of the site, near the servitude access. Although this option avoids the central dune corridor and aligns with SANParks' recommendation to maintain habitat connectivity, the proposed location overlaps with Critically Endangered Knysna Sand Fynbos. **Specialist input confirms that this vegetation type is highly sensitive and irreplaceable, and development here would result in a high negative impact on biodiversity.** As such, despite potential benefits in road alignment and ecological corridor protection, this alternative is not preferred due to the significant irreversible loss of endangered vegetation. This option would result in the direct loss of Critically Endangered Knysna Sand Fynbos (NEM: BA, 2022 list). The loss of such vegetation is considered irreplaceable and irreversible. For this reason, Alternative 2 is not viable and cannot be supported in terms of national legislation or provincial biodiversity planning frameworks (WCBSP).

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Conclusion

The preferred alternative, which proposes the development of the main dwelling house in the southwestern section of Portion 76 of the Farm Uitzicht No. 216, with a reduced footprint of approximately 1000 m², is considered the most appropriate and sustainable layout option. This alternative was selected based on its ability to balance legal compliance, environmental sensitivity, and practical development considerations.

From an ecological perspective, this **layout avoids the Critically Endangered Knysna Sand Fynbos** found in the northern portion of the site (as seen in Alternatives 1, 2 and 3) and is instead located within an area dominated by the Least Threatened Goukamma Dune Thicket. The smaller development footprint further limits disturbance to natural habitat and avoids overlap with key ecological corridors. **Although the access route does traverse some sensitive vegetation, the impact is considered low and manageable, and will be mitigated through road narrowing, ecological rehabilitation, and strict construction footprint demarcation.**

The Preferred Alternative, where the main dwelling is proposed on the foredune in the southwestern corner of Portion 76, and accessed by a 830m road across the foredune, is based on the premise of the southern foredune area being mapped as (LC) Goukamma Dune Thicket (AT 36), and perceived as being less sensitive than (CE) Knysna Sand Fynbos (FFd10) which is mapped on the northern sector. This premise is based on SANBI mapping classification criteria, not necessarily on what is present on the sensitive undisturbed foredune portions of the property. Vegetation variations exist, particularly as the foredune aspects alternate between south and north facing slopes.

The Preferred Alternative was not supported by Confluent Environmental Pty (Ltd), Ms. Bianke Fouché, Specialist Plant Species and Terrestrial Biodiversity Report, 22 July 2024, who stated that Alternative 4 (One dwelling in the north-western corner of the property) is the most acceptable layout for the proposed dwelling on the property, and that Alternative 1 (One dwelling and new access road) and Alternative 3 (Two dwellings and new access road) would likely trigger Offsets due to residual impacts that can't be reduced with mitigation proposed in their report.

The Alternatives evaluated are described in Table 8, pg. 42 of this report.

Table 8: Layout and Design Phase impact 1 - Fragmentation of habitats & plant populations

LAYOUT & DESIGN Impact no. 1	Alternative 1: One dwelling & new access road		Alternative 2: One dwelling & neighbours existing road (with a small new section) used for access.		Alternative 3: Two dwellings & new access road		Alternative 4: One dwelling in the north- western corner of the property	
Mitigation	Without	With	Without	With	Without	With	Without	With

10. CONCLUSION

The proposed development on Portion 76/216 will have an impact on pristine fynbos and strandveld vegetation. The habitats here are biodiverse and support a host of plant species of conservation concern (SCC). The property is also part of a wider open corridor that is part of a CBA 1. The impact assessment presented makes it clear that Alternative 4 is the most acceptable layout for the proposed dwellings on the property. Alternative 2 can also be considered without potentially triggering a requirement for an offset. This is because the residual impacts for Alternatives 2 and 4 are reduced to Minor or Negligible negative for all of the impacts that were assessed. Given the highly sensitive nature of the vegetation here, all effort should be made to limit the total PAOI of the development.

Offset requirements will likely also be triggered for this development should Alternative options 1 or 3 be followed, due to the Moderate residual impacts that can't be reduced with the mitigation proposed in this report. Areas with a Very High SEI (not calculated in the first botanical report but presented in this report) may be developed where the residual impact is Minor or Negligibly negative. Even though avoidance mitigation is preferred in Very High SEI areas (Verburgt et al., 2020), the Alternative 4 is a viable option to be considered given:

Extract from Pg. 53.

Discussion of the Alternatives: Only residual (post-mitigation) impacts that have a significance of Low or Negligible are acceptable. Where impacts are Moderate post-mitigation, offset requirements may be triggered for this development. This means that the most feasible development options on Portion 76 of 216 would be Alternative 2 and 4, in order to make appropriate allowance for fragmentation avoidance (Table 8). Alternatives 1 and 3 both have a residual fragmentation impact that remains moderate despite the mitigation proposed above.

[41]

Extract from Pg. 41.

Discussion of the Alternatives: The residual impacts on the loss of plant species, considering the SCC diversity on the property, can be reduced below Moderate for alternative options (Table 10), given the mitigation proposed above. Alternative option 4 is the only alternative where species loss can be reduced to a Negligible negative impact, and this is because the north-western corner, despite being in the most sensitive habitat on the property, has been invaded for several decades. By building there, that established invasive stand will be vanquished, and incentive to clear the remaining Knysna Sandstone Fynbos is also likely.

Extract from Pg. 47.

These findings and recommendations were not carried through into the DBAR, and contradict that stated by Eco Route. Ms. B. Fouché is a Candidate Botanical Scientists (Registration No: 141757) registered with the South African Council for Natural Scientific Professions (SACNASP), the report was reviewed by Dr. J. Dabrowski, who is Aquatic and Ecological Science SACNASP registered (Registration No. 115166).

The report followed the: (1) Protocol for the specialist assessment and minimum report content requirements for environmental impacts on terrestrial plant species (28 July 2023); and (2) the protocol for the specialist assessment and minimum report content requirements for environmental impacts on terrestrial biodiversity (20 March 2020).

A second specialist study, Terrestrial Animal Species SSVR and Impact Assessment, Confluent Environmental Pty (Ltd), Ms. M. Leitner (SACNASP Ref. No. 166055), February 2024 further concludes:

reasons it is also recommended that the building in the south be the only one built on the property. It is, however, noted that construction of the dwelling in the north rather than the south would have the lowest impact given that it is located in lower sensitivity habitat, and would not require the additional road (A possible fourth Alternative SDP which would have the lowest impact of all). Consideration should also be given to the swimming pool proposed for the southern dwelling regarding the source of the water, whether it is chlorinated, and the

Extract from Pg. 77.

A third specialist study was included by Enviro-Prac Consultancy, Dr. C. Ebersohn, Vegetation Sensitivity Analysis April 2017 (undertaken 8 years ago), and although the author is recognised as knowledgeable, the author does not appear to be SACNASP registered, nor were the required specialist protocols followed.

SANParks queries whether the Environmental Screening Tool suggested the need for a Visual Impact Assessment to be undertaken. Visual impacts have not been addressed adequately. The property is visible from tourist view points along CR Swart Road, and other areas.

Point 2: Development on the Foredunes and within a Coastal Risk Area Coastal Protection Zone

The CPZ is defined in Section 16 of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008) (NEM: ICMA). The Western Cape DEA&DPs, “Western Cape Provincial Coastal Management Programme 2022 – 2027”, further summarises aspects of the CPZ as follows.

Feature	Constituents	Characteristics/Purpose
The Coastal Protection Zone	▪ Sensitive coastal areas, as declared in terms of Section 21 of the Environment Conservation Act (Act No. 73 of 1989); ▪ Any part of the littoral active zone that is not coastal public property; ▪ Any coastal protected area, or part of such area, which is not coastal public property. ▪ Any rural land situated wholly or partially within one kilometre of the High-Water Mark (HWM) which is zoned as agricultural or undetermined; ▪ Any urban land unit that is situated completely or partly within 100 metres of the HWM; ▪ Any coastal wetland, lake, lagoon or dam which is situated completely or partially within a land unit situated within 1000 metres of the HWM that was zoned for agricultural or undetermined use, or is within 100 metres of the HWM in urban areas; ▪ Any part of the seashore which is not coastal public property (including all privately owned land below the HWM); ▪ Any Admiralty Reserve which is not coastal public property; and ▪ Any land that would be inundated (submerged or covered) by a 1:50 year flood or storm event (this includes flooding caused by both rainstorms and rough seas).	▪ To protect the ecological integrity, natural character, and the economic, social and aesthetic value of the neighbouring coastal public property; ▪ To avoid increasing the effect or severity of natural hazards ▪ To protect people, property and economic activities from the risks and threats which may arise from dynamic coastal processes such as wave and wind erosion, coastal storm surges, flooding and sea-level rise. ▪ To maintain the natural functioning of the littoral active zone. ▪ To maintain the productivity of the coastal zone; and ▪ To allow authorities to perform rescue and clean-up operations.

8	Implementation of land use legislation in coastal protection zone	Section 62 of the NEM: ICMA obliges any organ of state that is implementing any legislation that regulates the planning or development of land, in a manner that conforms to the principles of cooperative governance contained in Chapter 3 of the Constitution, apply that legislation in relation to land in the coastal protection zone in a way that gives effect to the purposes for which the protection zone is established as set out in Section 17 of the NEM: ICMA. Furthermore, SPLUMA requires that a land use scheme must comply with environmental legislation.
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Uitzicht 216, Portion 76 falls entirely in the CPZ (Fig.2), therefore careful environmentally sensitive decision-making must be made for any proposed development on this property.

As the property falls within the 1km high-water-mark, this has further implications for agricultural worker accommodation, in terms of the Knysna Municipality: Zoning Scheme By-law, 29 June 2020:

“agricultural worker accommodation”

Land use description: “*agricultural worker accommodation*” means accommodation provided for bona fide agricultural workers, including accommodation for labourers and farm managers, **as determined by the Municipality** based on the extent of the bona fide agricultural activities on the land unit.

Development parameters:

The development parameters applicable to “*agriculture*” apply with the following additional development parameters:

- (a) the number of units must be reasonably connected to the bona fide agricultural activities on the land unit; and
- (b) no agricultural worker accommodation may be erected within 1 km of the high-water mark of the sea or a tidal river.

Approval of any future second dwelling for a farm manager must be attained from the Knysna Municipality, via a Land Use Application process.

Garden Route National Park Coastal Management Line

The Coastal Management Line for the Garden Route National Park was established in GNR. No. 3668, 14 July 2023, in terms of NEM: ICMA. Section 4 describes development risk management measures applicable for new infrastructure seaward of the CML and existing infrastructure in areas at risk to dynamic coastal process. The new and existing infrastructure provisions are what is being applied to SANParks infrastructure. SANParks encourages that these measures be applied to private property adjacent to SANParks land. It must be noted that several properties which border Portion 76, are Contract National Park committed properties, which will legally be declared as part of the park.

The CML extends for between 70 to 100m in places into the lower southern section of Portion 76.

Knysna Protected Environment Development Control Area

SANParks is responsible for the Proper Administration of the Knysna Protected Environment (KPE) (GN 1175 of 2009) Regulations, and for the authorisation of any development (as defined in the Regulations) in the DCA, as per Section 8. The KPE DCA extends 50m from the high-water mark into Portion 76 (Fig 2), and as such SANParks' authorisation is required for any development to proceed in this area.

As per Section 9 and 10 of the KPE Regulations SANParks may request additional studies to be undertaken, should it be deemed that these are required.

Dune Stability, Coastal Erosion & Climate Change Resilience

SANParks does not support any development and infrastructure on the two foredunes situated in the southern section of Portion 76.

The stability of the foredunes is a concern. Dune slumping on the seaward foredune of Portion 72 has recently occurred (2023 – 2024) (**Fig. 13**), and blowouts are evident on Portion 73 and 74 (**Fig. 14**). These dune areas could be deemed littoral active zones, being unstable and dynamic because of natural processes.

Conserving the seaward foredune and ensuring that it remains free from development is a necessary climate change resilience strategy. Any development on this active foredune would be at risk as coastal erosion impacts intensify in the future with climate change. It would be difficult to defend such development from coastal erosion, given the unstable steep dune slopes, erodibility, and slumping potential. The effects of climate change are already being experienced along this stretch of coast (**Fig. 15**).



Fig. 13. Recent dune slumps (2023-2024) evident on the seaward foredune, Portion 72.



Fig. 14. Two blowouts are evident on the seaward foredune, Portions 73 & 74.



Fig.15. September 2023 storm surge, which washed away the Brenton on Sea beach walkway.

Point 3: Infrastructure

Water

Should the landowner require borehole water the following should be noted:

In terms of the National water Act, 1998 (Act No. 36 of 1998), Revision of General Authorisations for the Taking and Storing of Water, GNR. No 40243, 2 September 2016, Section 2.3; a Water Use License (WUL) may be required due to the property being situated within 500m from the high-water mark of the ocean.

Section 2.3 states the following exclusions from General Authorisations:

2.3. Geographical area and water resources to which the authorisation applies

Except where stated differently in the notice this authorisation applies to all land and all water resources in South Africa, subject to the following exclusions:

1. No water that is taken in terms of this authorisation may be taken within a 500 metre radius from the boundary (delineated edge) of a wetland, pan or estuary.
2. No groundwater that is taken in terms of this authorisation may be taken within a 500 metre radius from the boundary of a wetland or estuary, within a 100 metre radius from the delineated riparian edge of a water course or a state dam, within a 500 metre radius of a state dam wall or within 500 metres from the high-water mark of the ocean.

Further a WUL may be required, if water demand for the primary supply is >1kl/da/ha (>1kl/day/ha which is permitted for general usage). Confirmation from the relevant Competent Authority should be sought.

Sewerage

SANParks is not in support of septic tanks. Cleaner environmentally friendly options should be investigated.

Electricity

SANParks supports the use of solar panels, however these should be positioned so as not to face east/ west to minimise glare and reflections. Similarly glare from windows should be minimised.

Point 4: Alien Invasive Species and Fire Management

The landowner's attention is drawn to the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEM:BA) Alien and Invasive Species Regulations, 25 September 2020, where a landowner is legally responsible for the removal of alien vegetation on their property. SANParks requests sight of the required Invasive Species Control Plan (ISCP), and clarity on whether this has been submitted to and approved by the Department of Forestry Fisheries and the Environment (DFFE). SANParks seeks confirmation on whether alien clearing if any has occurred on the property.

Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. SANParks requires clarity on whether the landowner is a member of the Southern Cape Fire Protection Association (SCFPA), and whether the necessary legally required firebreaks, agreements and/or exemptions are in place.

SANParks stands firm on previous comments made regarding fire.

- **Fire management.** The landowners are members of the Southern Cape FPA. It is possible to make fire breaks to protect infrastructure at the landowners preferred location for the main house. However, Kerk Laan could act as a firebreak if it is widened and slashed. In a case of emergency, it would be less risky to evacuate people from Kerk Laan than in a fynbos corridor with tricky access for fire trucks. The Campbell road and the new section of road that would need to be constructed from Campbell road to preferred site would not be ideal roads for the Knysna Fire Department as their trucks would struggle to gain access easily to the house. However, Kerk Laan would be a much easier access point for fire trucks and this should be considered for fire safety in this fire-prone area. Conducting an ecological burn in future will also be more risky with infrastructure developed in the fire path. The June 2017 fire and the ecological burn executed on 15 May 2017, that slowed the fire down dramatically before it reached Brenton, is still fresh in our memories. A functional Fire Management Unit in the Knysna Sand Fynbos will be desirable as there will be future fires.

Point 5: Conservation Stewardship

Portion 76 of Uitzicht 216 falls within SANParks' protected area expansion footprint and Land Inclusion Plan for the GRNP. The property is within the Western Heads Knysna Sand Fynbos Coastal Corridor, which is the subject of a collaborative conservation initiative being supported by SANParks, CapeNature, Knysna Municipality, the Table Mountain Fund, WWF, the Western Heads Goukamma Conservancy (WHGC), and landowners.

Due to the extremely high conservation value of this corridor, and the threatened loss of the last remaining Critically Endangered Knysna Sand Fynbos, WWF purchased three properties which SANParks manages (Portions 71, 72 and 40) (**Fig. 16**). Several other landowners have committed their properties to Contract National Park (CNP) conservation stewardship and these are in various stages of the commitment process (**Fig. 16**).

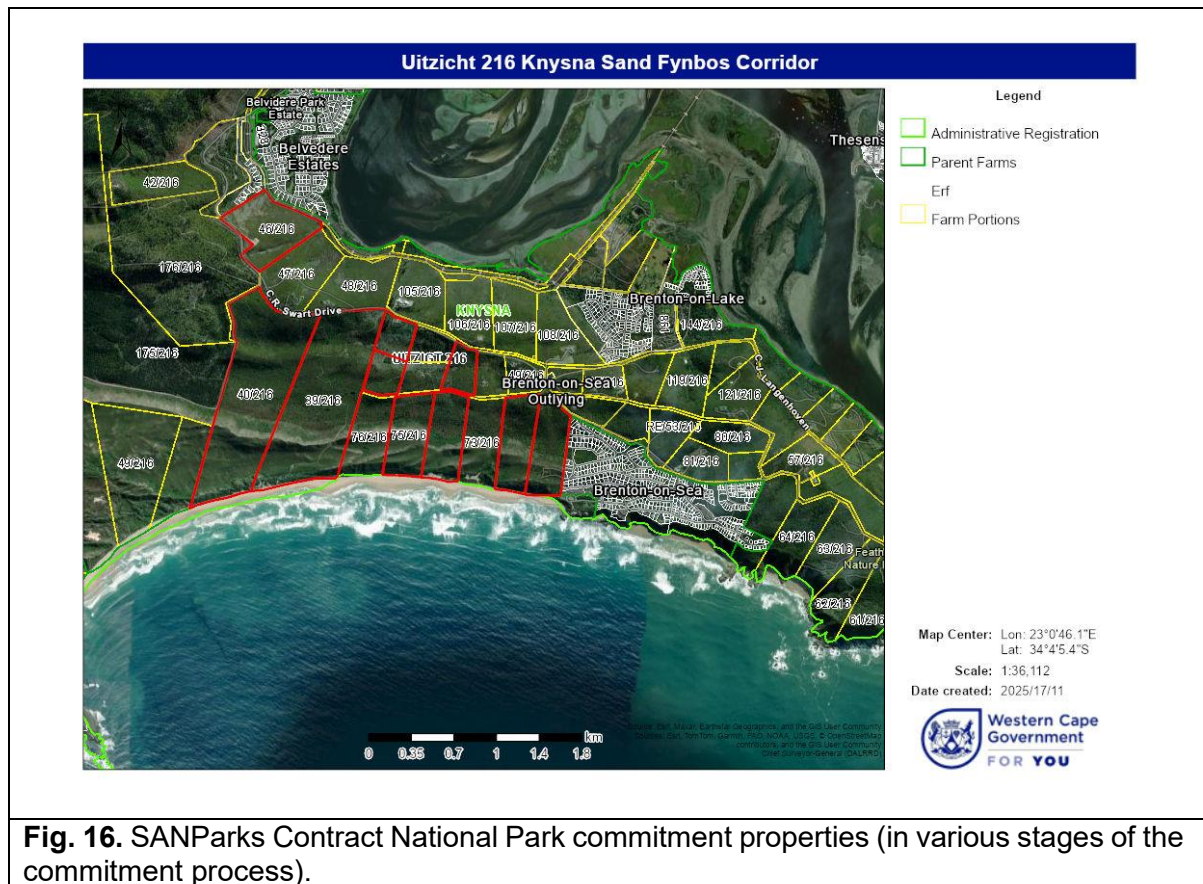


Fig. 16. SANParks Contract National Park commitment properties (in various stages of the commitment process).

Portion 76 sits central to these CNP properties. A CNP is an area of privately owned land that is declared as part of a National Park, the landowner retains ownership of their property but commits the property to formal conservation and co-manage the property with SANParks. In return, the landowner may derive financial benefits, such as an income tax deduction and a municipal property rates exemption. Some 334ha has been committed to formal CNP conservation stewardship with SANParks, a legacy which will extend in perpetuity, to benefit future generations.

Several biodiversity stewardship categories exist that a landowner can opt into; these are described in tabular form in **Fig. 17**. Stewardship categories in the top-tier of the table require the greatest commitment level from a landowner but receive the greatest support from conservation authorities and greater financial incentives. The SANParks CNP stewardship category is shown in the top row (**Fig. 17**). Properties that become SANParks CNP are declared as part of the GRNP, in terms of the National Environmental Management: Protected Areas Act (Act 57 of 2003) (NEM:PAA).

Landowners of other properties in the corridor (154ha) (i.e., the Featherbed/eastern sector of the Western Heads) have chosen the Private Nature Reserve category, which involved working through CapeNature.

The cumulative stewardship areas under some form of conservation protection or which are planned for conservation equate to approx. 500ha (i.e., only 28%) of the last remaining 1750ha of Critically Endangered Knysna Sand Fynbos on the Western Heads. Concerted efforts are necessary to secure the remaining two thirds.

Achieving a conservation outcome on this property is important to SANParks, and to other key role-players in the area.

Table 1 - Biodiversity stewardship categories

	TYPE OF AGREEMENT	LEGAL MECHANISM	DESCRIPTION
Increasing biodiversity importance Increasing support from conservation authority Increasing commitment to conservation	BIODIVERSITY STEWARDSHIP CATEGORY 1: PROTECTED AREAS		
	Nature Reserve or National Park	National Environmental Management: Protected Areas Act (Act 57 of 2003)	- Suitable for sites with highest biodiversity importance - Binding on property: declaration of Nature Reserve, and a title deed restriction - Binding on landowner: contract with landowner usually for 99 years/in perpetuity** - Considered to be part of South Africa's protected area estate, and contributes to meeting protected area targets
	Protected Environment	National Environmental Management: Protected Areas Act (Act 57 of 2003)	- Suitable for declaration over multiple properties - Less restrictive land use than Nature Reserve or National Park - Binding on property: declaration of Protected Environment. Optional title deed restriction. - Binding on landowner - Considered to be part of South Africa's protected area estate, and contributes to meeting protected area targets
	BIODIVERSITY STEWARDSHIP CATEGORY 2: CONSERVATION AREAS		
	Biodiversity Management Agreement	National Environmental Management: Biodiversity Act (Act 10 of 2004)	- Less restrictive than protected area declaration - Must have a Biodiversity Management Plan (in terms of Biodiversity Act) on all/part of the property - Binding on landowner: contract with landowner for a minimum of 5 years, or longer in 5 year increments
	Biodiversity Agreement	Contract law	- Less restrictive than protected area declaration - Binding on landowner: contract with landowner for a minimum of 5 years or longer
	Conservation Servitude	Property	- Less restrictive than protected area declaration - Binding on landowner: notarial deed registered at the Deeds Registry for a minimum of 99 years or in perpetuity - Binding on successor in title - Provides management conditions particular to the area in question
	Business, Industry and Biodiversity initiatives		Examples: - Conservation Champions Programme - Water Stewards - Sustainable Farming
	Conservation agreements		- Offers direct incentives for conservation through a negotiated benefit package in return for conservation actions by communities. - Signed for a 3-year duration (with the option for renewal)
	BIODIVERSITY STEWARDSHIP CATEGORY 3: PARTNERSHIP AREAS		
	This is an informal category of biodiversity stewardship which involves a registration of a site within this category by the provincial conservation authority or conservation NGO. - No legal certainty, duration and intent - Involves collective action by landowners or communities - Biodiversity conservation management benefits without formal agreements or accountability - Registration of mechanisms is advised		Examples of such include (but are not limited to): - Conservancies - Buffer Zones and Transition Zones of Biosphere Reserves - Sites of Conservation Significance - Community conservation areas
	** Eligibility for tax incentives requires a minimum of a 99 year or in perpetuity title deed restrictions		

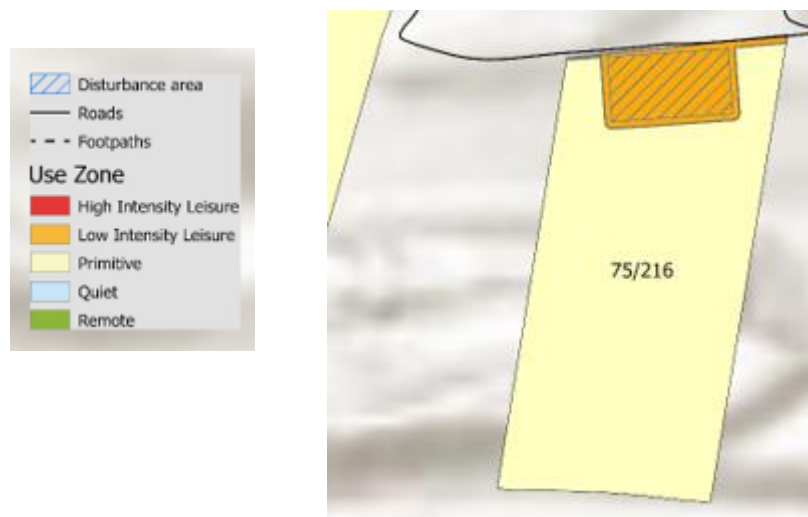
Fig. 17. Biodiversity stewardship categories, as extracted from pg.3 SANBI 2018 Stewardship Guideline³.

³SANBI. 2018. Biodiversity Stewardship Guideline. A guideline produced for the Department of Environment, Forestry and Fisheries. Developed by Wilson, N., Kershaw, P., Marnewick, D. and Purnell, A.

Portion 76 qualifies as a SANParks CNP property (top-tier). The landowner is welcome to have discussions with SANParks on CNP stewardship options and financial incentives available. The following documents would require signing: (1) a Written Agreement in terms of Section 20(3) of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) (NEM:PAA); (2) a Co-management Agreement in terms of Section 42 of NEM:PAA; (3) a Property Operational Plan; and (4) with a GRNP Declaration process to follow.

A component of this process is the drafting of a Zonation Plan, based on park zonation principals, as the property is eventually declared as part of the park. The Zonation Plan sets out which portions of the property may be developed, and what activities may take place in the various areas of the property.

SANParks' position for properties situated seaward of Church Street is to allow only a development area situated directly adjacent to Church Street, in which a primary dwelling is permitted, and if approved by the Knysna Municipality, a second managers house may be permitted, however this must be placed in this same development area. No development is supported lower down the property, and on the foredunes, and no roads may be constructed through the property to the foredunes. Approved hiking paths, a beach access path, and a small sea viewing deck of approximately 25m² maximum may be permitted. An example of a Zonation Plan, which was prepared for the previous landowner of Portion 75 Uitzicht 216 is as follows:



SANParks supports a clustered layout approach for dwelling/s and infrastructure placement. A diffuse layout approach that fragments the landscape is not supported. This approach is applied throughout the corridor. The only exception to this position, is Portion 39, which has a road constructed across the foredunes and a dwelling situated behind the seaward foredune. It must however be noted that Portion 39 has been owned by the same landowners since 1972, and the road was formalised from 1980 to 1990, and the dwelling was pre-existing, prior to the EIA Regulations, which were enacted in 1997. The dwelling burnt down in the 2017 fires and municipal approval was attained to re-build it. SANParks will not support any new developments of this nature in the corridor.

SANParks' position is not only based on the need to prevent landscape fragmentation and biodiversity loss, and support landscape connectivity and functioning, but is further intended to retain landscape character, tranquillity and a sense of place across the conservation corridor.

Therefore, based on the above, SANParks does not support the Preferred Alternative. SANParks does not support the construction of a road across the foredunes and the construction of a house on the foredunes. Further, the disturbance/ building footprint areas suggested (main dwelling approx. 2500m², and road approx. 4565m², total 7065m²) are excessive and underestimated. It is unclear if this refers to a building or disturbance footprint. No area calculations have been provided for embankments, water tanks, garages, storage areas, vegetable gardens etc. The road will be constructed across steep, erodible slopes.

SANParks will only support a dwelling close to Church Street, in the north-western section of the property. Avoiding and minimising the environmental impact in this way would also be aligned with the national environmental management principles (section 2(4) of the National Environmental Management Act, 1998), which provide, amongst other things, that –

- That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied; and
- Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure.

Point 6: Summary and Way Forward

In summary, SANParks does not support the Preferred Alternative, which includes the construction of a dwelling on the foredune in the southern sector, and a road leading from Church Street over the length of the property and foredune to the dwelling. This will result in the destruction and loss of critically endangered vegetation and will set a dangerous precedent for the area. Sea views gained by landowners do not warrant such a loss, particularly when other alternatives are available, which allow primary development rights.

SANParks will support a small disturbance area directly adjacent to Church Street, with road access directly from the existing Church Street road servitude. This is in line with SANParks position for other proposed developments along Church Street, where several landowners have committed to CNP and are in various phases of CNP commitment.

The southern section of Portion 76 is considered highly sensitive: the CML extends some 70 to 100m in; the high-water-mark adjoins the southern property boundary; dune stability, coastal erosion, and climate change resilience are concerns; the property in its entirety falls within the CPZ; and the KPE Development Control Area extends 50m into the property. Authorisation of any development in the Development Control Area is required from SANParks as per Section 8 of the KPE Regulations.

Specialist studies undertaken by Confluent Environmental Pty (Ltd) similarly did not support the Preferred Alternative of a dwelling on the southern sector of the property on the foredune and a road leading over the dune to the dwelling. An Alternative 4 was supported (One dwelling in the north-western corner of the property), with an Alternative 1 (One dwelling and new access road) and Alternative 3 (Two dwellings and new access road) noted as likely triggering Offsets due to residual impacts that can't be reduced with mitigation proposed in their report. These findings and recommendations were not carried through into the DBAR, and contradict findings stated by Eco Route.

SANParks does not support septic tanks; and solar panels and windows must be positioned to reduce glare. SANParks questions whether a Visual Impact Assessment should be undertaken.

It is recommended that the following conditions are considered, in conjunction with authorisation of a main dwelling next to Church Street in the north-western sector of the property, with road access directly from the existing Church Street road servitude:

1. The landowner should commit the remaining portion of the property to a biodiversity conservation stewardship mechanism, which should comprise of:
 - 1.1. A SANParks NEM:PAA CNP stewardship agreement for a 99-year period. The stewardship process should be concluded through the signing of the following: (1) a Written Agreement in terms of Section 20(3) of NEM:PAA; (2) a Co-management Agreement in terms of Section 42 of NEM:PAA; (3) a Property Operational Plan; and (4) with a GRNP Declaration process to follow.
 - 1.2. It is recommended that a voluntary title deed restriction is registered against the property (i.e., via a Notarial Deed). This will ensure that the conservation status of the property is transferred to any new owner on the sale of a property.
 - 1.3. These actions should occur prior to any construction activities being permitted to take place on the property.
2. The property should be rezoned to Open Space III or IV.
3. Fencing must not inhibit wildlife movement.
4. An Environmental Management Programme (EMPr) must be implemented and monitored by an Environmental Control Officer (ECO). The EMPr must be finalised based on any Environmental Authorisation (EA) outcomes/conditions.
5. The landowner's attention is drawn to the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEM:BA) Alien and Invasive Species Regulations, 25 September 2020, where a landowner is legally responsible for the removal of alien vegetation on their property. The owner should formalise an Invasive Alien Vegetation Control Plan as required by the NEM:BA.
6. Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. The owner should join the local Fire Protection Association, if not already a member. The owner should consider using non-flammable building materials, including external fittings such as aluminium gutters, and should consider an irrigation system to mitigate fire risk
7. A permit from the Department of Forestry, Fisheries & the Environment (DFFE) must be attained should any protected tree species be disturbed on the property, as per the National Forests Act (Act 84 of 1998), as amended.
8. Should any resources of suspected heritage value be uncovered during clearing, Heritage Western Cape (HWC) must be contacted immediately for instructions.

9. The disturbance footprint/ no-go areas should be fenced off during the construction phase with a barrier material, such as shade cloth to prevent workers from encroaching into adjacent vegetation, and to ensure that animals are not injured on the building site.
10. An indigenous plant rescue operation should be conducted prior to site clearance.
11. Topsoil should be set-aside for reuse.
12. Confirmation is required from the relevant Competent Authorities (BOCMA) on the need for a WUL. Due to the property being situated within 500m of the high-water mark of the ocean.

SANParks' full comment letter must be included in the body of the Draft Basic Assessment Report, and not only in a Comments and Responses report/ table. Evidence of this must be emailed to SANParks.

SANParks reserves the right to revise initial comments if additional information becomes available.

Yours sincerely



Dr Vanessa Weyer
Principal Planner
SANParks Garden Route National Park

CC:	Victor Mokoena	SANParks
	Elmonique Petersen	SANParks
	Jessica Hayes	SANParks
	Arnelle Collison	SANParks
	Marthan Theart	SANParks
	Jeff Manual	SANParks
	Mashudu Mudau	DFFE
	Nyiko Nkosi	DFFE
	Megan Simons	CapeNature
	Jan Coetzee	WWF
	Franci Gresse	WWF
	Danie Swanepoel	WC DEADP
	Caren George	WC DEADP
	Mulalo Musekene	Knysna Municipality
	Hennie Smit	Knysna Municipality
	Shaun Madumbo	Knysna Municipality
	Johan Labuschagne	WHGC

NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Ref number: 14/12/16/3/3/1/3185 (PREVIOUS) - Draft Basic Assessment Report - Proposed Development of a Residential Dwelling on Portion 76 of the Farm Uitzicht, Knysna, Western Cape

From admin@ecoroute.co.za <admin@ecoroute.co.za>
Date Mon 29/06/2026 14:58
To 'bianca@ecoroute.co.za' <bianca@ecoroute.co.za>

Hi Bianca,

Please see below comments received.

Kind regards,

Carina Leslie
Personal Assistant/Admin
Office: 064 691 4394
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Eco Route
Environmental Consultancy

From: Mashudu Mudau <MaMudau@dffe.gov.za>
Sent: Monday, June 29, 2026 14:32
To: 'Carina' <admin@ecoroute.co.za>
Cc: Nompumelelo Mtshali <NMtshali@dffe.gov.za>; Thivhulawi Nethononda <TNETHONONDA@dffe.gov.za>
Subject: Re: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Ref number: 14/12/16/3/3/1/3185 (PREVIOUS) - Draft Basic Assessment Report - Proposed Development of a Residential Dwelling on Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Dear Bianca

The Directorate: Protected Areas Planning and Management Effectiveness would like to thank you for the opportunity to review the Draft Basic Assessment report and the Environmental Programme report for the aforementioned project. The proposed project will entail constructing a single primary (single-story) dwelling (main farmhouse) in the southwestern portion of the site. The proposed development will also include the construction of a new internal road, 830 meters long. The road surface will be 2.5 meters wide, and the disturbed area for road construction will vary between 4 and 5.5 meters wide. The proposed development will be within the Knysna Protected Area, in the Knysna Local Municipality, Western Cape Province.

Comments on the Draft Basic Assessment Report (DBAR) - The Proposed Development on Portion 76 of Farm 216 Uitzicht, Knysna Local Municipality, Western Cape Province

The DBAR and associated documents that are submitted for review correctly acknowledges that the proposed development falls within the **Knysna Protected Environment context** and the applicability of **NEM: PAA (Act 57 of 2003)** and the **Regulations for the Proper Administration of the Knysna Protected Environment (R1175/2009)** and associated Development Control Area (DCA) provisions (Section E, pages 26–27). Also, Protected Environments are declared to regulate land use in sensitive landscapes; the proposed activity must be explicitly aligned with low-impact, biodiversity-compatible use requirements and the maintenance of ecological integrity. Therefore:

- The DBAR must explicitly demonstrate how the proposed development complies with DCA provisions applicable to the Knysna Protected Environment, including any land use limitations or spatial controls.
- A clear justification is required that the activities are compatible with the purpose of the Protected Environment and do not compromise biodiversity conservation or ecological functioning.
- The report must substantiate that the proposed activity is consistent with the regulatory framework governing activities in a Protected Environment.
- EMPr must align with and support regulatory compliance demonstrated in the DBAR, including clear linkage to PE regulations and DCA controls.

Furthermore, the proposed development site and project area of interest (POI) are characterized by sensitive environmental features. These include the mapped Critical Biodiversity Area (CBA), Knysna Sand Fynbos, which is classified as Critically Endangered (CR). It is within the coastal zone regulated by the Integrated Coastal Management Plan (ICMP)NEM: ICMA. The southern boundary of the property, which the development is proposed, forms part of a primary dune system identified as highly sensitive, erosion-prone, and unsuitable for structural development.

While the scope of the proposed development has not materially deviated from the original proposal, aside from the reduction of the building footprint to approximately 1000 m² and the inclusion of additional specialist inputs, the key areas of concern previously highlighted remain largely unresolved. A review of both the DBAR and the associated Appendices indicates that, although certain aspects have been acknowledged, adequate demonstration of compliance and substantive responses to the Directorate's concerns have not been provided. Accordingly, the outstanding issues are outlined below:

BIODIVERSITY SENSITIVITY

- The directorate previously indicated that the development must align with CBA1 management objectives, which include avoiding habitat loss & fragmentation. This is because the entire site falls within CBA1 and has Critically Endangered Knysna Sand Fynbos in the northern section, as acknowledged in Appendix D7 & D8. During the site visit conducted in March 2026, the southern section had evidence of Knysna Sand Fynbos recruitment.
- Therefore, the DBAR should, supported by road-specific fragmentation analysis, demonstrate that the selected layout meets CBA1 avoidance requirements, including fragmentation and faunal disturbance, particularly regarding road corridors. Additionally, the scattered individuals must be treated as a contiguous recovering ecosystem, not as an incidental occurrence.

HYDROLOGICAL & AQUATIC RISK

- The Directorate raised concerns regarding the presence of unmapped wetlands/interdunal systems, alteration of drainage patterns, particularly through dune and valley systems, and the precautionary approach to their presence, given the extent of the earthworks required for the construction of both the road and main dwelling. The aquatic compliance statement acknowledges potential interdunal systems and the impacts of road construction on drainage, flow pathways, and sediment transport.
- Therefore, the report must consider a formal stormwater management system instead of passive management, particularly for the proposed road infrastructure. This is critical given that the specialists, Appendix D2, D10, and D8, identified erosion risks associated with sandy soil and high rainfall, as well as where road construction introduces altered flow conditions. These must also be reflected in impact significance or mitigation measures.

FOOTPRINT & EARTHWORKS ASSOCIATED WITH ROAD

- The DBAR continues to present SDP alternatives, including a new 850m long internal road, while the Geotechnical report confirms significant earthworks, retaining walls, and slope modification required for road construction. Additionally, the Aquatic and biodiversity reports identify valley bottoms and dune systems near the proposed road alignment, and the report further identifies use of the existing road as the preferred alternative (Appendix D8, Section 1.1), but the DBAR still includes a new road alternative and does not incorporate the specialists' requirements into the DBAR's impact assessment or disturbance footprint calculations. Therefore:
- The report must quantify the disturbance footprint and associated infrastructure, cut/fill, and the retaining wall.
- The Civil Services Report states that no formal stormwater system exists, and that water will be allowed to drain naturally (Appendix D12, Sections 5.4 and 6.5). The DBAR does not assess the implications of this approach where road construction may alter flow conditions, concentrate runoff, or increase erosion and sediment transport risk. The absence of formal stormwater management must be assessed in relation to the proposed road infrastructure.
- The current DBAR reflects a revised and reduced development footprint; however, the supporting specialist reports, including the Heritage Impact Statement and the Civil Service Report, are still depicting an earlier development scenario comprising two dwellings and associated infrastructure. As a result, there is a misalignment between the current proposal and the baseline assumptions underpinning the specialist findings and impact conclusions.
- It is therefore recommended that all specialist inputs be reviewed and, where necessary, updated to align with the final development footprint and associated infrastructure layout to ensure consistency and defensibility of the assessment.

The DBAR on page 77 refers to the Site Sensitivity Verification Report (SSVR) as a key input informing the biodiversity sensitivity and SCC assessment of the site; however, the SSVR is not included in the application documentation. The SSVR must be submitted to enable verification of sensitivity ratings, assessment assumptions, and the adequacy of proposed mitigation measures.

While the DBAR acknowledges the presence of Species of Conservation Concern (SCC), mitigation measures remain generic and are not explicitly aligned to SCC requirements. It is recommended that the species-specific mitigation measures, spatial avoidance, and buffering informed by SCC distribution, and clear monitoring and management actions be included to demonstrate how impacts on SCC will be avoided, minimised, and managed.

It is recommended for the EAP to fully address the above-mentioned concerns or comments, where applicable, provide clarity on certain matters to the Directorate: Protected Areas Planning and Management Effectiveness, and consider comments submitted by all other Stakeholders, Interested and Affected Parties.

*Regards,
Mashudu Mudau*

Protected Areas Planning and Management Effectiveness
Department of Forestry, Fisheries and the Environment
Environment House
473 Steve Biko and Soutpansberg Streets
PRETORIA
Tel: (012) 399 9945
E-mail: mamudau@dfre.gov.za

From: admin@ecoroute.co.za <admin@ecoroute.co.za>

Sent: Thursday, 28 May 2026 10:34

To: Bathandwa Ncube <BNcube@dfre.gov.za>; Lydia Kutu <LKutu@dfre.gov.za>; Zama Langa <ZLANGA@dfre.gov.za>; Thivhulawi Nethononda <TNETHONONDA@dfre.gov.za>; christina.mokoena@dfre.gov.za; Salome Mambane <SMAMBANE@dfre.gov.za>; Danie Swanepoel <Danie.Swanepoel@westerncape.gov.za>; OCEIA <OCEIA@dfre.gov.za>; Tabisile Mhlana <tmhlana@dfre.gov.za>; Rueben Molale <RMolale@dfre.gov.za>; OCEIA@environment.co.za;

nathan.jacobs@westerncape.gov.za; 'Noluvo Toto' <noluvo.toto@westerncape.gov.za>; Stephanie Barnardt <stephanie.barnardt@westerncape.gov.za>; Azni.November@westerncape.gov.za; Dirk.Prinsloo@westerncape.gov.za; Vanessa Stoffels <vanessa.stoffels@westerncape.gov.za>; 'Roberts John (BVL)' <robertsj@dws.gov.za>; Cor.VanderWalt@westerncape.gov.za; Brandon.Layman@westerncape.gov.za; Melanie Koen <Mkoen@dfpe.gov.za>; Innocent Mapokgole <imapokgole@dfpe.gov.za>; Leptieshaam Bekko <leptieshaam.Bekko@westerncape.gov.za>; Mercia J Liddle <Mercia.Liddle@westerncape.gov.za>; Hilda.Hayward@westerncape.gov.za; Ryan.Apolles@westerncape.gov.za; coastalenquiries@westerncape.gov.za; BC Admin <bcadmin@dfpe.gov.za>; Kmathetja@dfpe.gov.za; MMatlala Rabothata <MRABOTHATA@dfpe.gov.za>; Melvin.Schwartz@dalrrd.gov.za; mark.lakay@pgwc.gov.za; Lyle.Martin@westerncape.gov.za
Cc: 'Andrepeach' <andrepeach@lantic.net>; hansswartinc@gmail.com; 'bianca@ecoroute.co.za' <bianca@ecoroute.co.za>; 'Jessica' <jessica@ecoroute.co.za>; 'janet' <janet@ecoroute.co.za>
Subject: NOTIFICATION OF PUBLIC PARTICIPATION - DFFE Ref number: 14/12/16/3/3/1/3185 (PREVIOUS) - Draft Basic Assessment Report - Proposed Development of a Residential Dwelling on Portion 76 of the Farm Uitzicht, Knysna, Western Cape

Good day,

A 30-day public participation will be held from **28/05/2026 - 29/06/2026**.

Kindly find below the link to the DRAFT Basic Assessment Report and relevant appendices.

[Draft Basic Assessment Report - The Proposed Development on Portion 76 \(A Portion of Portion 54\) of Farm 216 Uitzicht, Knysna, Western Cape - DFFE Ref no: 14/12/16/3/3/1/3185 | Eco Route](#)

Please submit your comments to the EAP undersigned in this email within 30 days of this notice (i.e., on or before 29 June 2026).

Thank you for your participation in this process.

Kind regards,

Ms. Bianca Gilfillan
Reg. EAP (EAPASA): 2023/7929
EcoRoute



The EAP
Eco Route Environmental Consultancy
P.O. Box 1252
SEDFIELD
6573

Attention: Ms Bianca Gilfillan

Tel: 064 691 4394

Email: bianca@ecoroute.co.za

RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE DRAFT BASIC ASSESSMENT FOR THE PROPOSED DEVELOPMENT ON PORTION 76 (A PORTION OF PORTION 54) OF FARM 216, UITZICHT, KNYSNA, WESTERN CAPE

Good Day,

Your request for comment from the Sub-directorate: Coastal Management on the above-mentioned draft basic assessment report received on 28 May 2025, refers.

1. COMMENT

- 2.1 The sub-directorate: Coastal Management ("SD: CM") has reviewed the information as specified above and have the following commentary:
- 2.1.1. The SD: CM's comments dated 11 April 2025 and 19 December 2025, refer.
- 2.1.2. In our comments referred to item 2.1.1. above, the SD: CM recommended that the proposed dwelling should be relocated outside the littoral active zone (LAZ). The EAP responded that the applicant has a strong preference for siting the main house in the south-western portion of the property referring to the combination of factors that were considered. Considering the position of Farm 76/216 within the coastal protection zone (CPZ), the NEM: ICMA, as well as the SD:CM comments referred to in item 2.1.1 cannot simply be disregarded, especially as it was stated that the SD: CM does not support residential development within the LAZ.
- 2.1.3. The applicant indicated in their Draft BAR on page 15 that "*...the southern boundary of the property forms part of a primary dune system identified as highly sensitive, erosion-prone and unsustainable for structural development...*" then " Accordingly the preferred

development footprint has been shifted inland 120-140m from the HWM – ensuring full alignment with ICMP coastal erosion, stability and environmental directives. This relocation substantially reduces potential coastal process impacts, visual intrusion, dune destabilisation and vegetation loss..." – this does not address the fact that the proposed dwelling is still located within the LAZ as defined in the NEM: ICMA.

- 2.1.4. There are numerous examples along the provincial coastline of residential and resort development that have been severely impacted and degraded by mobile sand due to inappropriate location within the LAZ, resulting in some developments being abandoned.
- 2.1.5. In light of item 2.1.2. the SD: CM does not object to the property owner's primary land use right, however the SD: CM reiterates that it **does not support** the proposal for a dwelling within the LAZ as defined in the NEM: ICMA, and still recommends that the proposed dwelling be relocated outside the LAZ as its proposed location is unwarranted. It is however noted that the final decision is at the discretion of the competent authority.
3. The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: "...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment..." together with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.
4. The SD: CM reserves the right to revise or withdraw its comments and request further information from you based on any information that may be received.

Yours faithfully



Digitally signed by
leptieshaam Bekko
Date: 2026.06.29
16:11:41 +02'00'

leptieshaam Bekko
CONTROL ENVIRONMENTAL OFFICER
SUB-DIRECTORATE: COASTAL MANAGEMENT
DATE: 29 June 2026



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Demar Centre, Main Road, Knysna, WC, Contact Number: 066 374 7795
Enquiries: TF Gwala, E-mail: TGwala@dfpe.gov.za

EIA-WC-GR-0020-2026-27

RE: COMMENT ON DRAFT BASIC ASSESSMENT REPORT (BAR) FOR PORTION 76 OF
THE FARM 216 UITZICHT, KNYSNA

DATE: 29 June 2026

Eco Route
Attention: Ms. Bianca Gilfillan
Email: bianca@ecoroute.co.za
Cell/ Tel: -

Dear Sir/ Madam

I refer to your e-mail notification of 28 May 2026 with documents.

Please receive comments from the Branch: Forestry Management, Directorate: Forest Resource Protection in the Department of Forestry, Fisheries and the Environment (DFPE) on the above-mentioned Draft BAR.

The mandate of the Forestry Branch in the Department of Forestry, Fisheries and the Environment (DFPE), as a commenting authority, is to ensure control over developments that affect State forests, natural forests, forest nature reserves and protected trees.

1. The applicant must assess and quantify the anticipated impacts on the indigenous forests. The National Forests Act of 1998 (as amended) provides the strongest and most comprehensive legislation and mandate for the protection of all natural forests in South Africa. The principles of the Act in Section 3 state clearly that "...natural forests may not be destroyed save in exceptional circumstances where, in the opinion of the Minister, a proposed new land use is preferable in terms of its economic, social or environmental benefits".

2. Section 7 of the National Forest Act (NFA), act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a license. Under section 62 (1) of the NFA any person who contravenes the prohibition of certain acts in relation to trees in natural forests referred to in Section 7 (1) is guilty of a second category offence. A person who is guilty of a second category offence may be sentenced on a first conviction for that offence to a fine or imprisonment for a period of up to two years, or to both a fine and such imprisonment. Section 15 of the NFA, prohibits the destruction of protected trees without a license- "No person may cut, damage, destroy or remove any protected tree; or collect, remove, transport, export, purchase, sell donate or in any other manner acquire or dispose of any protected tree....." Anyone contravening this prohibition, is guilty of a first category offence, and can be sentenced to up to 3 years imprisonment, or a fine, or both.

3. Section 7 of the Act prohibits the cutting, disturbance, destruction or removal of any indigenous living or dead tree in a forest without a licence, while Section 15 places a similar prohibition on protected tree species listed under the Act, some of which are also forest species.



Batho pele – putting people first



Departement van Bosbou, Visserie en die Omgewing • Department of Forestry, Fisheries and the Environment • UmNyango wezamaHlathi, zokuThiya neBhoduluko • iSebe lezamaHlathi, ezokuLoba noKusingqongileyo • Umnyango Wezamahlathi, Ezokudoba Nezemvelo • Kgoro ya Dithokgwa, Boreahlapi le Tikologo • Lefapha la Meru, Botshwasi ba dithapi le Tikologo • Lefapha la Dikgwa, Dithapi le Tikologo • Litiko Letemahlatsi, Tihlanti Netendzawo • Muhasho wa zwa Vhusima-magaka, Vhureakhovhe na Mupo • Ndzwawulo ya Swihlahla, Vunjoverti na Mbango. The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessively for the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act, and/or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

4. Cutting or disturbing an indigenous tree in a natural forest without a valid Forest Act Licence is a criminal offence and a transgression of the National Forests Act, 1998 (Act No. 84 of 1998) and carries a fine or imprisonment or both.

5. Indigenous trees with active bird nests or other significant biodiversity features may not be destroyed without a valid Fauna Permit from the provincial conservation authority, the Western Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform ("DAERL"), if these would be affected.

DDFE studied the supporting documents for the above-mentioned Draft BAR and the following points related to Forestry's mandate i.e. the implementation of the NFA are applicable

6. According to the information provided: "According to report the entire property is mapped as a Critical Biodiversity Area (CBA). The northern portion of the property supports Knysna Sand Fynbos, which is classified as Critically Endangered (CR) under the National Environmental Management: Biodiversity Act (NEM:BA), 2022. The southern portion of the property comprises Goukamma Dune thicket. The applicant proposes to exercise the primary land use rights of Portion 76 of the Farm Uitzicht No. 216, Knysna Municipality, through the construction of a single primary dwelling (main farmhouse) within the south-western portion of the site. Portion 76 of Farm Uitzicht No. 216 is located approximately 1.5 km north of Brenton-on-Sea, within the jurisdiction of the Knysna Municipality, Western Cape. The southern boundary abuts Brenton Beach, and the total property extent is approximately 21.01 hectares. Main dwelling is a single-storey structure of approximately 1000 m². Access to the site will be via the existing servitude from Kerk Laan, with an internal access road linking the servitude to the dwelling footprint. Property is zoned as Agriculture 1. The total construction disturbance area will not exceed 0.25 ha (2 500 m²) for the principal-built footprint and immediate construction platform". The property consists of Coastal forest as well as protected trees- Forestry request that the layout should avoid sensitive vegetation types according to the NFA- and thus reduce fragmentation of indigenous forest as well as protected trees- Forestry request that coastal forest patches as well as protected trees be GPS'd, mapped and indicated as no-go areas.



FIGURE 2: APPLICATION AREA IN RELATION TO EXISTING ACCESS SERVITUDE

Forestry has the following comments:

- i. Forestry has a co-operative governance relationship with various Authorities as well as stakeholders, and thus will take their concerns into consideration if such should arise.
- ii. Forestry requests the following:
 1. Forestry requests that the layout should avoid sensitive vegetation types according to the NFA- and thus reduce fragmentation of indigenous forest as well as protected trees.
 2. Forestry requests that coastal forest patches as well as protected trees be GPS'd, mapped and indicated as no-go areas.
- iii. Kindly note that this letter is not a NFA licence.

- iv. Section 15 of the National Forest Act (NFA) (Act No. 84 of 1998) as amended prohibits the cutting, disturbing, damaging or destroying of protected tree species without a licence. Section 7 of the National Forest Act (NFA), Act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a license.

Note: The Department reserves the right to revise the initial comments based on any additional information that may be received.

Should you wish to correspond further on this matter, quote Reference EIA-WC-GR-0020-2026-27. Enquiries may be directed to Ms. TF Gwala at TGwala@dfre.gov.za, Cell 066 374 7795.

Yours Faithfully,



SIGNATURE OF DELEGATED AUTHORITY

Department of Forestry, Fisheries and the Environment

Letter signed by: Ms. J. Mans

Designation: Director Forest Resource Protection (Acting)

Branch: Forestry Management



29 June 2026

Bianca Gilfillan
Eco Route Environmental Consultancy
P.O. Box 1252
Sedgefield, 6573

Per email:

admin@ecoroute.co.za

bianca@ecoroute.co.za

janet@ecoroute.co.za

**RE: SANPARKS COMMENTS, DRAFT BASIC ASSESSMENT,
THIRD PUBLIC PARTICIPATION PROCESS, PROPOSED
DEVELOPMENT, UITZICHT 216, PORTION 76, KNYSNA,
WESTERN CAPE**

DFFE Reference Nos:

14/12/16/3/3/1/3114 - 6 March 2025, First Interested and Affected Parties (IAPs) Circulation

14/12/16/3/3/1/3185 - 11 November 2025, Second IAPs Circulation

14/12/16/3/3/1/3185 (Previous) - 28 May 2026, Third IAPs Circulation

SANParks has conducted numerous site visits and provided several comments on this application, which include:

1. Draft Basic Assessment report (DBAR), 1 October 2020 - not supported by SANParks.
2. DBAR, 28 January 2021, follow-up comment - not supported by SANParks.
3. DBAR (DFFE Ref. No. 14/12/16/3/3/1/3114), 7 April 2025 (**Annexure 1**).

Preferred and Alternative layouts were not supported by SANParks. SANParks only supported a disturbance area directly adjacent to Church Street.

It is understood that Eco Route applied for a time extension to submit this application to DFFE, however due to not meeting timeframes and submission processes, the application lapsed, necessitating the re-submission of a new application, with a new application number being issued.

4. DBAR (DFFE Ref. No. 14/12/16/3/3/1/3185), 9 December 2025 (**Annexure 2**).

lai-lais/richtersveld transfrontier

addo elephant

agulhas

augrabies falls

bontebok

camdeboo

golden gate highlands

karoo

kgalagadi transfrontier

knysna

kruger

mapungubwe

marakele

meerkat

mokala

mountain zebra

namaqua

table mountain

tankwa karoo

tsitsikamma

west coast

wilderness

The Preferred Alternative was not supported by SANParks. SANParks supported a small disturbance area directly adjacent to Church Street, with road access directly from the existing Church Street Road servitude.

The current application is a DBAR (DFFE Ref No. 14/12/16/3/3/1/3185 (Previous)), Eco Route, April 2026.

It is unclear why the application is being re-submitted for a third time, with a time lapse evident from the last DBAR which was circulated to IAPs of the 11 November 2025 to the current DBAR which was circulated to IAPs on 28 May 2026, i.e., approx. 7 months' later. SANParks seeks clarity on any extensions that may have been requested and granted by DFFE and the validity thereof. It is unclear if this is now a new application. Clarity is sought.

Key aspects of the current application are as extracted below.

Proposed Development Description

The proposed development comprises the construction of a single main dwelling in the south-western portion of the property, identified as the preferred layout based on the integrated specialist assessment and alternatives analysis. The development remains intentionally limited in extent and is proposed as a single residential development node with associated access and services, while the majority of the property remains undeveloped and in a natural state.

Main Dwelling

- A single-storey structure of approximately 1000 m² (including covered verandas and integrated garage), downscaled from the previously proposed 3000 m².
- Designed in a low-profile, contemporary coastal style, using earth-toned, non-reflective materials to blend with the natural dune landscape.
- Positioned to minimise ecological disturbance and visual intrusion, in accordance with visual, botanical, and geotechnical recommendations.

Access

- Access to the site will be via the existing servitude from Kerk Laan, with an internal access road linking the servitude to the dwelling footprint.
- The access route will follow natural contours to reduce the need for cut-and-fill and minimise vegetation clearance.

Water Supply

- The development will be self-sufficient in water supply, relying primarily on rainwater harvesting from roof surfaces.
- Rainwater harvesting and on-site storage will be provided as part of the development. The final tank configuration and associated footprint form part of the total assessed development footprint and will be confirmed in the detailed civil and services design.
- Borehole abstraction will only be used as a supplementary source, subject to licensing by the Breede-Gouritz Catchment Management Agency (CMA).

Wastewater Management

- On-site sanitation will be provided by means of an engineered on-site wastewater solution. The final position, design and footprint of the septic tank and soakaway system, or other approved on-site sanitation alternative, will be informed by the detailed civil design and geotechnical input and will form part of the total development footprint assessed in this BAR.

Stormwater Management

- Runoff will be managed through infiltration-based measures such as:
 - Rainwater tanks
 - Permeable driveway surfaces

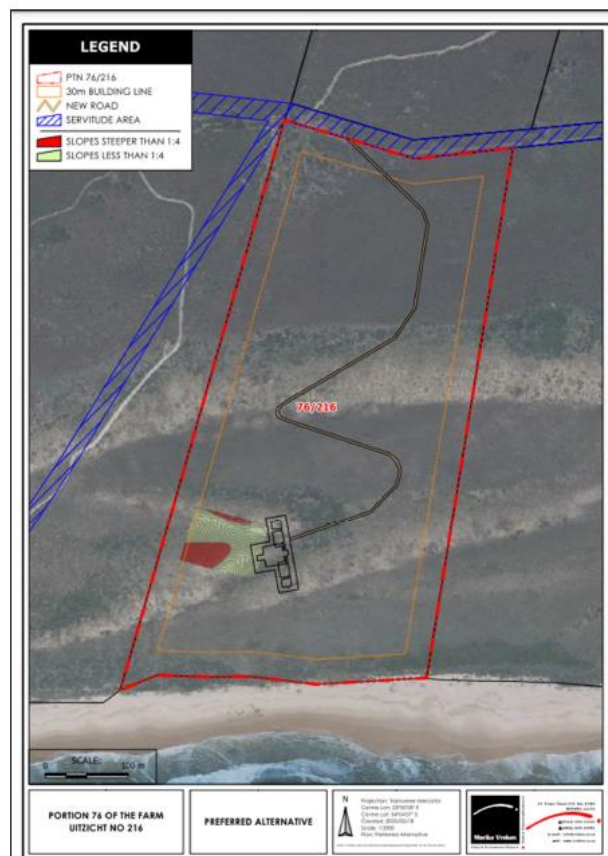
- Swales and soakaways, where applicable
- No subsoil drains are required along roads but are recommended behind retaining walls if used.

Landscaping

- Only indigenous vegetation will be used to:
 - Maintain ecological integrity
 - Reduce fire risk
 - Ensure the visual integration of the development with the surrounding landscape
- No disturbance will occur beyond the demarcated development footprint.
- Construction Footprint
- The total construction disturbance area will not exceed 0.25 ha (2 500 m²) for the principal built footprint and immediate construction platform. Where associated service infrastructure, road disturbance, tanks, sanitation infrastructure, and ancillary construction areas are required, these must remain within the clearly demarcated and authorised disturbance envelope shown on the final approved layout and engineering drawings.
- The layout was selected to avoid sensitive vegetation types and reduce fragmentation of natural habitats.

The preferred development layout has not been amended as part of this resubmission. The property remains within a highly sensitive coastal and biodiversity context, and the BAR recognises the need to consider the Garden Route District Municipality Integrated Coastal Management Plan, the broader Coastal Protection Zone, the Knysna Protected Environment, and specialist findings relating to dune stability, biodiversity sensitivity and visual impact. Should any additional specialist studies be required by the competent authority, the Draft BAR will be amended only to include such specialist information, clarification or supporting detail, where required, without introducing a revised layout.

Aerial Plan of the proposed activity (1000m²)



Internal Road

The proposal entails the construction of a new internal road to provide access to the southern part of the property. The internal road will be 830 meters in length. The road surface area will be 2.5 meters wide and the disturbed area for construction of the road varies between 4 to 5.5 meters wide.

PO Box 1252 Sedgfield, 6573

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Recommendations

Earthworks

Excavations up to 3 meters deep are classified as "Soft" per SABS1200D. Sidewalls become unstable at angles over 30 degrees, so they should be battered or supported with retaining walls. The soil beneath the topsoil is generally suitable for backfilling in various applications but must be approved by the engineer before use.

The proposed dwelling site has a moderate slope of about 1:5 and will require significant earthworks for level platforms. The access road also has steep terrain, necessitating earthworks and retaining walls for the box cut.

Total road disturbance area is stated as 830m x 5.5m, i.e., 4565m². No allowance has been made for retaining structures which will be necessary.

Construction Disturbance area; >2500m² (unclear if this refers to building or disturbance footprint)

Total Disturbance therefore is >7065m²

The conclusion and recommendations stated on pg. 174 and 175 are contradictory and confusing. Mention is made of a "preferred alternative of a main dwelling in the south-western portion", then later it is recommended that the "development be located within the northern portion of the property adjacent to Kerk Laan".

PO Box 1252 Sedgfield, 6573

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Section I

1. Conclusion and Recommendations

- Based on the findings of the specialist studies and the alternatives analysis, the preferred alternative is the siting of one main dwelling in the south-western portion of Portion 76. This location avoids the transformation of Critically Endangered Knysna Sand Fynbos, limits visual exposure, and aligns with the less sensitive Goukamma Dune Thicket vegetation type.
- Alternative 2 (farm manager's house included) was rejected as it expands the footprint unnecessarily and infringes on sensitive areas.
- Alternative 3 (northern location, as per SANParks' suggestion) was found to be not viable due to the permanent and irreplaceable loss of Critically Endangered vegetation, contravening national legislation (NEM: BA, 2022 list) and WCBSP objectives.
- The No-Go Alternative does not meet the landowner's basic residential needs and does not provide a reasonable and balanced outcome.
- Accordingly, the south-western siting is recommended as the only defensible option."

Recommended Development Location (Northern Portion)

The EAP therefore recommends that the proposed development be located within the northern portion of the property, adjacent to Kerk Laan. This alternative is considered the most environmentally responsible and lowest-risk option and is aligned with both specialist findings and key concerns raised during the public participation process.

It is acknowledged that development within the northern portion may require a relaxation of the applicable building line in terms of the relevant municipal planning framework and zoning scheme. Should this alternative be pursued, the necessary land use planning approvals will be obtained from the competent authority prior to construction.

SANParks points which were raised in SANParks' comments of 7 April 2025 (**Annexure 1**) and 9 December 2025 (**Annexure 2**) stand.

SANParks will not support any form of development on the foredune, nor any road access over the foredune to such development. SANParks will only support a small disturbance area adjacent to Church Street, with road access directly from the existing Church Street road servitude. This conforms with SANParks position for other development applications along Church Street, where several landowners have committed to Contract National Park (CNP) with SANParks and are in various phases of the CNP declaration process.

The damage and destruction to the foredune; the loss of sensitive critically endangered fynbos vegetation; and the negative impacts on the Knysna Sand Fynbos Corridor (the subject of a concerted conservation effort by several role-players in the region) are considered significant and high. The sensitivity of the proposed development site is graphically evident from drone photographs which were taken in June 2026 of the Brenton Knysna Sand Fynbos Corridor, to aid fire and alien vegetation management in the corridor (**Fig. 1, 2 & 3**).



Fig. 1. View of Brenton Knysna Sand Fynbos Corridor looking west, from Uitzicht 216 Portion 76. This is further a fire corridor, which runs east to west to the CapeNature Goukamma Nature Reserve (Source: SANParks).

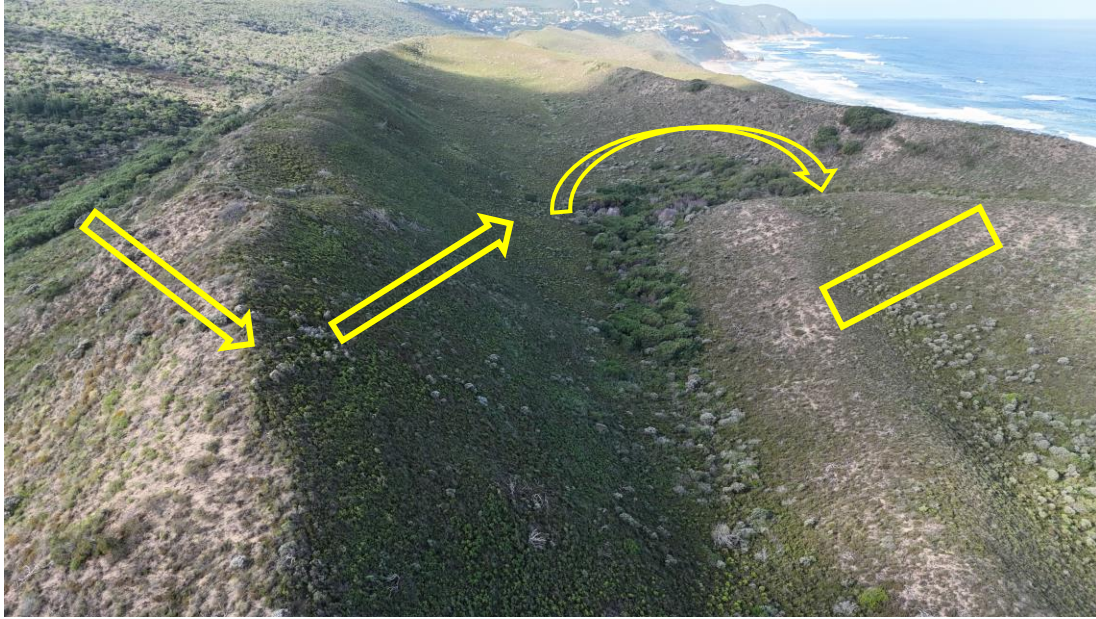


Fig. 2. Approximation of disturbance of foredune by proposed access road and dwelling (Source: SANParks).



Fig. 3. Corresponding orientation of the Preferred Layout (Source: DBAR (DFFE Ref No. 14/12/16/3/3/1/3185 (Previous)), Eco Route, April 2026).

Further, **Fig. 4** illustrates that the proposed road access to the dwelling over the foredunes will traverse two steep slope areas, i.e., going up and over the dune where slopes are $>30\%$. The northern slope of this dune is sparsely vegetated due to a north facing aspect, erosion on this slope is highly likely. Embankments and retaining structures will be necessary, which will increase disturbance footprint areas, and loss of vegetation.

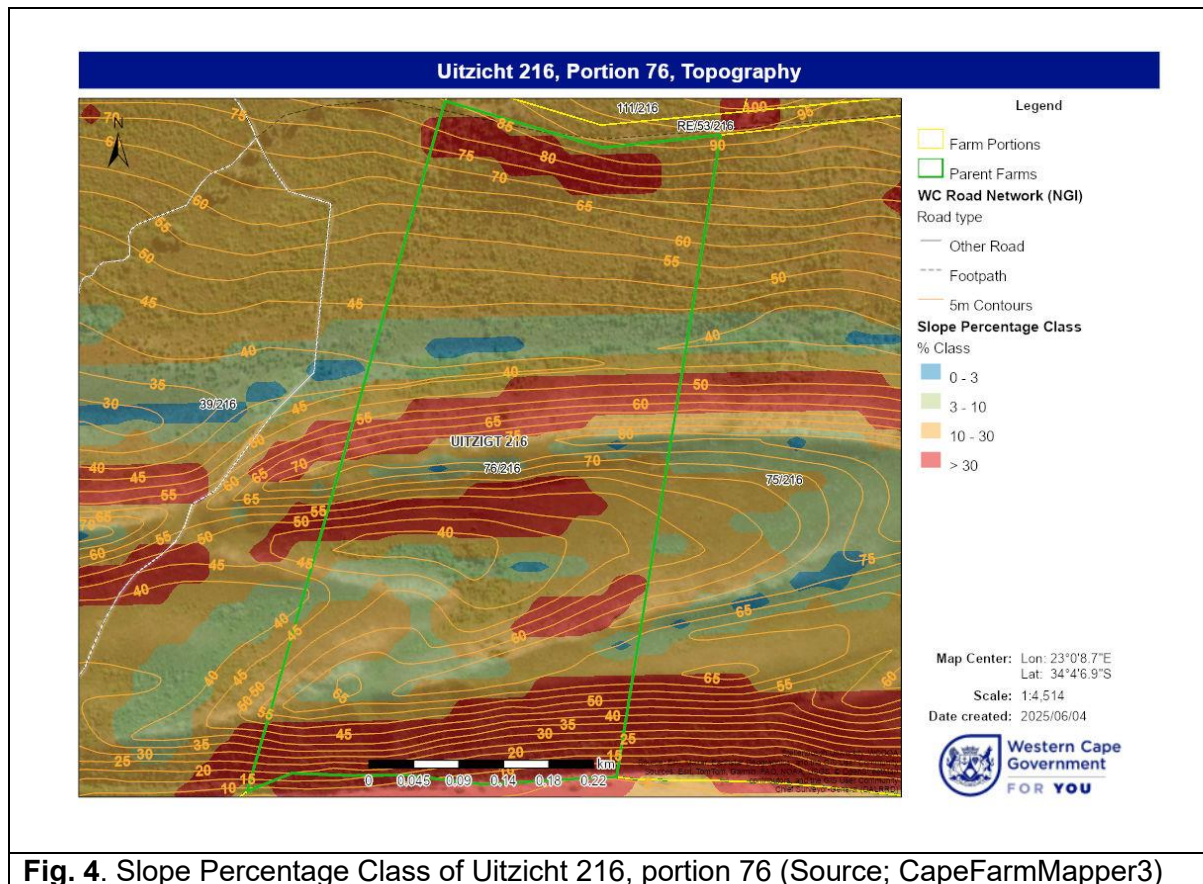


Fig. 4. Slope Percentage Class of Uitzicht 216, portion 76 (Source; CapeFarmMapper3)

Benefits from the proposed development in its preferred location (in the south-western corner of the property) will only benefit the Applicant, with no benefits, only a loss to society and future generations. SANParks cannot support any development on the foredune, particularly when other alternatives, i.e. developing adjacent to Church Street in the north-eastern corner, in an already disturbed area are possible, which will allow primary development rights. SANParks will support a building line relaxation in this area to allow the development closer to Church Street.

SANParks' full comment letters, including **Annexure 1 and 2**, should be included in the body of the Final Basic Assessment Report, not only in a Comments and Responses report/ table. Evidence of this should be provided to SANParks.

SANParks reserves the right to revise comments if additional information becomes available.

Yours sincerely

Dr Vanessa Weyer
Principal Planner
SANParks Garden Route National Park

CC:	Victor Mokoena	SANParks
	Lwazi Khuzwayo	SANParks
	Elmonique Petersen	SANParks
	Jessica Hayes	SANParks
	Arnelle Collison	SANParks
	Marthan Theart	SANParks
	Jeff Manual	SANParks
	Carlo van Tonder	CapeNature
	Mashudu Mudau	DFFE
	Nyiko Nkosi	DFFE
	Danie Swanepoel	WC DEADP
	Caren George	WC DEADP
	Jan Coetzee	WWF
	Franci Gresse	WWF
	Philip Hendricks	Knysna Municipality
	Mulalo Musekene	Knysna Municipality
	Hennie Smit	Knysna Municipality
	Shaun Madumbo	Knysna Municipality
	Johan Labuschagne	WHGC

Attachments:

Annexure 1: SANParks comments, DBAR (DFFE Ref. No. 14/12/16/3/3/1/3114), 7 Apr 2025.

Annexure 2: SANParks comments, DBAR (DFFE Ref. No. 14/12/16/3/3/1/3185), 9 Dec 2025.

**THE NATURAL VEGETATION OF
THE WESTERN HEADS (KNYSNA),
notes on its
ECOLOGICAL SENSITIVITY
and proposed
FUTURE DEVELOPMENT.**

This report was prepared during May 2005 by:

**Regalis Environmental Services
P.O. Box 1512
6620 Oudtshoorn.
Tel: 044-2791987
Fax: 044-2792185
Email: janvlok@mweb.co.za**

1. Background

To attain an overview of the conservation value of the area between Buffalo Bay and Belvedere in the Knysna Municipality, the Western Heads Protection Group requested Regalis Environmental Services to survey and map the natural vegetation of the area and to provide a report in which the areas of high conservation value are indicated and briefly discussed.

The specific terms of reference for this assignment was as follows;

1. Survey, classify and map the natural terrestrial vegetation at a scale of 1: 10 000.
2. Provide a diagnostic description of the vegetation units and briefly discuss their ecological sensitivities and conservation value.
3. Indicate which areas that have rehabilitation potential should be restored to ensure that areas of particular concern to conservation could be maintained.
4. Provide a map the areas of highest conservation value as well as corridors that should be retained to maintain vital ecological processes in the area.

The intention of this assignment was to assemble and disseminate information that would enable all the interested and affected parties to take better-informed decisions about potential impacts of future development in the area.

Here I provide a summary of the results of my field study, as well as recommendations on the establishment of an ideal core conservation area in the region. Please note that these recommendations should be read in a regional context and that it should not be used for the development of individual properties. Finer scale studies would be required for individual properties, with any development recommendation taking due cognisance of the cumulative impacts of development on individual properties on the larger affected area. The maps provided in this report are also available in electronic format, but these should not be used beyond a scale of 1:10 000.

2. Study Approach

The ca. 2 300-hectare study area was surveyed over a period of three days during April 2005. The individual vegetation units present in the area were identified by means of recording the dominant species present at a site. Characteristic and distinctive species were also recorded along transects of at least 200 meters in the least transformed examples of the units, but no quantitative sampling was done. Potentially interesting habitats were investigated to locate rare and endangered species, but existing literature (*e.g.* Vlok, 1998) were also consulted to determine which rare and endangered species are present in the various vegetation types.

All the vegetation units identified in this study were correlated with those described and mapped by van der Merwe (1976) in the Goukamma Nature Reserve. Our species nomenclature often differs due to plant name changes. Here I follow the more recent nomenclature of Goldblatt and Manning (2000).

Once the vegetation units have been identified a three-tier vegetation hierarchy was developed to indicate relationships between the different units. The individual units were then mapped on an aerial photo at a scale of 1: 10 000. These polygons were digitised to develop an electronic copy of the map in ArcView 3.2 format. A similar procedure was followed to map the transformation layer, with the three transformation categories defined as follows;

1. Near Pristine – which implies areas in which the vegetation is still pristine or only slightly disturbed, either through physical disturbance, or light infestations by alien vegetation or altered fire regimes.
2. Moderately Transformed – implies that small patches of near-pristine may still be present, but that most of the natural vegetation has been altered to some degree, but not beyond the point where it could not recover fairly easily with minor rehabilitation actions. Transformation here is mostly due to infestation by alien vegetation, planting of *Pinus* trees (1st rotation), small areas of physical

disturbance, some previous harvesting of indigenous trees and/or altered fire regimes.

3. Severely Transformed – which implies that the natural vegetation has been altered to such a degree that it could only be restored by serious rehabilitation actions. Transformation here is mostly due to urban development and afforestation by *Eucalyptus* and *Pinus* trees (more than one rotation).

Finally by using pattern in plant communities and available data on current and past occurrence of fauna (vertebrate and invertebrate) an ideal core conservation area and potential nodes for development are proposed. Here the following aspects were considered, in order of significance;

1. The occurrence of rare and endangered species in the affected area;
2. The degree to which the local plant communities are represented in existing formal conservation areas (including the adjacent Goukamma and nearby Robberg Nature Reserves);
3. The occurrence of unique geological features (See Tinley, 1985),
4. Vital ecological processes required to retain maximum species richness in these vegetation units;
5. The current ecological condition and potential long-term survival prospect of the natural vegetation;
6. The recommendations by STEP for the Subtropical Thicket Biome;
7. The degree to which the different vegetation units are sensitive to direct physical disturbance and potential indirect long-term impacts of urban development.
8. The rehabilitation potential of currently afforested areas.
9. The location of existing infrastructure and single dwellings.
10. Landscape features to propose pragmatic boundaries for a Conservancy considering fire hazard risk relative to urban development and environmental requirements.
11. Potential aesthetic impact of the proposed development nodes.
12. Potential long-term impact of additional development on critical natural resources sustaining current tourism industry in the Knysna-Buffalo Bay region.

4. Study Results

4.1 The Vegetation of the Study Area

Sixteen distinct vegetation units were found in the area, two are aquatic types and fourteen are terrestrial units belonging to the Forest, Sub-Tropical Thicket and Fynbos biomes (See Table 4.1). The spatial distribution of these units is indicated on Map 4.1.

The combination of vegetation units present in the Western Heads area is unique to a relatively small area within the Cape Floristic Region. This combination of vegetation units seems to be restricted to the coastal lowlands (< 200 meter altitude) between the Kaaimans River in the west and the Knysna estuary in the east. None of the local Fynbos units are replicated outside this area and some species (*e.g. Pentashistis barbata ssp. orientalis*, *Selago villicaulis*, *etc.*) are endemic to this area.

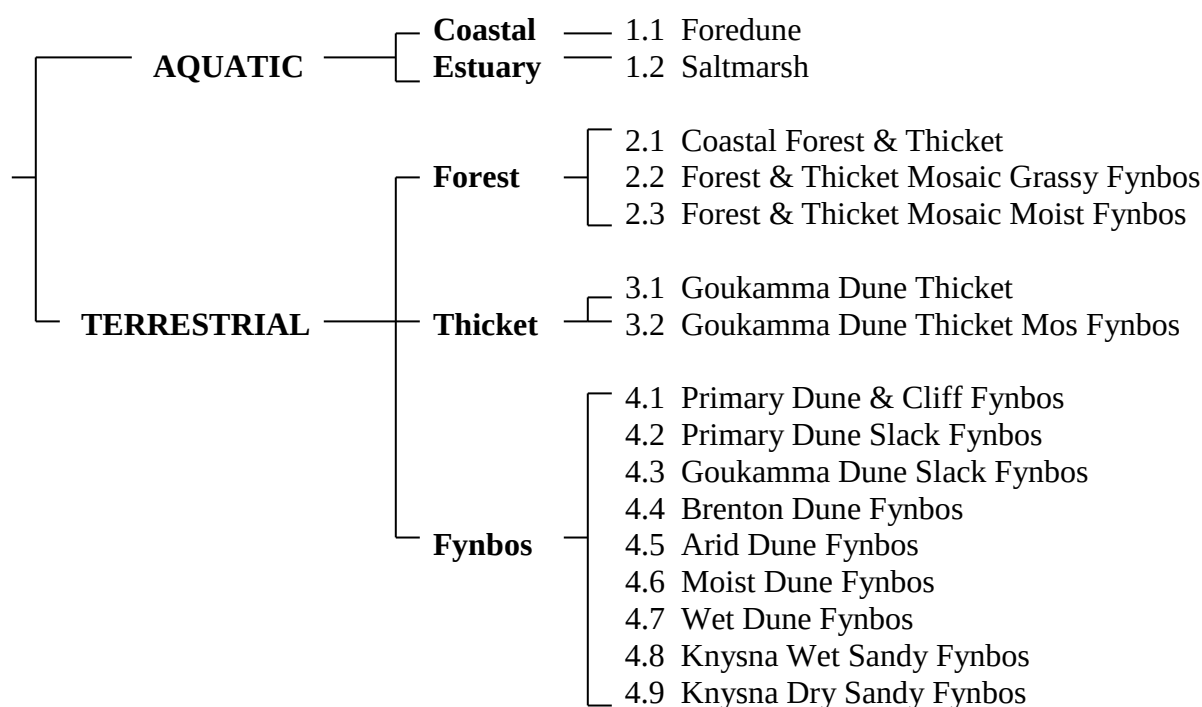


Table 4.1 Relationships between the sixteen vegetation units present in the Western Heads study area.

4.2 Diagnostic Species and Ecological Features of Vegetation units

Here I will provide a brief description of the vegetation units recognised in this study area. The sequence in which they are described follows a south-to-north transect, from the coast and estuary inland towards the northern boundary of the study area. First I provide some information on the diagnostic and rare plant species present, then will note if it is an important habitat for rare or uncommon fauna, then note which ecological processes are required to maintain the local biodiversity, then discuss specific sensitivities of the unit and finally note to what extent the unit also occurs on the Goukamma Nature Reserve.

1.1 Foredune

The Foredune unit forms a narrow band along the upper edge of the high-water mark along the coastline. Locally it does not form much of a “dune” and is rarely more than one meter high. It is easy to recognise and have species such as *Arctotheca populifolia*, *Gazania rigens* and *Tetragonia decumbens* common and dominant (See Figure 4.1). Where better-established shrubs such as *Morella cordifolia* and *Rhus crenata* are also present. *Gladiolus gueinzii* is an interesting species present in this unit, but it is not a rare species, as it is quite widespread. In other areas Black Oystercatchers use this habitat for nesting sites, but no such nesting sites are currently known from the local area.

An important ecological driver of this unit is a sustained supply of sand from the sea. The local fore dune system used to receive its sand supply from the Goukamma river mouth via a dune-plume system just north of Buffalo Bay. This source of sand has largely been arrested through stabilization of the original “drift-sands” in the Goukamma area. This may explain why the local Foredune community is rather poorly developed, as it no longer receives adequate sand from the sea. If this is true, much of the current primary dune vegetation may in time also become eroded. Once the Foredune community disappears, sand will be scoured by wave action from the following dune system, the unit here called the Primary Dune & Cliff Fynbos.



Figure 4.1: Example of the rather poorly developed **Foredune** vegetation in the Western Heads area. This unit is a vital “building block” to ensure the stability of the more inland dune systems. The long-term stability of especially the Primary Dune & Cliff Fynbos vegetation unit depends on the condition of this vegetation unit.

1.2 Saltmarsh

The Saltmarsh vegetation unit is restricted to the outer perimeter of the Knysna estuary. It cannot be mistaken with any of the other vegetation units in the area as it is dominated by characteristic species such as *Chenolea diffusa*, *Cotula coronopifolia*, *Juncus acutus*, *Limonium scabrum*, *Sarcocornia perennis*, *Scirpus maritimus* and *Suaeda fruticosa*. This unit plays an important role to retain the biodiversity and ecological processes of the estuary. Its own health is largely determined by fresh water supply from the uplands and adjacent terrestrial vegetation. This unit is very sensitive to physical disturbance and pollution from adjacent terrestrial activities, including soil erosion.

2.1 Coastal Forest & Thicket

This rather uncommon forest type is restricted to the lowlands and is best developed in fire-protected sites along rivers and at river mouths (See Figure 4.2). The presence of subtropical tree species such as *Calodendrum africana*, *Celtis africana*, *Ekebergia capensis* and occasionally *Olea europaea ssp. africana* differentiates this unit from the upland Afromontane forest types. No rare plant species are known from this unit, but it is the habitat of uncommon bird species such as the Knysna Woodpecker (*Campethera notata*). I suspect that some uncommon invertebrates may also be present. Large herbivores (e.g. Elephant) were probably important to retain disturbance regimes, such as controlling lianas that are currently often overgrowing the canopy, but have little evidence to sustain this notion. Few near-pristine examples of this vegetation unit can still be found, but there is a small example in the Goukamma Nature Reserve, along the banks of Groenvlei. It is better developed towards the east, e.g. Alexandria district.



Figure 4.2: An example of the uncommon Coastal Forest and Thicket vegetation unit on the Western Heads study area.

2.2 Forest & Thicket mosaic with Grassy Fynbos

This unit is essentially the ecotone between the Coastal Forest & Thicket and the Knysna Dry Sandy Fynbos. It occurs upslope from the forest and thicket vegetation, in sites where fires can periodically penetrate. Here the woody elements tend to form bush-clump patches in a matrix of the fynbos vegetation. Woody species such as *Apodytes dimidiata*, *Canthium inerme*, *Cassine peragua*, *Diospyros dichrophylla*, *Grewia occidentalis*, *Osyris compressus*, *Pterocelastrus tricuspidatus*, *Rhus lucida*, *Scutia myrtina*, *Sideroxylon inerme* and *Tarchonanthus camphoratus* are often the dominant species. Grasses (e.g. *Digitaria*, *Panicum*, *Sporobolus*, *Stenotaphrum*, *Themeda*, etc.) are usually abundant in open spaces between these woody bush-clumps along with many herbaceous species. Legumes (e.g. *Aspalathus spinosa*, *Indigofera verrucosa*, *Rhynchosia caribaea*, etc.) are also often abundant. Quite amazing is also the presence and relative abundance of several succulents (e.g. *Aloe ferox*, *Sarcostemma viminale*, etc.) in this unit (Figure 4.3). This unit is largely absent from the Goukamma Nature Reserve, but presence of species such as *Selago cinerea* suggests that it also occurs to the west and east.



Figure 4.3: Example of the Forest & Thicket mosaic with Grassy Fynbos vegetation on the Western Heads.

2.3 Forest & Thicket mosaic with Moist Fynbos

As in the former unit this unit is mostly an ecotonal vegetation type between Forest and Thicket and the adjacent fire-driven Fynbos. This unit differs in being restricted to better-watered sites, often south-facing slopes. The succulent component is absent here, but the woody tree component remains prominent. Some of the tree species (e.g. *Olea europaea*, *Scutia myrtina*, etc.) are absent. Legumes remain prominent in the open spaces, with *Indigofera porrecta* being a localised endemic that acts as the food plant for the rare Brenton-Blue butterfly (*Orachrysops niobe*). Bracken-fern (*Pteridium aquilinum*) is often locally abundant in this unit (See Figure 4.4), often indicating sites where forest patches have been eliminated in recent times. A fine balance between disturbance regimes caused by mammals and fire is required to maintain this unit. Without this disturbance regime the vegetation becomes overgrown by tree species. This unit is absent from the Goukamma Nature Reserve, but it occurs eastwards up to Natures Valley.



Figure 4.4: Example of the Forest & Thicket mosaic with Moist Fynbos vegetation on the Western Heads.

3.1 Goukamma Dune Thicket

This unit is largely restricted to a narrow band along the northern foot of secondary dunes (See Figure 4.5). It shares most of its common woody species with the Coastal Forest & Thicket unit, but here the tall canopy species (*e.g. Celtis*) are absent. Woody trees and shrubs (*e.g. Pterocelastrus tricuspidatus, Sideroxylon inerme, etc.*) are dominant, but they rarely form a canopy higher than 5 meters above the ground. Many of the species are thorny (*e.g. Azima tetracantha, Capparis sepiaria, Carissa bispinosa, etc.*) No rare plant species are known from this unit, but it seems to be an important habitat for some rare birds, such as the Knysna Warbler (*Bradypterus sylvaticus*). Fires burning from a northwesterly direction clearly defined the boundaries of this unit. An increase in alien vegetation along its boundaries threatens this unit, as they increase the fire intensity. This unit is well developed in the Goukamma Nature Reserve and further westwards. It seems to act as an important migration corridor for certain fauna along the coast. Maximum connectivity should be retained between the remaining examples of the Goukamma Dune Thicket and other Coastal Forest and Thicket vegetation units.



Figure 4.5: A classic example of how the Goukamma Dune Thicket vegetation is largely restricted to the lower north-facing slopes of secondary dunes.

3.2 Goukamma Dune Thicket mosaic with Dune Fynbos

This unit developed in recent times in the previous “dune-plume” area, where sand blew from the Goukamma River mouth eastwards. Marram grass (*Ammophila arenaria*) and Rooikrans (*Acacia cyclops*) were planted to arrest the movement of these “drift sands” and these two alien species are still abundant in this unit. Indigenous primary dune species (e.g. *Ehrharta villosa*, *Ischyrolepis eleocharis*, *Metalasia muricata*, *Morella cordifolia*, *Passerina rigida*, *Rhus crenata*, etc.) established subsequently and are still the most common species in more exposed sites. Patches of Goukamma Dune Thicket, typically with woody species such as *Azima tetracantha*, *Capparis sepiaria*, *Carissa bispinosa*, *Pterocelastrus tricuspidatus*, *Sideroxylon inerme*, *Tarchonanthus camphoratus* etc., are dominant in the dune slack areas. On steep, moist south facing slopes occur a sub-community in which *Ischyrolepis eleocharis* is the dominant species along with shrubs such as *Phylica littoralis* and the uncommon *Erica fourcadei*. This vegetation unit thus consists of a patchwork of different vegetation communities, most of which are too small to map individually.

Most of the local vegetation is very vulnerable to physical disturbance, due to the relative recent establishment of the area. Many of the local dune slopes are very steep and will erode rapidly if the vegetation is disturbed. This “man-made” vegetation unit is also well represented within the Goukamma Nature Reserve.

4.1 Primary Dune & Cliff Fynbos

This unit occurs on the often-steep south facing slopes of the first dune system (See Figure 4.6). Towards the east it also occurs on rocky cliffs, where the plant community is somewhat different, but not significantly so. Common and distinctive species are *Agathosma apiculata*, *Gazania rigens*, *Helichrysum dasyanthum*, *Helichrysum teretifolium*, *Ischyrolepis eleocharis*, *Limonium scabrum*, *Metalasia muricata*, *Morella cordifolia*, *Passerina rigida*, *Phylica littoralis* and *Silene primuliflora*. *Cliffortia serpyllifolia* can also be abundant in the rocky sites towards the east. No rare plant species are known from this vegetation unit. This vegetation is almost constantly exposed to salt-laden winds blowing from the sea, which renders it quite vulnerable to physical disturbance. Once an area has been disturbed, it takes a long period for plants to re-establish. Most of the steep slopes are also prone to soil erosion, once the vegetation has been disturbed. This unit is also well represented within the Goukamma Nature Reserve.



Figure 4.6: A typical example of the local Primary Dune & Cliff Fynbos vegetation.

4.2 Primary Dune Slack Fynbos

This unit is restricted to the area between the first and second row of dunes. It is dominated by *Agathosma apiculata* and *Metalasia muricata* (See Figure 4.7), but a number of other shrubs and herbs (e.g. *Anthospermum aethiopicum*, *Felicia echioides*, *Lotononis pungens*, *Muraltia squarrosa*, *Pelargonium betulinum*, *Sutera campanulata*, *Wahlenbergia uitenhagensis*, etc.) are also present. Some geophytes (e.g. *Brunsvigia orientalis*, *Satyrium membranaceum*, etc.) and graminoids (e.g. *Hellmuthia membranacea*, *Imperata cylindrica*, *Ishyrolepis eleocharis*, etc.) are present, but this unit is not very rich in species. No rare plant species are known from this unit, but the rare Duthie's golden mole (*Chlorotalpa duthiae*) may be present. Fires will be required to rejuvenate this vegetation, seemingly at a frequency of 10-12 years. This unit seems to be absent from the Goukamma Nature Reserve and it may be restricted to the study area.



Figure 4.7: The band of white-flowered shrubs (*Metalasia muricata*) in the centre indicates a pristine example of the local Primary Dune Slack Fynbos.

4.3 Goukamma Dune Slack Fynbos

This unit occurs just north of the secondary dune system. Although it shares common species with the Primary Dune Slack Fynbos, such as *Agathosma apiculata*, *Hellmuthia membranacea*, *Imperata cylindrica* and *Metalasia muricata*, it differs substantially in its species composition. Species such as *Chrysanthemoides monilifera*, *Cliffortia falcata*, *Cymbopogon marginatus*, *Erica discolor*, *Muraltia squarrosa*, *Passerina vulgaris*, *Pentaschistis pallida* and *Tetraria cuspidata* are also abundant in this unit. No rare plant species are known from this unit, but the very rare localised endemic butterfly *Chrysoritis mithras* occur here. This butterfly uses *Chrysanthemoides monilifera* as its food plant and it is thus important to retain this species in the unit.

Large numbers of the rather uncommon flightless dung beetle (*Circellium bacchus*), best known from the Addo Elephant Park, has been noted in this unit in sites where cattle have been grazing. The presence of this insect indicates that large herbivores were most probably quite abundant in the past in this unit. This would not be surprising as it is quite rich in grass species, especially after a fire. To retain this beetle in the area some herbivores will have to be retained in the system.

Fire is also an important natural disturbance regime in this unit. To ensure that the vegetation does not become moribund, it will have to be burned at a frequency of 10-12 years, during summer to autumn months (January-April). This unit is well represented within the Goukamma Nature Reserve.

4.4 Brenton Dune Fynbos

This uncommon unit is restricted to the south facing slopes of the some of the more stable secondary dunes (See Figure 4.8). It shares many species with the Primary Dune & Cliff Fynbos, such as *Agathosma apiculata*, *Helichrysum dasyanthum*, *Helichrysum teretifolium*, *Ischyrolepis eleocharis*, *Passerina rigida* and *Pelargonium betulinum*, but it is richer in species. *Erica glumaeiflora* is usually quite abundant and a characteristic species of this unit. Two rare and threatened plant species, *Pentashistis barbata ssp. orientalis* and *Satyrium princeps* occur in this unit. The former species is perhaps restricted to this unit and is dependant on periodic fires and seemingly also some soil disturbance. The latter may result from mole-rat action and in the past perhaps also from large herbivores that moved through the area. This unit seems to be poorly represented in the Goukamma Nature Reserve.



Figure 4.8: The Brenton Dune Fynbos occurs here in the foreground, with the band of white-flowered shrubs (*Metalasia muricata*) in the background indicating the boundaries of the Primary Dune Slack Fynbos.

4.5 Arid Dune Fynbos

The Arid Dune Fynbos occurs on the north facing slopes of the primary and secondary dune systems. The relatively sparse vegetation is dominated by few species, with *Agathosma apiculata*, *Cymbopogon marginatus*, *Cyperus brevis*, *Imperata cylindrica*, *Ischyrolepis eleocharis*, *Metalasia muricata*, *Muraltia squarrosa*, *Olea exasperata* and *Stipagrostis zeyheri* the most common species. *Centella tridentata* is a characteristic species, but it is never common. No rare plant or animal species are known from this unit. Due to its aridity and the general loose nature of the sand, this unit is very vulnerable to physical disturbance. Soil erosion tends to be rapid and difficult to control once the vegetation has been disturbed. This unit is quite abundant in the Goukamma Nature Reserve.



Figure 4.9: A typical example of the Arid Dune Fynbos occurs here in the foreground. Note how sparse the vegetation is here in comparison with those of the Moist Dune Fynbos of the adjacent south facing slope.

4.6 Moist Dune Fynbos

This unit occurs on the south facing slopes of the more inland well-stabilised dunes. It is quite rich in species and cannot easily be confused with any of the other local fynbos units. Species such as *Artemisia afra*, *Athanasia trifurcata*, *Erica discolor*, *Erica hispidula*, *Leucadendron salignum*, *Metalasia densa*, *Passerina filiformis*, *Pentashistis pallida*, *Phyllica stipularis*, *Restio triticeus*, *Selago villicaulis*, *Tetraria cuspidata*, *Thamnochortus cinereus* and *Thamnochortus erectus* are abundant and distinctive species. *Erica fourcadei* is the only rare plant species known from this unit, but the uncommon *Gladiolus vaginatus* was also seen here. I suspect that this unit would be rich in geophytes after a fire, of which some may be rare species. This unit will also have to burn at intervals of 10-12 years to rejuvenate the vegetation. It is well represented on the Goukamma Nature Reserve.

4.7 Wet Dune Fynbos

This unit is most similar to the Moist Dune Fynbos, but it is restricted to wetter sites. It is most distinctive on the upper south facing slopes, as it may integrate with the Forest & Thicket mosaic with Moist Fynbos unit on lower slopes. It can be easily recognised by the presence of species such as *Erica sessiliflora* and *Protea cynaroides* and in some sites *Widdringtonia cupressoides* (See Figure 4.10). Bracken (*Pteridium aquilinum*) is often also abundant here.

No rare species are known from this unit, but the local small-flowered form of *Protea cynaroides* seems to represent a threatened genetic race of this species. The food plant of the Brenton Blue butterfly, *Indigofera erecta*, is occasionally also present in this unit. Currently fires are excluded from most of the areas in which this unit occurs, resulting in the rapid development of tree species (e.g. *Tarchonanthus camphoratus*) that will eventually outshade all the fynbos species. This relatively small vegetation unit is absent from the Goukamma Nature Reserve and is probably not conserved anywhere else.



Figure 4.10: Wet Dune Fynbos occurs here in the foreground, with *Widdringtonia cuppressoides* and *Psoralea affinis* prominent. Note how much it differs in density from the Arid Dune Fynbos in the background.

4.8 Knysna Wet Sandy Fynbos

This unit occurs on south facing slopes in the more inland dune systems. It is quite rich in species, many of which show a distinct affinity with the more upland Mountain Fynbos units. In this unit species such as *Agathosma capensis*, *Anginon difforme*, *Berzelia intermedia*, *Bobartia orientalis*, *Diospyros dichrophylla*, *Drosera cistiflora*, *Erica sparsa*, *Helichrysum felinum*, *Hippia frutescens*, *Leucadendron salignum*, *Leucospermum cuneiforme*, *Mastersiella purpurea*, *Metalasia densa*, *Montinia caryophyllacea*, *Otholobium heterosepalum*, *Phyllica axillaris*, *Printzia polifolia*, *Restio triticeus*, *Thamnochortus cinereus* and *Watsonia knysnana* are abundant and characteristic species. The localised endemic *Muraltia knysnaensis* occurs in this unit, but is not restricted to it.

This unit is absent from the Goukamma Nature Reserve and is not conserved anywhere else either.

4.9 Knysna Dry Sandy Fynbos

This unit looks most similar to the Moist Dune Fynbos as species such as *Disperago krausii*, *Erica discolor*, *Leucadendron salignum*, *Metalasia densa*, *Restio triticeus* and *Thamnochortus cinereus* are abundant. It differs in occurring on north facing slopes and in having the grassy component (e.g. *Digitaria eriantha*, *Eustachys paspaloides*, *Pentasthesis pallida*, *Stipagrostis zeyheri*, *Themeda triandra*, etc.) better developed. At the base of the dune slopes this unit changes into the Forest & Thicket mosaic with Grassy Fynbos unit. No rare species are known to occur in this unit. The grassy component was most probably extensively used by game species in the past, especially soon after fires. The more arid sandy soils seems to be prone to erosion when the natural vegetation is disturbed and where dense stands of alien vegetation was burned. This unit is absent from the Goukamma Nature Reserve



Figure 4.11: A typical example of the Knysna Dry Sandy Fynbos that occurs mostly on the north facing slopes of the more inland dunes in the Western Heads area.

4.3 Current Condition of the Vegetation

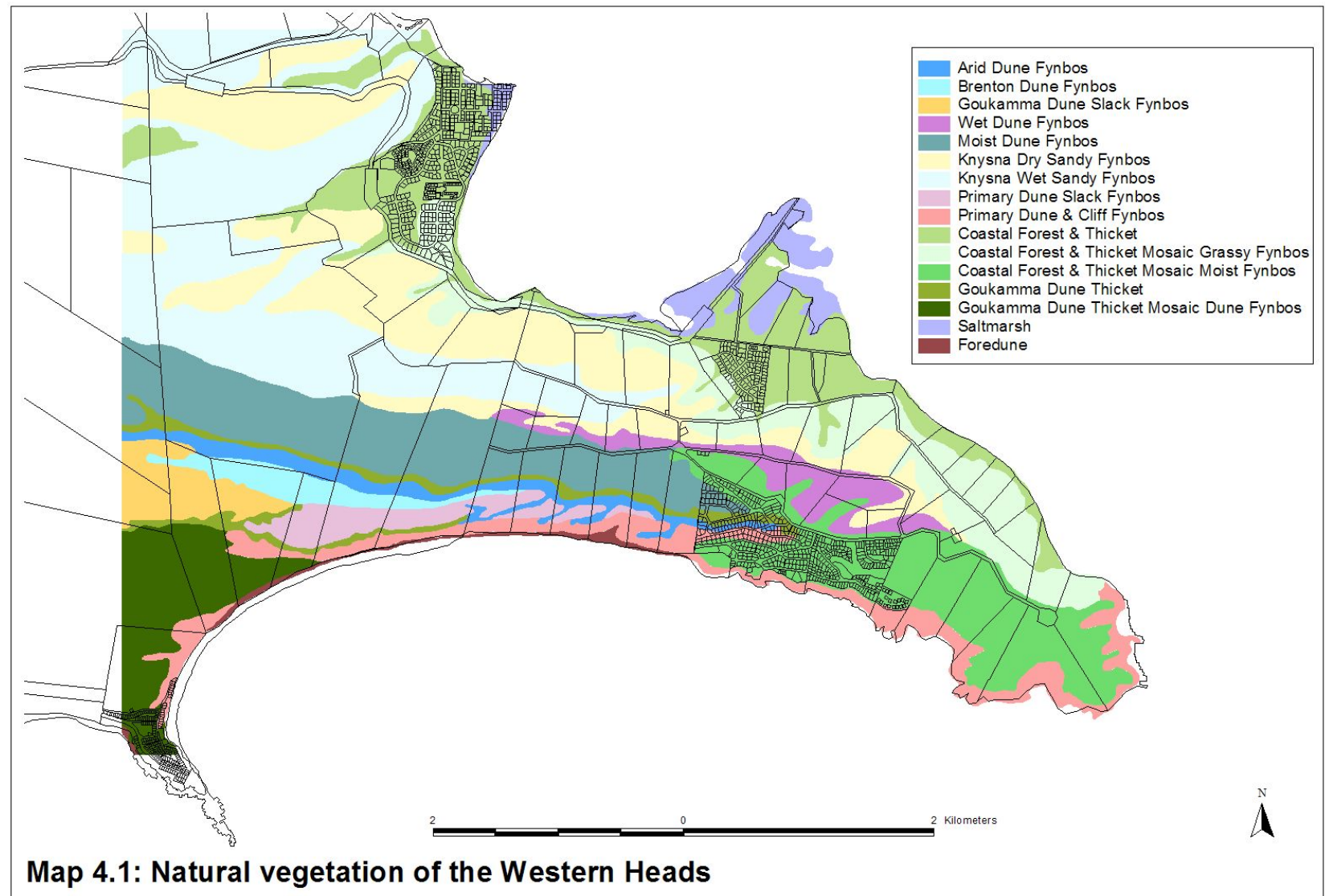
Most of the local vegetation types have been affected by urban development, infestation by alien vegetation and/or altered ecological processes (Map 4.2 and Tables 4.1 & 4.2).

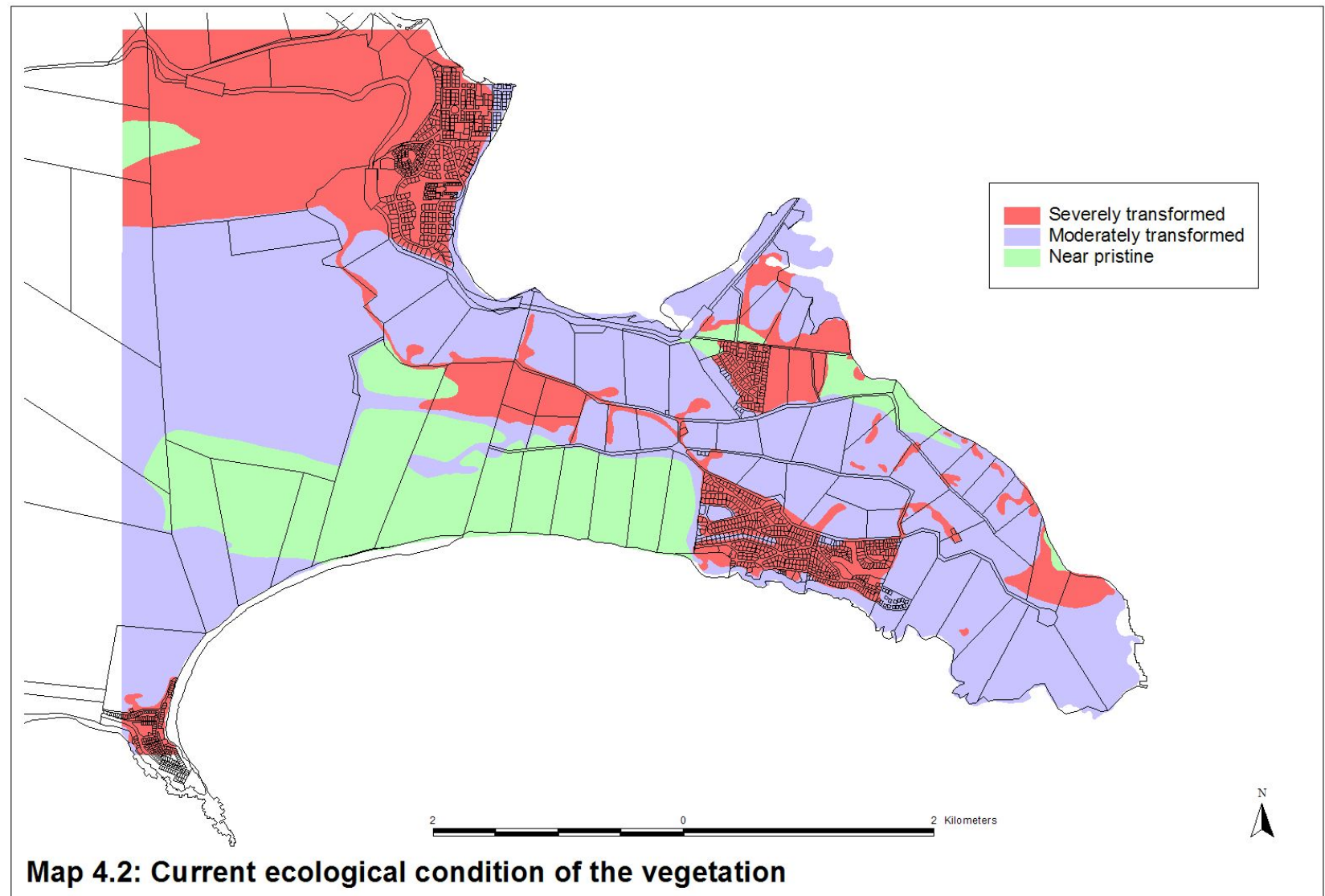
Table 4.1: Spatial extent of the sixteen vegetation units of the Western Heads area and degree to which they have been transformed (percentage of total area).

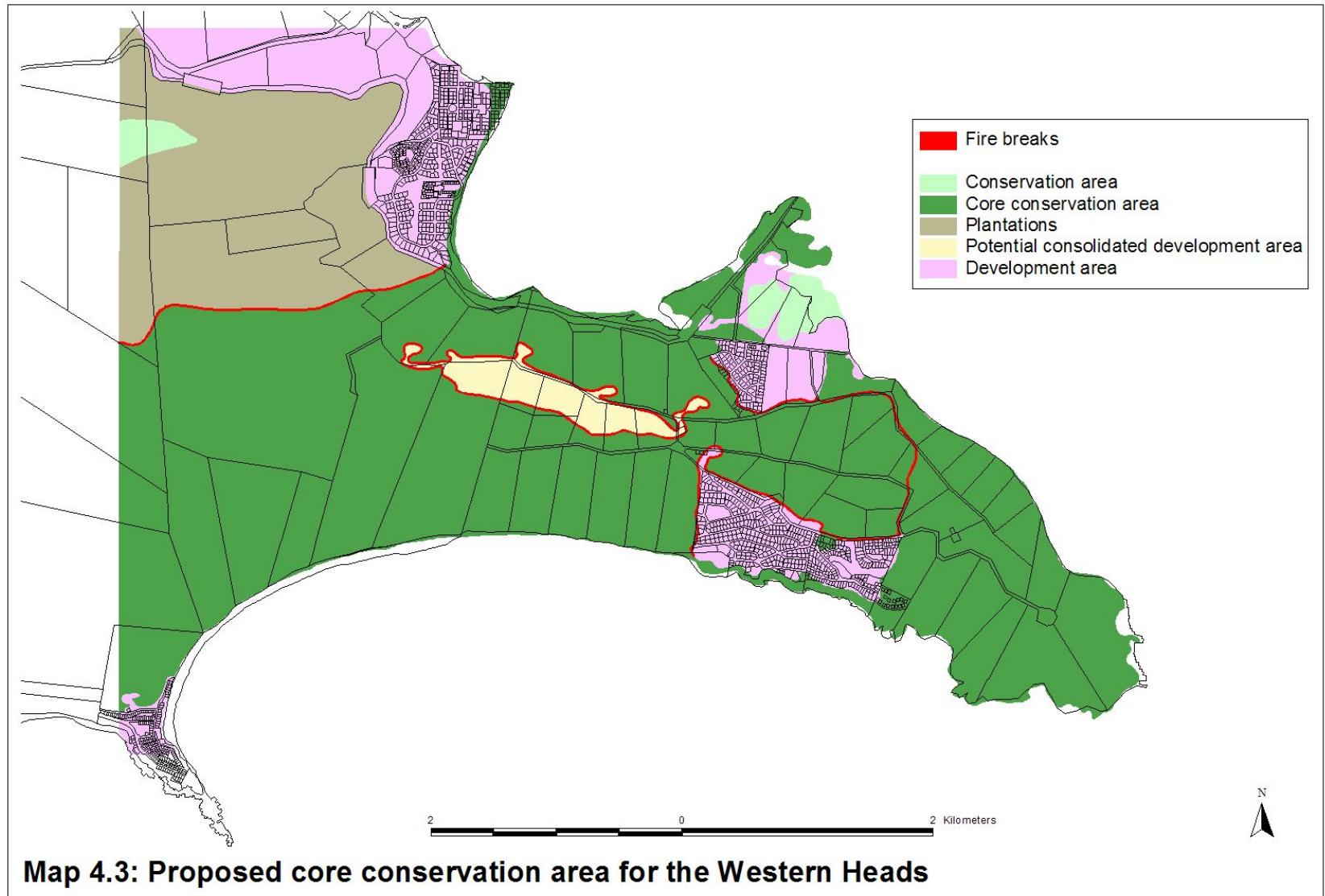
VEGETATION TYPE	TRANSFORMATION			TOTAL
	SEVERE	MODERATE	PRISTINE	AREA (ha)
Foredune	0.0%	31.6%	68.4%	14.8
Brenton Dune Fynbos	0.0%	0.4%	99.6%	37.7
Primary Dune Slack Fynbos	0.0%	0	100.0%	49.8
Goukamma Dune Slack Fynbos	0.0%	32.8%	67.2%	51.9
Goukamma Dune Thicket	10.1%	24.2%	65.7%	52.0
Arid Dune Fynbos	5.7%	5.6%	88.7%	52.8
Wet Dune Fynbos	9.5%	90.5%	0	61.8
Saltmarsh	6.8%	93.1%	0.1%	62.4
Goukamma Dune Thicket Mosaic Dune Fynbos	11.1%	87.3%	1.5%	111.5
Primary Dune & Cliff Fynbos	7.2%	60.5%	32.4%	121.7
Coastal Forest & Thicket Mosaic Grassy Fynbos	19.3%	76.7%	4.0%	184.1
Coastal Forest & Thicket Mosaic Moist Fynbos	29.4%	70.5%	0	213.8
Moist Dune Fynbos	2.2%	55.3%	42.6%	225.3
Coastal Forest & Thicket	64.9%	20.2%	14.9%	257.9
Knysna Dry Sandy Fynbos	34.5%	65.3%	0.2%	354.6
Knysna Wet Sandy Fynbos	54.8%	39.8%	5.4%	446.1

Table 4.2: Spatial extent of the Western Heads vegetation units that are still in a pristine to moderate ecological condition.

VEGETATION TYPE	AREA (hectare)	
	PRISTINE	PRIST+MOD
Foredune	10.1	14.8
Brenton Dune Fynbos	37.5	37.7
Goukamma Dune Thicket	34.2	46.8
Arid Dune Fynbos	46.8	49.8
Primary Dune Slack Fynbos	49.8	49.8
Goukamma Dune Slack Fynbos	34.9	51.9
Wet Dune Fynbos	0.0	56.0
Saltmarsh	0.1	58.1
Coastal Forest & Thicket	38.4	90.5
Goukamma Dune Thicket Mosaic Dune Fynbos	1.7	99.1
Primary Dune & Cliff Fynbos	39.4	113.0
Coastal Forest & Thicket Mosaic Grassy Fynbos	7.4	148.5
Coastal Forest & Thicket Mosaic Moist Fynbos	0.0	150.9
Knysna Wet Sandy Fynbos	24.2	201.7
Moist Dune Fynbos	95.9	220.4
Knysna Dry Sandy Fynbos	0.8	232.2







4.4 Proposed core Conservation Area and nodes for Development

To ensure that the biodiversity of the Western Heads is adequately captured, the following aspects should be captured in a core conservation area;

1. At least 50 hectares of pristine to moderately transformed examples of vegetation units that are poorly conserved elsewhere.
2. Sites where rare and endangered species are known to occur or habitat types where they are very likely to occur.
3. Some examples of all the local vegetation types (thus full gradient from Foredune to climax Forest).
4. Examples of unique or unusual geological features (e.g. the east-west running dune systems).
5. Areas that is sensitive to physical disturbance.
6. Sites that is aesthetically valuable in a regional context.

To ensure that the local biodiversity remains ecologically viable such a core conservation area must be designed to;

1. Allow vital ecological processes that sustain the local biodiversity to be operative or at least to be simulated through management actions. This includes disturbance processes such as fire regime and presence of certain faunal components.
2. Link existing conservation areas (Goukamma Nature Reserve, Knysna Estuary).
3. Evade fringe effects of urban and other severely transformed sites.

Following the above basic requirements a core conservation area is proposed for the Western Heads and this area is indicated on Map 4.3. This proposal is a robust attempt to ensure that all the main environmental issues that should be considered in the Western Heads are addressed. They include;

1. A linkage between the Knysna estuary and the Goukamma Nature Reserve.
2. Capturing representative examples of unique local biodiversity and geological features.

3. Safeguarding sensitive and aesthetically important features.
4. Proposing a site that would be most suitable for the consolidation of development rights of currently undeveloped units within the potential core conservation area.

The proposed core conservation area includes some sites that are currently regarded as moderately transformed (Map 4.2). These are mostly *Pinus* plantations that are currently within their first rotation of being planted with pine trees (*ca.* 30 years old). To my opinion these areas (previously mostly Moist Dune Fynbos and Knysna Wet Sandy Fynbos, See Map 4.1) have a high potential of recovery of the original natural vegetation, if the Pine trees will be removed and the sites are burned. Currently the closed Pine canopy allows only a few of the original fynbos species to continue to grow, but the topsoil would contain propagules of most of the non-serotinous species that originally occurred in the area. Previous studies have shown that even sites that have been afforested for periods up to 60 years (in their 1st rotation) can recover well, if the topsoil (upper 15 cm) is not disturbed heavily during harvesting operations and if area is burned after the Pine trees have been removed.

The two most important reasons why this currently afforested area is included in the proposed core conservation area are, because;

1. Some restoration work will be required to ensure that a reasonable portion of the poorly conserved Knysna Wet Sandy Fynbos can be captured in the conservation area, and since;
2. The proposed northern border would form a pragmatic fire management boundary for the proposed core conservation area.

The other moderately transformed sites that are included in the proposed conservation area have been transformed by either low to moderate densities of alien vegetation, or through altered fire regimes. These sites also have a high rehabilitation potential and should be restored through the eradication of the alien vegetation and the institution of ecologically correct fire management regimes to ensure that the rather unique biodiversity of the Western Heads would be maintained.

5. Conclusions and Recommendations

There can be little doubt that much of the land located between Buffalo Bay in the west and Belvedere in the east (here called the Western Heads) is of considerable significance to environmental conservation, both on a regional and national level.

Most of the local vegetation types are poorly conserved elsewhere, even though the land is in close proximity to the Goukamma Nature Reserve. The area furthermore provides an irreplaceable opportunity to link two existing conservation areas of national importance and capturing some unique dune systems in the country (See Tinley, 1985). It also provides one of the last remaining opportunities to restore vital ecological processes that retain the rather unique biodiversity of the area. Several of the local vegetation types are sensitive to physical disturbance and further disruption of sustaining ecological processes, such as fire regime. Unplanned location of more residential and resort units and their associated services (roads, water, sewerage and electricity) in the proposed core conservation area will undoubtedly constrain the potential development of a conservation area of considerable significance.

Modern man has already interrupted many of the larger scale ecological processes (*e.g.* movement of sand, natural fire regimes, grazing by large herbivores, *etc.*) that used to retain local biodiversity patterns and the stability of the local environment. If appropriate actions are not taken now the inhabitants of this region may soon have to pay for the degradation of the area. We can already start to see the collapse of the basic critical components of the local environment, individual species. Applicable examples of local endemic fauna and flora are the Brenton-Blue butterfly (*Orachrysops niobe*) and an unusual grass species (*Pentasthitis barbata ssp. orientalis*). Please note that I do not imply that these rare species were instrumental to uphold the stability of the local environment (often called keystone-species), but their loss (or near-extinction) indicate

that the local environment is no longer healthy. The reason why these species are disappearing is simply because original ecological processes that sustained them have been disrupted. What I am implying is that the further disruption of these processes may very well result in the local inhabitants ending up in the same predicament as the Brenton-Blue butterfly – the environmental services that sustained this organism was disrupted to the point that it could no longer live in the area. Why do I say this?

Long term stability of the rather unique local dune systems (Tinley, 1985) have been undermined by altering original sand provision from the south, through stabilisation of old “drift-sand” systems to maintain a road to Buffalo Bay. The currently poorly developed condition of the “Foredune” plant community seems to indicate that sand is gradually being lost from the area and that the primary/frontal dune system (the very site where everybody would like to locate their vacation house to see the “white water”) is the next to be scoured away in time.

Also rather alarming is the fact that landowners have allowed alien vegetation to encroach their land. These alien plants not only displace indigenous species, they also create an exacerbated fire risk and very high fire intensities that will destabilise sensitive plant communities that are currently holding the rather fragile sand dune systems where most of the current infrastructure has been established. Any further loss or fragmentation of the rather humble fynbos vegetation may severely compromise the integrity of one of the important biodiversity features in the area - the Knysna estuary (remember the impacts of soil loss from the Simola development?).

Rather intriguing to me is the potential importance of the original component of large herbivores in this environment to retain on the rather delicate intercept between the local Thicket-Fynbos-Forest biomes. Keep in mind here that 400-500 elephants roamed this region a mere 110 years ago (see Van der Merwe, 1976) and coupled to the occurrence of elephants was those of buffalo. These animals obviously played a very important role in

the past to maintain patterns in the local vegetation, especially the occurrence of woody versus non-woody species. Their grazing impacts affected fire regime and many localised endemic plant species tend to be restricted to sites where these two opposing defoliation factors (*i.e.* grazing & fire) maintained specific vegetation types (See Vlok *et al*, 2003). The removal of these large herbivores over the past century may very well have disrupted some rather sensitive, but vital ecological process that retained highly specialised fauna and flora (*e.g.* Brenton Blue butterfly, Flightless dung beetle, etc.). During my field study this interesting possibility reoccurred to me several times, but there is (alas) currently little scientific evidence to support this point of view.

The Western Heads study area provides a fine example of how modern man has impacted upon, but still depends on critical environmental services to maintain a high standard of living. Here the main question is perhaps; “How much more development can still be allowed in the Western Heads, before the vital environmental services will collapse to the point that the local inhabitants will have to pay exorbitant amounts to restore them?” This is not an easy question to answer, as it largely depends on the time-span that we are talking about. If we consider a time-span of 30-50 years one would immediately need to safeguard at least the currently most used economic environmental resources of the area (estuary, coastline and aesthetic appeal of the area). These resources not only support the local Western Heads community, but also those of the larger Knysna Municipality domain. To safeguard these natural resources now, I firmly believe that the only option is to establish the core conservation area proposed and illustrated in Map 4.3.

How doable is this proposal? Well, that would depend on the landowner willingness and of those of all the interested and affected parties to safeguard the future of the affected area. There are still several options available to shift the development rights of individual private properties to less sensitive areas, including to sites located on the Goukamma Nature Reserve, *etc.* This is clearly an issue to be considered and debated by all the interested and affected parties, with due consideration of the needs of the environment.

6. References

- Goldblatt P. and Manning J., 2000. Cape Plants. A conspectus of the Cape flora of South Africa. **Strelitzia** 9: 1-743.
- Tinley K.L., 1985. Coastal dunes of South Africa. **South African National Scientific Programmes**. Report No 109: 1-300.
- Van der Merwe C.V., 1976. Die plantekologiese aspekte en bestuursprobleme van die Goukamma-Natuurreservaat. MSc Thesis. University of Pretoria.
- Vlok J.H.J., 1998. Die omgewingsensitiwiteit van gedeeltes 41, 49 & 50 van die eiendom Uitzicht 216 in die Knysna distrik. Unpublished confidential report, Regalis Environmental Services, Oudtshoorn.
- Vlok J.H.J., D.I.W Euston-Brown & Cowling R.M. 2003. Acock's Valley Bushveld 50 years on: new perspectives on the delimitation, characterisation and origin of subtropical thicket vegetation. **South African Journal of Botany** 69: 1. 27-51.
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FS13 Goukamma Strandveld

Distribution: In Sedgefield Bay, wedged between the Knysna Heads to the east and Wilderness to the west covering 39 km².

Vegetation & Landscape Features: Parabolic dunes occur along the coastal margin, with inland ridges supporting Knysna Sand Fynbos. Mesic Dune Thicket patches are common in the Goukamma Strandveld, and in fire-protected and locally wet areas, they grow into forests. Altitude ranging between 1 – 196 metres (median 49 m).

Geology and Soils: The vegetation is overlaying the Klein Brak Formation rocks cemented beach deposits, Waenhuiskrans aeolianite sand on oxidised, neutral sands. The Klein Brak Formation rocks, which are primarily quartz-rich, shelly sandstones, border the dune cordon between Arniston and De Hoop Nature Reserve.

Climate: Like that of the St Francis Strandveld but with a lower annual rainfall 500–700 mmyr⁻¹. Warm temperate, subhumid to semi-arid and sub-Mediterranean. The temperature regime is equable: mean midsummer temperatures are 20–22 °C, and midwinter temperatures 16–18 °C.

Important Taxa (d=dominant, e=South African endemic, et=possibly endemic to a vegetation type)

Growth form	Species
Shrub	<i>Passerina corymbosa</i> (d), <i>Erica glumiflora</i> (d), <i>Metalasia muricata</i> (d), <i>Imperata cylindrica</i> (d), <i>Restio eleocharis</i> (d) and <i>Struthiola argentea</i> (d). <i>Cliffortia falcata</i> (d), <i>Chironia decumbens</i> (d) and <i>Erica glandulosa</i> ssp. <i>Fourcadii</i> (d). – Diagnostic of the vegetation type. <i>Cliffortia falcata</i> (d) , <i>Chironia decumbens</i> (d) and <i>Erica glandulosa</i> ssp. <i>Fourcadii</i> (d). <i>Disparago kraussii</i> (d), <i>Cliffortia linearifolia</i> (d) and <i>Lachnaea diosmoides</i> (d). <i>Disparago kraussii</i> , <i>Carpobrotus edulis</i> , <i>Cliffortia linearifolia</i> and <i>Lachnaea diosmoides</i> .
Succulent	<i>Carpobrotus edulis</i> (d)

Conservation

Conserved in	Goukamma Provincial Nature Reserve, Garden Route National Park, Keurbooms River Nature Reserve- Seagull Colony, Robberg Nature Reserve, Wilderness National Lake Area
Area protected	3.6 km ² (8.6%)
Threat activities	Not yet assessed

Reference

Cowling RM, Cawthra H, Privett S, Grobler BA. 2023. The vegetation of Holocene coastal dunes of the Cape south coast, South Africa. *PeerJ* 11:e16427 <https://doi.org/10.7717/peerj.16427>



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PER E-MAIL

Dear Ms. Gilfillan

COMMENTS ON THE AMENDED DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF THE FARM UITZICHT, KNYSNA, WESTERN CAPE PROVINCE

The Directorate: Biodiversity Conservation has reviewed and evaluated the reports.

Following a review of the Draft Basic Assessment Report (DBAR), specialist studies and supporting documentation, it is considered that the proposed development should not be supported in its current form due to the exceptional biodiversity sensitivity of the receiving environment and the potential for irreversible impacts on a mapped Critical Biodiversity Area (CBA).

The property is located entirely within a Critical Biodiversity Area (CBA) as identified in the Western Cape Biodiversity Spatial Plan (2017; 2023 Update). The primary management objective for CBAs is to maintain these areas in a natural or near-natural ecological state to ensure the persistence of biodiversity pattern, ecological processes and ecosystem functioning. These areas are intended to avoid further habitat transformation, except in exceptional circumstances where it can be demonstrated that no reasonable or feasible alternatives exist and where biodiversity objectives will not be compromised.

While the applicant has refined the development footprint and relocated the proposed dwelling further inland to avoid direct impacts on the coastal dune system, this refinement does not alter the fundamental constraint that the proposed development remains located entirely within a mapped CBA. The avoidance of the most sensitive portion of the site is acknowledged; however, avoidance within a CBA should not be interpreted as justification for development where the broader biodiversity objectives for the site remain inconsistent with additional habitat transformation.

The site supports indigenous vegetation, including Knysna Sand Fynbos, which is classified as Critically Endangered, and Goukamma Dune Thicket, which contributes to the ecological functioning of the adjacent coastal ecosystem. Even where the proposed footprint may avoid the highest-value habitat, the introduction of permanent residential infrastructure within an intact natural landscape is expected to result in direct habitat loss and long-term indirect impacts, including habitat fragmentation, edge effects, increased human disturbance, invasive alien plant introduction, altered fire regimes, domestic animal impacts, artificial lighting, noise and increased maintenance activities. These impacts cannot be fully mitigated through standard environmental management measures.



COMMENTS ON THE AMENDED DRAFT BASIC ASSESSMENT REPORT THE PROPOSED DEVELOPMENT OF A PRIMARY DWELLING AND ACCESS ROAD ON PORTION 79 OF FARM 205, RUYGTE VALLEY, SEDGEFIELD, WESTERN CAPE PROVINCE

The proposal must also be considered in the context of cumulative impacts. Incremental residential development within mapped CBAs contributes to the progressive erosion of biodiversity priorities and ecological connectivity. Although the footprint of a single dwelling may appear limited in isolation, repeated approvals of similar developments within biodiversity priority areas undermine the strategic objectives of the Western Cape Biodiversity Spatial Plan and reduce the effectiveness of systematic biodiversity planning. Decision-making should therefore consider not only the site-specific impacts but also the cumulative consequences of permitting further transformation within CBAs.

The alternatives assessment demonstrates that the preferred layout is environmentally preferable relative to other on-site alternatives. However, the assessment does not adequately demonstrate that the proposed activity itself is appropriate within a biodiversity priority area. The identification of a preferred alternative within a constrained site does not necessarily satisfy the requirement to demonstrate that the development represents the least environmentally damaging practicable alternative when viewed in the broader planning context. The assessment should distinguish between the least impactful layout and the broader question of whether development should occur on this site at all.

The environmental management principles contained in section 2 of the National Environmental Management Act, 1998, require that disturbance of ecosystems and loss of biological diversity be avoided, or where avoidance is not possible, minimised and remedied. The principles further require a risk-averse and precautionary approach where there is uncertainty regarding environmental impacts. Given the acknowledged biodiversity sensitivity of the property, the presence of Critically Endangered vegetation, the site's location entirely within a CBA, and its proximity to a highly sensitive coastal ecosystem, the precautionary principle should be afforded significant weight in the competent authority's decision.

Although mitigation measures proposed in the Environmental Management Programme are noted, mitigation cannot fully compensate for the permanent transformation of intact indigenous habitat or the long-term ecological consequences associated with residential occupation. In this instance, avoidance of development remains the most effective form of mitigation and is consistent with the management objectives applicable to Critical Biodiversity Areas.

Based on the available information, it is recommended that the proposed development not be authorised. The proposal is considered inconsistent with the biodiversity management objectives applicable to Critical Biodiversity Areas and would result in permanent transformation of a site identified as important for maintaining biodiversity pattern and ecological processes. While the applicant has demonstrated efforts to minimise impacts through refinement of the development footprint, these measures do not sufficiently overcome the fundamental biodiversity constraints associated with the site.

In conclusion, the Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@dffe.gov.za for the attention of Mr. Seoka Lekota.

Yours faithfully



Mr. Seoka Lekota

**Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Forestry, Fisheries & the Environment**

Letter signed by: Ms. M Rabothata

Designation: Control Biodiversity Officer Grade A: Biodiversity Conservation

Date: 08/07/2026