



South African  
NATIONAL PARKS

To develop, protect, expand, manage and promote a system of sustainable national parks that represents natural and cultural heritage assets, through innovation, excellence, responsible tourism and just socio-economic benefit for current and future generations.

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Western Cape Department of Environmental Affairs & Development  
Planning Reference No.: 16/3/3/6/7/1/D2/19/0099/24

**RE: PROPOSED RESIDENTIAL DWELLING AND GUEST ACCOMODATION UNITS ON ERF 301, HOEKWIL, WILDERNESS HEIGHTS, GEORGE MUNICIPALITY, WESTERN CAPE. BASIC ASSESSMENT, PRE-APPLICATION PHASE**

Erf 301, Whites Road, Hoekwil, Wilderness Heights, falls within the Garden Route National Park (GRNP) Buffer Zone and within the Coastal Protection Zone (CPZ). Achieving a conservation outcome on this property is important to SANParks.

A non-perennial river runs through the property along the property's eastern boundary from north to south (**Fig. 1**). A second north to south running non-perennial river borders the property outside to the west (**Fig. 5**). This is situated between 20 - 40m in places away from the property boundary. Critical Biodiversity Areas (CBA) are mapped as extending across the entire property (**Fig.1**). Critical Biodiversity Areas are required to be safeguarded in their natural or near-natural state because they are critical for conserving biodiversity and maintaining ecosystem functioning.

The property is mapped as predominantly Garden Route Granite Fynbos (FFg 5) (**Fig. 2**), which is listed as Critically Endangered (CE) in the National Environmental Management Biodiversity Act (Act No. 10 of 2004), Revised National List of Ecosystems that are Threatened and in Need of Protection GNR No. 2747, 18 November 2022. Goukamma Dune Thicket (AT 36), listed as of Least Concern (LC), is mapped in a small section of the lower south-western quadrant of the property.

Erf 301 is 3.96ha in extent and is zoned Agricultural Zone II (small holding). The property owner is Jeanne Lisa Holmes. The property is situated outside the Urban Edge.

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

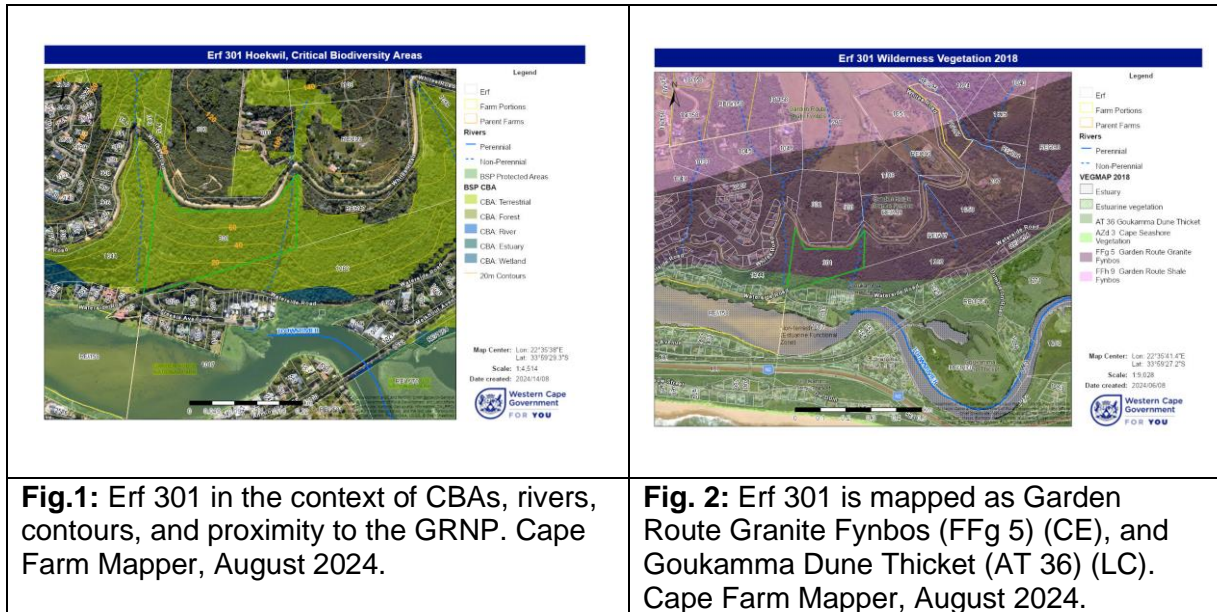
table mountain

tankwa karoo

tsitsikamma

west coast

wilderness



The application being commented on is a Basic Assessment (BA) in its Pre-application Phase.

The development proposal is described as follows:

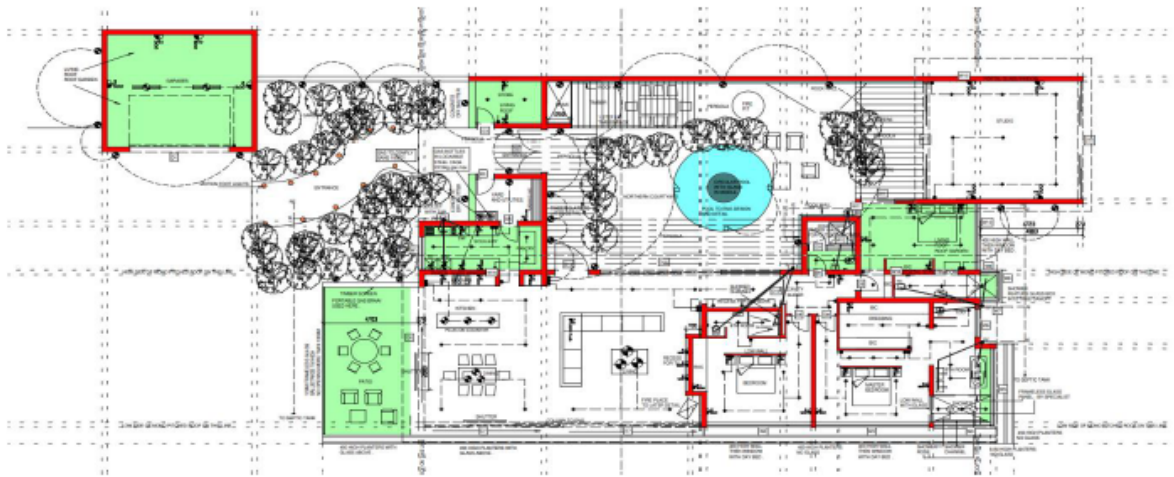
The proposal is for the development of a single residential dwelling with six (6) smaller guest units called "Pods". The 3-bedroom primary dwelling is positioned centrally on the property as close as possible to Whites Road to the north, with four (4) of the Pods to the west of it and another two (2) Pods directly south. The proposed development will proceed in two phases with the first phase including the construction of the primary dwelling with four of the Pods. The second phase will include the finalisation of the last two Pods.

The primary dwelling (including a store and garage) will have a footprint of 446 m<sup>2</sup> with the front half raised off the ground (on columns) to minimise the disturbance on vegetation and habitats, effectively reducing the permanent disturbance area to approximately 200 m<sup>2</sup>. Each of the pods will have a footprint of approximately 50 m<sup>2</sup>, with only a quarter of that area being levelled for construction as the rest of the pod areas will also be constructed on columns. This effectively reduces the permanent disturbance area to approximately 10 m<sup>2</sup>.

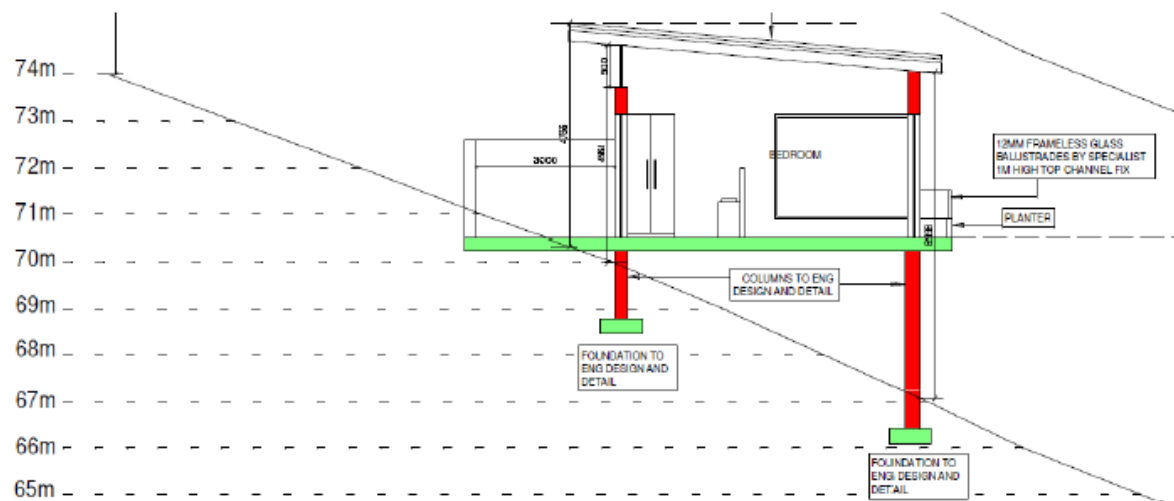
The single storey primary dwelling is proposed to have a mono-pitch roof to allow light in from the north and lower the total height of the structure. The proposed building plans (with the floor plan, elevations & sections) for the primary dwelling shows how the structure is accommodated within an 8.5m parallel line with the slope of the property (Appendix B1).

The tourist accommodation units will be one-bedroom units between the vegetation of ±50m<sup>2</sup> each, which includes outdoor spaces. It is also proposed to be mono-pitch, single storey structures with a maximum height of ±7.48m, as determined by the topography. The units will not be identical in size, but the building materials and finishes will be the same.

Some features of the primary dwelling will include a circular pool with island in the middle, living roof gardens, a braai area with pergola, and patio. Pods will each comprise a single bedroom, along with supplementary living amenities such as an adjoining bathroom. They will be constructed on columns and stabilized on platforms according to the engineer's design specifications.



**Figure 1: Roof Layout of main dwelling.**



**Figure 2: Elevation Plan of Pod.**

The total development footprint is 1 638 m<sup>2</sup> with a total coverage of 4.16%, as shown in Table 1 below. The estimated permanent disturbance area is based on the main dwelling and Pod units extending onto column, effectively elevating a portion of the structures above the ground whereby vegetation will remain or be able to regrow. The temporary disturbance area includes the installation of services and working areas during construction. These areas will be rehabilitated once construction is completed.

Estimated permanent and temporary measurements for the proposed development on Erf 301:

Erf size	39322 m <sup>2</sup>
<b>The estimated development footprint:</b>	
Main dwelling (including garage and storage)	446 m <sup>2</sup>
Six single Pods / Units	300 m <sup>2</sup> (50 m <sup>2</sup> each)
Access road and driveway platform	812 m <sup>2</sup>
Guest Parking	80 m <sup>2</sup>
Total development footprint	1 638 m <sup>2</sup>
Total footprint of site as a percentage	4.16 %

<b>The estimated permanent disturbance area:</b>	
Main dwelling (including garage and storage)	200m <sup>2</sup>
Six single Pods / Units	60 m <sup>2</sup> (10 m <sup>2</sup> each)
Access road and driveway platform	812 m <sup>2</sup>
Guest Parking	80 m <sup>2</sup>
Total disturbance footprint	1152 m <sup>2</sup>
Total footprint of site as a percentage	2.92 %
<b>The estimated temporary disturbance area:</b>	
2 meter working space around primary dwelling	140 m <sup>2</sup>
2 meter working space around guest units	390 m <sup>2</sup>
Septic tank installation 5m x 2m	10 m <sup>2</sup>
Security fence	450 m <sup>2</sup>
Electrical lines	60 m <sup>2</sup>
Total	1050 m <sup>2</sup>

A 2-meter working area will be necessary along the eastern and southern boundaries of the primary dwelling to accommodate the proposed development. This additional space is essential for certain construction techniques like scaffolding. Similarly, each guest unit will also be allocated the same working space around its perimeter.

It will be recommended to avoid disturbing vegetation during the installation of the security fence, utilizing "bossie kap" methods. Furthermore, it will be advised to navigate around existing vegetation, and that the installation should be coordinated in collaboration with an appointed Environmental Control Officer (ECO).

Once construction commences, any portion of the property beyond the designated working area will be strictly NO-GO area. Clear demarcations will be established before any construction activities begin. The development plan is structured to preserve the majority of the property in its natural vegetative state, with the house footprint minimized to accommodate the Applicant's primary needs while minimizing environmental impact.



Figure 3: Site Development Plan for Erf 301 Hoekwil in Wilderness.

Extracts taken from the Pre-application Basic Assessment Report, EcoRoute Environmental Consultancy, 5 July 2024.

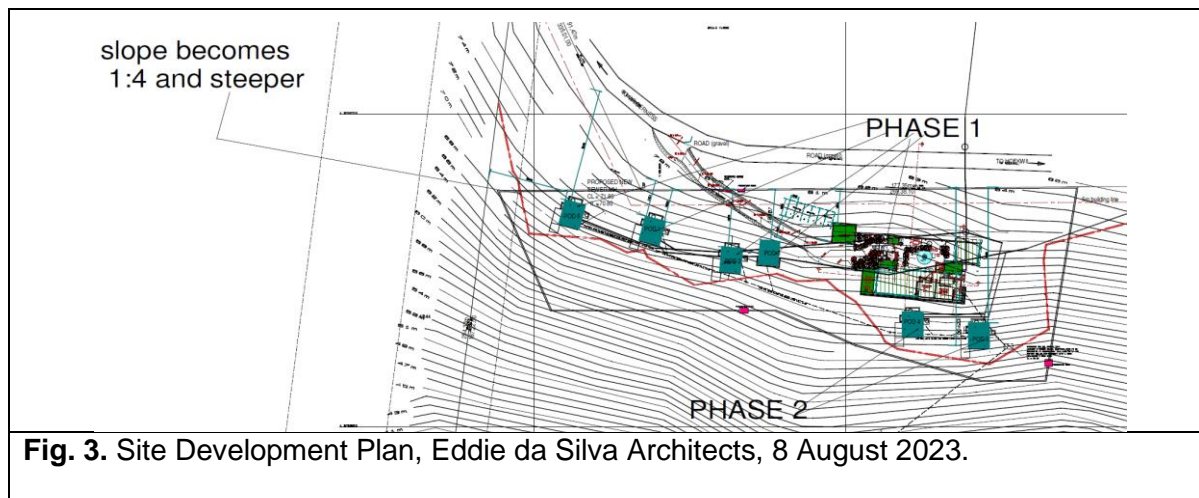


Fig. 3. Site Development Plan, Eddie da Silva Architects, 8 August 2023.

Site servicing stated in the BA Pre-application report is described as follows:

**Water** - A 50mm diameter water connection exists on the northeast corner of the site. The water line will be surface laid in flexi-hose pipe as per engineer specification to minimise disturbance. Water will be supplemented with rainwater harvesting.

**Sewerage** - An existing 160mm diameter municipal sewer line exist on the lower end of the property along its Southern boundary and Waterside Road. A switchback gravity sewer line with a series of back drop manhole structure is proposed to accommodate the steep site topography towards the southwest corner of the site. Sewage services for both the primary dwelling and guest units will be redirected to a single new 6 Kilo Liter septic tank, located on the east side of the property. The overflow pipe from the sewage connection will be linked to a conservancy tank positioned at the southern end of the property, near Waterside Road. The sewerage line will be surface laid in flexi-hose pipe as per engineer specification to minimise disturbance.

**Electricity** - From the municipal supply point, power supply cabling will be run underground via a typical narrow trench - 300mm(W) x 700mm (D).

**Stormwater** - Stormwater run-off will be directed into soft landscaping and dispersed over large sections of the property and surrounding natural vegetation to prevent concentrated run off and erosion. Concentrated run off from roofs will be diverted into rainwater harvesting tanks with an overflow connected to an artificially constructed swale to prevent erosion.

**Access** - Main access to the development is proposed from the northern boundary of the property leading out of Whites Road.

A Land Use application (LUA), by Marlize de Bruyn Planning is running concurrently with the BA Pre-application. The LUA includes re-zoning from Agriculture II (small holding) to Open Space III (nature conservation), with special consent being applied for, for tourist accommodation.

The BA Pre-application describes the LUA as follows:

It is necessary to rezone Erf 301 from Agriculture Zone II to Open Space Zone III. The primary land use right of this proposed zoning is nature conservation area with tourist accommodation as a consent use. The rezoning and land use application will be undertaken by Marlize de Bruyn Planning, and comprises the following<sup>4</sup>:

- ❖ Removal of Restrictive Conditions par. D(b) in terms of Section 15(2)(f) of the George Municipality: Land Use Planning By-Law, 2023;
- ❖ Rezoning in terms of Section 15(2)(a) of the George Municipality; Land Use Planning By-Law, 2023 from Agriculture Zone II (small holding) to Open Space Zone III (nature conservation area);
- ❖ Consent use in terms of Section 15(2)(o) of the George Municipality: Land Use Planning By-Law, 2023 for tourist accommodation;
- ❖ Permanent departure in terms of Section 15(2)(b) of the George Municipality: Land Use Planning By-Law, 2023 for the following:
  - Primary dwelling: increase in wall plate height from 6.5m to  $\pm 7.069\text{m}$  (south elevation),  $\pm 7.841\text{m}$  (east elevation) &  $\pm 8.037\text{m}$  (west elevation);
  - Tourist accommodation units: increase in wall plate height from 6.5m to  $\pm 6.336\text{m}$ ,  $\pm 6.998\text{m}$  and  $\pm 7.480\text{m}$  respectively.

On the northern elevation (facing Whites Road) the maximum height is  $\pm 4.61\text{m}$ , on the western elevation  $\pm 8.037\text{m}$ , the east elevation  $\pm 7.841\text{m}$  and the south elevation  $\pm 7.069\text{m}$ . These elevation heights are the height measured from natural ground level (NGL) to the wall plate height. According to the zoning by-law height from NGL to wall plate should be 6.5m. Due to the topography of the property, this is not possible. If the highest point of the proposed monopitch roof was turned to face

south and not north as in this instance, the wall plate height would have been complied with and the highest point of the mono pitch roof would in all probability complied with the maximum parameter of 8.5m. Facing the mono pitch roof to the south, would however cause the proposed dwelling to not follow the contours of the property and be higher than viewed from the south. The proposed design ensures that the primary dwelling is lower as viewed from the south.

SANParks (Dr. Vanessa Weyer) attended a site inspection on the 7<sup>th</sup> August 2024, together with the landowner representative, Mr. Sean Holmes, EcoRoute (Ms. Jocelyn Marshall and Mr. Justin Britton), Marlize de Bruyn Town Planners (Mrs. Marlize de Bruyn), Wilderness Ratepayers and Residents Association (WRRRA) (Mr. Balvindra Walter), Wilderness and Lakes Environmental Action Forum (WALEAF) (Mr. Charles Scott), and the Western Cape Government Department of Environmental Affairs and Development Planning (WC DEA&DP) (Mr. Francois Naude) (**Figs. 4 - 9**).



**Fig. 4:** Proposed property entrance situated on the western sector of property, to be taken off Whites Road.



**Fig. 5:** Non-perennial river bordering the property, situated outside to the west, draining north to south.



**Fig. 6:** Views onto the property. Photograph taken from Whites Road further west.



**Fig. 7:** Property road frontage along Waterside Road.



**Fig. 8:** Mature Yellowwood tree observed on the Waterside Road section of property.



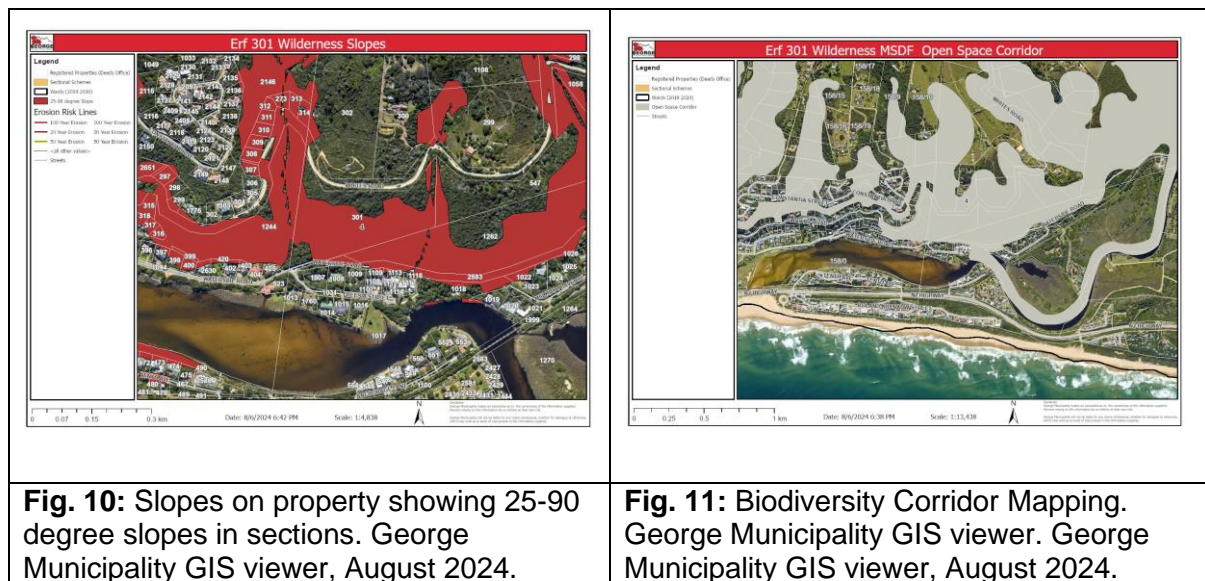
**Fig. 9:** Granite rock outcrop observed on Waterside Road section of property.

**Point 1: Disturbance Areas and Slope Stability**

The Environmental Assessment Practitioner (EAP) argues that as the front half of the dwellings will be raised on columns off the ground, disturbance areas will be less than the footprint areas. SANParks disagrees with this statement as regardless of levelling only occurring in one section, the building will still “shadow out” the entire area and occupy the entire footprint space in the landscape permanently. Disturbance areas may in fact be greater than the total stated footprint area of 1638m<sup>2</sup>. Area calculations appear not to have been included for embankments and retaining structures which will be required to stabilize the access road, driveway, parking, and building platforms, nor for the artificially constructed stormwater swale, and for developing on steep slope sections. Earthworks, soil movements and storage have not been factored in. A working area space of 2m around dwellings is not considered adequate for working on this challenging site.

The majority of the property is mapped as comprising of 25-90 degree slopes (**Fig. 10**). Although it is noted that the dwellings are planned to be sited in the less steep site areas, the steep slopes below have the potential to be impacted by vegetation removal, soil erosion, and water runoff. Open areas under the dwellings will require stabilisation, as vegetation is unlikely to grow under structures, due to low light conditions and the south-facing slopes.

No geotechnical study has been undertaken to determine site stability and the suitability of the site for construction. SANParks is concerned that the underlying granite (outcrops were observed on the southern portion of the site), with possible shallow soil depths could create slope instability/ slips in areas. Further clarity and investigation are warranted from a specialist. Slope stability is a concern as stability will likely be exacerbated by climate change affects.



**Point 2: Visual Impacts**

Although the EAP states that the “skyline would not be negatively affected”, by dwellings, SANParks believes that visual impacts may be considerable, and may negatively affect views from the adjacent park.

A specialist visual impact assessment has not been undertaken.



### **Point 3: Rezoning Agriculture II to Open Space III**

SANParks will support the rezoning of the property from Agriculture II to Open Space III and the tourism consent use. The property has valuable linkages into biodiversity corridors (**Fig. 11**) and is important for landscape functionality and connectivity in the region.

### **Point 4: Summary and Way Forward**

SANParks is concerned that the property is of high conservation value, with valuable landscape functionality and connectivity. It contains some of the last remaining indigenous vegetation in the Wilderness area, which is rapidly being transformed and lost mostly to housing, in response to a semigration influx of people into the region.

SANParks believes that visual impacts may be considerable and may negatively affect views, and the visitor experience from the adjacent park.

The property is predominantly steep with 25-90 degree slopes. Although it is noted that the dwellings are planned to be sited in the less steep site areas and on columns, the steep slopes below have the potential to be impacted by vegetation removal, soil erosion, and water runoff. Disturbance areas may be larger than stated due to the need for stabilisation structures and embankments, in response to developing on a steep site. No geotechnical study has been undertaken to determine site stability and the suitability of the site for construction. SANParks is concerned that the underlying granite (outcrops were observed on the southern portion of the site), with possible shallow soil depths could create slope instability/ slips in areas, which would be exacerbated by climate change affects. Clarity from a specialist is required.

SANParks will support a primary dwelling, provided that adequate mitigation measures are implemented to mitigate potential slope instability and negative visual impacts, and that the disturbance footprint is kept to a minimum. The landowner could investigate an alternative to use the primary dwelling as a dual guest house. SANParks will support the LUA tourism consent use, to facilitate this.

SANParks does not support the construction of the six pods, some of which appear to be situated on the 25-90 degree/ 1:4 and steeper slope areas or bordering these. SANParks believes that these pods will fragment the landscape and will set a dangerous precedent for neighboring properties, who will follow suit, resulting in cumulative impacts.

SANParks recommends that the landowner investigate formal or informal Biodiversity Stewardship Agreement options for the property, to safeguard the high biodiversity value of property and to enhance the corridor and landscape functionality and connectivity. Such an agreement should be included as a condition of approval. The property is currently not included in SANParks' Stewardship Land Inclusion Plan for Contract National Park (CNP), however discussions could be held with SANParks to ascertain if based on the high biodiversity value of the property, and a due diligence assessment, whether the property could be motivated for inclusion. Landowners may qualify for rates and tax incentives for CNP inclusion.

It is recommended that the following conditions are considered as conditions of approval:

- The design of buildings and/or structures is to blend into the natural landscape.
- No visually intrusive buildings and/or structures are to be erected.
- An indigenous plant rescue operation should be conducted prior to site clearance.
- Topsoil should be set-aside for reuse.
- Care should be taken during construction activities to limit soil erosion.

- Permeable paving surfaces should be used where possible to limit excess surface runoff.
- Fencing (post-construction), should this be required, should be kept to a minimum. The George Municipality Fencing Bylaw should be adhered to.
- Reduced and low lighting should be incorporated in the design to prevent night light pollution.
- 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.
- 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 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.
- 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, 84 of 1998, as amended.
- Should any resources of suspected heritage value be uncovered during clearing, Heritage Western Cape (HWC) must be contacted immediately for instructions.
- An Environmental Control Officer (ECO) should be appointed for the construction phase and monthly photographic compliance reports should be submitted.

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

Yours sincerely



Dr Vanessa Weyer  
Principal Planner  
Garden Route National Park

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