

From: OCEIA <OCEIA@dffe.gov.za>
Sent: Thursday, 22 May 2025 16:38
To: joclyn@ecoroute.co.za; OCEIA
Cc: admin@ecoroute.co.za; janet@ecoroute.co.za; Yolokazi Galada; Yvonne Mokadi; Sibusiso Mbethe; Tabisile Mhlana
Subject: DFFE comments on DEADP Ref: 16/3/3/1/D1/13/0001/25 - Draft Basic Assessment Report - Portion 91 Of Farm Matjiesfontein 304, Keurboomstrand, Plettenberg Bay, Western Cape

Good day Ms Marshal,

Apologies for the delayed response.

The Department of Forestry, Fisheries, and the Environment (DFFE); Branch Oceans & Coasts (O&C) appreciates the opportunity granted to provide comments and recommendations on the Draft Basic Assessment Report for the proposed residential development on portion 91 of Farm Matjes Fontein 304, Keurboomstrand, Plettenberg Bay, Western Cape province. This Branch provides comments based on the provisions of the National Environmental Management Act 107 of 1998 (“NEMA”) and the National Environmental Management: Integrated Coastal Management Act 24 of 2008 (“ICM Act”).

The Branch O&C has the mandate to ensure the holistic management of the coast, estuarine areas and maintenance of the seascapes to realise that the development and use of natural resources are sustainable. The Branch further ensures that the ecological integrity, natural character, and economic, social, and aesthetic value of the coastal zone are maintained to protect people, properties, and economic activities against the impacts of dynamic coastal processes. Please note the following comments;

1. The proposed development falls within the Coastal Protection Zone as defined in the ICM Act. It is observed that the area seaward of the proposed development has already been modified with residential development.
2. The proposed development will not affect the risk zones as delineated by the Western Cape Department of Environmental Affairs and Development Planning. However, it seems it could be affected by the Coastal Climate Change Vulnerability Assessment (CoVu) Coastal Flood Risk, please see the coastal viewer developed by DFFE at <https://ocims.environment.gov.za/coastal%20viewer/> . Section 3.5. page 51-52 of the BAR also to some extent confirms some coastal flooding in 1:100-year floodlines exacerbated by Climate Change and this may indeed be something to look at in the alternative designs.
3. It is noted that the Forestry Branch of DFFE was notified but could not provide comments. The recommendation by the EAP that if any protected tree is observed on the site, the Forestry Branch of DFFE in Knysna must be contacted is supported. The Knysna office can also be reached through Innocent Mapokgole at imapokgole@dffe.gov.za or Melanie Koen at mkoen@dffegov.za .
4. The Conservation Plan is supported but relevant authorities such as Forestry Branch of this Department need to be involved.
5. There seems to have been a lot of objections from the local community as per the previous PP. Meaningful consultation with the local community is important, where meetings are held and more information is presented for an informed consultation. In the *Sustaining the Wild Coast NPC and Others v Minister of Mineral Resources and Energy and Others (3491/2021) [2022] ZAECMKHC 55; 2022 (6) SA 589 (ECMK) (1 September 2022)*, the meaningful consultation was discussed at length, even

though that case dealt with mining matters but it brought sharply the meaning consultation involved in EIA applications.

6. According to the report on pg. 46 *“No freshwater features such as drainage lines, rivers or wetlands are indicated to occur within the footprint of the property or within proximity to the property”* The absence of mapped freshwater features such as drainage lines, rivers, or wetlands within or near the development footprint reduces the risk of direct impacts on freshwater ecosystems. However, it is recommended that indirect impacts on the estuary via altered hydrology, sedimentation, or pollution must still be carefully managed.
7. Despite the positive measures, the development footprint of approximately 4.15 hectares and associated infrastructure may still pose risks such as increased sedimentation, nutrient runoff, and habitat disturbance if not carefully managed. It is recommended that strict erosion and sediment control measures be implemented during construction to prevent sediment runoff from entering nearby watercourses and ultimately the estuary. The contractor/consultant is encouraged to provide training on best practices for erosion control, sediment management, and spill prevention to all site personnel.
8. It is indicated in the report that *“the development will be focused on the southern, flatter portion of the property where historical clearing of vegetation has taken place. This area is also aligned with the lower-lying contours of the site mapped as the EFZ”*. This necessitates precautionary measures to avoid degradation of estuarine water quality and habitat.
9. The report states that *“the northern portion of the property is steep and forested, while the southern portion is very flat with pasture currently grazed by horses. The development will be focused on the southern, flatter portion of the property where historical clearing of vegetation has taken place. This area is also aligned with the lower-lying contours of the site mapped as the EFZ”*. It is recommended that the northern steep and forested portion of the property likely provides important ecological functions such as habitat connectivity, erosion control, and groundwater recharge, which benefit the estuarine system downstream. These areas should be conserved and protected from disturbance.
10. The southern flat pasture area, currently grazed by horses and targeted for development, may be suitable for construction; however, it still requires measures to prevent runoff, sedimentation, and nutrient loading into the estuary.
11. The Branch O&C, however, does not object to the proposed development.

If further comments or engagement are required with regards to estuarine functional areas, correspondence must be addressed to [@OCEIA](#) and further engagement with Estuary team will be coordinated. Kindly note that the Branch Oceans and Coasts reserves the right to revise its comments and request further information based on any additional information received.

Enkosi
Sibusiso Mbethe
Specialised Environmental Officer & PSA Secretary
Directorate: Coastal Development & Coordination
Chief Directorate: Integrated Coastal Management
Branch: Oceans and Coasts
V&A Waterfront,
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“A genuine leader is not a searcher for consensus, but a molder of consensus” Martin Luther King, JR.

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

Sent: Wednesday, 21 May 2025 15:23

To: Yolokazi Galada <YGalada@dffe.gov.za>; OCEIA <OCEIA@dffe.gov.za>; Rueben Molale <RMolale@dffe.gov.za>

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

Subject: RE: Notification of Public Participation: DEADP Ref: 16/3/3/1/D1/13/0001/25 - Draft Basic Assessment Report - Portion 91 Of Farm Matjiesfontein 304, Keurboomstrand, Plettenberg Bay, Western Cape

Good Day All

I trust you are well.

I am following up on the email below. Please can you kindly provide your comments.

Much appreciated.

Kind Regards,

Joclyn Marshall

MSc Environmental Science

EAPASA 2022/5006

072 126 6393



Eco Route
Environmental Consultancy

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

Sent: Monday, 05 May 2025 13:24

To: 'Yolokazi Galada' <YGalada@dffe.gov.za>; 'OCEIA' <OCEIA@dffe.gov.za>; 'Rueben Molale' <RMolale@dffe.gov.za>

Cc: 'admin@ecoroute.co.za' <admin@ecoroute.co.za>; 'janet@ecoroute.co.za' <janet@ecoroute.co.za>; 'Steve Kleinhans' <Steve.Kleinhans@westerncape.gov.za>; 'Francois Naude' <Francois.Naude@westerncape.gov.za>

Subject: RE: Notification of Public Participation: DEADP Ref: 16/3/3/1/D1/13/0001/25 - Draft Basic Assessment Report - Portion 91 Of Farm Matjiesfontein 304, Keurboomstrand, Plettenberg Bay, Western Cape

Good Day All

Thank you for your response.

The public participation period for the Draft BAR was between 24 March – 25 April 2025. The deadline for submission of the Final BAR is 9 June 2025.

Please may I kindly ask that you provide comment by 16 May 2025 to provide sufficient time to response accordingly.

I hope you will find this acceptable.

Kind Regards,

Joclyn Marshall

MSc Environmental Science

EAPASA 2022/5006

072 126 6393



From: Yolokazi Galada <YGalada@dffe.gov.za>
Sent: Wednesday, 30 April 2025 10:38
To: OCEIA <OCEIA@dffe.gov.za>; joclyn@ecoroute.co.za; Rueben Molale <RMolale@dffe.gov.za>
Cc: admin@ecoroute.co.za; janet@ecoroute.co.za; 'Steve Kleinmans' <Steve.Kleinmans@westerncape.gov.za>; Francois Naude <Francois.Naude@westerncape.gov.za>
Subject: RE: Notification of Public Participation: DEADP Ref: 16/3/3/1/D1/13/0001/25 - Draft Basic Assessment Report - Portion 91 Of Farm Matjiesfontein 304, Keurboomstrand, Plettenberg Bay, Western Cape

Dear Colleagues

The below communication is noted and well received. We are just awaiting confirmation of timeframe to provide comments. Many Thanks

Regards
Yolo

From: OCEIA <OCEIA@dffe.gov.za>
Sent: Friday, 25 April 2025 15:06
To: joclyn@ecoroute.co.za; Rueben Molale <RMolale@dffe.gov.za>; OCEIA <OCEIA@dffe.gov.za>; Yolokazi Galada <YGalada@dffe.gov.za>
Cc: admin@ecoroute.co.za; janet@ecoroute.co.za; 'Steve Kleinmans' <Steve.Kleinmans@westerncape.gov.za>; Francois Naude <Francois.Naude@westerncape.gov.za>
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Good day Joclyn,

Can you please indicate the timeframe?

[@Yolokazi Galada](#), we will facilitate- please receive the request below.

Enkosi
Sibusiso Mbethe
Specialised Environmental Officer & PSA Secretary
Directorate: Coastal Development & Coordination
Chief Directorate: Integrated Coastal Management
Branch: Oceans and Coasts
V&A Waterfront,
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“A genuine leader is not a searcher for consensus, but a molder of consensus” Martin Luther King, JR.

From: joclyn@ecoroute.co.za <joclyn@ecoroute.co.za>
Sent: Friday, 25 April 2025 10:00
To: Rueben Molale <RMolale@dffe.gov.za>; OCEIA <OCEIA@dffe.gov.za>
Cc: admin@ecoroute.co.za; janet@ecoroute.co.za; 'Steve Kleinmans' <Steve.Kleinmans@westerncape.gov.za>;

Francois Naude <Francois.Naude@westerncape.gov.za>

Subject: FW: Notification of Public Participation: DEADP Ref: 16/3/3/1/D1/13/0001/25 - Draft Basic Assessment Report - Portion 91 Of Farm Matjiesfontein 304, Keurboomstrand, Plettenberg Bay, Western Cape

Dear Mr Molale

We are in the application phase for the proposed Residential Development on Portion 91 of the Farm 304 Matjes Fontein in the Keurbooms area, Plettenberg Bay.

We have been requested by DEA&DP to obtain comments from Branch Oceans & Coasts (Estuary Management) within the National Department Fisheries Forestry and the Environment. Written comment is required in respect of the impact of the proposed development on the EFZ and *vice versa*.

Please can you assist in providing comment. All documents can be downloaded from our website on the link below. Otherwise, I can send documents you may require.

[Draft Basic Assessment Report : Proposed Residential Development on Portion 91 of Farm Matjiesfontein 304, Keurboomstrand, Plettenberg Bay, Western Cape | Eco Route](#)

I look forward to your response.

Kind Regards,

Joclyn Marshall

MSc Environmental Science
EAPASA 2022/5006
072 126 6393



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

Sent: Thursday, 20 March 2025 13:57

To: Danie.Swanepoel@westerncape.gov.za; Steve.Kleinbans@westerncape.gov.za; Francois.Naude@westerncape.gov.za; RMolale@dffe.gov.za; oceia@environment.gov.za; BCAdmin@environment.gov.za; tnethononda@dffe.gov.za; Nathan.Jacobs@westerncape.gov.za; Noluvo.Toto@westerncape.gov.za; Stephanie.barnardt@westerncape.gov.za; Azni.November@westerncape.gov.za; 'Vanessa Stoffels' <Vanessa.Stoffels@westerncape.gov.za>; RobertsJ@dwa.gov.za; 'Cor Van der Walt' <Cor.VanderWalt@westerncape.gov.za>; 'Brandon Layman' <Brandon.Layman@westerncape.gov.za>; leptieshaam.Bekko@westerncape.gov.za; Mercia.Liddle@westerncape.gov.za; Hilda.Hayward@westerncape.gov.za; Ryan.Apolles@westerncape.gov.za; 'Melanie Koen' <Mkoen@dffe.gov.za>

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

Subject: Notification of Public Participation: DEADP Ref: 16/3/3/1/D1/13/0001/25 - Draft Basic Assessment Report - Portion 91 Of Farm Matjiesfontein 304, Keurboomstrand, Plettenberg Bay, Western Cape

Good day,

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

<https://we.tl/t-UF0e3y3nqc>

A 30-day public participation for the Draft BAR will be held from **24/03/2025 – 25/04/2025**.

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:
<https://www.ecoroute.co.za/node/67>

ENVIRONMENTAL ASSESSMENT PROC

Notification of Public Participation:

The Proposed Residential Development on Portion 91 of Farm 304, Keurboomstrand, Plettenberg Bay, Western

Notice is hereby provided in terms of the National Environmental Management Act (Act 101 of 1998), the National Environmental Management Act: Environmental Regulations 2014, as amended, of a 30-day Public Participation Process under the authority of the Department of Environmental Affairs and Forestry (DEA&DP). The Public Participation Process will run from **24/03/2025 – 25**

DEADP Ref: 16/3/3/1/D1/13/0001/25

Activity:

The Basic Assessment Application is for the proposed development of income residential development on Portion 91 of Farm Matjesfontein 304. The development concept includes 60 group housing stands with average 3 houses will vary in size but will be built in a similar style that will enhance the quality of the neighbourhood. Ample open spaces and landscaped streets are incorporated to enhance the quality of the neighbourhood.

The following EIA Listed Activities are applicable:

Government Notice No. R327 (Listing Notice 1): Activity 12(ii)(c), 27 & 28

Government Notice No. R324 (Listing Notice 3): Activity 4(i) (ii) (aa) & (bb) & 14(ii) (c) (i) (hh)

A Draft Basic Assessment Report and relevant appendices will be registered Interested and Affected Parties (I&APs) for public review and documents may be accessed via our website during the public participation period.

Should you wish to gain further information regarding the project or 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 whether you have a direct business, financial, personal, or other interest which you may have in the project. Please note that information submitted by I&AP's becomes public information in terms of the Protection of Personal Information Act 4 of 2013 (POPIA), no personal information will be made available to the public.

Environmental Assessment Practitioner: Joclyn Marshall (EAPASA Reg 21)

www.ecoroute.co.za
P.O. Box 1252, Sedgefield, 6573
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Cell: 082 55 77 122



Kind Regards,

Joclyn Marshall

MSc Environmental Science

EAPASA 2022/5006

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