



Comments and Response Report

The Proposed Development of a Small Beachfront Security Estate on Portions 66 and 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape.

DEA&DP Ref. No: 16/3/3/5/D1/14/0011/25

APPROACH

The public participation process for the Project was undertaken with due reference to Section 39 of the EIA Regulations, 2014 (as amended). Specifically, this comprised the following activities:

- The Notice of Intent to Submit an application was submitted to the Department of Environmental Affairs and Development Planning (DEA&DP) in 02 December 2024, and acknowledged on 20 February 2025.
- A 30-Day Pre-Application Public Participation Process was undertaken which ran from 05 June 2025 to 07 July 2025.
- All Registered Interested and Affected Parties identified in the BAR process were notified of the Amendment via email. Registered I&AP's that do not have email addressed were notified via registered mail.
- Advertisement of the Amendment Application was done via the local newspaper, the Knysna-Plett Herald.
- Two site signs were placed at the site in areas that can be easily viewed by the public.
- All documents were made available on the Eco Route website.
- A second 30-Day Public Participation Process will be undertaken following the submission of the Amendment application to DEA&DP.
- A stakeholder and Interested and Affected Parties (I&AP) database was prepared for the project (Annexure 3).
- The preparation of an Issues Trail, listing the comments received throughout the public participation process to date (Annexure 4).
- BOCMA consultation regarding WULA is incorporated into Annexure 5
- Evidence of comments received have been included in Annexure 6.
- Evidence of notifications sent to I&APs have been included in Annexure 7. Emails sent to private individuals have been excluded from annexure 2 due to the POPI Act.

AMENDMENT APPLICATION

Notification of Public Participation:

Part 2 Amendment Application for the Athina Estate on Portion 66 and 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape.

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended) of the Amendment of a valid Environmental Authorisation. A 30-day Public Participation Process will be undertaken under the authority of the Department of Environmental Affairs and Development Planning (DEA&DP).

The Public Participation Process will run from **05/06/2025 – 07/07/2025**.

DEADP Ref for EA: **16/3/3/1/D1/14/0028/22**

DEADP Ref for Amendment: **16/3/3/5/D1/14/0007/24**

Location and Activity:

The Part 2 Amendment is for the Athina Estate development on Portion 66 and 67 of the Farm Brakkloof 443 in the Bitou Municipality, Plettenberg Bay, Western Cape. The Environmental Authorisation was issued on 31 July 2024 which approved the development of 9 residential stands with associated infrastructure and communal open space. A Part 1 Amendment was approved on 14 June 2024 for amendments to the SDP which included the realignment of the internal road and minor realignment of the five beachfront erven. The new proposed changes to the SDP are as follows:

- The amendment of the Site Development Plan ("SDP") to reflect a boardwalk instead of a footpath.
- A revised layout proposed for the amendment of building plates that will have an overall reduction in the development footprint of the building plates for P06 and P07.

The following Listed Activities in terms of the EIA Regulation 2014 as per the EA (16/3/3/1/D1/14/0028/22), are relevant:

- Government Notice No. R327 (Listing Notice 1): Activity 17(v)(e) & 19A(ii)
- Government Notice No. R324 (Listing Notice 3): 12(i)(iii)

A Part 2 Amendment Application and relevant appendices will be made available to all registered Interested and Affected Parties (I&AP's) for public review and comment. All relevant documents may be accessed via our website (www.ecoroute.co.za) during the public participation period.

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
Joclyn Marshall (EAPASA Reg 2022/5006)
P.O. Box 1252, Sedgefield, 6573
Email: admin@ecoroute.co.za
Cell: 072 126 6393



Figure 1: Advert placed in the Knysna-Plett Herald on 05 June 2025.



Figure 2: Site sign placed on portion 66 and 67 of 443 Brakkakloof, coordinates 34° 5'23.63"S, 23°22'8.90"E.



Figure 3: Site sign placed on portion 66 and 67 of 443 Brakkakloof, coordinates 34° 5'26.87"S , 23°22'10.37"E.

Annexure 2: Notification to Stakeholders and I&AP's



NOTIFICATION OF PUBLIC PARTICIPATION: Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

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

Date Thu 05 Jun 2025 13:19

To 'Danie Swanepoel' <Danie.Swanepoel@westerncape.gov.za>; 'Francois Naude' <Francois.Naude@westerncape.gov.za>; Dorien.Werth@westerncape.gov.za <Dorien.Werth@westerncape.gov.za>; Nathan Jacobs <Nathan.Jacobs@westerncape.gov.za>; BCAdmin@environment.gov.za <BCAdmin@environment.gov.za>; RMolale@dfpe.gov.za <RMolale@dfpe.gov.za>; OCEIA <OCEIA@dfpe.gov.za>; OCeia@environment.gov.za <OCEIA@environment.gov.za>; BNcube@dfpe.gov.za <BNcube@dfpe.gov.za>; Lydia Kutu <LKutu@dfpe.gov.za>; Thivhulawi Nethononda <Tnethononda@dfpe.gov.za>; Noluvo.Toto@westerncape.gov.za <Noluvo.Toto@westerncape.gov.za>; Stephanie Barnardt <Stephanie.barnardt@westerncape.gov.za>; Azni.November@westerncape.gov.za <Azni.November@westerncape.gov.za>; Dirk.Prinsloo@westerncape.gov.za <Dirk.Prinsloo@westerncape.gov.za>; RobertsJ@dws.gov.za <robertsj@dws.gov.za>; 'Cor Van der Walt' <Cor.VanderWalt@westerncape.gov.za>; 'Brandon Layman' <Brandon.Layman@westerncape.gov.za>; Vanessa Stoffels <vanessa.stoffels@westerncape.gov.za>; Melanie Koen <mkoen@dfpe.gov.za>

Cc joclyn@ecoroute.co.za <joclyn@ecoroute.co.za>; 'Janet' <janet@ecoroute.co.za>

Good day,

Kindly find below link to the Part 2 Amendment and relevant appendices.

<https://we.tl/t-5UuHufYBev>

Amendment Application For the ATHINA ESTATE-05.06.2025.pdf

12 files sent via WeTransfer, the simplest way to send your files around the world

we.tl

A 30-day public participation will be held from **05/06/2025 – 07/07/2025**. 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:

[Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape | Eco Route](#)

NOTIFICATION OF PUBLIC PARTICIPATION: Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

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

Date Thu 05 Jun 2025 13:21

To Andiswa Sam <asam@bocma.co.za>; rmphahlele@bocma.co.za <rmphahlele@bocma.co.za>; Sbonelo Ndlovu <sndlovu@bocma.co.za>; Megan Simons <msimons@capenature.co.za>; abrahamsN@nra.co.za <abrahamsn@nra.co.za>; managerfpa@gmail.com <managerfpa@gmail.com>; 'Vanessa Weyer' <vanessa.weyer@sanparks.org>; environment@caa.co.za <environment@caa.co.za>

Cc joclyn@ecoroute.co.za <joclyn@ecoroute.co.za>; 'Janet' <janet@ecoroute.co.za>

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NOTIFICATION OF PUBLIC PARTICIPATION: Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

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

Date Thu 05 Jun 2025 13:27

To cschliemann@plett.gov.za <cschliemann@plett.gov.za>; mrhode@plett.gov.za <mrhode@plett.gov.za>; 'Anjé Minne' <aminne@plett.gov.za>; info@gardenroute.gov.za <info@gardenroute.gov.za>; Nina Viljoen (Dr) <nina@gardenroute.gov.za>

Cc joclyn@ecoroute.co.za <joclyn@ecoroute.co.za>; 'Janet' <janet@ecoroute.co.za>

Good day,

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Environmental Assessment Practitioner
Joclyn Marshall (EAPASA Reg 2022/5006)
P.O. Box 1252, Sedgfield, 6573
Email: admin@ecoroute.co.za
Cell: 072 126 6393

ECO-ROUTE
ENVIRONMENTAL
CONSULTANCY



REGISTRATION NO. 1998/031976/23

Annexure 3: Interested and Affected Parties Database

STATE DEPARTMENTS			
Name	Contact Person	Contact Details	Email
Department of Environmental Affairs and Development Planning (DEA & DP)	Francois Naude Dorien Werth	Private Bag x 6509, George, 6530 044 814 2013 (T)	Francois.Naude@westerncape.gov.za Dorien.Werth@westerncape.gov.za
Department of Health	Nathan Jacobs	Private Bag x6592, George, 6530 044-803 2727 (T) 044-873 5929 (F)	Nathan.Jacobs@westerncape.gov.za
Department of Environmental Affairs and Development Planning (DEA & DP)	Danie Swanepoel		Danie.Swanepoel@westerncape.gov.za
DFFE Directorate: Biodiversity & Conservation	Mr Seoka Lekota	Environmental House 473 Steve Biko, Arcadia Pretoria 0083	BCAdmin@environment.gov.za
DFFE: Oceans and Coast	Rueben Molale		RMolale@dfre.gov.za OCeia@environment.gov.za OCEIA@dfre.gov.za

Department of Forestry, Fisheries and the Environment (DFFE): Integrated Environmental Authorisations	Ms Bathandwa Ncube Ms Lydia Kutu	012 399 9368 (T)	BNcube@dfre.gov.za LKutu@dfre.gov.za
DFFE Protected Areas, Planning and Management Effectiveness	Mr Thivhulawi Nethononda	Environmental House 473 Steve Biko, Arcadia Pretoria 0083	Tnethononda@dfre.gov.za
Heritage Western Cape	Noluvo Toto Stephanie Barnardt	Private Bag x9067, Cape Town, 8000 021-483 9729 (T) 021-483 9845 (F)	Noluvo.Toto@westerncape.gov.za Stephanie.barnardt@westerncape.gov.za
Provincial Roads Dept	Azni November Dirk Prinsloo	Private Bag x617, Oudtshoorn, 6620 044 272 6071 (T) 044 272 7243 (F)	Azni.November@westerncape.gov.za Dirk.Prinsloo@westerncape.gov.za
Department of Water & Sanitation	John Roberts	Private Bag x16, Sanlamhof, 7532 021 941 6179 (T) 021 941 6082 (F)	RobertsJ@dwa.gov.za
Dept of Agriculture Land Use Management	Cor van der Walt Brandon Layman	Private Bag x1, Elsenburg, 7601 021 808 5099 (T)	Cor.VanderWalt@westerncape.gov.za Brandon.Layman@westerncape.gov.za
Transport & Public Works / Department of Infrastructure	Vanessa Stoffels	24 th Floor, 9 Lower Burg Street, Cape Town 021 483 4669 (T)	Vanessa.Stoffels@westerncape.gov.za

DAFF: Forestry Management	Melanie Koen	Private Bag x12, Knysna, 6570 044 302 6902 (T) 044 382 5461 (F)	MKoen@dffe.gov.za
Coastal Management Unit, DEA&DP	leptieshaam Bekko Mercia J Liddle Hilda Hayward Ryan Apolles	Private Bag x9086, Cape Town, 8000 021 483 3370 (T) 078 744 9205 (Cell) leptieshaam Bekko)	leptieshaam.Bekko@westerncape.gov.za Mercia.Liddle@westerncape.gov.za Hilda.Hayward@westerncape.gov.za Ryan.Apolles@westerncape.gov.za
Department of Rural Develop. & Land Reform	Melvin Schwartz	P.O. Box 872 George 6530	Melvin.schwartz@dalrrd.gov.za
ORGANS OF STATE			
Name	Contact Person	Contact Details	Email
Breede-Olifants Catchment Management Agency	Andiswa Sam R Mphahlele SI Ndlovu	PO Box 1205, George, 6530 023 346 8000 (T) 023 347 2012 (F)	asam@bocma.co.za rmphahlele@bocma.co.za sndlovu@bocma.co.za
Cape Nature Land Use Advice	Megan Simons	Private Bag x6546, George, 6530 044 802 5328 (T)	msimons@capenature.co.za
SANRAL	Nicole Abrahams	Private Bag x19, Bellville, 7530 021 957 4602 (T)	AbrahamsN@nra.co.za
Southern Cape Fire Protection Agency	Dirk Smit	Private Bag x12, Knysna, 6570 044 302 6912 (T) 086 616 1682 (F)	managerfpa@gmail.com

SANPARKS	Dr. Vanessa Weyer	PO Box 3542, Knysna, 6570 044 302 5600 (T)	Vanessa.Weyer@sanparks.org
South African Civil Aviation Authority	Canny Mosebjadi Mothapo	083 461 6292	environment@caa.co.za
MUNICIPALITIES			
Name	Contact Person	Contact Details	Email
Bitou Municipality	Chris Schliemann	PO Box 255, Plettenberg Bay, 6600 044 501 3324 (T) 086 659 7954 (F) 083 628 4001	cschliemann@plett.gov.za
Bitou Municipality	Michael Rhode	PO Box 255, Plettenberg Bay, 6600 044 501 3264 (T) 044 533 3485 (F)	mrhode@plett.gov.za
Bitou Municipality	Anje Minne	PO Box 255, Plettenberg Bay, 6600 044 501 3318 (T) 044 533 6885 (F)	aminne@plett.gov.za
Garden Route District Municipality	Mr. Lusanda Menze	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	info@gardenroute.gov.za
Garden Route District Municipality	Dr. Nina Viljoen	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	nina@gardenroute.gov.za
PUBLIC			
Portion No.	Contact Person	Contact Details	Email
The Ivor Karan Trust (Portion 88 of the farm Brakkloof 443)	Ivor Karan		

Portion 89A and 112	Albert van der Merwe obo Almerwe Trust		
Erf 65 / 443	Bruce Anderson obo Jacobs Anderson Share Block		
Erf 65 / 443	Trevor Charles Frost Family Trust obo Jacobs/Anderson Share Block		
<ul style="list-style-type: none"> • Plett Erven 3959 / 3960 / 3961 (Celsum 1069 (Pty) Ltd • Plett Erf 3958 (Philippus Greeff Joubert) • Plett Erf 12906 (BF Solar (Pty) Ltd • Plett Erf 13006 (Ursula Walter Kruse & Carlos Maria Criado Perez Trefault) • Plett Er 13011 (Schnitzel Von Krumm Investments (Pty) Ltd) • Plett Erf 13012 (H Pretorius) • Plett Erf 13013 (Iyakhula II Trust) • Plett Erf 13015 (IS Projects CC) • Plett Erf 13016 (V Hulme) • Plett Erf 13018 (A Mulckhuyse) 	Marika Vreken obo Duin & See Homeowners Association		
Erf 87 / 443	Delarey Viljoen obo Mr PK Gain		
Erf 87 / 443	Hilland and Associates obo Peter Gain / Cathy Avierinos		
	EcoVive on behalf of Plett Environmental Forum		

	S Comline Plettenberg Bay Ratepayers and Residents Association		
	K. Otto		

Annexure 4: Issues and Response Register

COMMENTS	RESPONSE
COMMENTS RECEIVED IN RESPONSE TO NOTICE OF INTENT (NOI) DATED 05 JUNE 2025	
Department of Environmental Affairs and Development Planning (DEA&DP) – 20/02/2025	
<p>ACKNOWLEDGEMENT OF AND COMMENT ON THE NOTICE OF INTENT TO SUBMIT AN APPLICATION IN TERMS OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (DEA&DP REF. 16/3/3/1/D1/14/0028/22 ISSUED ON 31 JULY 2022) FOR THE DEVELOPMENT OF A BEACHFRONT SECURITY ESTATE ON PORTION 66 & 67 OF FARM 443, PLETTENBERG BAY, WESTERN CAPE</p> <p>1. The abovementioned document compiled by the appointed Environmental Assessment Practitioner, Ms. Joclyn Marshall (EAPASA No: 2022/5006), of Eco Route (Pty) Ltd., received by this Directorate via electronic mail on 02 December 2024, refers.</p> <p>2. This letter serves as an acknowledgment of receipt of the aforementioned document by this Directorate.</p> <p>3. This Directorate considered the previous Notice of Intent which was submitted on 03 October 2024 with the ref 16/3/3/6/7/5/D1/14/0311/24.</p> <p>4. This Directorate has reviewed the documents and provides the following comment and guidance:</p>	
<p>4.1. It is noted that the proposal entails the amendment of the Site Development Plan ("SDP") to reflect a boardwalk instead of a footpath. The boardwalk extends beyond the approved development footprint.</p> <p>4.2. Furthermore, there is a revised layout proposed for the amendment of building plates that will have an overall reduction in the development footprint of the building plates for P06 and P07; however, the proposed building footprints will extend beyond those previously assessed.</p> <p>4.3. According to the proposed changes to the SDP, it is noted that PO8 with the additional building plate will transverses the existing erven boundary.</p>	<p>The Application submitted on 7 July 2025 to DEA&DP is that of a Part 2 Amendment.</p> <p>A further proposed amendment has been included in the Draft Amendment Application for the amendment of Condition 21 as contained in the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025. This is highlighted as red in the document.</p> <p>Condition 21 – <i>The Holder must ensure the development provides the public unrestricted access to the coastal public property. A coastal access point should be established and maintained on the site.</i></p>

<p>Therefor there will be additional impacts that was not assessed in the previous Environmental Authorisation.</p> <p>4.4. Considering the impacts during the construction phase and the operational phase, there will be a change in the visual and landscaping impacts. These further highlight that there will be additional impacts which were not assessed when the initial application for Environmental Authorisation was considered.</p> <p>4.5. The latest proposal to amendment the Environmental Authorisation (i.e., changes to the approved SDP) will result in a change to the scope of a valid environmental authorisation where such change will result in an increased level or change in the nature of impact where such level of or change in the nature of the impact was not</p> <ul style="list-style-type: none"> assessed and included in the initial application for environmental authorisation; or taken into consideration in the initial application Environment authorisation. <p>This view is supported by the changes to the building plates / footprints and the development of a boardwalk, which were not previously assessed nor taken into account in the initial application for environmental authorisation.</p> <p>The application to amend the Environmental Authorisation (Ref. 16/3/3/1/D1/14/0028/22 issued on 31 July 2022) must therefore follow the process described in Part 2 of Chapter 5 of the Environmental Impact Assessment Regulations, 2014, and not Part 1 as suggested in the NOI Form.</p>	<p>It is proposed to amend this condition to the following –</p> <p><i>The Holder must ensure that access to the coastal public property over the servitude right of way is not restricted in accordance with the title deed condition.</i></p>
<p>4.6. Please be advised that in accordance with Regulation 12(1) you are required to appoint a registered environmental assessment practitioner (EAP) to manage the application which must be submitted in terms of Part 2 of Chapter 5 of the Environmental Impact Assessment Regulations, 2014. Such an EAP must comply with the prescripts set out in Regulation 13 of the Environmental Impact Assessment Regulations, 2014, amongst others being "independent".</p> <p>Whereas, "independent", in relation to an EAP, a specialist or the person responsible for the preparation of an environmental audit report, means—</p>	<p>It has been confirmed by the Applicant that Eco Route Environmental Consultancy is no longer the Environmental Control Officer for Athina Estate. The ECO contract for the Construction and Rehabilitation phase has been completed.</p> <p>An external audit report was submitted to DEA&DP by an independent EAP in May 2025 on closure of the initial construction works.</p> <p>Confirmation letter from the Applicant is included below. Please also see Appendix Q. The EAP's CV is also attached as Appendix Q.</p>

(a) that such EAP, specialist or person has no business, financial, personal or other interest in the activity or application in respect of which that EAP, specialist or person is appointed in terms of these Regulations; or
(b) that there are no circumstances that may compromise the objectivity of that EAP, specialist or person in performing such work;
excluding—

(i) normal remuneration for a specialist permanently employed by the EAP;
or
(ii) fair remuneration for work performed in connection with that activity, application or environmental audit.

Furthermore, in accordance with Regulation 12(3) you must take all reasonable steps to verify whether the EAP complies with Regulation 13(1)(a) and 13(1)(b), meaning that you must verify that the EAP is independent and that they have expertise in conducting environmental impact assessments or undertaking specialist work as required, including knowledge of the National Environmental Management Act, 1998 (Act No. 107 of 1998, as amended) ("NEMA"), these Environmental Impact Assessment Regulations, 2014 and any guidelines that have relevance to the proposed activity.

It is understood that **Eco Route Environmental Consultancy** is currently appointed to undertake the ongoing environmental control officer (ECO) responsibilities as stipulated in the Environmental Authorisation (Ref. 16/3/3/1/D1/14/0028/22 issued on 31 July 2022) until the activities are concluded. In light of the current business and/or financial interest, it appears that neither *Eco Route Environmental Consultancy's* or an EAP in its employ, will conform to the definition of 'independent' should they be appointed to manage the intended application for the amendment of the Environmental Authorisation (Ref. 16/3/3/1/D1/14/0028/22 issued on 31 July 2022) in terms of Part 2 of Chapter 5 of the Environmental Impact Assessment Regulations, 2014.

You are advised to verify the requirements of Regulation 13(1)(a) and (b) prior to the appointment of such a registered person to manage your intended application, or to ensure that you can demonstrate that the requirements of Regulations 13(2) and 13(3) of the Environmental Impact Assessment Regulations, 2014 have been complied with.

4.7. Please note that it is the responsibility of the applicant / proponent / EAP to ascertain whether subsequent versions of the NOI have been published or produced by the competent authority. In this regard please



ATHINA
ESTATE

ATHINA DEVELOPMENT PTY (LTD)
Reg no: 2018/081918/07

DEA&DP Attention: Danie Swanepoel

We have appointed Eco Route Environmental Consultancy as our ECO on site. As the management agent our responsibility was to develop all the infrastructure for roads and services. This process has now been completed as is evident in the last ECO reports. We have now handed over the development to the homeowners association who will be responsible from hereon with regards to complying with the Environmental Authorisation Ref16/3/3/1/D1/14/0028/22.

It is only envisioned that the first houses will be constructed in 2026, therefor the need for an Eco on site will only be required in 2026. Rehabilitation of the site can only continue post construction of each single residential house, however the rehabilitation of the site where areas were disturbed during the implementation of the services is now complete.

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

Kyle Powter
082 505 1770

kpowter

Noted.

<p>note that the form submitted to this Department is not the latest version of the Notice of Intent. The current version of the form is dated April 2024 is available on request from the Department or can be downloaded from URL: https://d7.westerncape.gov.za/eadp/resource-library/forms. Future submissions must be done on the aforementioned form until such time that a newer version has been produced and published by this Department.</p>	
<p>5. Kindly quote the abovementioned reference number in any future correspondence in respect of the proposed application.</p>	
<p>6. This Department reserves the right to revise initial comments and request further information from you based on any new or revised information received.</p>	
COMMENTS RECEIVED IN RESPONSE TO PRE-APPLICATION BASIC ASSESSMENT REPORT DATED 05 JUNE 2025	
STATE DEPARTMENTS	
Department of Forestry, Fisheries and the Environment (DFFE): Branch Oceans & Coasts (O&C) – 25/06/2025	
<p>The Department of Forestry, Fisheries, and the Environment (DFFE), Branch Oceans & Coasts (O&C) appreciates the second opportunity granted to comment on the Proposed Amendment of the environmental Authorization (EA) for the Development of a Beachfront Security Estate on Portion 66 & 67 of Farm 443, Plettenberg Bay, Western Cape. 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").</p> <p>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.</p> <p>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.</p>	<p>Noted.</p>

Based on the submitted section post-application BAR, the Branch O&C presents the comments stipulated below for consideration. Please note the recommendations for your consideration:	
1. This amendment application refers to the Environmental Authorisation (EA) issued on 31 July 2024; however, the EA in Appendix G is dated 31 July 2023.	Correct.
2. The proposed amendments to the EA are the amendment of the Site Development Plan (SDP) to reflect a boardwalk instead of footpath, a revised layout proposed for the amendment of building plates that will have an overall increase in the development footprint of the building plates by 165m ² for P06 and P07 and the inclusion of an additional development footprint area on building plate PO8 of 54m ² , and removal of development footprint area from PO9 of 71m ² that will have an overall decreased of 17m ² . The proposed boardwalk should be constructed within the property boundaries, and the service area should not obstruct the right-of-way for the public and its establishment purpose.	<p>A further proposed amendment has been included in the Draft Amendment Application for the amendment of Condition 21 as contained in the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025. This is highlighted as red in the document.</p> <p>Condition 21 – <i>The Holder must ensure the development provides the public unrestricted access to the coastal public property. A coastal access point should be established and maintained on the site.</i></p> <p>It is proposed to amend this condition to the following – <i>The Holder must ensure that access to the coastal public property over the servitude right of way is not restricted in accordance with the title deed condition.</i></p>
3. This Branch notes that the proposed elevated boardwalk will minimize direct contact with sensitive ecosystems, thereby reducing habitat disturbance. Indeed, studies indicate that properly designed boardwalks can facilitate the recovery of native vegetation, reduce soil compaction and erosion by limiting human trampling. From the application, it is not clear why this option was not included in the initial EA application.	Noted and agreed.
4. Using durable, non-toxic materials is recommended to ensure that the materials resist rot and withstand the impacts of coastal conditions and climate-related factors.	Durable and non-toxic materials will be used for the boardwalk. This will also reduce maintenance requirements.
5. The Branch O&C would like to remind the applicant of Section 15 NEM: ICM Act 2008 (Act No. 24 of 2008)" <i>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 intentional act or omission of that organ of state or other people."</i>	This is noted and will be done should this be a requirement in future.

Therefore, should any protection measures be required in the future, the applicant will be required to conduct a maintenance management plan.	
6. 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.	Noted. The Applicant is aware of their Duty of Care to the environment. This is also stipulated in the EMPr.
7. 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, together with any occupiers of the property, should only use the designated access points to the beach and ensure that the public can safely use and enjoy the coastal zone.	As per Condition 20.3. of the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025, <i>the ecological servitude must not be fenced on the eastern and western boundaries</i> . This servitude will remain unfenced in perpetuity. Please see page 12 to 13 of the Amendment Application.
8. While on the subject of public coastal access, the EA amendment, states that "The property will be fenced and gated, however access to the frontal/coastal beach walking trail will not be denied. The Homeowners Association will control the development..." The branch wishes to express concerns regarding private players such as a HOA burdening itself with the responsibility of managing and controlling the public exercising the right of access to the coast. Even though this is a good gesture that could be appreciated, the concern is that this should be a municipal function or a function of a public body. In this regard, it is recommended that such an undertaking be recorded in a manner that guarantees that the coastal access right-of-way will remain in perpetuity.	Noted and agreed. Public access will not be provided through the gated estate. The access right of way will remain in perpetuity as per the condition of the Title Deed and Notarial Deed of Servitude K750/1996 (Appendix O).

<p>9. 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.</p>	<p>The proposed amendments will not affect coastal public property, the coastal protection zone or coastal access land. The amendment will not change existing rights as per the Title Deed as the servitude will give access right of way to Portion 60. Please see Appendix O and page 12 to 13 of the Amendment Application.</p>
<p>10. You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no other additional activities outside the scope of this application may commence before an Environmental Authorization is granted by the Department.</p>	<p>Noted.</p>
<p>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@dffe.gov.za / 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.</p>	
Department of Environmental Affairs and Development Planning (DEA&DP): Coastal Management – 03/07/2025	
<p>Good Day,</p> <p>Your request for comment from the Sub-directorate: Coastal Management on the abovementioned part 2 amendment application received on 05 June 2025, refers.</p> <p>1. CONTEXT</p> <p>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'".</p>	<p>Noted.</p>

<p>1.2. The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme ("PCMP"). The PCMP 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. The Department has developed the next generation PCMP that includes priority objectives for the next 5 years. This PCMP was adopted on 19 May 2023 and available upon request.</p> <p>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 ("NEMA"). 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.</p> <p>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. 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.</p>	
<p>2. COMMENT</p> <p>2.1 The sub-directorate: Coastal Management ("SD:CM") has reviewed the information as specified above and have the following commentary:</p> <p>2.1.1. An environmental authorisation was issued on 31 July 2024 for the development of 9 residential stands with associated infrastructure and communal open space on Farm 66/443 and Farm 67/443. A part 1 amendment was approved on 14 June 2024 for amendments to the SDP which included the realignment of the internal road and minor realignment of the five beachfront erven. The new proposed changes to the SDP are as follows:</p> <p>2.1.1.1. The amendment of the Site Development Plan to reflect a boardwalk instead of a footpath</p>	<p>A further proposed amendment has been included in the Draft Amendment Application for the amendment of Condition 21 as contained in the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025. This is highlighted as red in the document.</p> <p>Condition 21 – <i>The Holder must ensure the development provides the public unrestricted access to the coastal public property. A coastal access point should be established and maintained on the site.</i></p>

<p>2.1.1.2. A revised layout proposed for the amendment of building plates that will have a slight increase in the development footprint of the building plates P06 and P07</p> <p>2.1.1.3. The inclusion of an additional development footprint area on building plate P08 and removal of development footprint area from P09 that will have a slight decrease in the development footprint for the two stands.</p>	<p>It is proposed to amend this condition to the following – <i>The Holder must ensure that access to the coastal public property over the servitude right of way is not restricted in accordance with the title deed condition.</i></p>
<p>2.1.2. The SD: CM is satisfied that all the proposed amendments and SDP will occur landward of the Garden Route District's coastal management line ("CML"). The increased effects of climate change, sea level rise and increased storm surges in coastal environments obliges the Department to take a more cautious approach when considering developments along the coast and estuaries. The technical delineation of the CML project was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone.</p>	<p>Noted and agreed.</p>
<p>2.1.3. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk to flooding, wave-run-up modelling, inter alia, and was delineated in conjunction with and supported by other organs of state including the Local and District Municipalities, CapeNature and all other organs of state represented on the steering committee for the Garden Route District CML project. The principal purpose of the CML is to protect coastal public property ("CPP"), private property and public safety; to protect the CPZ; 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 a quantification of risks and pro-active planning for future development. The SD: CM can confirm the proposed development would not be affected by coastal processes as per the Department's coastal risk modelling and due to the property's elevation.</p>	<p>Noted and agreed.</p>
<p>2.1.4. It should be noted that the seaward boundary of the subject properties forms part of the littoral active zone ('LAZ') and as such the SD: CM advises the proposed boardwalk in item 2.1.1.1. may not occur outside the applicant's property boundary nor may the applicant create any further footpaths through the LAZ to the coast. Any development within the LAZ will impede the ecological processes relating to beach replenishment, the cycle of erosion and accretion that occur naturally along sandy shores and will negatively impact the ability of coastal dunes to mitigate the impact of sea level rise as well as the increase in the magnitude and frequency of storm surges currently being experienced along the coast.</p>	<p>The boardwalk will remain within the property boundary. No further footpaths will be created. The existing footpath will be designated access.</p>

2.1.5. Due to the subject properties' proximity to the coast, be advised that the proposed development and associated activities may in no way hinder public's ability to access coastal public property.	As per Condition 20.3. of the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025, <i>the ecological servitude must not be fenced on the eastern and western boundaries</i> . This servitude will remain unfenced in perpetuity.
2.1.6. Based on the abovementioned items, the SD: CM does not object to the proposed amendment application for Farm 66/443 and Farm 67/443, provided that all the abovementioned items are considered, effectively applied and that the EMPr is strictly adhered to.	Noted, the EMPr will be strictly adhered to. All items have been addressed above.
2.2. 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.	Noted.
3. 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.	
Department of Forestry, Fisheries and the Environment (DFFE): Directorate Biodiversity Conservation – 07/07/2025	
<p>The Directorate: Biodiversity Conservation has reviewed and evaluated the amendment report</p> <p>Based on the information provided in the amended report, changes to the approved SDP will result in a change to the scope of a valid environmental authorisation where such change will result in an increased level or change in impact where such a change in the nature of the impact was not - assessed and included initially. Each potential environmental impact and risk identified was assessed according to specific criteria as part of the part 2 EA amendment. No significant impact to the biodiversity themes and areas will be affected. The proposed amendment is still within the ESA1 according to the screening tool.</p> <p>The Directorate Biodiversity Conservation does not have any objection to the proposed amendment, provided mitigation measures as outlined are adhered to and implemented.</p> <p>In conclusion, the Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the</p>	<p>Mitigation measures will be adhered to and implemented as per the approved EMPr.</p> <p>Mr. Seoka Lekota of the Directorate: Biodiversity Conservation has been included in the PPP, and is registered as an I&AP.</p>

<p>Directorate: Biodiversity Conservation at Email; BCAdmin@dfre.gov.za for the attention of Mr. Seoka Lekota.</p> <p>Yours faithfully</p>	
ORGANS OF STATE	
Breeder-Gouritz Catchment Management Agency (BGCMA): Rabokale Mphahlele – 10/06/2025	
<p>Good day,</p> <p>Thank you for the opportunity to comment on the above-referenced amendment application for the Athina Estate, located on Portions 66 and 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape. The application involves proposed changes to the Site Development Plan (SDP), which include:</p> <ul style="list-style-type: none"> • Amendment of the footpath to reflect a boardwalk; • Slight increase in the development footprint of building plates P06 and P07; • Inclusion of an additional development footprint area on building plate P08; and • Removal of a development footprint area from P09, resulting in a slight overall decrease in • development footprint across the two stands. <p>This office confirms that a water use licence is already in place for this development, under Licence No: 02/K60G/CI/134, dated 24 August 2021.</p> <p>Please note that the licence remains valid provided that the proposed SDP amendments do not result in any new or additional impacts, or an increase in the significance of impacts already assessed and approved under the existing licence. In this regard, confirmation by a suitably qualified aquatic specialist must be submitted to this office for review prior to approval and implementation of the amended SDP.</p> <p>Kindly note that this office reserves the right to revise its comments should it be deemed necessary.</p>	<p>Thank you for the confirmation of the valid water use license.</p> <p>Please see confirmation from the aquatic specialist, attached as Annexure 5 of this report.</p> <p>The aquatic specialist confirms that the amendments as described are minor and will not result in an increase in the significance of impacts to the wetland system.</p>
PUBLIC	
No comments received.	



Annexure 5: Consultation with BOCMA

joclyn@ecoroute.co.za

From: admin@ecoroute.co.za
Sent: Tuesday, 10 June 2025 08:30
To: joclyn@ecoroute.co.za
Subject: Fw: Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Joclyn,

Please see below.

Kind regards,

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



Eco Route
Environmental Consultancy

From: Rabokale Mphahlele <rmphahlele@bocma.co.za>
Sent: Tuesday, 10 June 2025 02:48
To: Admin <admin@ecoroute.co.za>
Subject: Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

Good day,

Thank you for the opportunity to comment on the above-referenced amendment application for the Athina Estate, located on Portions 66 and 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape. The application involves proposed changes to the Site Development Plan (SDP), which include:

- Amendment of the footpath to reflect a boardwalk;
- Slight increase in the development footprint of building plates P06 and P07;
- Inclusion of an additional development footprint area on building plate P08; and
- Removal of a development footprint area from P09, resulting in a slight overall decrease in development footprint across the two stands.

This office confirms that a water use licence is already in place for this development, under Licence No: 02/K60G/CI/134, dated 24 August 2021.

Please note that the licence remains valid provided that the proposed SDP amendments do not result in any new or additional impacts, or an increase in the significance of impacts already assessed and approved under the existing licence. In this regard, confirmation by a suitably qualified aquatic specialist must be submitted to this office for review prior to approval and implementation of the amended SDP.

Kindly note that this office reserves the right to revise its comments should it be deemed necessary.


Best regards

Rabokale

The Athina Estate development received a Water Use License (02/K60G/CI/13424). The requirement for a license was due to the presence of a large depression wetland that lies across the road to the west of the development. The freshwater assessment that was compiled for the water use license and the environmental authorisation provides a detailed assessment of potential impacts to the wetland based on the SDP that was provided at the time.

I can confirm that the amendments as described above are minor and will not result in an increase in the significance of impacts to the wetland system. Please feel free to contact me if you need any clarification on the above.

Yours sincerely



James Dabrowski

Pr. Sci. Nat. (Water Resources: 114084)

Annexure 6: Evidence of comments received



REFERENCE: 16/3/3/6/7/5/D1/14/0426/24
DATE OF ISSUE: 20 February 2025

The Managing Director
Athina Development (Pty) Ltd.
1ST Floor, Dean Street Arcade, Main Street
NEWLANDS
7700

Mobile: 0825051770
E-mail: kylepowter1@gmail.com

Dear Sir,

ACKNOWLEDGEMENT OF AND COMMENT ON THE NOTICE OF INTENT TO SUBMIT AN APPLICATION IN TERMS OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (DEA&DP REF. 16/3/3/1/D1/14/0028/22 ISSUED ON 31 JULY 2022) FOR THE DEVELOPMENT OF A BEACHFRONT SECURITY ESTATE ON PORTION 66 & 67 OF FARM 443, PLETTENBERG BAY, WESTERN CAPE

1. The abovementioned document compiled by the appointed Environmental Assessment Practitioner, Ms. Joclyn Marshall (EAPASA No: 2022/5006), of Eco Route (Pty) Ltd., received by this Directorate via electronic mail on 02 December 2024, refers.
2. This letter serves as an acknowledgment of receipt of the afore-mentioned document by this Directorate.
3. This Directorate considered the previous Notice of Intent which was submitted on 03 October 2024 with the ref 16/3/3/6/7/5/D1/14/0311/24.
4. This Directorate has reviewed the documents and provides the following comment and guidance:
 - 4.1. It is noted that the proposal entails the amendment of the Site Development Plan ("SDP") to reflect a boardwalk instead of a footpath. The boardwalk extends beyond the approved development footprint.
 - 4.2. Furthermore, there is a revised layout proposed for the amendment of building plates that will have an overall reduction in the development footprint of the building plates for P06 and P07; however, the proposed building footprints will extend beyond those previously assessed.

- 4.3. According to the proposed changes to the SDP, it is noted that PO8 with the additional building plate will transverses the existing erven boundary. Therefor there will be additional impacts that was not assessed in the previous Environmental Authorisation.
- 4.4. Considering the impacts during the construction phase and the operational phase, there will be a change in the visual and landscaping impacts. These further highlight that there will be additional impacts which were not assessed when the initial application for Environmental Authorisation was considered.
- 4.5. The latest proposal to amendment the Environmental Authorisation (i.e., changes to the approved SDP) will result in a change to the scope of a valid environmental authorisation where such change will result in an increased level or change in the nature of impact where such level of or change in the nature of the impact was not
- assessed and included in the initial application for environmental authorisation; or
 - taken into consideration in the initial application environment authorisation.

This view is supported by the changes to the building plates / footprints and the development of a boardwalk, which were not previously assessed nor taken into account in the initial application for environmental authorisation.

The application to amend the Environmental Authorisation (Ref. 16/3/3/1/D1/14/0028/22 issued on 31 July 2022) must therefore follow the process described in Part 2 of Chapter 5 of the Environmental Impact Assessment Regulations, 2014, and not Part 1 as suggested in the NOI Form.

- 4.6. Please be advised that in accordance with Regulation 12(1) you are required to appoint a registered environmental assessment practitioner (EAP) to manage the application which must be submitted in terms of Part 2 of Chapter 5 of the Environmental Impact Assessment Regulations, 2014. Such an EAP must comply with the prescripts set out in Regulation 13 of the Environmental Impact Assessment Regulations, 2014, amongst others being "independent".

Whereas, **"independent"**, in relation to an EAP, a specialist or the person responsible for the preparation of an environmental audit report, means—

- (a) that such EAP, specialist or person has no business, financial, personal or other interest in the activity or application in respect of which that EAP, specialist or person is appointed in terms of these Regulations; or
- (b) that there are no circumstances that may compromise the objectivity of that EAP, specialist or person in performing such work;
excluding—
 - (i) normal remuneration for a specialist permanently employed by the EAP; or
 - (ii) fair remuneration for work performed in connection with that activity, application or environmental audit.

Furthermore, in accordance with Regulation 12(3) you must take all reasonable steps to verify whether the EAP complies with Regulation 13(1)(a) and 13(1)(b), meaning that you must verify that the EAP is independent and that they have expertise in conducting environmental impact assessments or undertaking specialist work as required, including knowledge of the National Environmental Management Act, 1998 (Act No. 107 of 1998, as amended) ("NEMA"), these Environmental Impact Assessment Regulations, 2014 and any guidelines that have relevance to the proposed activity.

It is understood that **Eco Route Environmental Consultancy** is currently appointed to undertake the ongoing environmental control officer (ECO) responsibilities as stipulated in the Environmental Authorisation (Ref. 16/3/3/1/D1/14/0028/22 issued on 31 July 2022) until the activities are concluded. In light of the current business and/or financial interest, it appears that neither Eco Route Environmental Consultancy's or an EAP in its employ, will conform to the definition of 'independent' should they be appointed to manage the intended application for the amendment of the Environmental Authorisation (Ref. 16/3/3/1/D1/14/0028/22 issued on 31 July 2022) in terms of Part 2 of Chapter 5 of the Environmental Impact Assessment Regulations, 2014.

You are advised to verify the requirements of Regulation 13(1)(a) and (b) prior to the appointment of such a registered person to manage your intended application, or to ensure that you can demonstrate that the requirements of Regulations 13(2) and 13(3) of the Environmental Impact Assessment Regulations, 2014 have been complied with.

- 4.7. Please note that it is the responsibility of the applicant / proponent / EAP to ascertain whether subsequent versions of the NOI have been published or produced by the competent authority. In this regard please note that the form submitted to this Department is not the latest version of the Notice of Intent. The current version of the form is dated April 2024 is available on request from the Department or can be downloaded from URL: <https://d7.westerncape.gov.za/eadp/resource-library/forms>. Future submissions must be done on the aforementioned form until such time that a newer version has been produced and published by this Department.
5. Kindly quote the abovementioned reference number in any future correspondence in respect of the proposed application.
6. This Department reserves the right to revise initial comments and request further information from you based on any new or revised information received.

Yours faithfully

pp **Francois Naudé** Digitally signed by Francois Naudé
Date: 2025.02.20 06:03:47 +02'00'

HEAD OF DEPARTMENT

ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 3

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

(reference: 16/3/3/6/7/5/D1/14/0426/24)

Copied to: **Eco Route Environmental Consultancy**

EAP: Ms. Joclyn Marshall
Janet Ebersohn

E-mail: joclyn@ecoroute.co.za
E-mail: janet@ecoroute.co.za

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

Attention: Ms Joclyn Marshall

Tel: 072 126 6393

Email: admin@ecoroute.co.za

RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE PART 2 AMENDMENT APPLICATION FOR THE ATHINA ESTATE ON PORTION 66 AND 67 OF THE FARM BRAKKLOOF 443, PLETTENBERG BAY, WESTERN CAPE.

Good Day,

Your request for comment from the Sub-directorate: Coastal Management on the above-mentioned part 2 amendment application received on 05 June 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 PCMP 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. The Department has developed the next generation PCMP that includes priority objectives for the next 5 years. This PCMP was adopted 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. 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. An environmental authorisation was issued on 31 July 2024 for the development of 9 residential stands with associated infrastructure and communal open space on Farm 66/443 and Farm 67/443. A part 1 amendment was approved on 14 June 2024 for amendments to the SDP which included the realignment of the internal road and minor realignment of the five beachfront erven. The new proposed changes to the SDP are as follows:
 - 2.1.1.1. The amendment of the Site Development Plan to reflect a boardwalk instead of a footpath
 - 2.1.1.2. A revised layout proposed for the amendment of building plates that will have a slight increase in the development footprint of the building plates P06 and P07
 - 2.1.1.3. The inclusion of an additional development footprint area on building plate P08 and removal of development footprint area from P09 that will have a slight decrease in the development footprint for the two stands.
 - 2.1.2. The SD: CM is satisfied that all the proposed amendments and SDP will occur landward of the Garden Route District's coastal management line ("CML"). The increased effects of climate change, sea level rise and increased storm surges in coastal environments obliges the Department to take a more cautious approach when considering developments along the coast and estuaries. The technical delineation of the CML project was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone.

- 2.1.3. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk to flooding, wave-run-up modelling, *inter alia*, and was delineated in conjunction with and supported by other organs of state including the Local and District Municipalities, CapeNature and all other organs of state represented on the steering committee for the Garden Route District CML project. The principal purpose of the CML is to protect coastal public property ("CPP"), private property and public safety; to protect the CPZ; 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 a quantification of risks and pro-active planning for future development. The SD: CM can confirm the proposed development would not be affected by coastal processes as per the Department's coastal risk modelling and due to the property's elevation.
- 2.1.4. It should be noted that the seaward boundary of the subject properties forms part of the littoral active zone ('LAZ') and as such the SD: CM advises the proposed boardwalk in item 2.1.1.1. may not occur outside the applicant's property boundary nor may the applicant create any further footpaths through the LAZ to the coast. Any development within the LAZ will impede the ecological processes relating to beach replenishment, the cycle of erosion and accretion that occur naturally along sandy shores and will negatively impact the ability of coastal dunes to mitigate the impact of sea level rise as well as the increase in the magnitude and frequency of storm surges currently being experienced along the coast.
- 2.1.5. Due to the subject properties' proximity to the coast, be advised that the proposed development and associated activities may in no way hinder the public's ability to access coastal public property.
- 2.1.6. Based on the abovementioned items, the SD: CM does not object to the proposed amendment application for Farm 66/443 and Farm 67/443, provided that all the above-mentioned items are considered, effectively applied and that the EMPr is strictly adhered to.
- 2.2. 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.

3. 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: 2025.07.03 11:45:36 +02'00'

leptieshaam Bekko
CONTROL ENVIRONMENTAL OFFICER
SUB-DIRECTORATE: COASTAL MANAGEMENT
DATE: 03 July 2025



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: 260783

Enquiries: Ms. Tabisile Mhlana

Telephone: (021) 493 7049

Email: OCEIA@dffe.gov.za

Ms. Joclyn Marshall

Eco Route Environmental Consultancy

P.O. Box 3511

Knysna

6570

Tel: 072 126 6393

Email Address: admin@ecoroute.co.za

Dear Ms. Marshall

COMMENTS ON THE APPLICATION FOR PART TWO AMENDMENT OF AN ENVIRONMENTAL AUTHORISATION FOR THE DEVELOPMENT OF A BEACHFRONT SECURITY ESTATE ON PORTION 66 & 67 OF FARM 443, PLETTENBERG BAY, WESTERN CAPE.

The Department of Forestry, Fisheries, and the Environment (DFFE), Branch Oceans & Coasts (O&C) appreciates the second opportunity granted to comment on the Proposed Amendment of the Environmental Authorization (EA) for the Development of a Beachfront Security Estate on Portion 66 & 67 of Farm 443, Plettenberg Bay, Western Cape. 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.



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.

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 section post-application BAR, the Branch O&C presents the comments stipulated below for consideration. Please note the **recommendations for your consideration**:

1. This amendment application refers to the Environmental Authorisation (EA) issued on 31 July 2024; however, the EA in Appendix G is dated 31 July 2023.
2. The proposed amendments to the EA are the amendment of the Site Development Plan (SDP) to reflect a boardwalk instead of footpath, a revised layout proposed for the amendment of building plates that will have an overall increase in the development footprint of the building plates by 165m² for P06 and P07 and the inclusion of an additional development footprint area on building plate PO8 of 54m², and removal of development footprint area from PO9 of 71m² that will have an overall decreased of 17m². The proposed boardwalk should be constructed within the property boundaries, and the service area should not obstruct the right-of-way for the public and its establishment purpose.
3. This Branch notes that the proposed elevated boardwalk will minimize direct contact with sensitive ecosystems, thereby reducing habitat disturbance. Indeed, studies indicate that properly designed boardwalks can facilitate the recovery of native vegetation, reduce soil compaction and erosion by limiting human trampling. From the application, it is not clear why this option was not included in the initial EA application.
4. Using durable, non-toxic materials is recommended to ensure that the materials resist rot and withstand the impacts of coastal conditions and climate-related factors.
5. The Branch O&C would like to remind the applicant of Section 15 NEM: ICM Act 2008 (Act No. 24 of 2008) *"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 intentional act or omission of that organ of state or other people."* Therefore, should any protection measures be required in the future, the applicant will be required to conduct a maintenance management plan.
6. 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.
7. 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, together with any occupiers of the property, should only use the designated access points to the beach and ensure that the public can safely use and enjoy the coastal zone.

8. While on the subject of public coastal access, the EA amendment, states that “The property will be fenced and gated, however access to the frontal/coastal beach walking trail will not be denied. The Homeowners Association will control the development...” the branch wishes to express concerns regarding private players such as a HOA burdening itself with the responsibility of managing and controlling the public exercising the right of access to the coast. Even though this is a good gesture that could be appreciated, the concern is that this should be a municipal function or a function of a public body. In this regard, it is recommended that such an undertaking be recorded in a manner that guarantees that the coastal access right-of-way will remain in perpetuity.
9. 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.
10. You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no other additional activities outside the scope of this application may commence before an Environmental Authorization is granted by the Department.

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@dffe.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,



Mr. Ryan Peter
Director: Coastal Development & Coordination
Department of Forestry, Fisheries & the Environment
Date: 25/06/2025



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: 16/3/3/5/D1/14/0007/24

Enquiries: Portia Makitla /Orefemetse Ramantsi
Tel : 012 399 9411 **Email :** pmakitla@dffe.gov.za

Joclyn Marshall
Eco Route Environmental Consultancy
Email Address: admin@ecoroute.co.za

PER E-MAIL

Dear Ms., Marshall

COMMENTS ON THE DRAFT PART 2 EA AMENDMENT FOR PROPOSED DEVELOPMENT FOR THE ATHINA ESTATE ON PORTION 66 & 67 OF THE FARM BRAKKLOOF 443, PLETTENBERG BAY, WESTERN CAPE PROVINCE

The Directorate: Biodiversity Conservation has reviewed and evaluated the amendment report

Based on the information provided in the amended report, changes to the approved SDP will result in a change to the scope of a valid environmental authorisation where such change will result in an increased level or change in impact where such a change in the nature of the impact was not - assessed and included initially. Each potential environmental impact and risk identified was assessed according to specific criteria as part of the part 2 EA amendment. No significant impact to the biodiversity themes and areas will be affected. The proposed amendment is still within the ESA1 according to the screening tool.

The Directorate Biodiversity Conservation does not have any objection to the proposed amendment, provided mitigation measures as outlined are adhered to and implemented.

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



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.

**COMMENTS ON THE DRAFT PART 2 EA AMENDMENT FOR PROPOSED DEVELOPMENT FOR
THE ATHINA ESTATE ON PORTION 66 & 67 OF THE FARM BRAKKLOOF 443, PLETTENBERG
BAY, WESTERN CAPE PROVINCE**

pp 

Mr Seoka Lekota

Control Biodiversity Officer Grade B: Biodiversity Conservation

Department of Forestry, Fisheries & the Environment

Date: 07/07/2025

From: admin@ecoroute.co.za
Sent: Tuesday, 10 June 2025 08:30
To: joclyn@ecoroute.co.za
Subject: Fw: Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Joclyn,

Please see below.

Kind regards,

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



Eco Route
Environmental Consultancy

From: Rabokale Mphahlele <rmphahlele@bocma.co.za>
Sent: Tuesday, 10 June 2025 02:48
To: Admin <admin@ecoroute.co.za>
Subject: Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

Good day,

Thank you for the opportunity to comment on the above-referenced amendment application for the Athina Estate, located on Portions 66 and 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape. The application involves proposed changes to the Site Development Plan (SDP), which include:

- Amendment of the footpath to reflect a boardwalk;
- Slight increase in the development footprint of building plates P06 and P07;
- Inclusion of an additional development footprint area on building plate P08; and
- Removal of a development footprint area from P09, resulting in a slight overall decrease in development footprint across the two stands.

This office confirms that a water use licence is already in place for this development, under Licence No: 02/K60G/CI/134, dated 24 August 2021.

Please note that the licence remains valid provided that the proposed SDP amendments do not result in any new or additional impacts, or an increase in the significance of impacts already assessed and approved under the existing licence. In this regard, confirmation by a suitably qualified aquatic specialist must be submitted to this office for review prior to approval and implementation of the amended SDP.

Kindly note that this office reserves the right to revise its comments should it be deemed necessary.

Best regards

Rabokale

From: Rabokale Mphahlele <rmphahlele@bgcma.co.za>

Sent: Thursday, February 23, 2023 7:10 PM

To: Joclyn Marshall <joclyn@ecoroute.co.za>

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

Subject: Re: PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE DEVELOPMENT ON PORTION 66 AND 67 OF THE BRAKKLOOF 443 PLETTENBERG BAY

Good day

Herewith attached please find the revised BGCMA on above-referenced development

Kind regards

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

Sent: Wednesday, February 22, 2023 11:01 AM

To: Rabokale Mphahlele <rmphahlele@bgcma.co.za>

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

Subject: RE: PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE DEVELOPMENT ON PORTION 66 AND 67 OF THE BRAKKLOOF 443 PLETTENBERG BAY

Good Morning

Please see requested report attached. Please let me know if you require any further information.

Kind Regards,



Joclyn Marshall

Eco Route Environmental Consultancy

MSc Environmental Science

0721266393

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

Sent: Wednesday, February 22, 2023 9:15 AM

To: 'Joclyn Marshall' <joclyn@ecoroute.co.za>

Subject: FW: PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE DEVELOPMENT ON PORTION 66 AND 67 OF THE BRAKKLOOF 443 PLETTENBERG BAY

Please see below and forward requested information

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

Kind Regards

The Athina Estate development received a Water Use License (02/K60G/CI/13424). The requirement for a license was due to the presence of a large depression wetland that lies across the road to the west of the development. The freshwater assessment that was compiled for the water use license and the environmental authorisation provides a detailed assessment of potential impacts to the wetland based on the SDP that was provided at the time.

I can confirm that the amendments as described above are minor and will not result in an increase in the significance of impacts to the wetland system. Please feel free to contact me if you need any clarification on the above.

Yours sincerely



James Dabrowski

Pr. Sci. Nat. (Water Resources: 114084)

Annexure 7: Evidence of notifications sent to I&APs

NOTIFICATION OF PUBLIC PARTICIPATION: Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

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

Date Thu 05 Jun 2025 13:19

To 'Danie Swanepoel' <Danie.Swanepoel@westerncape.gov.za>; 'Francois Naude' <Francois.Naude@westerncape.gov.za>; Dorien.Werth@westerncape.gov.za <Dorien.Werth@westerncape.gov.za>; Nathan Jacobs <Nathan.Jacobs@westerncape.gov.za>; BCAdmin@environment.gov.za <BCAdmin@environment.gov.za>; RMolale@dffe.gov.za <RMolale@dffe.gov.za>; OCEIA <OCEIA@dffe.gov.za>; OCeia@environment.gov.za <OCEIA@environment.gov.za>; BNcube@dffe.gov.za <BNcube@dffe.gov.za>; Lydia Kutu <LKutu@dffe.gov.za>; Thivhulawi Nethononda <Tnethononda@dffe.gov.za>; Noluvo.Toto@westerncape.gov.za <Noluvo.Toto@westerncape.gov.za>; Stephanie Barnardt <Stephanie.barnardt@westerncape.gov.za>; Azni.November@westerncape.gov.za <Azni.November@westerncape.gov.za>; Dirk.Prinsloo@westerncape.gov.za <Dirk.Prinsloo@westerncape.gov.za>; RobertsJ@dws.gov.za <robertsj@dws.gov.za>; 'Cor Van der Walt' <Cor.VanderWalt@westerncape.gov.za>; 'Brandon Layman' <Brandon.Layman@westerncape.gov.za>; Vanessa Stoffels <vanessa.stoffels@westerncape.gov.za>; Melanie Koen <mkoen@dffe.gov.za>

Cc joclyn@ecoroute.co.za <joclyn@ecoroute.co.za>; 'Janet' <janet@ecoroute.co.za>

Good day,

Kindly find below link to the Part 2 Amendment and relevant appendices.

<https://we.tl/t-5UuHutYBev>

[Amendment Application For the ATHINA ESTATE-05.06.2025.pdf](#)

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we.tl

A 30-day public participation will be held from **05/06/2025 – 07/07/2025**. 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:

[Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape | Eco Route](#)

AMENDMENT APPLICATION

Notification of Public Participation:

Part 2 Amendment Application for the Athina Estate on Portion 66 and 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape.

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended) of the Amendment of a valid Environmental Authorisation. A 30-day Public Participation Process will be undertaken under the authority of the Department of Environmental Affairs and Development Planning (DEA&DP).

The Public Participation Process will run from **06/06/2025 – 07/07/2025**.

DEADP Ref for EA: **16/3/3/1/D1/14/0028/22**

DEADP Ref for Amendment: **16/3/3/5/D1/14/0007/24**

Location and Activity:

The Part 2 Amendment is for the Athina Estate development on Portion 66 and 67 of the Farm Brakkloof 443 in the Bitou Municipality, Plettenberg Bay, Western Cape. The Environmental Authorisation was issued on 31 July 2024 which approved the development of 9 residential stands with associated infrastructure and communal open space. A Part 1 Amendment was approved on 14 June 2024 for amendments to the SDP which included the realignment of the internal road and minor realignment of the five beachfront erven. The new proposed changes to the SDP are as follows:

- The amendment of the Site Development Plan ("SDP") to reflect a boardwalk instead of a footpath.
- A revised layout proposed for the amendment of building plates that will have a slight increase in the development footprint of the building plates P06 and P07.
- The inclusion of an additional development footprint area on building plate PO8 and removal of development footprint area from PO9 that will have a slight decreased in the development footprint for the two stands.

The following Listed Activities in terms of the EIA Regulation 2014 as per the EA (16/3/3/1/D1/14/0028/22), are relevant:

- Government Notice No. R327 (Listing Notice 1): Activity 17(v)(e) & 19A(ii)
- Government Notice No. R324 (Listing Notice 3): 12(i)(iii)

A Part 2 Amendment Application and relevant appendices will be made available to all registered Interested and Affected Parties (I&AP's) for public review and comment. All relevant documents may be accessed via our website (www.ecoroute.co.za) during the public participation period.

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
Joclyn Marshall (EAPASA Reg 2022/5006)
P.O. Box 1252, Sedgefield, 6573
Email: admin@ecoroute.co.za
Cell: 072 126 6393

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REGISTRATION NO. 1998/031976/23

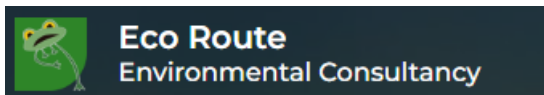
Kind regards,

Joclyn Marshall

MSc Environmental Science

EAPASA 2022/5006

072 126 6393



NOTIFICATION OF PUBLIC PARTICIPATION: Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

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

Date Thu 05 Jun 2025 13:21

To Andiswa Sam <asam@bocma.co.za>; rmphahlele@bocma.co.za <rmphahlele@bocma.co.za>; Sbonelo Ndlovu <sndlovu@bocma.co.za>; Megan Simons <msimons@capenature.co.za>; abrahamsN@nra.co.za <abrahamsn@nra.co.za>; managerfpa@gmail.com <managerfpa@gmail.com>; 'Vanessa Weyer' <vanessa.weyer@sanparks.org>; environment@caa.co.za <environment@caa.co.za>

Cc joclyn@ecoroute.co.za <joclyn@ecoroute.co.za>; 'Janet' <janet@ecoroute.co.za>

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<https://we.tl/t-5UuHutYBev>

[Amendment Application For the ATHINA ESTATE-05.06.2025.pdf](#)

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Environmental Assessment Practitioner
Joclyn Marshall (EAPASA Reg 2022/5006)
P.O. Box 1252, Sedgefield, 6573
Email: admin@ecoroute.co.za
Cell: 072 126 6393

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REGISTRATION NO. 1998/031976/23

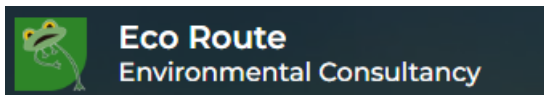
Kind regards,

Joclyn Marshall

MSc Environmental Science

EAPASA 2022/5006

072 126 6393



NOTIFICATION OF PUBLIC PARTICIPATION: Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

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

Date Thu 05 Jun 2025 13:27

To cschliemann@plett.gov.za <cschliemann@plett.gov.za>; mrhode@plett.gov.za <mrhode@plett.gov.za>; 'Anjé Minne' <aminne@plett.gov.za>; info@gardenroute.gov.za <info@gardenroute.gov.za>; Nina Viljoen (Dr) <nina@gardenroute.gov.za>

Cc joclyn@ecoroute.co.za <joclyn@ecoroute.co.za>; 'Janet' <janet@ecoroute.co.za>

Good day,

Kindly find below link to the Part 2 Amendment and relevant appendices.

<https://we.tl/t-5UuHutYBev>

[Amendment Application For the ATHINA ESTATE-05.06.2025.pdf](#)

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AMENDMENT APPLICATION

Notification of Public Participation:

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DEADP Ref for Amendment: **16/3/3/5/D1/14/0007/24**

Location and Activity:

The Part 2 Amendment is for the Athina Estate development on Portion 66 and 67 of the Farm Brakkloof 443 in the Bitou Municipality, Plettenberg Bay, Western Cape. The Environmental Authorisation was issued on 31 July 2024 which approved the development of 9 residential stands with associated infrastructure and communal open space. A Part 1 Amendment was approved on 14 June 2024 for amendments to the SDP which included the realignment of the internal road and minor realignment of the five beachfront erven. The new proposed changes to the SDP are as follows:

- The amendment of the Site Development Plan ("SDP") to reflect a boardwalk instead of a footpath.
- A revised layout proposed for the amendment of building plates that will have a slight increase in the development footprint of the building plates P06 and P07.
- The inclusion of an additional development footprint area on building plate PO8 and removal of development footprint area from PO9 that will have a slight decreased in the development footprint for the two stands.

The following Listed Activities in terms of the EIA Regulation 2014 as per the EA (16/3/3/1/D1/14/0028/22), are relevant:

- Government Notice No. R327 (Listing Notice 1): Activity 17(v)(e) & 19A(ii)
- Government Notice No. R324 (Listing Notice 3): 12(i)(iii)

A Part 2 Amendment Application and relevant appendices will be made available to all registered Interested and Affected Parties (I&AP's) for public review and comment. All relevant documents may be accessed via our website (www.ecoroute.co.za) during the public participation period.

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
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Kind regards,

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EAPASA 2022/5006

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