

Ecoroute 004

06 February 2026

**Breede-Olifants Catchment Management Agency (BOCMA)**

Attention: Mr SI Ndlovu

[sndlovu@bocma.co.za](mailto:sndlovu@bocma.co.za)

Reference: 4/10/2/K40D/RUYGTE VALLEY 205/79, SEDGEFIELD

Dear Mr Ndlovu,

**RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY**

Eco Route Environmental Consultancy acknowledges receipt of the Breede-Olifants Catchment Management Agency (BOCMA) letter dated **15 December 2025**, and thanks the Agency for reviewing the Draft Basic Assessment Report.

We respond as follows:

**1. No objection noted**

We acknowledge BOCMA's confirmation that there is no objection to the proposed development. This is noted and appreciated.

**2. Previous BOCMA comments (20 June 2025)**

We confirm that the comments issued on **20 June 2025** remain applicable and will continue to be adhered to. These requirements have been incorporated into the Environmental Management Programme (EMPr) and project compliance framework.

**3. Wastewater disposal**

The development will not discharge wastewater to the environment without lawful authorisation. All wastewater infrastructure will comply with applicable municipal standards and National Water Act requirements. No unauthorised discharge will occur.

**4. Pollution reporting**

The property owner and contractor acknowledge the duty in terms of Section 19 of the National Water Act. Any pollution incident will be reported to BOCMA within 24 hours, and emergency response procedures are included in the EMPr.

**5. Water Use Authorisation**

The applicant acknowledges that any water uses triggered under Section 21 of the National Water Act will require authorisation prior to commencement. No regulated water use activity will occur without approval.

**6. Onus on the property owner**

The property owner accepts full responsibility to comply with the National Water Act and all related legal obligations before construction or operational activities begin.

**7. Future amendments**

We acknowledge that BOCMA reserves the right to amend or request further information. Eco Route will cooperate fully with any additional requests.

**8–10. Application process and contact**

Should a Water Use Authorisation be required, the applicant will utilise the official DWS e-WULAAS portal and liaise directly with BOCMA as advised.

Eco Route Environmental Consultancy confirms that all BOCMA conditions will be implemented through the EMPr and monitored by the Environmental Control Officer.

We thank BOCMA for its review and continued engagement.

Thank you for your participation in the process.

Kind regards,

Bianca Gilfillan  
Environmental Assessment Practitioner  
Eco Route Environmental Consultancy



# Eco Route

**ENVIRONMENTAL CONSULTANCY**

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

PhD Univ. Pretoria

Cell: 072 222 6013

e-mail: [egersohn@cyberperk.co.za](mailto:egersohn@cyberperk.co.za)

MS. JANET EBERSOHN

Bsc. Hons. Environmental Manag

Cell: 082 557 7122

e-mail: [janet@ecoroute.co.za](mailto:janet@ecoroute.co.za)

Ecoroute 005

06 February 2026

Kate

Dear Kate,

**RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY**

Thank you for your written comment submitted as part of the public participation process. Your concerns regarding environmental sensitivity, development footprint, and long-term site impacts have been carefully considered and are addressed below.

**Development footprint**

The preferred development footprint is strictly limited to 1,375 m<sup>2</sup>. All construction activities are confined to this demarcated area. The remainder of the 5.21 ha property will remain natural and is subject to ecological management and conservation controls.

**Environmental sensitivity**

Specialist biodiversity and geotechnical studies confirm that development has been positioned within the stable portion of the property, outside cliff-edge hazard zones and protected forest areas. No development is permitted in ecologically sensitive no-go areas.

**Sewage and infrastructure**

All wastewater infrastructure must comply with municipal and environmental standards. No discharge to the surrounding environment is permitted. Systems are designed to prevent groundwater contamination.

**Climate resilience and coastal protection**

The dwelling is located more than 100 m from the High-Water Mark and outside projected coastal erosion risk zones. Stormwater controls and dune vegetation retention are mandatory to prevent erosion and maintain long-term site stability.

**Stewardship and conservation**

The majority of the property remains undeveloped and will be managed under ecological protection measures, including invasive alien clearing and vegetation rehabilitation.

The amended Basic Assessment Report and Environmental Management Programme incorporate all specialist recommendations to ensure minimal environmental impact.

Thank you for participating in the assessment process.

Kind regards,

Bianca Gilfillan

Environmental Assessment Practitioner

Eco Route Environmental Consultancy

Ecoroute 007

06 February 2026

Mr De Waal

Dear Mr De Waal,

**RE: RESPONSE TO COMMENTS — DRAFT BASIC ASSESSMENT REPORT: PORTION 79 OF FARM 205, RUYGTE VALLEY, SEDGFIELD**

Thank you for your submission regarding the Draft Basic Assessment Report.

Engineering assessments confirm the development is located in the stable central-northern portion of the property. No infrastructure is permitted on steep dune slopes or in identified weak zones.

Foundations will:

- use a lightweight elevated design
- avoid the D7 fracture
- follow engineer-approved compaction standards
- retain stabilising vegetation

The project is located beyond the projected 100-year erosion risk lines and outside designated flood hazard zones. Stormwater management is executed through the use of permeable surfaces to minimise runoff concentration. The engineering report validates the project's feasibility, contingent upon the implementation of the specified mitigation measures.

All mitigation measures are enforceable through the Environmental Management Programme.

We appreciate your engagement in the public participation process.

Yours sincerely,

Bianca Gilfillan  
Environmental Assessment Practitioner  
Eco Route Environmental Consultancy

Ecoroute 006

06 February 2026

Ms Brigitte Beck

Dear Ms Beck,

**RE: RESPONSE TO COMMENTS — DRAFT BASIC ASSESSMENT REPORT: PORTION 79 OF FARM 205, RUYGTE VALLEY, SEDGEFIELD**

Eco Route Environmental Consultancy acknowledges receipt of your correspondence regarding the Draft Basic Assessment Report for the above-mentioned project.

Your comments have been formally recorded and addressed in the updated Comments and Response Report, forming part of the amended submission.

The amended documentation clarifies:

- The distinction between building footprint and disturbance footprint
- Total development footprint (Preferred Alternative: 1 375 m<sup>2</sup> | Alternative: 1 175 m<sup>2</sup>)
- Sewage infrastructure design and compliance
- Climate resilience and geotechnical safeguards
- Coastal protection setback compliance
- Long-term stewardship and conservation commitments

All specialist recommendations have been incorporated into the Environmental Management Programme to ensure strict environmental management during construction and operation.

Thank you for your participation in the public participation process.

Yours sincerely,

Bianca Gilfillan  
Environmental Assessment Practitioner  
Eco Route Environmental Consultancy



# Eco Route

**ENVIRONMENTAL CONSULTANCY**

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

PhD Univ. Pretoria

Cell: 072 222 6013

e-mail: [ebersohn@cyberperk.co.za](mailto:ebersohn@cyberperk.co.za)

MS. JANET EBERSOHN

Bsc. Hons. Environmental Management

Cell: 082 557 7122

e-mail: [janet@ecoroute.co.za](mailto:janet@ecoroute.co.za)

Ecoroute 005

06 February 2026

Ms Uta

Dear Ms Uta,

**RE: RESPONSE TO COMMENTS — DRAFT BASIC ASSESSMENT REPORT: PORTION 79 OF FARM 205, RUYGTE VALLEY, SEDGEFIELD**

Eco Route confirms receipt of your comments on the Draft Basic Assessment Report.

All issues raised have been reviewed and formally addressed in the updated Comments and Response Report included in the amended submission.

Key clarifications include:

- Footprint calculations and disturbance limits
- Conservation zoning and stewardship commitments
- Protection of indigenous vegetation
- Engineering and slope stability safeguards
- Climate resilience considerations

Mitigation measures form binding conditions within the Environmental Management Programme.

Thank you for participating in the assessment process.

Yours sincerely,

Bianca Gilfillan

Environmental Assessment Practitioner

Eco Route Environmental Consultancy



# Eco Route

**ENVIRONMENTAL CONSULTANCY**

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

PhD Univ. Pretoria

Cell: 072 222 6013

e-mail: [egersohn@cyberperk.co.za](mailto:egersohn@cyberperk.co.za)

MS. JANET EBERSOHN

Bsc. Hons. Environmental Management

Cell: 082 557 7122

e-mail: [janet@ecoroute.co.za](mailto:janet@ecoroute.co.za)

Ecoroute 005

06 February 2026

Ms Zelda Eastwood

Dear Ms Eastwood,

**RE: RESPONSE TO COMMENTS — DRAFT BASIC ASSESSMENT REPORT: PORTION 79 OF FARM 205, RUYGTE VALLEY, SEDGEFIELD**

Thank you for your submission regarding the Draft Basic Assessment Report.

The amended design demonstrates that this development:

- occupies less than 1% of the site
- preserves ecological corridors
- avoids high-risk dune zones
- supports invasive species removal
- strengthens conservation stewardship

The undeveloped portion of the property will remain protected natural land.

The project does not establish precedent for high-density coastal development and remains a low-impact, controlled footprint.

We appreciate your participation in the public participation process.

Yours sincerely,

Bianca Gilfillan

Environmental Assessment Practitioner

Eco Route Environmental Consultancy



# Eco Route

**ENVIRONMENTAL CONSULTANCY**

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

PhD Univ. Pretoria

Cell: 072 222 6013

e-mail: [ebersohn@cyberperk.co.za](mailto:ebersohn@cyberperk.co.za)

MS. JANET EBERSOHN

Bsc. Hons. Environmental Manag

Cell: 082 557 7122

e-mail: [janet@ecoroute.co.za](mailto:janet@ecoroute.co.za)

Ecoroute 009

06 February 2026

Niel de Villiers

[devilliers@law.co.za](mailto:devilliers@law.co.za)

Dear Mr de Villiers

## **RE: Response to comments on the Draft Basic Assessment Report – Portion 79 of Farm 205 Ruygte Valley, Sedgefield**

Thank you for your detailed submission dated 15 December 2025 regarding the Draft Basic Assessment Report (DBAR) for the proposed residential development on Portion 79 of Farm 205 Ruygte Valley. Your comments are acknowledged and appreciated. The Environmental Assessment Practitioner (EAP) has carefully reviewed your concerns and responds as follows.

### **1. Public participation process and access to information**

The public participation process was undertaken in accordance with the Environmental Impact Assessment Regulations, 2014 (as amended). Notification was placed in the local newspaper, site notices were erected and registered Interested and Affected Parties (I&APs) were provided with access to the DBAR and supporting specialist studies.

While you raise concerns regarding timing and accessibility during the holiday closure period, the comment period itself complied with regulatory minimum timeframes. All written comments received within the prescribed period, including your submission, have been accepted and formally recorded. No comments were excluded on the basis of office closure.

All available specialist reports that informed the DBAR were made available to I&APs. Where updated modelling or clarifications were prepared in response to comments, these were incorporated into the Comments and Response Report to ensure transparency of the decision-making record.

### **2. Development footprint and disturbance calculations**

You dispute the calculation of the disturbance footprint and raise concerns about secondary construction impacts. The footprint presented in the DBAR represents the maximum cleared and permanently disturbed area required for the approved development envelope, including structures and essential service infrastructure.

Temporary construction disturbance areas are managed through the Environmental Management Programme (EMPr) and are subject to strict rehabilitation requirements. These areas are not permitted to remain cleared and must be restored to natural vegetation post-construction. The long-term ecological footprint is therefore limited to the defined permanent disturbance area.

The EMPr includes explicit controls on construction laydown areas, material storage, access routes, erosion protection, and rehabilitation obligations. No open-ended clearing rights are granted.

### **3. Visual impact and visibility from the beach**

Your submission places strong emphasis on visual intrusion. The final visual assessment acknowledges that portions of the development may be visible from limited beach viewpoints. This is explicitly stated in the updated modelling response and does not rely on an assumption of total invisibility.

The assessment conclusion is not based on denying visibility, but on evaluating:

- scale relative to landscape
- screening by vegetation

- building height controls
- material palette
- siting behind dune contours
- cumulative visual context

Mitigation measures include strict height limits, non-reflective materials, fragmented building layout, vegetation retention, and restoration of disturbed areas. These conditions are enforceable through the EMPr and any environmental authorisation.

The competent authority must assess whether the mitigated visual impact remains acceptable within the coastal landscape. The assessment does not claim zero impact; it evaluates managed impact.

#### **4. Coastal protection and geotechnical risk**

The geotechnical assessment confirms that development is restricted to the stable central–northern portion of the property. No construction is permitted on steep dune slopes, erosion-prone areas, or structurally weak zones.

All foundations must be engineered for sandy dune soils and signed off by an ECSA-registered engineer. Vegetation retention and soft stormwater management are required to protect slope stability.

The development footprint is located outside the 100 m High Water Mark setback and outside mapped erosion-risk areas based on available projections. Climate resilience considerations are incorporated into the engineering recommendations.

#### **5. Legislative compliance**

The application is being assessed under NEMA and the EIA Regulations. The listed activities applied for are disclosed in the DBAR and were advertised as part of the public participation process.

Any final decision will rest with the competent authority, which independently evaluates legal compliance, environmental acceptability, and public interest considerations.

#### **6. Specialist disagreements**

Where specialist opinions differ, the EAP is required to evaluate the evidence and present a reasoned assessment. The decision does not rest on excluding viewpoints, but on weighing technical merit, updated modelling, and enforceable mitigation measures.

All specialist inputs remain part of the public record and will be available to the competent authority.

#### **7. Closing**

Your concerns regarding coastal landscape integrity, precedent, and environmental protection are noted and form part of the official decision-making record. The competent authority will consider your submission alongside all other I&AP comments before making a determination.

We thank you for your engagement in the process.

Yours sincerely

**Bianca Gilfillan**

Environmental Assessment Practitioner  
Eco Route Environmental Consultancy



# Eco Route

**ENVIRONMENTAL CONSULTANCY**

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

PhD Univ. Pretoria

Cell: 072 222 6013

e-mail: [ebersohn@cyberperk.co.za](mailto:ebersohn@cyberperk.co.za)

MS. JANET EBERSOHN

Bsc. Hons. Environmental Mana

Cell: 082 557 7122

e-mail: [janet@ecoroute.co.za](mailto:janet@ecoroute.co.za)

Ecoroute 005

06 February 2026

Prof A.T. Lombard

Dear Prof Lombard,

**RE: RESPONSE TO COMMENTS — DRAFT BASIC ASSESSMENT REPORT: PORTION 79 OF FARM 205, RUYGTE VALLEY, SEDGEFIELD**

Eco Route acknowledges receipt of your detailed submission.

Your technical concerns were carefully considered and incorporated into the revised assessment documentation.

The amended report addresses:

- Biodiversity sensitivity and conservation priority areas
- Edge effects and ecological buffers
- Development footprint limitations
- Long-term management commitments
- Compliance with biodiversity planning frameworks

Specialist recommendations are embedded within the Environmental Management Programme.

We thank you for your expert contribution to the process.

Yours sincerely,

Bianca Gilfillan

Environmental Assessment Practitioner

Eco Route Environmental Consultancy



# Eco Route

**ENVIRONMENTAL CONSULTANCY**

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

PhD Univ. Pretoria

Cell: 072 222 6013

e-mail: [ebersohn@cyberperk.co.za](mailto:ebersohn@cyberperk.co.za)

MS. JANET EBERSOHN

Bsc. Hons. Environmental Management

Cell: 082 557 7122

e-mail: [janet@ecoroute.co.za](mailto:janet@ecoroute.co.za)

Ecoroute 001

06 February 2026

Dr Vanessa Weyer

E-mail: [vanessa.weyer@sanparks.org](mailto:vanessa.weyer@sanparks.org)

Dear Dr Weyer,

## **THE PROPOSED RESIDENTIAL AND 3 COTTAGES DEVELOPMENT OF PORTION 79 OF FARM 205 RUYGTE VALLEY, SEDGEFIELD, KNYSNA MUNICIPALITY, WESTERN CAPE PROVINCE, SOUTH AFRICA**

Eco Route Environmental Consultancy acknowledges receipt of SANParks' submission regarding the proposed development on Portion 79 of Farm 205.

Your concerns have been carefully considered and addressed in the amended Basic Assessment documentation and the updated Comments and Response Report.

The amended submission clarifies the distinction between the building footprint and the broader disturbance footprint. The building footprint refers strictly to permanent structures, while the disturbance footprint includes temporary construction working areas and service zones. These temporary areas will be rehabilitated post-construction and do not represent permanent site transformation.

The total development footprint has been recalculated using the updated constraints map to ensure full transparency. All infrastructure components — including access, parking, pedestrian boardwalks, and services — are included in the revised footprint calculations. The majority of the property remains a conserved natural landscape.

Sewage infrastructure will consist of a sealed, contained on-site treatment system designed specifically for environmentally sensitive coastal sites. No untreated discharge will occur, and infrastructure is positioned outside sensitive ecological zones.

Climate resilience has been considered in the design. The development footprint is outside active erosion zones and beyond the high-water mark buffer, with construction methods selected to protect dune stability and account for long-term coastal dynamics.

The proposal complies with the National Environmental Management: Integrated Coastal Management Act and coastal protection principles. No disturbance of the littoral active zone will occur, and the development does not alter shoreline processes.

Finally, the amended application includes stewardship and conservation commitments. The majority of the property will remain under conservation management, including invasive clearing and ecological rehabilitation, embedded within the Environmental Management Programme.

We appreciate your participation in the public process. Your input has contributed to strengthening the amended submission.

Yours faithfully

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

EcoRoute



# Eco Route

**ENVIRONMENTAL CONSULTANCY**

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

PhD Univ. Pretoria

Cell: 072 222 6013

e-mail: [egersohn@cyberperk.co.za](mailto:egersohn@cyberperk.co.za)

MS. JANET EBERSOHN

Bsc. Hons. Environmental Manag

Cell: 082 557 7122

e-mail: [janet@ecoroute.co.za](mailto:janet@ecoroute.co.za)

Ecoroute 002

06 February 2026

Sasha Mentz

[sasha@nicheunity.com](mailto:sasha@nicheunity.com)

Dear Ms Mentz,

**RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY**

Thank you for submitting your comments on the Draft Basic Assessment Report (BAR) for the proposed development on Portion 79 of Farm Ruygte Valley 205. Your input is acknowledged and appreciated. All comments have been formally recorded and addressed in the updated Comments and Response Report forming part of the Amended BAR.

We provide the following consolidated response to your concerns.

**Biodiversity and conservation**

The site falls within a highly sensitive coastal thicket system and is recognised as part of the Western Cape Milkwood Forest and Goukamma Strandveld ecosystem. The Amended BAR incorporates the full Terrestrial Biodiversity Assessment and adopts all specialist mitigation requirements.

The approved development footprint is strictly limited to the defined building envelope. The remainder of the property will remain natural and is proposed to be conserved through rezoning and ecological management commitments. Alien invasive clearing, search-and-rescue of indigenous vegetation, and long-term rehabilitation are binding requirements in the Environmental Management Programme (EMPr).

The development footprint represents a very small percentage of the 5.21 ha site and is designed to minimise ecological fragmentation while maintaining a conservation buffer to adjacent protected areas.

**Geotechnical and coastal risk**

A specialist geotechnical investigation confirmed that the southern dune slopes are unstable and unsuitable for development. The approved layout is positioned within the central–northern stable portion of the property, outside the erosion-risk areas and more than 100 m from the High-Water Mark.

No development is permitted in geotechnical no-go zones. Foundations must be engineered and signed off by an ECSA-registered structural engineer. Vegetation retention is mandatory to stabilise dune systems. These requirements are enforceable through the EMPr and ECO monitoring.

**Visual and landscape impacts**

A Visual Compliance Statement confirms that the structures will be visually recessive and screened by existing vegetation and topography. The buildings are low-profile, fragmented in layout, and use natural materials and earth-toned finishes to reduce visual intrusion. Strict lighting controls, vegetation retention, and rehabilitation measures ensure that the long-term visual character of the landscape is maintained.

**Footprint and disturbance**

The total development footprint refers only to the approved construction envelope. All disturbance outside this footprint is prohibited. Construction zones must be demarcated and monitored by an Environmental Control Officer. Rehabilitation of any temporary disturbance is compulsory.

**Wastewater and services**

The development is off-grid. Wastewater will be managed via compliant conservancy systems with regular servicing. No discharge into natural systems is permitted. Stormwater is managed through permeable surfaces and soft drainage measures to prevent runoff concentration.

**Climate resilience and long-term sustainability**

The development integrates climate-resilient design, including dune stabilisation, vegetation protection, permeable infrastructure, and erosion controls. Monitoring provisions are included in the operational phase to detect early signs of environmental stress.

**Heritage**

Heritage Western Cape has confirmed that no further studies are required. A chance-find protocol remains in place should any heritage material be discovered during construction.

**Conclusion**

The Amended BAR reflects all specialist findings and incorporates binding mitigation measures that substantially reduce environmental risk. The project footprint is small, tightly controlled, and located within a stable area of the site. Long-term conservation commitments form part of the approval conditions.

Your comments have materially contributed to strengthening the environmental safeguards of the project, and we thank you for your engagement.

Thank you again for your engagement in the process.

Kind regards,

Bianca Gilfillan  
Environmental Assessment Practitioner  
Eco Route Environmental Consultancy



# Eco Route

ENVIRONMENTAL CONSULTANCY

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

PhD Univ. Pretoria

Cell: 072 222 6013

e-mail: [egersohn@cyberperk.co.za](mailto:egersohn@cyberperk.co.za)

MS. JANET EBERSOHN

Bsc. Hons. Environmental Management

Cell: 082 557 7122

e-mail: [janet@ecoroute.co.za](mailto:janet@ecoroute.co.za)

Ecoroute 003

06 February 2026

Tessa Joubert, MSc

Ecological Restoration Practitioner

Sedgefield Resident

Dear Ms Joubert,

## **RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY**

Thank you for your detailed submission dated 15 December 2025 regarding the proposed development. Your concerns regarding climate resilience, biodiversity, water security and heritage value are acknowledged and appreciated. Each issue raised has been carefully considered and is addressed below.

### **1. Sustainability and cumulative climate risk**

The Basic Assessment includes specialist input addressing geotechnical stability, biodiversity sensitivity and long-term environmental resilience. The development footprint is confined to a small, stable portion of the property and avoids erosion-prone coastal slopes. Construction methods are designed to minimize disturbance, maintain vegetation cover, and incorporate climate-resilient drainage and stormwater controls. The majority of the site remains undeveloped and is subject to ecological management commitments.

### **2. Agricultural and ecological landscape value**

The site is recognized as ecologically sensitive and forms part of a broader coastal buffer system. For this reason, the layout preserves over 99% of the property in a natural state outside the defined footprint. The EMPr includes strict conservation provisions, invasive species removal, rehabilitation measures and long-term stewardship commitments to maintain ecological function.

### **3. Forest protection and National Forests Act**

The assessment acknowledges the presence of protected milkwood forest components. Any impact on protected trees is subject to permitting under the National Forests Act. No clearing may occur without authorization, and the EMPr requires specialist supervision, plant rescue and restoration protocols.

### **4. Water security concerns**

The proposed dwelling is not a high water-demand development. On-site rainwater harvesting, low-impact drainage and controlled wastewater infrastructure reduce pressure on municipal systems. The scale of development does not materially alter regional water supply or contribute to systemic water risk.

### **5. Climate Change Bill and long-term risk**

The design avoids cliff-edge hazard zones and incorporates geotechnical recommendations to address erosion and slope stability. The footprint lies outside projected coastal risk lines identified in the geotechnical investigation. Vegetation retention further stabilizes dune systems and enhances climate resilience.

### **6. Heritage considerations**

Heritage Western Cape reviewed the Notice of Intent to Develop and confirmed that no further heritage studies are required. The property does not contain identified heritage resources, and chance-find procedures are included in the EMPr as a precautionary safeguard.

## **7. Alignment with planning frameworks**

The development was assessed against municipal and provincial spatial frameworks and environmental legislation. Conditions imposed through the EMPr ensure compliance with biodiversity protection principles and the precautionary approach required in sensitive coastal environments.

### **Conclusion**

The amended Basic Assessment and Environmental Management Programme incorporate mitigation measures that substantially reduce environmental risk while preserving the ecological integrity of the site. Your submission contributed to strengthening the final safeguards included in the documentation.

Thank you for participating in the public process.

Kind regards,

Bianca Gilfillan  
Environmental Assessment Practitioner  
Eco Route Environmental Consultancy



# Eco Route

**ENVIRONMENTAL CONSULTANCY**

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

PhD Univ. Pretoria

Cell: 072 222 6013

e-mail: [egersohn@cyberperk.co.za](mailto:egersohn@cyberperk.co.za)

MS. JANET EBERSOHN

Bsc. Hons. Environmental Manag

Cell: 082 557 7122

e-mail: [janet@ecoroute.co.za](mailto:janet@ecoroute.co.za)

Ecoroute 005

06 February 2026

Visual Resource Management Africa cc

Att: Mr Steve (VRMA)

P O Box 7233

George

6531

Email: [steve@vrma.co.za](mailto:steve@vrma.co.za)

Dear Mr Steve,

## **RE: Response to VRMA Comments – Draft Basic Assessment Report: Portion 79 of Farm 205, Ruygte Valley**

Eco Route Environmental acknowledges receipt of your written comments dated 15 December 2025 regarding the Draft Basic Assessment Report (DBAR) for the proposed primary dwelling and access road on Portion 79 of Farm 205, Ruygte Valley.

We appreciate the detailed technical input provided. Your concerns have been carefully reviewed and responded to in the updated Comments and Response Report. The key matters are addressed below for clarity.

### **1. Visual Baseline Report**

The Draft Visual Baseline Report submitted by VRMA has now been formally included in the project record and reviewed alongside the other specialist inputs. No information has been excluded from consideration by the competent authority. The authority will have access to the full set of specialist materials when making its decision.

### **2. Skyline intrusion and visibility risk**

We acknowledge VRMA's concern that skyline intrusion cannot be fully confirmed without architectural and earthworks detail. In response:

- The final EMPr requires strict design controls
- Maximum structure height limitations are imposed
- Earthworks must follow natural contours
- Vegetation buffers must be retained
- Final architectural plans must be ECO-reviewed

These controls are enforceable conditions to prevent skyline break and visual dominance.

The development footprint is deliberately fragmented into small structures to reduce bulk and visual mass.

### **3. Dune crest and slope concerns**

The engineering and geotechnical assessment confirms that development has been positioned within the stable central-northern portion of the site and outside geotechnical hazard zones. No infrastructure is permitted within steep dune faces or identified structural weakness zones.

The EMPr includes:

- Prohibition of construction in no-go slope areas

- Mandatory ECO oversight
- Foundation engineering certification
- Erosion control measures

#### **4. Access road design**

The straight-line access concern is acknowledged. The final approved access alignment will follow terrain-sensitive design principles and must minimise vegetation removal and visual corridor effects. This requirement is written into the EMPr.

#### **5. Alternatives assessment**

Alternative layouts were assessed and documented in the BAR. The competent authority will consider all alternatives together with the specialist findings before reaching a decision.

Eco Route Environmental confirms that VRMA's concerns have been formally recorded and integrated into the environmental management framework. The final decision rests with the competent authority after reviewing the complete specialist record.

We thank you for your professional engagement in this process.

Yours sincerely,

Bianca Gilfillan  
Environmental Assessment Practitioner  
Eco Route Environmental



# Eco Route

**ENVIRONMENTAL CONSULTANCY**

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

PhD Univ. Pretoria

Cell: 072 222 6013

e-mail: [ebersohn@cyberperk.co.za](mailto:ebersohn@cyberperk.co.za)

MS. JANET EBERSOHN

Bsc. Hons. Environmental Management

Cell: 082 557 7122

e-mail: [janet@ecoroute.co.za](mailto:janet@ecoroute.co.za)

Ecoroute 005

06 February 2026

Western Cape Roads Infrastructure

Dear Sir / Madam,

**RE: RESPONSE TO COMMENTS — DRAFT BASIC ASSESSMENT REPORT: PORTION 79 OF FARM 205, RUYGTE VALLEY, SEDGEFIELD**

Eco Route confirms receipt of your correspondence.

The proposed access route follows the existing stable alignment and avoids dune crests and slopes.

Construction traffic will:

- use designated access only
- minimise disturbance
- follow erosion control protocols

The access design complies with geotechnical and environmental requirements.

We appreciate your review and participation in the assessment process.

Yours faithfully,

Bianca Gilfillan

Environmental Assessment Practitioner

Eco Route Environmental Consultancy