



Eco Route

ENVIRONMENTAL CONSULTANCY
REGISTRATION NO. 1998/031976/23

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EcoRoute Ref.: 001

30 March 2026

Western Heads Goukamma Conservancy
Dr David Alan Edge

Dear Sir

PROJECT: PROPOSED RESIDENTIAL DWELLING ON PORTION 76 OF FARM UITZICHT NO. 216, KNYSNA, WESTERN CAPE: DRAFT BASIC ASSESSMENT REPORT – COMMENTS RESPONSE LETTER

The Basic Assessment process for the proposed residential dwelling on Portion 76 of Farm Uitzicht No. 216, Knysna, Western Cape, has progressed through multiple public participation and submission phases due to the lapsing of previous applications and subsequent resubmissions to the Department of Forestry, Fisheries and the Environment (DFFE). Previous application processes were undertaken under DFFE reference numbers 14/12/16/3/3/1/3114 and 14/12/16/3/3/1/3185. The application lapsed due to administrative timeframes and was subsequently resubmitted. A new application is now being submitted to the DFFE and a new DFFE reference number will be issued upon acceptance of the application.

Public Participation was undertaken during the Consultation Basic Assessment phase, as well as during the Draft Basic Assessment Report phase. Comments received from Interested and Affected Parties and Organs of State have been incorporated into the Comments and Response Report and the Draft Basic Assessment Report.

No amendment to the preferred layout is proposed as part of this resubmission.

Please find below the Comments and Responses as captured in the Comments and Response Report.

Western Heads Goukamma Conservancy (WHGC) – 10 December 2025

Comment	Response
<p>Objection 1: Landscape context – The DBAR failed to adequately address the landscape context and incorrectly states that the property does not border a protected area. The property is located within a Critical Biodiversity Area and within the GRNP expansion footprint and Coastal Protection Zone.</p>	<p>The comment is noted. The DBAR acknowledges that Portion 76 is located within a Critical Biodiversity Area, the Coastal Protection Zone, and within the Garden Route National Park expansion and conservation corridor context. The statement in the DBAR refers specifically to the property not being formally declared as a protected area, although it forms part of a broader conservation landscape. The sensitivity of the broader landscape and ecological corridor has been considered in the specialist studies and the impact assessment.</p>
<p>Objection 2: Main dwelling footprint – The main dwelling footprint is excessive and spread out, resulting in unnecessary disturbance within a CBA and not consistent with “appropriate scale and form”.</p>	<p>The comment is noted. The originally proposed dwelling footprint of approximately 3000 m² has been significantly reduced to approximately 1000 m² (including verandas and garage). The disturbance footprint has also been reduced accordingly. The intention is to limit the development footprint as far as practicable while still allowing reasonable use of the property in line with primary rights.</p>
<p>Objection 3: Internal road – The internal road will cause significant biodiversity loss, fragmentation of the ecological corridor, erosion risk, visual impact, and long-term ecological impacts.</p>	<p>The comment is noted. The internal road is required to provide access to the proposed dwelling site; however, mitigation measures have been included to minimise impacts, including limiting road width, following natural contours, minimising cut and fill, implementing erosion control, and rehabilitating disturbed areas. The road footprint is included in the total disturbance footprint assessed in the DBAR.</p>
<p>Objection 4: Environmental sensitivity – Insufficient emphasis is placed on the environmental sensitivity of the southern section of the site.</p>	<p>The comment is noted. The DBAR and specialist studies confirm that the site has High to Very High biodiversity sensitivity and is located within a CBA. This sensitivity informed the alternatives assessment and the reduction of the development footprint. Mitigation and strict environmental management measures are included in the EMPr.</p>
<p>Objection 5: Exercising primary rights / definition of a dwelling – The proposed dwelling exceeds the definition of a dwelling and is excessive for a property within a CBA.</p>	<p>The comment is noted. The application is for a single residential dwelling exercising primary land use rights. The dwelling has been reduced in size from the previously proposed structure. No commercial use forms part of this application, and any future change in land use would require separate approval from the relevant authorities.</p>
<p>Objection 6: Alternatives – The DBAR should have selected Alternative 4 (northern disturbed area) as it has the lowest environmental impact and does not require an internal road.</p>	<p>The comment is noted. Alternative 4 was assessed as part of the alternatives assessment process. The preferred alternative was selected based on an integrated assessment of environmental sensitivity, geotechnical constraints, access, services, and practical development considerations. While Alternative 4 has certain advantages, it also has constraints, and the final preferred alternative represents the most feasible option when all factors are considered together.</p>

<p>Objection 7: Public Participation Process – The PPP is incomplete and several issues raised by I&APs were marked as “Noted” or “No response”.</p>	<p>The comment is noted. The Comments and Response Report has been expanded and updated to ensure that all comments received from Interested and Affected Parties are captured and responded to in detail.</p>
<p>Objection 8: Visual Impact Assessment – A Visual Impact Assessment (VIA) should have been conducted and visual impacts have been underestimated.</p>	<p>The comment is noted. The visual impact of the proposed development was considered in the DBAR. The dwelling is proposed as a low-profile structure with natural colours and materials to blend into the landscape. Landscaping and rehabilitation will further reduce visual impact over time. The visual impact is expected to be localised.</p>
<p>Objection 9: Boreholes and water pipeline impacts – The impacts of drilling and long water pipelines have not been adequately assessed.</p>	<p>The comment is noted. Water supply will primarily be from rainwater harvesting, with borehole water as a supplementary source if required and subject to approval from the relevant authority. Any pipeline installation will be limited to the minimum required footprint and disturbed areas will be rehabilitated.</p>
<p>Objection 10: Kerk Laan upgrade – Upgrading Kerk Laan may have significant environmental impacts and has not been assessed.</p>	<p>The comment is noted. Access to the property is via an existing servitude road (Kerk Laan). No major road upgrade forms part of this application. Any required maintenance or minor improvement to allow safe access would be limited and subject to environmental management measures.</p>
<p>Objection 11: Missing information – The BAR and EMPr lack detail on disturbance footprints, services, road footprint, septic tank, water tanks, and construction impacts.</p>	<p>The comment is noted. The development footprint includes the dwelling, internal access road, and associated services infrastructure. Environmental management measures for construction activities, excavation, topsoil management, stormwater management, and rehabilitation are included in the EMPr and will be implemented during construction.</p>
<p>Objection 12: Lack of Duty of Care / Alien clearing – The applicant has not cleared invasive alien vegetation and is not fulfilling Duty of Care obligations.</p>	<p>The comment is noted. The applicant acknowledges the responsibility in terms of the National Environmental Management: Biodiversity Act (NEM:BA) to control alien invasive vegetation. An Alien Invasive Vegetation Management Plan will be implemented as part of the Environmental Management Programme (EMPr).</p>
<p>Conclusion: WHGC objects to the preferred alternative due to biodiversity loss, ecosystem fragmentation, and visual impact, and requests that the northern alternative be considered.</p>	<p>The objection is noted. The DBAR includes an alternatives assessment and specialist input to inform the decision-making process. The proposed development footprint has been reduced and mitigation measures have been included to minimise environmental impacts. The competent authority will consider all comments received, the specialist studies, and the mitigation measures in making a decision on the application.</p>

We trust that the above responses adequately address the comments raised. All comments received have been considered as part of the environmental assessment process and have informed the specialist assessments, impact assessment, and Environmental Management Programme.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned.

Yours sincerely,

Bianca Gilfillan (Ms)

EAPASA: 2023/2792

Eco Route Environmental Consultancy



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EcoRoute Ref.: 001

30 March 2026

WWF South Africa

Dear Sir / Madame

PROJECT: PROPOSED RESIDENTIAL DWELLING ON PORTION 76 OF FARM UITZICHT NO. 216, KNYSNA, WESTERN CAPE: DRAFT BASIC ASSESSMENT REPORT – COMMENTS RESPONSE LETTER

The Basic Assessment process for the proposed residential dwelling on Portion 76 of Farm Uitzicht No. 216, Knysna, Western Cape, has progressed through multiple public participation and submission phases due to the lapsing of previous applications and subsequent resubmissions to the Department of Forestry, Fisheries and the Environment (DFFE). Previous application processes were undertaken under DFFE reference numbers 14/12/16/3/3/1/3114 and 14/12/16/3/3/1/3185. The application lapsed due to administrative timeframes and was subsequently resubmitted. A new application is now being submitted to the DFFE and a new DFFE reference number will be issued upon acceptance of the application.

Public Participation was undertaken during the Consultation Basic Assessment phase, as well as during the Draft Basic Assessment Report phase. Comments received from Interested and Affected Parties and Organs of State have been incorporated into the Comments and Response Report and the Draft Basic Assessment Report.

No amendment to the preferred layout is proposed as part of this resubmission.

Please find below the Comments and Responses as captured in the Comments and Response Report.

Comment	Response
<p>COMMENTS ON DRAFT BASIC ASSESSMENT FOR PROPOSED DEVELOPMENT OF PORTION 76 OF FARM UITZICHT NO 216, KNYSNA, WESTERN CAPE (DFFE Ref: 14/12/16/3/3/1/3114 & 14/12/16/3/3/1/3185)</p> <ol style="list-style-type: none"> WWF South Africa (WWF-SA) hereby wish to confirm its registration as an Interested and Affected Party (I&AP) in accordance with the Environmental Impact Assessment (EIA) Regulations of the National Environmental Management Act No. 107 of 1998 (NEMA) for the above-mentioned prospecting application for environmental authorization. WWF-SA has a strong interest in protecting sensitive ecosystems and threatened ecological areas and work closely with conservation partners such as SANParks to ensure the protection of South Africa’s unique biodiversity and the critical ecosystem services it provides to all South Africans. In recognition of the critical importance of conserving the unique and highly sensitive biodiversity occurring within the Knysna Sand Fynbos Coastal Corridor, WWF-SA owns several properties that are in the process of being declared part of the Garden Route National Park (GRNP). 	<p>WWF-SA is hereby registered as an Interested and Affected Party (I&AP) and will be kept informed of the progress of the application. All relevant reports and notifications will be provided in accordance with the EIA Regulations, 2014, as amended.</p> <p>The comment is noted and supported. The environmental sensitivity of the site and surrounding area has been recognised and assessed through specialist studies and the Basic Assessment process. The proposed development footprint has been reduced and located to minimise environmental impact, and mitigation measures have been included in the EMPr to protect biodiversity and ecosystem functioning.</p> <p>The comment is noted. The broader conservation context and the Garden Route National Park expansion initiative are acknowledged in the DBAR and were taken into consideration during the site sensitivity assessment and alternatives assessment.</p>
<p>PROPOSED DEVELOPMENT SITE CONTEXT</p> <ol style="list-style-type: none"> Ptn 76 of Farm Uitzicht No 216 is located in the Knysna Sand Fynbos Coastal Corridor, as well as the protected area expansion footprint of the GRNP. This corridor focusses specifically on the conservation of the critically endangered Knysna Sand Fynbos, one of South Africa’s most threatened ecosystems, with 83% of its original 15,000 ha already transformed by plantations, agriculture, and urban development. For this reason, the entire property is classified as a Critical Biodiversity Area (CBA) in terms of the 2023 Western Cape Biodiversity Spatial Plan 	<p>The comment is noted and acknowledged. The DBAR confirms that the property is located within a Critical Biodiversity Area and within a sensitive coastal and ecological corridor. The development proposal has therefore been designed as a low-density development with a very limited disturbance footprint to minimise ecological and landscape impacts.</p> <p>The comment is noted and confirmed. The DBAR acknowledges the CBA status and proposes a low-density, biodiversity-sensitive land use with</p>

<p>(adopted on 13 December 2024, Gazette Extraordinary No. 9017) and National Environmental Management: Protected Areas Act (Act No. 57 of 2003; NEM: PAA).</p> <p>6. The low southern section of the property is traversed by two foredunes that are highly sensitive, dynamic, and inherently unstable systems, continuously shaped by coastal processes such as wind and wave action. These dunes are prone to slumping and blowouts due to their steep slopes (greater than 30%) and highly erodible soils, meaning any disturbance significantly accelerates erosion and destabilization. Importantly, they serve a critical climate change resilience function by acting as natural buffers against storm surges and sea-level rise; disturbing them compromises this protective role and increases long-term risks to infrastructure and ecosystems. Recognizing their ecological importance, these areas are designated as part of the Coastal Protection Zone under the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008), which legally regulates land use adjacent to coastal public property to safeguard vital coastal ecosystems.</p> <p>7. Site visits conducted by SANParks confirmed the sensitivity of the property in terms of the above-mentioned aspects, as well as its excellent ecological condition.</p>	<p>mitigation measures and strict development controls to minimise environmental impact. The majority of the property will remain in a natural state.</p> <p>The comment is noted. The sensitivity of the foredune system and coastal processes has been assessed in the specialist studies, including the geotechnical assessment. Development constraints and mitigation measures have been identified to ensure that development occurs outside the most sensitive and unstable areas as far as practicable, and that dune stability is maintained.</p> <p>The comment is noted and agreed. The ecological sensitivity of the site has been confirmed by specialist studies and is acknowledged in the DBAR. This is the reason why the development footprint is limited and why mitigation and environmental management measures are proposed.</p>
<p>COMMENT ON PROPOSED DEVELOPMENT</p>	
<p>8. It is noted that the southern section of the property comprises Least Threatened Goukamma Dune Thicket and the northern section Critically Endangered Knysna Sand Fynbos. The property borders Kerk Laan and includes a previously disturbed area in the northwestern corner, which SANParks has identified as acceptable for development.</p> <p>9. As noted on page 20 of 173, Section 2(4)(a) of the National Environmental Management Act No. 107 of 1998, NEMA requires that the disturbance of ecosystems and loss of biodiversity be avoided, or where unavoidable, minimized and remedied. In this case, the landowner has the opportunity to completely avoid disturbing a critically endangered vegetation type by building in the disturbed section. However, the landowner and EAP have</p>	<p>The comment is noted and consistent with the findings of the specialist botanical and biodiversity assessments included in the DBAR.</p> <p>The comment is noted. Alternative locations, including the disturbed area in the north-western portion of the property, were considered as part of the alternatives assessment. The preferred alternative was selected based on an integrated assessment of environmental, engineering, access, services, visual, and geotechnical considerations. The preferred alternative has also been significantly reduced in scale to minimise impacts. Mitigation</p>

<p>disregarded this option and instead proposed a “preferred development alternative” that would:</p> <ul style="list-style-type: none"> a. destroy critically endangered vegetation; and b. permanently disturb a highly unstable coastal area prone to erosion. <p>10. This conclusion is reinforced by the fact that the recommendation of the biodiversity and plant species specialist has been ignored. According to the Specialist Plant Species and Terrestrial Biodiversity Report (dated 22 July 2024), Alternative 4 (one dwelling in the northwestern corner of the property) is the most acceptable layout, while Alternative 1 (preferred by the EAP and landowner) and Alternative 3 would likely trigger offsets due to residual impacts that cannot be mitigated.</p> <p>11. Furthermore, the proposal disregards the objectives of the 2023 Western Cape Biodiversity Spatial Plan, which seeks to maintain Priority Natural Areas and Critical Biodiversity Areas in a natural or near-natural state, with no further loss of habitat.</p> <p>12. In our view, approving the landowner’s preferred alternative would set a dangerous precedent, placing critical ecosystems at risk.</p> <p>13. WWF therefore cannot support the authorisation of the preferred layout alternative proposed by the EAP and landowner and unequivocally endorses the comments submitted by SANParks on 9 December 2025 and the Western Heads Goukamma Conservancy on 10 December 2025.</p>	<p>measures are included in the EMPr to minimise biodiversity impacts and disturbance.</p> <p>The comment is noted. The botanical specialist findings and recommendations were considered as part of the alternatives assessment; however, the final preferred alternative reflects an integrated environmental assessment considering all specialist inputs and site constraints. Mitigation measures recommended by the specialist have been incorporated into the EMPr and will be implemented.</p> <p>The comment is noted. The proposed development represents a low-density residential development exercising primary land use rights with a very small disturbance footprint relative to the size of the property. The majority of the property will remain in a natural state and no further subdivision or additional development is proposed.</p> <p>The comment is noted. Each application is assessed on its own merits and based on site-specific environmental assessment, specialist input, and mitigation measures. The proposed development is limited in scale and includes mitigation measures to reduce environmental impact.</p> <p>The comment is noted. The concerns raised by WWF-SA will be considered by the competent authority in their decision-making process. The DBAR provides the environmental assessment, specialist input, and mitigation measures to inform the competent authority’s decision.</p>
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We trust that the above responses adequately address the comments raised. All comments received have been considered as part of the environmental assessment process and have informed the specialist assessments, impact assessment, and Environmental Management Programme.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned.

Yours sincerely,

Bianca Gilfillan (Ms)

EAPASA: 2023/2792

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EcoRoute Ref.: 001

30 March 2026

Directorate: Coastal Management, DEA&DP, Western Cape Government

Dear Sir / Madame

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Public Participation was undertaken during the Consultation Basic Assessment phase, as well as during the Draft Basic Assessment Report phase. Comments received from Interested and Affected Parties and Organs of State have been incorporated into the Comments and Response Report and the Draft Basic Assessment Report.

No amendment to the preferred layout is proposed as part of this resubmission.

Please find below the Comments and Responses as captured in the Comments and Response Report.

Comment	Response
<p>RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE PRE-APPLICATION BASIC ASSESSMENT PROCESS FOR THE PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE</p> <p>Your request for comment from the Sub-directorate: Coastal Management (SD: CM) pertaining to the notice of the pre-application Basic Assessment Report (BAR) for the above-mentioned application received on 17 November 2025 and the previous comment by the SD: CM, dated 11 April 2025, refer.</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>1.2 The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme (“PCMP”). The Western Cape Provincial Coastal Management Programme (“WC: PCMP 2022-2027) is a five (5) year strategic document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the Province. This WC: PCMP 2022-2027 was adopted by the Provincial MEC for Local Government, Environmental Affairs and Development Planning on 19 May 2023 and available upon request.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

<p>1.3 A key priority of the PCMP is the Estuarine 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 of which over 20 Estuarine Management Plans have already been approved.</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>Noted.</p> <p>Noted.</p>
<p>2. COMMENT</p> <p>2.1 The sub-directorate: Coastal Management (“SD: CM”) has reviewed the information for the proposed construction of a single main dwelling in the south-western portion of Portion 76 of Farm Uitzicht No. 216, and have the following commentary:</p> <p>2.1.1 The entire development site is a Critical Biodiversity Area, is located within the buffer zone of the Garden Route National Park (GRNP) and is located within the Knysna Protected Environment (KPE) with the KPE Development Control Area (DCA) extending some 50m into the lower southern section of Portion 76. Furthermore, the development area is located within the Coastal Protection Zone (CPZ) and the Littoral Active Zone (LAZ). Two foredunes traverse the lower southern section of the property, which run east-west. Slopes are steep on either side of these foredunes.</p>	<p>The comment is noted and the environmental sensitivity of the site is acknowledged. The DBAR and specialist studies recognise that the property is located within a highly constrained coastal and biodiversity-sensitive environment, including the CBA, CPZ, KPE and associated GRNP buffer context. These sensitivities informed the site assessment and the consideration of alternatives. The proposal has been reduced to a single dwelling only, with a substantially reduced footprint relative to earlier concepts, in order to limit the extent of disturbance as far as practicable.</p>
<p>2.2 It is noted that the proposed site for the dwelling is unchanged from what was previously proposed and that this site is considered as the most</p>	<p>The comment is noted. Dune stability, coastal erosion and climate resilience are acknowledged as critical considerations for this</p>

<p>feasible location in terms of the Geotechnical Soil Test Report. Dune stability and coastal erosion are of serious concern, especially in the context of climate change (adaptation and mitigation strategies are imperative). As far as possible, primary and secondary dunes should remain intact and not be developed. Their value as ecological infrastructure to mitigate the impacts of dynamic coastal processes and climate change is essential to ensure the resilience of coastal communities.</p>	<p>application. The preferred location was retained because it was identified through the integrated assessment as the most feasible option when geotechnical, environmental, access and service constraints were considered together. The applicant's position remains that the development footprint has been limited and reduced in scale, and that mitigation and design controls are intended to minimise disturbance to the dune system as far as practicable. The importance of dunes as ecological infrastructure is acknowledged.</p>
<p>2.3 The Specialist Terrestrial Biodiversity & Plant Species themes Site Sensitivity Verification (prepared by Confluent Environmental, dated November 2023) confirmed that the site is of Very High sensitivity consisting of Knysna Sand Fynbos, which is critically endangered, and Strandveld-Fynbos mosaic.</p>	<p>The comment is noted and consistent with the specialist findings. The very high biodiversity sensitivity of the site is acknowledged. This is precisely why the proposal has been reduced in extent, why specialist input has informed the layout, and why strict mitigation and environmental management measures are proposed.</p>
<p>2.4 Based on the above and on previous comments, the SD:CM does not support the proposed development of a residential dwelling on Portion 76 of the Farm 216 Uitzicht in Knysna within the LAZ, as it is deemed to be unwarranted.</p>	<p>The objection is noted. The SD:CM's position is fully acknowledged and will be reflected in the final Comments and Response Report and BAR. The applicant nevertheless maintains that the application is for a single dwelling exercising primary land use rights, that the proposal has been materially reduced from earlier concepts, and that the preferred alternative was selected following an integrated assessment of all available specialist and technical information. The competent authority is respectfully requested to consider the full specialist record, the revised footprint, and the proposed mitigation measures in reaching its decision.</p>
<p>3 The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: "...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment..." together with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.</p>	<p>The comment is noted and accepted. The applicant acknowledges the statutory duty of care in terms of NEMA and NEM: ICMA. The EMPr and specialist recommendations are intended to ensure that impacts are avoided where possible and otherwise minimised, managed and rehabilitated in accordance with legal requirements.</p>

4 The SD: CM reserves the right to revise its comments and request further information from you based on any information that may be received.	Noted. The applicant and EAP acknowledge the Department's right to revise its comments and to request additional information if required.
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We trust that the above responses adequately address the comments raised. All comments received have been considered as part of the environmental assessment process and have informed the specialist assessments, impact assessment, and Environmental Management Programme.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned.

Yours sincerely,

Bianca Gilfillan (Ms)

EAPASA: 2023/2792

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Public Participation was undertaken during the Consultation Basic Assessment phase, as well as during the Draft Basic Assessment Report phase. Comments received from Interested and Affected Parties and Organs of State have been incorporated into the Comments and Response Report and the Draft Basic Assessment Report.

No amendment to the preferred layout is proposed as part of this resubmission.

Please find below the Comments and Responses as captured in the Comments and Response Report.

Tanja Meyburgh – November/December 2025	
Comment	Response
The property is located within the expansion footprint of the Garden Route National Park and functions as an ecological corridor and buffer.	The comment is acknowledged. The protected area expansion and corridor function have been recognised and considered in the BAR and specialist studies.
Development within this area may compromise biodiversity and ecological connectivity.	The concern is noted. The potential impacts on biodiversity and ecological connectivity have been assessed and remain key considerations.
The proposed development footprint and associated infrastructure may result in unacceptable environmental impacts.	The objection is acknowledged. The significance of impacts has been assessed, and mitigation measures have been proposed; however, these concerns are recognised as material to the decision-making process.
The proposal is not supported from a conservation planning perspective.	The objection is noted. The DFFE Protected Areas position will be considered together with all other authority comments in the final assessment.
<p>Re: Objection to the Proposed Development of Portion 76 (A Portion of Portion 54) of Farm 216 Uitzicht, Knysna, Western Cape. As set out in the Draft Basic Assessment Report by Eco Route.</p> <p>I hereby object to the proposed development and support the objections submitted by the Western Heads Gougamma Conservancy and SANParks in this regard. I am owner of the portion 74 and 75 Uitsicht which I bought with the sole intention to help save this sensitive area for his environmental value and as a natural ecologically pristine area for generations to come. Portion 76 falls within an exceptionally sensitive biodiversity area as per SANBI Biodiversity classification, and is a core conservation area. I share a boundary with portion Uitsicht portion 75 and both the portions 74 and 75 look directly onto the dunes where the intended development is proposed. We also share an access road which runs on the Northern boundary of both my properties. Portion 74 and 75 are already committed to be included into SANparks due to their important conservation value.</p>	<p>The objection and background information are noted. The environmental sensitivity of the property and the broader conservation context have been acknowledged in the Draft Basic Assessment Report (DBAR) and specialist studies. The application is for a single dwelling exercising primary land use rights, and the development footprint has been significantly reduced in scale and carefully positioned based on specialist input and site constraints. The majority of the property will remain in a natural state and mitigation measures are included in the Environmental Management Programme (EMPr) to minimise ecological disturbance.</p>

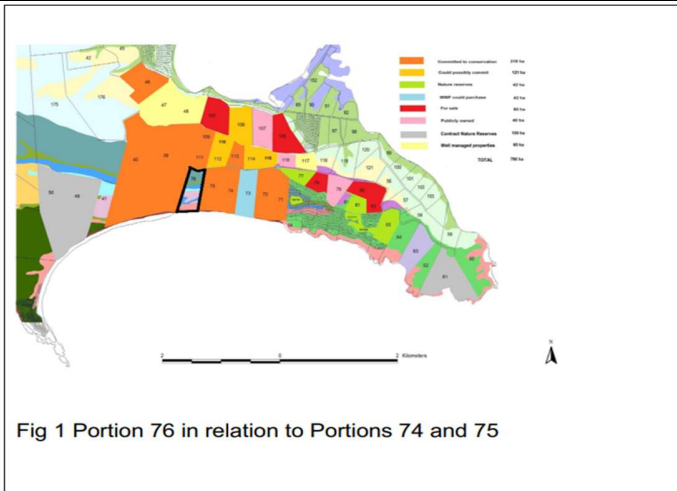


Fig 1 Portion 76 in relation to Portions 74 and 75

1. Main house:

The location and size of the footprint of the main dwelling which will be developed in the sensitive dune area. All of the other dwellings in the area are located near the municipal or provincial roads to prevent disturbance of new roads cutting into the landscape creating an even larger footprint of disturbance. All the dwellings in the area are on much smaller footprints and the suggested footprint for those in SANparks is a maximum of 300m², which is what most properties will adhere to. There are no other buildings on the beachfront in the area, which means that this house would not only ruin the existing aesthetics of this important Tourist and ecological attraction, but will set a precedent for future development which will have devastating effects on the ecology of the dune. SANparks has suggested an alternative location of a residence in the Northern Boundary which minimises the footprint, does not disrupt the connectivity of the ecological corridor, and minimises the aesthetic impact of the road and dwelling in a pristine wilderness landscape. The size and layout of this house is furthermore not in line with a domestic dwelling and I have concerns that this will be used or applied for commercial use in future. Commercial use would mean increased traffic and pollution for the whole area as access runs through the middle of all the portions.

The comment is noted. The proposed dwelling has been reduced in size from the originally proposed 3000 m² to approximately 1000 m² (including verandas and garage), and the total disturbance footprint is limited to approximately 0.25 ha. The application is strictly for a single residential dwelling and not for commercial use. Any future change in land use would require a separate land use application and environmental process, if applicable. The location of the dwelling was determined through an alternatives assessment and specialist input, taking into account environmental, geotechnical, access and services constraints. Mitigation measures are included to minimise visual and ecological impacts.

2. Internal Road:

the footprint and disturbance to the fynbos is increased by locating the dwelling site on the dunes. This can be mitigated by building the dwelling

The comment is noted. The internal access road has been assessed as part of the DBAR and specialist studies. The road will be designed to

<p>closer to existing roads. This road will require excavations due to the steep descent of the land which will be an eyesore and disturb the landscape and ecology. The report does not adequately represent the impact of this road.</p>	<p>follow natural contours as far as possible to minimise cut and fill, vegetation clearance and visual impact. The road width will be kept to a minimum and disturbed areas will be rehabilitated after construction. These mitigation measures are included in the EMPr.</p>
<p>3. Access road: the access road to portion 76 runs along the northern boundary of both portion 74 and 75. It is a road that has not been reinforced and is a dust farm road which will not tolerate large trucks or large building machinery. I anticipate damage to the integrity of my northern borders as well as those of my neighbours, with the number and type of vehicles that will be needed to access a development of this size. Nothing is mentioned of who will be responsible for the maintenance and repair of this road and how damage will be minimised. Furthermore, there are no overtaking or turning points for vehicles on this road, and this can only be achieved through encroaching on other properties such as mine at portion 74 and 75 and the neighbours.</p>	<p>The comment is noted. Construction traffic will be managed and limited as far as possible. Any damage to existing access roads caused by construction vehicles will be repaired by the applicant after construction. Construction Environmental Management measures will include traffic management, access control, and limitations on construction vehicle size where possible. No encroachment onto neighbouring properties will be permitted without landowner consent.</p>
<p>4. Ecology: no mention has been made of the surrounding areas, the plan already in place to create an ecological corridor along these properties or any of the context of this development. The impact on the surrounding area is massive both in noise, light, sound pollution of a natural conservation environment, and disturbance to the ecological corridor and movement of critical species and animals in the area. This property and its development does not exist in isolation of the larger landscape and development plan.</p>	<p>The comment is noted. The broader ecological corridor and surrounding conservation areas were considered in the biodiversity specialist studies and the DBAR. The development footprint is small relative to the property size and mitigation measures such as limited lighting, indigenous landscaping, construction controls, and rehabilitation are included in the EMPr to minimise ecological disturbance, noise and visual impacts.</p>
<p>5. Aesthetics: This is a false statement in the BAR page 100: <i>“As is evident portion 76/216 is only barely visible in the distance from the road leading to and from Brenton-on-Sea. Consequently, the proposed development will have no visual impact on the aesthetic value of the affected area. On heritage grounds, due to the entire absence of heritage resources or themes in and around 76/216, the proposed development will have negligible to no impact on the visual or aesthetic heritage value of the area.”</i> This is an image taken from the main road viewpoint from Belvedere to Brenton (mentioned in the above statement) with the Dune of the proposed site and how it fits into the area on the left of the image. Currently there is no development along this beach from Brenton on Sea up to Buffels Bay village. The proposed development on the dune on Portion 76 is visible and aesthetically devastating to both portion 74 and 75’s proposed residence</p>	<p>The comment is noted. Visual impacts were considered as part of the environmental assessment. The dwelling has been designed as a low-profile structure using natural colours and non-reflective materials to blend with the surrounding landscape. Landscaping with indigenous vegetation will further reduce visual impact over time. The visual impact is therefore expected to be localised and mitigated through design and landscaping measures.</p>

sites on the northern boundaries as well as many other properties in the area, including the ones above me and public access areas such as this viewpoint and beach.



I do not dispute the owner's primary land use right to a residence, however object to the proposed site location of the main residence, the proposed residence size and the proposed internal road (due to site selection on the dune). The objections are based primarily on the level of biodiversity loss, ecosystem fragmentation and aesthetic impact that can be avoided.

The objection is noted. The concerns raised regarding biodiversity, ecosystem fragmentation and visual impact have been considered in the DBAR and specialist studies. The proposed development footprint has been reduced and mitigation measures have been included to minimise environmental impacts. The competent authority will consider all comments received, the specialist studies, and the mitigation measures in making a decision on the application.

We trust that the above responses adequately address the comments raised. All comments received have been considered as part of the environmental assessment process and have informed the specialist assessments, impact assessment, and Environmental Management Programme.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned.

Yours sincerely,

Bianca Gilfillan (Ms)

EAPASA: 2023/2792

Eco Route Environmental Consultancy



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30 March 2026

Dr Vanessa Weyer,
Principal Planner,
SANParks Garden Route

Dear Madame

**PROJECT: PROPOSED RESIDENTIAL DWELLING ON PORTION 76 OF FARM UITZICHT NO. 216, KNYSNA,
WESTERN CAPE: DRAFT BASIC ASSESSMENT REPORT – COMMENTS RESPONSE LETTER**

The Basic Assessment process for the proposed residential dwelling on Portion 76 of Farm Uitzicht No. 216, Knysna, Western Cape, has progressed through multiple public participation and submission phases due to the lapsing of previous applications and subsequent resubmissions to the Department of Forestry, Fisheries and the Environment (DFFE). Previous application processes were undertaken under DFFE reference numbers 14/12/16/3/3/1/3114 and 14/12/16/3/3/1/3185. The application lapsed due to administrative timeframes and was subsequently resubmitted. A new application is now being submitted to the DFFE and a new DFFE reference number will be issued upon acceptance of the application.

Public Participation was undertaken during the Consultation Basic Assessment phase, as well as during the Draft Basic Assessment Report phase. Comments received from Interested and Affected Parties and Organs of State have been incorporated into the Comments and Response Report and the Draft Basic Assessment Report.

No amendment to the preferred layout is proposed as part of this resubmission.

Please find below the Comments and Responses as captured in the Comments and Response Report.

SANParks	
Comment	Response
<p>SANParks could support development in the node where the Managers Cottage is proposed adjacent to Kerk Laan, as discussed on-site on 8 September 2020. It would be preferable if all development is consolidated into one area (the area where the farm managers cottage is proposed) to minimise fragmentation of the landscape and impact on the sensitive fynbos environment.</p>	<p>This comment is acknowledged. SANParks' preference for a clustered development node adjacent to Kerk Laan is understood from a fragmentation and access perspective. However, the final preferred alternative was not based on access considerations alone. The northern / Kerk Laan area falls within the more sensitive northern portion of the property, where Critically Endangered Knysna Sand Fynbos is present, whereas the selected southern footprint was identified as the more feasible option when the botanical, terrestrial biodiversity, geotechnical and visual considerations were read together. The applicant's position is therefore that clustering adjacent to Kerk Laan is not automatically the least-impact option when direct loss of more sensitive vegetation is taken into account.</p>
<p>The applicant should be reminded that the main objective of Priority Natural Areas and CBAs is to maintain it in a natural or near natural state, with no further loss of natural habitat. Only low impact, biodiversity sensitive land uses are appropriate. The property is currently pristine and was not previously developed.</p>	<p>This is accepted. The property is highly sensitive and the objective of maintaining it in a natural or near-natural state is acknowledged. The application has therefore been reduced to a single dwelling with a substantially reduced footprint relative to earlier concepts, and the development envelope remains a very small portion of the overall 21 ha property. The proposal is motivated as a low-density exercise of existing primary land use rights, with the overwhelming majority of the property remaining undeveloped and available to continue functioning as natural habitat and ecological corridor.</p>
<p>SANParks request to meet with the landowners to discuss a way forward that can benefit biodiversity conservation and allow for low impact development without the need for a road over the pristine dunes. The current proposal will set a very bad precedent for potential development of other properties in the Knysna Sand Fynbos Coastal Corridor. The properties on both side of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023.</p>	<p>The request and objection are noted. Engagement with SANParks on biodiversity conservation and potential stewardship options is supported in principle. The concern regarding precedent is also understood. The applicant's position, however, is that this proposal must be assessed on its own site-specific merits, including the completed specialist studies, the reduced footprint, and the specific environmental constraints of Portion 76. It is not proposed as a broad corridor-opening precedent, but as a highly limited residential use on a privately owned property where primary rights exist. The conservation status and future inclusion of neighbouring properties in the GRNP is acknowledged but does not of itself extinguish the current owner's right to seek authorisation for a reduced and site-specific proposal.</p>
<p>(2) Draft Basic Assessment, Follow-up Comment, SANParks Objected - 28 January 2021 SANParks objected to the proposed development on 1 October 2020. A site visit with the landowners and FAP took place on 4 January 2021. Key points discussed:</p>	<p>Noted. The follow-up meeting and SANParks' continued objection form part of the historical decision-making context for the property and are acknowledged in full.</p>

<p>1. Proposed footprint of the main house. The landowners were not willing to change the proposed footprint of the main house to a position adjacent to Kerk Laan. They were willing to move the house to reduce visual impact in the level area behind the frontal dune.</p>	<p>This is noted. The current proposal reflects a reduced footprint and a refined siting concept relative to earlier iterations. The reason the dwelling was not moved to the Kerk Laan node is that the northern area is associated with more sensitive and more intact Critically Endangered Knysna Sand Fynbos. The selected location was preferred because it reduced direct impact on that vegetation type while also responding to the geotechnical recommendation regarding feasible siting.</p>
<p>2. Proposed road over the sand dunes. SANParks continue to object to the construction of a road over the sand dunes. The landowners indicated that their preferred option is to use Susan Campbell's road for access. They could use Kerk Laan and access via the gate and use the steep section of the Campbell road. The proposed option to use the Campbell road will reduce the negative impact on biodiversity but will necessitate a new section of road to be constructed on the Campbell property and over Portion 76.</p>	<p>SANParks' objection to the road is acknowledged as one of the central issues in the application. The Campbell Road option was considered but is not feasible in planning or practical terms because it depends on third-party property access and would still necessitate new road construction. The preferred access from Kerk Laan remains the most realistic and controllable access arrangement available to the applicant. The route has been aligned to minimise vegetation disturbance and follow natural contours, but it is accepted that a residual impact remains.</p>
<p>3. Maretha Alant met with Susan Campbell. Ms Campbell is opposed to providing access for the proposed development over her land.</p>	<p>Noted. This confirms that access via Susan Campbell's land is not available to the applicant and therefore cannot be treated as a dependable or lawful preferred alternative.</p>
<p>4. Footpath to the beach. Portion 76 of Farm Uitzicht 216 has a steep gradient to the beach and a footpath is not proposed in the BAR.</p>	<p>Noted. No footpath or beach access structure forms part of the current application. The steep gradient to the beach is acknowledged, and no separate beach access infrastructure is sought or relied upon in motivating the proposed dwelling.</p>
<p>5. Drilling for water required. The proposal is that water will be supplied by a borehole. Bringing drilling equipment to the proposed site for the main house will have a negative impact on biodiversity. Previous attempts to drill for water in the area (Investec) yielded poor return.</p>	<p>The concern is acknowledged. The water strategy for the property is based primarily on rainwater harvesting, with borehole use supplementary only if required and legally permissible. This reduces dependence on groundwater abstraction and limits the need for extensive drilling-related disturbance. If borehole drilling is undertaken, it would be once-off, highly localised, and subject to the same footprint controls that apply to the broader development. Previous poor yields in the area are noted and support the approach of not relying primarily on groundwater.</p>
<p>6. Contract National Park footprint. The property is in the priority protected area expansion footprint, in the Western Heads coastal ecological corridor, that can potentially link the Goukamma Nature Reserve with the Knysna Estuary. The property was included in the South African National Parks Land Inclusion Plan for the period 2020 – 2023 for the Garden Route National Park (GRNP). The landowners may be interested in incorporating the property into the GRNP but</p>	<p>This is acknowledged. The property's position within the protected area expansion footprint and ecological corridor is not disputed. SANParks' willingness to engage further on stewardship and potential future inclusion is welcomed. At the same time, the current application still falls to be considered on its own merits as a limited residential proposal on privately owned land. Stewardship remains a possible future conservation path, but it does not replace the need to evaluate the present application.</p>

<p>more information is required from SANParks. SANParks will further engage with the landowners when our draft documents are in place.</p>	
<p>A follow up fieldtrip with SANParks and the Southern Cape Fire Protection Association (FPA) present took place on 9 January 2021. Key points discussed:</p>	<p>Noted. The fieldtrip and issues raised are acknowledged as part of the application history.</p>
<ul style="list-style-type: none"> • <u>Development adjacent to Kerk Laan.</u> <p>Developing the main house in a disturbed area adjacent to Kerk Laan will have the least negative impact on biodiversity and landscape functionality. Other advantages are that the drilling equipment and construction vehicles will have easy access to the site via an existing road.</p>	<p>This view is acknowledged. The Kerk Laan option has logistical advantages from an access perspective. However, the applicant and EAP did not adopt it as the preferred layout because the northern portion of the property contains more sensitive and intact Knysna Sand Fynbos. The preference for the southern layout was based on the integrated reading of specialist findings, including the avoidance of direct intrusion into the more sensitive northern habitat and the geotechnical feasibility of the selected footprint.</p>
<ul style="list-style-type: none"> • Development in the low lying area, over the two sand dunes or using the Campbell road, will compromise landscape functionality and set a bad precedent. It will create fragmentation of a pristine coastal corridor. 	<p>The objection is noted. The concern about precedent and fragmentation is valid and remains one of the principal issues in the application. The applicant's counter-position is that the total transformed area remains limited relative to the size of the property, that the majority of the corridor remains intact, and that the selected layout avoids greater direct loss in the northern Critically Endangered vegetation. The proposal does create a localised disturbance, but the applicant does not accept that it results in irreversible failure of corridor functionality at the broader landscape scale.</p>
<ul style="list-style-type: none"> • <u>Fire management.</u> <p>The landowners are members of the Southern Cape FPA. It is possible to make fire breaks to protect infrastructure at the landowner's preferred location for the main house. However, Kerk Laan could act as a firebreak if it is widened and slashed. In a case of emergency, it would be less risky to evacuate people from Kerk Laan than in a fynbos corridor with tricky access for firetrucks. The Campbell road and the new section of road that would need to be constructed from Campbell road to preferred site would not be ideal roads for the Knysna Fire Department as their trucks would struggle to gain access easily to the house. However, Kerk Laan would be a much easier access point for fire trucks and this should be considered for fire safety in this fire-prone area. Conducting an ecological burn in future will also be more risky with infrastructure developed in the fire path. The June 2017 fire and the ecological burn executed on 15 May 2017, that slowed the fire down dramatically before it reached Brenton, is still fresh in our memories. A functional Fire Management</p>	<p>This comment is acknowledged in full. Fire risk is a real and material consideration on this property. The landowner's membership in the relevant fire structures and the feasibility of site-specific fire protection measures are noted. SANParks' preference for access and evacuation via Kerk Laan is understandable from a fire management perspective. The applicant's position remains that fire protection measures can be implemented at the preferred site, but SANParks' concern regarding access for emergency response and the implications for long-term ecological burn regimes is valid and must be recognised as an operational constraint associated with the chosen siting.</p>

<p>Unit in the Knysna Sand Fynbos will be desirable as there will be future fires.</p>	
<ul style="list-style-type: none"> • <u>Conservation value of property.</u> <p>More than 50% of the property contains Knysna Sand Fynbos and the entire property is a Critical Biodiversity Area (CBA). Although the Kerk Laan area is located in Knysna Sand Fynbos the transformation footprint can be limited with a good Site Development Plan and the current landscape functionality corridor will be maintained. Knysna Sand Fynbos type hosts threatened plant species and five threatened butterfly taxa (Mecenero et al. 2013), including CE taxa Orachrysops niobe (Brenton Blue) and Thestor brachycerus and is poorly protected. The original extent of Knysna Sand Fynbos was 15 355 ha. The remaining natural extent is 1 478 ha (9.6%) and the Western Cape target is 3 531 ha (23%). The Knysna Sand Fynbos asset is in deficit. Not only is Knysna Sand Fynbos endemic to the Western Cape, but it is also confined to a very specific and limited geographical area along the Garden Route coast (only found from the coastal flats from Wilderness, generally to the north of the system of lakes, several patches around the Knysna Lagoon, with more isolated patches eastwards to the Robberg peninsula near Plettenberg Bay). There is excellent landscape heterogeneity on the property.</p>	<p>This is accepted as an accurate statement of the exceptional conservation value of the property. The significance of the Knysna Sand Fynbos resource and the conservation corridor is not disputed. The applicant's position is not that the site is of low value, but rather that a very limited residential footprint can still be considered if carefully sited and controlled. The reason the southern option was preferred is precisely because it sought to avoid more direct and permanent loss within the northern Knysna Sand Fynbos areas, even though the entire property remains highly sensitive overall.</p>
<p>In summary, from a biodiversity conservation, landscape functionality and integrated fire management perspective, developing the main house adjacent to Kerk Laan is the preferred alternative for SANParks. Developing in the core of the Knysna Sand Fynbos Coastal Corridor will set a very bad precedent and contribute to a loss of biodiversity and landscape fragmentation. The properties on both side of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023. SANParks will continue to object to the access road over the sand dunes.</p>	<p>SANParks' summary objection is noted in full. The applicant and EAP accept that SANParks' preferred outcome is a northern / Kerk Laan node and continued opposition to a road across the dunes. The final preferred alternative differs because it seeks to avoid the more sensitive northern Critically Endangered Knysna Sand Fynbos, maintain development at a very limited scale, and rely on the portion of the site identified as most feasible through the integrated specialist process. The disagreement is therefore not about whether the site is sensitive, but about which limited option best balances biodiversity loss, feasibility and the exercise of existing land use rights.</p>
<p>(3) Draft Basic Assessment (DFFE Ref. No. 14/12/16/3/3/1/3114), SANParks Objected – 7 April 2025 - Please refer to the full SANParks comment, 7 April 2025.</p>	<p>Noted. SANParks confirms that its earlier 7 April 2025 objection remains relevant and forms part of the full objection record.</p>
<p>(4) The current application is a Draft Basic Assessment, DFFE Ref No. 14/12/16/3/3/1/3185, Eco Route, November 2025. Key aspects of the application are as extracted below.</p>	<p>Noted. The comments on the current November 2025 application are addressed below.</p>

<p>Proposed Development Description The proposed development comprises the construction of a single main dwelling in the south-western portion of the property, identified as the most suitable location based on specialist input and alternatives assessment. The development is designed to be environmentally sensitive, maintaining the ecological character of the area.</p>	<p>This is noted. SANParks' disagreement with the identification of the south-western portion as the most suitable location is acknowledged, but the applicant maintains that the selected footprint was chosen through an integrated process that considered biodiversity, geotechnical feasibility, visual absorption and practical development constraints.</p>
<p><u>Main dwelling</u></p> <ul style="list-style-type: none"> • A single-storey structure of approximately 1000 m² (including covered verandas and integrated garage), downscaled from the previously proposed 3000 m². • Designed in a low-profile, contemporary coastal style, using earth-toned, non-reflective materials to blend with the natural dune landscape. • • Positioned to minimise ecological disturbance and visual intrusion, in accordance with visual, botanical, and geotechnical recommendations. 	<p>The reduction from 3000 m² to approximately 1000 m² is material and is intended to reduce disturbance significantly. The design principles of low profile, earth-toned materials and reduced visual contrast are supported as appropriate mitigation measures. SANParks' concern remains the location rather than the reduction alone.</p>
<p><u>Access</u></p> <ul style="list-style-type: none"> • Access to the site will be via the existing servitude from Kerk Laan, with a short internal driveway linking to the house. • The access route will follow natural contours to reduce the need for cut-and-fill and minimise vegetation clearance. 	<p>The use of the existing servitude is noted and supported insofar as it reduces the need for new external access infrastructure. The area of disagreement remains the internal extension across the southern portion. The route has nonetheless been aligned to minimise cut-and-fill and vegetation clearance.</p>
<p><u>Water Supply</u></p> <ul style="list-style-type: none"> • The development will be self-sufficient in water supply, relying primarily on rainwater harvesting from roof surfaces. • A minimum rainwater storage capacity of 20 000 litres will be provided. • Borehole abstraction will only be used as a supplementary source, subject to licensing by the Breede-Gouritz Catchment Management Agency (CMA). 	<p>This approach is supported in principle. Prioritising rainwater harvesting reduces pressure on groundwater resources. Any borehole use must remain supplementary and subject to lawful authorisation.</p>
<p><u>Wastewater Management</u></p> <ul style="list-style-type: none"> • On-site sanitation will be provided via a septic tank and soakaway system, designed and located in accordance with the geotechnical report to avoid groundwater contamination. 	<p>SANParks' objection to septic tanks is acknowledged. The applicant's position remains that, in the absence of municipal sewer, a properly sited and engineered on-site system is the only practical servicing option. The geotechnical recommendations are intended to ensure that groundwater contamination risk is avoided.</p>
<p><u>Stormwater Management</u></p> <ul style="list-style-type: none"> • Runoff will be managed through infiltration-based measures such as: <ul style="list-style-type: none"> ○ Rainwater tanks ○ Permeable driveway surfaces ○ Swales and soakaways, where applicable 	<p>The stormwater approach is appropriate in principle for a site where concentrated runoff must be avoided. The use of infiltration-based measures supports the objective of reducing erosion and managing runoff locally.</p>

<ul style="list-style-type: none"> • No subsoil drains are required along roads but are recommended behind retaining walls if used. 	
<p><u>Landscaping</u></p> <ul style="list-style-type: none"> • Only indigenous vegetation will be used to: <ul style="list-style-type: none"> ◦ Maintain ecological integrity ◦ Reduce fire risk ◦ Ensure the visual integration of the development with the surrounding landscape • No disturbance will occur beyond the demarcated development footprint. • Construction Footprint: The total construction disturbance area will not exceed 0.25 ha (2 500 m²), representing less than 1.2% of the property. • The layout was selected to avoid sensitive vegetation types and reduce fragmentation of natural habitats. 	<p>These mitigation principles are supported. Indigenous landscaping, clear footprint demarcation and strict limitation of the disturbance area are necessary and appropriate. SANParks' dispute is not with those controls in themselves, but with whether the chosen southern footprint can still be justified despite them.</p>
<p>SANParks points which were raised in the previous comment of 7 April 2025 (attached) stand. SANParks does not support the Preferred Alternative. Points of concern previously raised are re-iterated and elaborated on below, with additional points added.</p>	<p>Noted. SANParks' confirmation that earlier concerns remain applicable is recorded in full.</p>
<p>Point 1: Evaluation of Alternatives by Specialists</p>	<p>Noted. SANParks' concerns regarding alternatives are addressed in the responses below.</p>
<p>The Eco Route DBA report concludes on pg. 52 & 53: Conclusion The preferred alternative, which proposes the development of the main dwelling house in the southwestern section of Portion 76 of the Farm Uitzicht No. 216, with a reduced footprint of approximately 1000 m², is considered the most appropriate and sustainable layout option. This alternative was selected based on its ability to balance legal compliance, environmental sensitivity, and practical development considerations.</p>	<p>This is the EAP's integrated conclusion. SANParks' disagreement with that conclusion is acknowledged. The EAP maintains that the selected layout was chosen on the basis of integrated specialist and practical considerations, not on biodiversity mapping alone.</p>
<p>From an ecological perspective, this layout avoids the Critically Endangered Knysna Sand Fynbos found in the northern portion of the site (as seen in Alternative 1, 2 and 3) and is instead located within an area dominated by the Least Threatened Goukamma Dune Thicket. The smaller development footprint further limits disturbance to natural habitat and avoids overlap with key ecological corridors. Although the access route does traverse some sensitive vegetation, the impact is considered low and manageable, and will be mitigated through road narrowing, ecological rehabilitation, and strict construction footprint demarcation.</p>	<p>This remains the applicant's ecological motivation for the selected footprint. SANParks' contrary view is acknowledged, but the applicant's position is that avoiding direct intrusion into the northern Knysna Sand Fynbos remains an important environmental consideration.</p>
<p>The Preferred Alternative, where the main dwelling is proposed on the foredune in the south-western corner of Portion 76, and accessed by a</p>	<p>SANParks' qualification of the mapped vegetation context is acknowledged. The applicant accepts that the southern area is still sensitive and not impact-</p>

<p>830m road across the foredune, is based on the premise of the southern foredune area being mapped as (LC) Goukamma Dune Thicket (AT36), and perceived as being less sensitive than (CE) Knysna Sand Fynbos (FFd10) which is mapped on the northern sector. This premise is based on SANBI mapping classification criteria, not necessarily on what is present on the sensitive undisturbed foredune portions of the property. Vegetation variations exist, particularly as the foredune aspects alternate between south and north facing slopes.</p>	<p>free. The point of departure is simply that the northern option would involve more direct loss of the mapped Critically Endangered Knysna Sand Fynbos, whereas the selected southern footprint was considered the better-balanced option overall.</p>
<p>The Preferred Alternative was not supported by Confluent Environmental Pty (Ltd), Ms. Bianca Fouché, Specialist Plant Species and Terrestrial Biodiversity Report, 22 July 2024, who stated that Alternative 4 (One dwelling in the north-western corner of the property) is the most acceptable layout for the proposed dwelling on the property, and that Alternative 1 (One dwelling and new access road) and Alternative 3 (Two dwellings and new access road) would likely trigger Offsets due to residual impacts that can't be reduced with mitigation proposed in their report.</p>	<p>This is acknowledged. The botanical specialist's preference for Alternative 4 is correctly recorded by SANParks. The EAP's final preferred layout differs because the final recommendation was based on an integrated interpretation of all studies and practical site constraints, not the botanical perspective only.</p>
<p>The Alternatives evaluated are described in Table 8, pg. 42 of this report.</p>	<p>Noted.</p>
<p>Discussion of the Alternatives: The residual impacts on the loss of plant species considering the SCC diversity on the property, can be reduced below Moderate for alternative options (Table 10), given the mitigation proposed above. Alternative option 4 is the only alternative where species loss can be reduced to a Negligible negative impact, and this is because the north-western corner, despite being in the most sensitive habitat on the property, has been invaded for several decades. By building there, that established invasive stand will be vanquished, and incentive to clear the remaining Knysna Sand Fynbos is also likely.</p>	<p>This conclusion is acknowledged. The applicant does not dispute that Alternative 4 has botanical advantages. The applicant's case remains that the preferred southern option better balances biodiversity, geotechnical feasibility, layout practicality and reduced direct intrusion into the northern Sand Fynbos areas.</p>
<p>These findings and recommendations were not carried through into the DBAR, and contradict that stated by Eco Route. Ms. B. Fouché is a Candidate Botanical Scientist (Registration No: 141757) registered with the South African Council for Natural Scientific Professions (SACNASP), the report was reviewed by Dr. J. Dabrowski, who is Aquatic and Ecological SACNASP registered (Registration No. 115166).</p>	<p>The comment is noted. The specialist credentials are acknowledged. The difference between the specialist preference and the EAP's integrated preferred alternative is recognised and is not denied.</p>
<p>The report followed the: (1) Protocol for the specialist assessment and minimum report content requirements for environmental impacts on terrestrial plant species (28 July 2023); and (2) the protocol for the specialist assessment and minimum report content requirements for environmental impacts on terrestrial biodiversity (20 March 2020).</p>	<p>Noted.</p>

<p>A second specialist study, Terrestrial Animal Species SSVR and Impact Assessment, Confluent Environmental Pty (Ltd), Ms. M. Leitner (SACNASP Ref. No. 166055), February 2024 further concludes:</p>	<p>Noted.</p>
<p>It is however noted that construction of the dwelling in the north rather than the south would have the lowest impact given that it is located in lower sensitivity habitat, and would not require the additional road (A possible Alternative SDP which would have the lowest impact of all). Consideration should also be given to the swimming pool proposed for the southern dwelling regarding the source of the water, whether it is chlorinated, and the</p>	<p>This comment is acknowledged. The northern alternative is recognised as attractive from an access and road-avoidance perspective. The EAP's preference for the southern option nonetheless remains based on the overall integrated balance of constraints. The concern regarding the swimming pool and water source is accepted and supports the need for a controlled water supply strategy, with rainwater harvesting remaining primary.</p>
<p>A third specialist analysis by Dr. C. Ebersohn, Vegetation Sensitivity Analysis April 2017 (undertaken 8 years ago), and although the author is recognised as knowledgeable, the author does not appear to be SACNASP registered, nor were the required specialist protocols followed.</p>	<p>SANParks' concern regarding the status of the older 2017 vegetation analysis is noted. The current application has, however, also been informed by the more recent Confluent specialist work, which forms part of the completed specialist record.</p>
<p>SANParks queries whether the Environmental Screening Tool suggested for a Visual Impact Assessment to be undertaken. Visual impacts have not been addressed adequately. The property is visible from tourist view points along CR Swart Road, and other areas.</p>	<p>This concern is valid and is acknowledged. The applicant's position is that the dwelling has been designed to visually recede into the landscape through low profile form and non-reflective materials, but SANParks is correct that the visual issue remains important given the scenic setting.</p>
<p>Point 2: Development on the Foredunes and within a Coastal Risk Area Coastal Protection Zone The CPZ is defined in Section 16 of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008) (NEM: ICMA). The Western Cape DEA&DPs, "Western Cape Provincial Coastal Management Programme 2022 – 2027", further summarises aspects of the CPZ as follows.</p>	<p>Noted.</p>
<p>Uitzicht 216, Portion 76 falls entirely in the CPZ (Fig 2), therefore careful environmentally sensitive decision-making must be made for any proposed development on this property.</p>	<p>Accepted. The CPZ context is fully acknowledged and is one of the central reasons the proposal has been reduced and tightly defined.</p>
<p>As the property falls within the 1km high-water-mark, this has further implications for agricultural worker accommodation, in terms of the Knysna Municipality: Zoning Scheme By-law, 29 June 2020:</p>	<p>Noted.</p>
<p>"agricultural worker accommodation" Land use description: "agricultural worker accommodation" means accommodation provided for bona fide agricultural workers, including accommodation for labourers and farm managers, as determined by the Municipality based on the extent of the bona fide agricultural activities on the land unit. Development parameters: The development parameters applicable to "agriculture" apply with the following additional development parameters: (a) the number of units must be reasonably connected to the bona fide agricultural activities on</p>	<p>This is acknowledged. The current preferred proposal is for a single primary dwelling. Any future second dwelling or worker accommodation would require separate land use consideration and does not form part of the current preferred application.</p>

<p>the land unit; and (b) no agricultural worker accommodation may be erected within 1 km of the high-water mark of the sea or a tidal river. Approval of any future second dwelling for a farm manager must be attained from the Knysna Municipality, via a Land Use Application process.</p>	
<p>Garden Route National Park Coastal Management Line The Coastal Management Line for the Garden Route National Park was established in GNR No. 3668, 14 July 2023, in terms of NEM: ICMA. Section 4 describes development risk management measures applicable for new infrastructure seaward of the CML and existing infrastructure in areas at risk to dynamic coastal process. The new and existing infrastructure that several properties which border Portion 76, are Contract National Park committed properties, which will legally be declared as part of the park. The CML extends for between 70 to 100m in places into the lower southern section of Portion 76.</p>	<p>Noted. The influence of the CML on the southern portion of the property is accepted as part of the coastal risk and planning context.</p>
<p>Knysna Protected Environment Development Control Area SANParks is responsible for the Proper Administration of the Knysna Protected Environment (KPE) (GN 1175 of 2009) Regulations, and for the authorisation of any development (as defined in the Regulations) in the DCA, as per Section 8. The KPE DCA extends 50m from the high-water mark into Portion 76 (Fig 2), and as such SANParks authorisation is required for any development to proceed in this area. As per Section 9 and 10 of the KPE Regulations SANParks may request additional studies to be undertaken, should it be deemed that these are required.</p>	<p>This is acknowledged. SANParks' role under the KPE regulations is accepted.</p>
<p>Dune Stability, Coastal Erosion & Climate Change Resilience SANParks does not support any development and infrastructure on the two foredunes situated in the southern section of Portion 76. The stability of the foredunes is a concern. Dune slumping on the seaward foredune of Portion 72 has recently occurred (2023 – 2024) (Fig. 13), and blowouts are evident on Portion 73 and 74 (Fig. 14). These dune areas could be deemed littoral active zones, being unstable and dynamic because of natural processes. Conserving the seaward foredune and ensuring that it remains free from development is a necessary climate change resilience strategy. Any development on this active foredune would be at risk as coastal erosion impacts intensify in the future with climate change. It would be difficult to defend such development from coastal erosion, given the unstable steep dune slopes, erodibility, and slumping potential. The</p>	<p>This is a major concern and is acknowledged in full. The applicant's position remains that the selected footprint is not located within the most unstable active erosion zone and that the seaward dune system in front of the development is to remain undisturbed. Even so, SANParks' climate resilience objection is material and stands as one of the strongest authority objections to the southern option.</p>

effects of climate change are already being experienced along this stretch of coast (Fig. 15).	
Point 3: Infrastructure Water Should the landowner require borehole water the following should be noted:	Noted.
In terms of the National Water Act, 1998 (Act No. 36 of 1998), Revision of General Authorisations for the Taking and Storing of Water, GNR No 40243, 2 September 2016, Section 2.3; a Water Use License (WUL) may be required due to the property being situated within 500m from the high-water mark of the ocean.	Accepted. If a WUL is required, the applicant must comply.
Section 2.3 states the following exclusions from General Authorisations: 2.3. geographical area and water resources to which the authorisation applies Except where stated differently in the notice this authorisation applies to all land and all water resources in South Africa, subject to the following exclusions: <ol style="list-style-type: none"> 1. No water that is taken in terms of this authorisation may be taken within a 500 metre radius from the boundary (delineated edge) of a wetland, pan or estuary. 2. No groundwater that is taken in terms of this authorisation may be taken within a 500 metre radius from the boundary of a wetland or estuary, within a 100 metre radius from the delineated riparian edge of a water course or a state dam, within a 500 metre radius of a state dam wall or within 500 metres from the high-water mark of the ocean. Further a WUL may be required, if water demand for the primary supply is >1kl/day/ha (>1kl/day/ha which is permitted for general usage). Confirmation from the relevant Competent Authority should be sought. 	Noted. The applicant accepts that confirmation must be obtained from the relevant competent authority and that lawful water use compliance is required.
Sewerage SANParks is not in support of septic tanks. Cleaner environmentally friendly options should be investigated.	SANParks' position is acknowledged. In the absence of municipal sewer, the applicant's case remains that a properly designed and correctly sited on-site system is the only practical servicing option.
Electricity SANParks supports the use of solar panels, however these should be positioned so as not to face east/ west to minimise glare and reflections. Similarly glare from windows should be minimised.	Accepted. These are reasonable design controls and can be incorporated into the final building design.
Point 4: Alien Invasive Species and Fire Management The landowner's attention is drawn to the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEM:BA) Alien and Invasive Species Regulations, 25 September 2020, where a landowner is legally responsible for the removal of alien vegetation on their property. SANParks requests sight of the required Invasive Species Control Plan	This is acknowledged. Alien invasive management is a legal and environmental obligation and should form part of the operational management of the property.

<p>(ISCP), and clarity on whether this has been submitted to and approved by the Department of Forestry Fisheries and the Environment (DFFE). SANParks seeks confirmation on whether alien clearing if any has occurred on the property.</p>	
<p>Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. SANParks requires clarity on whether the landowner is a member of the Southern Cape Fire Protection Association (SCFPA), and whether the necessary legally required firebreaks, agreements and/or exemptions are in place.</p>	<p>Accepted. Compliance with the fire legislation is required and is not disputed.</p>
<p>SANParks stands firm on previous comments made regarding fire.</p>	<p>Noted.</p>
<ul style="list-style-type: none"> • Fire management. <p>The landowners are members of the Southern Cape FPA. It is possible to make fire breaks to protect infrastructure at the landowner's preferred location for the main house. However, Kerk Laan could act as a firebreak if it is widened and slashed. In a case of emergency, it would be less risky to evacuate people from Kerk Laan than in a fynbos corridor with tricky access for fire trucks. The Campbell road and the new section of road that would need to be constructed from Campbell road to preferred site would not be ideal roads for the Knysna Fire Department as their trucks would struggle to gain access easily to the house. However, Kerk Laan would be a much easier access point for fire trucks and this should be considered for fire safety in this fire-prone area. Conducting an ecological burn in future will also be more risky with infrastructure developed in the fire path. The June 2017 fire and the ecological burn executed on 15 May 2017, that slowed the fire down dramatically before it reached Brenton, is still fresh in our memories. A functional Fire Management Unit in the Knysna Sand Fynbos will be desirable as there will be future fires.</p>	<p>This concern is acknowledged in full. Fire access, emergency evacuation, ecological burn implications and long-term fire management are all valid operational considerations associated with the chosen site.</p>
<p>Point 5: Conservation Stewardship Portion 76 of Uitzicht 216 falls within SANParks' protected area expansion footprint and Land Inclusion Plan for the GRNP. The property is within the Western Heads Knysna Sand Fynbos Coastal Corridor, which is the subject of a collaborative conservation initiative being supported by SANParks, CapeNature, Knysna Municipality, the Table Mountain Fund, WWF, the Western Heads Goukamma Conservancy (WHGC), and landowners. Due to the extremely high conservation value of this corridor, and the threatened loss of the last remaining Critically Endangered Knysna Sand Fynbos, WWF</p>	<p>The conservation value of the property and SANParks' stewardship invitation are acknowledged. Stewardship remains a positive potential future path for the property, but does not replace the need to assess the present residential application on its own merits.</p>

<p>purchased three properties which SANParks manages (Portions 71, 72 and 40) (Fig. 16). Several other landowners have committed their properties to Contract National Park (CNP) conservation stewardship and these are in various stages of the commitment process (Fig. 16). Portion 76 qualifies as a SANParks CNP property (top-tier). The landowner is welcome to have discussions with SANParks on CNP stewardship options and financial incentives available. The following documents would require signing: (1) a Written Agreement in terms of Section 20(3) of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) (NEM:PAA); (2) a Co-management Agreement in terms of Section 42 of NEM:PAA; (3) a Property Operational Plan; and (4) with a GRNP Declaration process to follow. A component of this process is the drafting of a Zonation Plan, based on park zonation principals, as the property is eventually declared as part of the park. The Zonation Plan sets out which portions of the property may be developed, and what activities may take place in the various areas of the property.</p>	
<p>SANParks' position for properties situated seaward of Church Street is to allow only a development area situated directly adjacent to Church Street, in which a primary dwelling is permitted, and if approved by the Knysna Municipality, a second managers house may be permitted, however this must be placed in this same development area. No development is supported lower down the property, and on the foredunes, and no roads may be constructed through the property to the foredunes. Approved hiking paths, a beach access path, and a small sea viewing deck of approximately 25m² maximum may be permitted. An example of a Zonation Plan, which was prepared for the previous landowner of Portion 75 Uitzicht 216 is as follows:</p>	<p>SANParks' policy position is noted in full. The applicant and EAP differ from this position in relation to the preferred site location, but the policy preference for a Church Street node is clearly recorded.</p>
<p>SANParks supports a clustered layout approach for dwelling/s and infrastructure placement. A diffuse layout approach that fragments the landscape is not supported. This approach is applied throughout the corridor. The only exception to this position, is Portion 39, which has a road constructed across the foredunes and a dwelling situated behind the seaward foredune. It must however be noted that Portion 39 has been owned by the same landowners since 1972, and the road was formalised from 1980 to 1990, and the dwelling was pre-existing, prior to the EIA Regulations, which were enacted in 1997. The dwelling burnt down in the 2017 fires and municipal approval was attained to re-build it. SANParks will not support any new developments of this nature in the corridor.</p>	<p>This is acknowledged. SANParks' corridor-wide approach to clustering and landscape character retention is clear. The applicant's case is that the current reduced southern proposal, although not aligned with SANParks' preferred clustering philosophy, remains capable of consideration because of the specific trade-off between northern vegetation sensitivity and southern feasibility.</p>

<p>SANParks' position is not only based on the need to prevent landscape fragmentation and to retain landscape character, tranquillity and a sense of place across the conservation corridor.</p>	
<p>Therefore, based on the above, SANParks does not support the Preferred Alternative. SANParks does not support the construction of a road across the foredunes and the construction of a house on the foredunes. Further, the disturbance/ building footprint areas suggested (main dwelling approx. 2500m², and road approx. 4565m², total 7065m²) are excessive and underestimated. It is unclear if this refers to a building or disturbance footprint. No area calculations have been provided for embankments, water tanks, garages, storage areas, vegetable gardens etc. The road will be constructed across steep, erodible slopes.</p>	<p>This objection is acknowledged in full. SANParks' concern regarding the extent and clarity of the disturbance footprint is valid. The applicant's position remains that the current proposal is materially reduced from earlier concepts and that the transformed area remains small relative to the total property. Even so, SANParks' concern regarding footprint clarity and the residual impact of the road is accepted as a substantive issue.</p>
<p>SANParks will only support a dwelling close to Church Street, in the north-western section of the property. Avoiding and minimising the environmental impact in this way would also be aligned with the national environmental management principles (section 2(4) of the National Environmental Management Act, 1998), which provide, amongst other things, that –</p> <ul style="list-style-type: none"> • That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot altogether be avoided, are minimised and remedied; and • Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure. 	<p>The principle is acknowledged. The difference between SANParks and the applicant is not whether these principles apply, but which limited siting option better satisfies them when the northern Critically Endangered vegetation and southern feasibility constraints are weighed together.</p>
<p>Point 6: Summary and Way Forward In summary, SANParks does not support the Preferred Alternative, which includes the construction of a dwelling on the foredune in the southern sector, and a road leading from Church Street over the length of the property and foredune to the dwelling. This will result in the destruction and loss of critically endangered vegetation and will set a dangerous precedent for the area. Sea views gained by landowners do not warrant such a loss, particularly when other alternatives are available, which allow primary rights. SANParks will support a small disturbance area directly adjacent to Church Street, with road access direct from the existing Church Street Road servitude. This is in line with SANParks position for other proposed</p>	<p>SANParks' summary objection, preferred alternative, and recommended conditions are acknowledged in full. The applicant and EAP maintain that the current reduced proposal remains capable of consideration because it avoids the more sensitive northern Knysna Sand Fynbos, confines transformation to a small portion of the property, and is based on the integrated reading of specialist studies rather than a single-issue assessment. At the same time, many of SANParks' recommended management measures are reasonable and supported in principle, including no-go demarcation, alien control, plant rescue, topsoil re-use, fire compliance, protected tree permitting, wildlife-friendly fencing, ECO oversight and heritage chance-find procedure. The main issue of disagreement remains SANParks' view that only a north-</p>

developments along Church Street, where some level disturbance is permitted to CNP committed properties.

The southern section of Portion 76 is considered highly sensitive: the CML extends some 70 to 100m in; the high-watermark adjoins the southern property boundary; dune stability, coastal erosion, and climate change resilience are concerns; the property in its entirety falls within the CPZ; and the KPE Development Control Area extends 50m into the property.

Authorisation of any development in the Development Control Area is required from SANParks as per Section 8 of the KPE Regulations. Specialist studies undertaken by Confluent Environmental Pty (Ltd) similarly did not support the Preferred Alternative of a dwelling on the southern sector of the property on the foredune and a road leading over the dune to the dwelling. An Alternative 4 was supported (One dwelling in the north-western corner of the property), with an Alternative 1 (One dwelling and new access road) and Alternative 3 (Two dwellings and new access road) noted as likely triggering Offsets due to residual impacts that can't be reduced with mitigation proposed in their report.

These findings and recommendations were not carried through into the DBAR, and contradict findings stated by Eco Route. SANParks does not support septic tanks; and solar panels and windows must be positioned to reduce glare. SANParks questions whether a Visual Impact Assessment should be undertaken.

western / Church Street node is acceptable, whereas the applicant maintains that the reduced southern option better balances biodiversity avoidance, feasibility and the exercise of lawful primary development rights.

The sensitivity of the southern section is acknowledged and is not disputed. It is accepted that the property falls within a constrained coastal and conservation context, including the CPZ, the influence of the CML, and the KPE Development Control Area. It is further acknowledged that SANParks authorisation is required where applicable in terms of the KPE Regulations. The applicant's position, however, remains that the preferred alternative was identified through an integrated assessment of all specialist inputs, rather than on a single specialist preference only. While Confluent Environmental supported Alternative 4 from a biodiversity perspective, the final preferred layout took into account the direct presence of more sensitive and intact Critically Endangered Knysna Sand Fynbos in the northern portion, together with geotechnical feasibility, overall constructability, and the objective of limiting direct impact on the northern habitat. The selected southern footprint is therefore motivated not on the basis that the area is low sensitivity, but on the basis that it was considered the more feasible option when all site constraints were read together. The proposal is also materially reduced from earlier concepts, limited to a single dwelling, and intended to retain the vast majority of the property in its natural state.

The comment is noted. The DBAR does not disregard the specialist findings; rather, the EAP undertook an integrated assessment in which all specialist inputs, site constraints, engineering feasibility, environmental sensitivity, and planning considerations were considered collectively in the alternatives assessment. While the botanical specialist indicated a preference for Alternative 4 from a vegetation perspective, the final preferred alternative reflects a balanced assessment across all disciplines, including geotechnical constraints, access feasibility, visual integration, services provision, and the objective of limiting the overall development footprint to a very small portion of the property. The preferred alternative has been significantly reduced from the original proposal and now comprises a single dwelling with a limited disturbance footprint, thereby reducing overall environmental impact. With regard to wastewater management, the property is not serviced by municipal sewer infrastructure, and on-site sanitation is therefore required. A septic tank and soakaway system is a standard and widely accepted solution for low-density rural residential development and will be designed and located

It is recommended that the following conditions are considered, in conjunction with authorisation of a main dwelling next to Church Street in the north-western sector of the property, with road access directly from the existing Church Street Road servitude:

1. The landowner should commit the remaining portion of the property to a biodiversity conservation stewardship mechanism, which should comprise of:
 - 1.1. A SANParks NEM:PAA CNP stewardship agreement for a 99-year period. The stewardship process should be concluded through the signing of the following: (1) a Written Agreement in terms of Section 20(3) of NEM:PAA; (2) a Co-management Agreement in terms of Section 42 of NEM:PAA; (3) a Property Operational Plan; and (4) with a GRNP Declaration process to follow.
 - 1.2. It is recommended that a voluntary title deed restriction is registered against the property (i.e., via a Notarial Deed). This will ensure that the conservation status of the property is transferred to any new owner on the sale of a property.
 - 1.3. These actions should occur prior to any construction activities being permitted to take place on the property.
2. The property should be rezoned to Open Space III or IV.
3. Fencing must not inhibit wildlife movement.
4. An Environmental Management Programme (EMPr) must be implemented and monitored by an Environmental Control Officer (ECO). The EMPr must be finalised based on any Environmental Authorisation (EA) outcomes/ conditions.
5. The landowner's attention is drawn to the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEM:BA) Alien and Invasive Species Regulations, 25 September 2020, where a landowner is legally responsible for the removal of alien vegetation

in accordance with the geotechnical recommendations to ensure that there is no risk of groundwater contamination. Alternative on-site systems can be considered at detailed design stage should the competent authority require a different system. With regard to glare, it is accepted that solar panels, glazing and external materials must be specified to minimise reflectivity. The dwelling is proposed as a low-profile structure using non-reflective, earth-toned materials to reduce both visual and glare impacts. In terms of visual impact, the development is a single dwelling with a low height profile and muted materials, and the visual specialist input and landscape assessment undertaken for the site indicate that visual impacts can be mitigated through appropriate design, siting and landscaping. The scale and nature of the proposed development is consistent with a low-density rural residential use and does not constitute a visually dominant or intrusive development in the broader landscape.

Noted.

on their property. The owner should formalise an Invasive Alien Vegetation Control Plan as required by the NEM:BA.

6. Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. The owner should join the local Fire Protection Association, if not already a member. The owner should consider using non-flammable building materials, including external fittings such as aluminium gutters, and should consider an irrigation system to mitigate fire risk.
7. A permit from the Department of Forestry, Fisheries & the Environment (DFFE) must be attained should any protected tree species be disturbed on the property, as per the National Forests Act (Act 84 of 1998), as amended.
8. Should any resources of suspected heritage value be uncovered during clearing, Heritage Western Cape (HWC) must be contacted immediately for instructions.
9. The disturbance footprint/ no-go areas should be fenced off during the construction phase with a barrier material, such as shade cloth to prevent workers from encroaching into adjacent vegetation, and to ensure that animals are not injured on the building site.
10. An indigenous plant rescue operation should be conducted prior to site clearance.
11. Topsoil should be set-aside for reuse.
12. Confirmation is required from the relevant Competent Authorities (BOCMA) on the need for a WUL. Due to the property being situated within 500m of the high-water mark of the ocean.

We trust that the above responses adequately address the comments raised. All comments received have been considered as part of the environmental assessment process and have informed the specialist assessments, impact assessment, and Environmental Management Programme.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned.

Yours sincerely,

Bianca Gilfillan (Ms)

EAPASA: 2023/2792

Eco Route Environmental Consultancy



Eco Route

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30 March 2026

The Department of Forestry, Fisheries, and the Environment (DFFE);
Branch Oceans & Coasts (O&C)

Dear Sir / Madame

**PROJECT: PROPOSED RESIDENTIAL DWELLING ON PORTION 76 OF FARM UITZICHT NO. 216, KNYSNA,
WESTERN CAPE: DRAFT BASIC ASSESSMENT REPOR – COMMENTS RESPONSE LETTER**

The Basic Assessment process for the proposed residential dwelling on Portion 76 of Farm Uitzicht No. 216, Knysna, Western Cape, has progressed through multiple public participation and submission phases due to the lapsing of previous applications and subsequent resubmissions to the Department of Forestry, Fisheries and the Environment (DFFE). Previous application processes were undertaken under DFFE reference numbers 14/12/16/3/3/1/3114 and 14/12/16/3/3/1/3185. The application lapsed due to administrative timeframes and was subsequently resubmitted. A new application is now being submitted to the DFFE and a new DFFE reference number will be issued upon acceptance of the application.

Public Participation was undertaken during the Consultation Basic Assessment phase, as well as during the Draft Basic Assessment Report phase. Comments received from Interested and Affected Parties and Organs of State have been incorporated into the Comments and Response Report and the Draft Basic Assessment Report.

No amendment to the preferred layout is proposed as part of this resubmission.

Please find below the Comments and Responses as captured in the Comments and Response Report.

**The Department of Forestry, Fisheries, and the Environment (DFFE);
Branch Oceans & Coasts (O&C) - 15 & 17 December 2025**

Comment	Response
<p>COMMENTS ON THE PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF THE FARM 216 UITICHT, KNYSNA, WESTERN CAPE.</p> <p>The Department of Forestry, Fisheries, and the Environment (DFFE); Branch Oceans & Coasts (O&C) appreciates the opportunity granted to provide comments and recommendations on the Pre-application Basic Assessment Report for proposed development of a residential dwelling on portion 76 of the farm 216 Uiticht, Knysna, Western Cape.</p> <p>This Branch will provide comments based on the provisions of the National Environmental Management Act 107 of 1998 (“NEMA”) and the National Environmental Management: Integrated Coastal Management Act 24 of 2008 (“ICM Act”). The Branch O&C has the mandate to ensure the holistic management of the coast, estuarine areas and maintenance of the seascapes to realise the development and use of natural resources are sustainable. The Branch further ensures that the ecological integrity, natural character, and economic, social, and aesthetic value of the coastal zone are maintained to protect people, properties, and economic activities against the impacts of dynamic coastal processes. Based on the submitted Draft BAR, the Branch O&C would like to submit the following comments for your consideration:</p> <ol style="list-style-type: none"> 1. The report under the ICM Act states that the proposed development does not fall within the littoral active zone. The ICM Act application is not limited only to the littoral active zone. The ICM Act applies to the coastal zone and coastal zone includes several areas including coastal protection zone, coastal public property etc. Of the coastal protection zone, the proposed development falls within the coastal protection zone (CPZ) as defined in the ICM Act. The object of the Act is inter alia to provide for the establishment, use and management of the CPZ. Since the CPZ has been established, section 16 entails the composition of the CPZ and section 17 details the purpose in which it was established. This therefore makes the ICM to be more relevant. 	<p>The comment is noted. The Basic Assessment Report has been updated to clarify that although the proposed development does not fall within the active littoral zone, the property is located within the Coastal Protection Zone (CPZ) as defined in terms of the National Environmental Management: Integrated Coastal Management Act (Act 24 of 2008). The report now recognises the applicability of the Act to the broader coastal zone and specifically addresses the objectives of the CPZ, including protection of coastal ecological integrity, maintenance of coastal processes and safeguarding coastal public property. The development footprint has been deliberately positioned outside the foredune system and outside areas identified as vulnerable to coastal erosion in order to remain consistent with the objectives of the ICM Act.</p>

<p>2. During the overlay of the Coastal Climate Change Vulnerability (CoVu) Assessment dataset, no signs of flooding or coastal erosion were observed to the site therefore DFFE has no objection to the proposed development on this aspect however the issue of public servitude from property Erf 39/216 remains DFFE concerns. The documents about public servitudes are requested to be shared with Dr Tshepiso Monnakgotla at tmonnakgotla@dffe.gov.za and copy oceia@dffe.gov.za. Access to the coastal public property is key in ICM management.</p>	<p>The comment is acknowledged. The Coastal Climate Change Vulnerability overlay confirming that the site is not exposed to flooding or coastal erosion risk is noted and aligns with the findings of the geotechnical and coastal assessments included in the BAR. Documentation regarding the existing public servitude will be provided to DFFE as requested. The development proposal does not obstruct public access to coastal public property and will continue to recognise existing access arrangements in accordance with the provisions of the ICM Act.</p>
<p>3. DFFE is in favour of the use of the existing public servitude and objects to the creation of the new road that will have more disturbance to the coastal vegetation. The only pathway to be created is from the servitude to the property that would have less vegetation disturbance than the alternative.</p>	<p>The comment is noted and has been considered in the final design. The proposed access arrangement makes use of the existing servitude alignment to the greatest extent possible in order to minimise vegetation disturbance. Any internal access required from the servitude to the dwelling footprint will be kept to the minimum practical width and will follow already disturbed or least sensitive areas as far as possible. Construction disturbance will be carefully managed through the Environmental Management Programme (EMPr) to limit vegetation clearing and avoid unnecessary impacts on coastal vegetation.</p>
<p>4. The dune system as a buffer in preventing damage to inland infrastructure, delay flooding to inland areas, absorb storm surges and high waves. The dunes also act as freshwater reservoirs and coastal acquirer recharges thus preventing saltwater intrusion. The dune system in front of the proposed development must not be disturbed. Section 15 of the ICM Act with reference to erosion and accretion must be considered in the context of the proposed development.</p>	<p>The importance of the dune system as ecological infrastructure is acknowledged. The development footprint has therefore been specifically located behind the primary dune system and outside the foredune ridge, ensuring that the dunes remain intact and continue to perform their ecological and coastal protection functions. No development is proposed on the primary dune system. Construction activities will be confined to the designated disturbance area identified through the geotechnical and biodiversity assessments. These measures ensure compliance with the intent of Section 15 of the ICM Act relating to erosion and accretion processes.</p>
<p>5. The use of rainwater harvesting strategy. The report further state that borehole water will be supplementary, DFFE recommends continuous monitoring of the groundwater including testing to prevent saltwater intrusion.</p>	<p>The recommendation is supported. The proposed development incorporates rainwater harvesting as the primary water supply strategy in order to reduce pressure on groundwater resources. Should borehole water be utilised as a supplementary source, groundwater monitoring will be implemented to ensure that abstraction remains sustainable and does not result in saltwater</p>

	intrusion. Monitoring measures will include periodic water level and water quality testing as part of the long-term management of the property.
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We trust that the above responses adequately address the comments raised. All comments received have been considered as part of the environmental assessment process and have informed the specialist assessments, impact assessment, and Environmental Management Programme.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned.

Yours sincerely,

Bianca Gilfillan (Ms)

EAPASA: 2023/2792

Eco Route Environmental Consultancy



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EcoRoute Ref.: 001

30 March 2026

The Department of Forestry, Fisheries, and the Environment (DFFE);
DFFE – Branch: Forestry Management, Directorate: Forest Resource Protection

Dear Sir / Madame

PROJECT: PROPOSED RESIDENTIAL DWELLING ON PORTION 76 OF FARM UITZICHT NO. 216, KNYSNA, WESTERN CAPE: DRAFT BASIC ASSESSMENT REPORT – COMMENTS RESPONSE LETTER

The Basic Assessment process for the proposed residential dwelling on Portion 76 of Farm Uitzicht No. 216, Knysna, Western Cape, has progressed through multiple public participation and submission phases due to the lapsing of previous applications and subsequent resubmissions to the Department of Forestry, Fisheries and the Environment (DFFE). Previous application processes were undertaken under DFFE reference numbers 14/12/16/3/3/1/3114 and 14/12/16/3/3/1/3185. The application lapsed due to administrative timeframes and was subsequently resubmitted. A new application is now being submitted to the DFFE and a new DFFE reference number will be issued upon acceptance of the application.

Public Participation was undertaken during the Consultation Basic Assessment phase, as well as during the Draft Basic Assessment Report phase. Comments received from Interested and Affected Parties and Organs of State have been incorporated into the Comments and Response Report and the Draft Basic Assessment Report.

No amendment to the preferred layout is proposed as part of this resubmission.

Please find below the Comments and Responses as captured in the Comments and Response Report.

DFFE – Branch: Forestry Management, Directorate: Forest Resource Protection

Date: 9 / 11 December 2025

(Reference in letter: EIA-WC-GR-0035-2025-26; signed 11/12/2025)

Comment	Response
<p>I refer to your e-mail notification of 17 November 2025 with documents. Please receive comments from the Branch: Forestry Management, Directorate: Forest Resource Protection in the Department of Forestry, Fisheries and the Environment (DFFE) on the above-mentioned proposed Draft BAR. Site inspection still to be conducted.</p> <p><u>The mandate of the Forestry Branch in the Department of Forestry, Fisheries and the Environment (DFFE), as a commenting authority, is to ensure control over developments that affect State forests, natural forest nature reserves and protected trees.</u></p> <p>The applicant must assess and quantify the anticipated impacts on the indigenous forests. The National Forests Act of 1998 (as amended) provides the strongest and most comprehensive legislation and mandate for the protection of all natural forests in South Africa. The principles of the Act in Section 3 state clearly that "...natural forests may not be destroyed save in exceptional circumstances where, in the opinion of the Minister, a proposed new land use is preferable in terms of its economic, social or environmental benefits".</p>	<p>The comment is noted. The need to identify and assess any impact on indigenous forest and forest-associated resources in terms of the National Forests Act is acknowledged.</p>
<p>Section 7 of the National Forest Act (NFA), act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a license. Under section 62 (1) of the NFA any person who contravenes the prohibition of certain acts in relation to trees in natural forests referred to in Section 7 (1) is guilty of a second category offence. A person who is guilty of a second category offence may be sentenced on a first conviction for that offence to a fine or imprisonment for a period of up to two years, or to both a fine and such imprisonment. Section 15 of the NFA, prohibits the destruction of protected trees without a license- "No person may cut, damage, destroy or remove any protected tree; or collect, remove, transport, export, purchase, sell donate or in any other manner acquire or dispose of any protected tree....."Anyone contravening this prohibition, is guilty of a first category offence, and can be sentenced to up to 3 years imprisonment, or a fine, or both.</p>	<p>The comment is noted and accepted. Compliance with Sections 7 and 15 of the National Forests Act is required, and no indigenous forest species or protected trees may be cut, damaged, disturbed or removed without the required licence.</p>

Section 7 of the Act prohibits the cutting, disturbance, destruction or removal of any indigenous living or dead tree in a forest without a licence, while Section 15 places a similar prohibition on protected tree species listed under the Act, some of which are also forest species.	The comment is noted. The statutory protection of indigenous forest trees and protected tree species is acknowledged.
Cutting or disturbing an indigenous tree in a natural forest without a valid Forest Act Licence is a criminal offence and a transgression of the National Forests Act, 1998 (Act No. 84 of 1998) and carries a fine or imprisonment or both.	The comment is noted and accepted.
Indigenous trees with active bird nests or other significant biodiversity features may not be destroyed without a valid Fauna Permit from the provincial conservation authority, the Western Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform ("DAERL"), if these would be affected.	The comment is noted. If any such biodiversity features are identified as affected, the necessary permits and approvals would be required prior to disturbance.
Forestry has a co-operative governance relationship with various Authorities as well as stakeholders, and thus will take their concerns into consideration if such should arise.	Noted.
Forestry request the following: 1. That a site inspection be conducted together with Consultant in order to determine whether Forestry's mandate is affected or not	The comment is noted. A site inspection with the consultant is acknowledged as the appropriate means of confirming whether Forestry's mandate is triggered on the site.
2. Section 15 of the National Forest Act (NFA) (Act No. 84 of 1998) as amended prohibits the cutting, disturbing, damaging or destroying of protected tree species without a licence. Section 7 of the National Forest Act (NFA), act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a license.	The comment is noted and accepted. No protected trees or indigenous forest trees may be disturbed without the required licences in terms of the NFA.
Kindly note that this letter is not a NFA licence	Noted.
Section 15 of the National Forest Act (NFA) (Act No. 84 of 1998) as amended prohibits the cutting, disturbing, damaging or destroying of protected tree species without a licence. Section 7 of the National Forest Act (NFA), act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a license.	Noted. The applicant acknowledges that separate authorisation under the National Forests Act would be required if protected trees or indigenous forest are affected.
Note: The Department reserves the right to revise the initial comment based on any additional information that may be received.	Noted.

We trust that the above responses adequately address the comments raised. All comments received have been considered as part of the environmental assessment process and have informed the specialist assessments, impact assessment, and Environmental Management Programme.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned.

Yours sincerely,

Bianca Gilfillan (Ms)

EAPASA: 2023/2792

Eco Route Environmental Consultancy



Eco Route

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30 March 2026

Ms Mashudu Mudau, Directorate: Protected Areas Planning and Management Effectiveness
The Department of Forestry, Fisheries, and the Environment (DFFE)
Protected Areas: mamudau@dffe.gov.za

Dear Sir / Madame

**PROJECT: PROPOSED RESIDENTIAL DWELLING ON PORTION 76 OF FARM UITZICHT NO. 216, KNYSNA,
WESTERN CAPE: DRAFT BASIC ASSESSMENT REPORT – COMMENTS RESPONSE LETTER**

The Basic Assessment process for the proposed residential dwelling on Portion 76 of Farm Uitzicht No. 216, Knysna, Western Cape, has progressed through multiple public participation and submission phases due to the lapsing of previous applications and subsequent resubmissions to the Department of Forestry, Fisheries and the Environment (DFFE). Previous application processes were undertaken under DFFE reference numbers 14/12/16/3/3/1/3114 and 14/12/16/3/3/1/3185. The application lapsed due to administrative timeframes and was subsequently resubmitted. A new application is now being submitted to the DFFE and a new DFFE reference number will be issued upon acceptance of the application.

Public Participation was undertaken during the Consultation Basic Assessment phase, as well as during the Draft Basic Assessment Report phase. Comments received from Interested and Affected Parties and Organs of State have been incorporated into the Comments and Response Report and the Draft Basic Assessment Report.

No amendment to the preferred layout is proposed as part of this resubmission.

Please find below the Comments and Responses as captured in the Comments and Response Report.

DFFE – Directorate: Protected Areas Planning and Management Effectiveness Date: 11 December 2025	
Comment	Response
<p>COMMENTS ON THE AMENDED DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED DEVELOPMENT OF A RESIDENTIAL DWELLING ON PORTION 76 OF THE FARM 216 UITZICHT, KNYSNA, WESTERN CAPE</p> <p><u>Background and Discussion</u></p> <p>The Directorate: Protected Areas Planning and Management Effectiveness would like to thank you for the opportunity to review the amended Draft Basic Assessment Report (DBAR) for the aforementioned project. The proposed project will entail the construction of one (1) main dwelling house to be situated in the southwestern corner of the property (1000m²) and a new internal road to provide access to the southern portion of the property.</p>	
<p><u>Comments on the Amended Draft Basic Assessment Report for Proposed Development of a Residential Dwelling on Portion 76 of the Farm 216 Uitzicht, Knysna, Western Cape</u></p> <p>After thorough review of the report submitted, the directorate has the following comments:</p> <p>The Project description of the proposed activity on page 18 of the DBAR states that “The applicant proposes to exercise the primary land use rights of Portion 76 of the Farm Uitzicht No. 216, Knysna Municipality, through the construction of a single primary dwelling (main farmhouse) within the southwestern portion of the site. The development proposal has been refined to significantly reduce its environmental footprint”. The statement is further supported by the statement describing the size of the proposed dwelling indicating that “A low-profile, single-storey structure, limited to a total built footprint of ±1 000 m², including covered verandas and an integrated garage” within the same page.</p>	<p>The comment is noted. The current proposal is for a single dwelling only and the footprint has been reduced from the earlier larger concept to approximately 1 000 m². The intent of the revised proposal is to materially reduce the extent of direct development relative to previous iterations while limiting associated infrastructure to the minimum required for the use of the property.</p>
<p>Upon reviewing the layout maps provided in both the draft BAR and the amended BAR, there appears to be no clear indication of a reduced dwelling footprint. The layout remains unchanged, and the dwelling size seems consistent across both versions. Based on the aerial view presented on page 16, the starting and ending points of the dwelling are identical. This raise concerns as to whether the dwelling size was genuinely reduced from 3 000 m² to 1 000 m².</p>	<p>The comment is noted. The concern relates to the clarity of the layout representation rather than the intention of the revised proposal. The current application is for a reduced single dwelling and not for the previously larger built form. The need for the final layout documentation to clearly and unambiguously reflect the reduced building footprint is acknowledged.</p>

<p>The Comments and Response Report on page 144 indicates that the exact building footprint and the overall disturbance footprint (including all construction-related activities such as working areas, laydown areas, and defensible firebreak space) will be mapped accurately, with clear square meterage calculations. The Directorate could not locate this information in any of the documents submitted. The absence of this information prevents an effective assessment of the scale, footprint, and potential environmental impacts of the proposed structure.</p>	<p>The comment is noted. The importance of clearly distinguishing between the built footprint and the total disturbance footprint is acknowledged. The total footprint associated with the dwelling, road and supporting infrastructure must be clearly identified so that the competent authority can assess the full extent of impact.</p>
<p>The project description on page 18 of the BAR indicates that "Access to the site will be via the existing servitude from Kerk Laan, with a short internal driveway linking to the house". It is, however, unclear how this route can be characterized as short when its length exceeds 800 m and traverses areas identified as very highly sensitive.</p>	<p>The comment is noted. The access route should be described consistently and accurately as an internal access road / driveway of substantial length. The concern regarding the sensitivity of the route and the wording used in the BAR is acknowledged.</p>
<p>The C&R report (page 175) notes that habitat loss will be confined to a "narrow linear feature in an already disturbed corridor." Based on the Directorate's review, disturbance is evident only along the north-western section of the property, and the referenced "disturbed corridor" is neither described nor spatially represented in the documentation. It is therefore recommended that a sensitivity map be provided, clearly indicating all disturbed areas and all remaining natural areas.</p>	<p>The comment is noted. The distinction between disturbed and natural areas must be clearly and spatially shown. The concern that the referenced disturbed corridor is not adequately mapped is acknowledged.</p>
<p>Furthermore, the C&R report indicates that Appendix D3 and Appendix D were developed to accommodate the turning areas or passing bays at designated intervals and bends, particularly on hairpin curves or steeper slopes, and appropriate subgrade preparation, compaction, and, where necessary, reinforced surfacing on steep or unstable sections. It is of concern that neither of these reports has indicated the location of the areas mentioned above, nor does the BAR provide this information.</p>	<p>The comment is noted. The location of turning areas, passing bays and any reinforced sections is material to the assessment of the total disturbance footprint and should be identified clearly where these are required.</p>
<p>The applicant was questioned if there is an intention to access the beach, the EAP responded that the applicant is considering accessing the beach. Although beach access is described as "desirable," no proposal or impact assessment was included in the BAR. Given that any footpath or boardwalk would affect sensitive dune vegetation, this omission is significant.</p>	<p>The comment is noted. No beach access infrastructure forms part of the current application. Any future proposal for a footpath, boardwalk or other access infrastructure would need to be separately assessed and authorised, if applicable, given the sensitivity of the dune vegetation.</p>
<p>On page 7 of the DBAR it is indicated that for Stormwater Management, runoff water will be managed through infiltration-based measures such as the rainwater tanks, permeable driveway surfaces, swales and soak aways. It remains unclear how run-off water will be collected via rainwater tanks. In addition, the BAR does not indicate where the proposed swales and soak aways will be constructed. It must also be clarified whether the installation</p>	<p>The comment is noted. The concern regarding the location and potential footprint implications of stormwater infrastructure is acknowledged. Any swales, soakaways or related stormwater features must form part of the total disturbance footprint and be considered in the environmental management of the site.</p>

<p>of these features will result in additional vegetation clearance and, if so, whether such clearance has been accounted for, the BAR is silent on these aspects.</p>	
<p>No subsoil drains are required along roads but are recommended behind retaining walls if used. The Directorate is concerned that the retaining walls have the potential to fragment wildlife movement corridors on the property.</p>	<p>The comment is noted. The potential for retaining walls and associated road infrastructure to interfere with faunal movement is acknowledged and remains a relevant consideration in the detailed road design and environmental management of the site.</p>
<p>Septic Tank and Soakaway System: Page 145 of the C&R report states that “The precise location, size, and design of the septic tank and soak away field will be identified, and any associated vegetation clearing or land disturbance will be included in the footprint calculations.” It is noted that the footprint calculations of the above have been accounted for, however the precise location, size and design of the septic tank soakaway have not been indicated in the report.</p>	<p>The comment is noted. The precise siting and footprint of the sanitation system are material and should be clearly identified so that the full environmental implications of the proposal can be properly assessed.</p>
<p>It was recommended that a conservancy tank be used instead of the septic tank and soakaway, the Environmental Assessment Practitioner (EAP) responded that the use of conservancy will be considered, however, the BAR seems to have not been considered and the reasons for not considering.</p>	<p>The comment is noted. The concern regarding the omission of a clear motivation for the preferred sanitation option is acknowledged. Alternative sewage treatment options should be transparently compared and motivated.</p>
<p>Furthermore, the septic tank will need to be emptied, the access road/path for the sucker has not been accounted for in the reports. Maintenance and access requirements, including vehicle access routes for suction, should be explicitly addressed.</p>	<p>The comment is noted. Long-term operational access requirements, including maintenance vehicle access for sanitation servicing, are relevant to the full disturbance and management implications of the development and should be clearly addressed.</p>
<p>The EAP has responded that the pool backwash will be disposed through the septic tank and soak away, this is concerning as it has been indicated severally that the vegetation type within the property is not conducive for the backwash.</p>	<p>The comment is noted. The concern regarding disposal of pool backwash is acknowledged. The method of backwash disposal must avoid adverse effects on soils, vegetation and groundwater.</p>
<p>Therefore, the BAR should include detailed mapping of the septic tank and soakaway positions and assess potential environmental impacts of the soakaways.</p>	<p>The comment is noted and supported. Clear mapping and impact consideration of the sanitation infrastructure are necessary.</p>
<p>The Draft Basic Assessment Report (DBAR), on page 7, states that on-site sanitation will be provided via a septic tank and soak away system, designed and located in accordance with the geotechnical report to avoid groundwater contamination. However, the geotechnical report primarily addresses recommendations for borehole drilling and does not guide the positioning of all development infrastructure, including the septic tank and soak away, in relation to geotechnical constraints. There is a discrepancy between the DBAR’s reliance on the geotechnical report for sanitation</p>	<p>The comment is noted. The discrepancy between the stated reliance on the geotechnical report and the actual scope of that report is acknowledged. The siting of sanitation infrastructure must be supported by appropriate technical justification relevant to that infrastructure.</p>

<p>infrastructure siting and the actual scope of the geotechnical report, which does not address septic tank and soakaway placement.</p>	
<p>Alternative sewage treatment options should be considered and documented, demonstrating how the selected system balances environmental integrity vs the alternatives.</p>	<p>The comment is noted. The need to motivate the selected sanitation system against reasonable alternatives is acknowledged.</p>
<p>The EAP must demonstrate that the placement of the septic tank and soak away has adequately considered geotechnical limitations and environmental sensitivities. This should include Clear mapping of the proposed locations relative to geotechnical constraints. An assessment of potential risks to groundwater and surrounding ecosystems. Evidence that environmental sensitivities, particularly in relation to soil permeability and vegetation, have been factored into the siting decision. Mitigation measures to address any identified risks.</p>	<p>The comment is noted. The siting of sanitation infrastructure must clearly demonstrate that geotechnical and environmental sensitivities have been considered and that risks to groundwater, vegetation and surrounding ecosystems are appropriately managed.</p>
<p>The borehole positions illustrated in Figure 13 of the Geotechnical Report are situated to the north of the proposed development and appear to be located at a considerable distance from the development footprint.</p>	<p>The comment is noted. The separation between borehole locations and the proposed dwelling footprint is acknowledged as a matter relevant to the assessment of associated pipeline disturbance.</p>
<p>The EAP has indicated that the siting of the boreholes was intended to minimize the length of water pipelines required to service the residential dwellings, while ensuring that the alignment of such pipelines either avoids or appropriately traverses areas of Critically Endangered Fynbos. Notwithstanding this, the BAR does not provide any detail regarding the proposed pipeline route, nor does it clarify how the routing will achieve the stated objectives.</p>	<p>The comment is noted. The absence of a clearly described and mapped pipeline route is acknowledged. The route and its relationship to sensitive vegetation and terrain should be clearly indicated so that the potential impact can be properly evaluated.</p>
<p>Therefore, the BAR should explicitly map and describe the proposed pipeline route, including its alignment relative to the borehole positions and the residential dwellings, and assess potential impacts of the pipeline on Critically Endangered Fynbos, with clear mitigation measures. This information is important as these pipelines will traverse on the steep dunes.</p>	<p>The comment is noted. The need for explicit mapping and assessment of the pipeline route, particularly in relation to steep dune terrain and sensitive vegetation, is acknowledged.</p>
<p>The directorate has noted that the comments provided previously were not responded to in the C&R report and the recommendations have not been considered, therefore, the comments that were expressed previously are still applicable.</p>	<p>The comment is noted. The Directorate's position that earlier comments remain applicable is acknowledged and recorded.</p>
<p>It is recommended for the EAP to fully address the above-mentioned concerns or comments and where applicable provide clarity on certain matters to the Directorate: Protected Areas Planning and Management Effectiveness. The EAP must also consider comments submitted by all other Stakeholders, Interested and Affected Parties.</p>	<p>The comment is noted. All stakeholder comments form part of the public participation record and are being considered as part of the final reporting.</p>

We trust that the above responses adequately address the comments raised. All comments received have been considered as part of the environmental assessment process and have informed the specialist assessments, impact assessment, and Environmental Management Programme.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned.

Yours sincerely,

Bianca Gilfillan (Ms)

EAPASA: 2023/2792

Eco Route Environmental Consultancy



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EcoRoute Ref.: 001

30 March 2026

Buffelsbaai Inwonersvereniging (BIV)
Vera Carstens
Secretary

Dear Madame

PROJECT: PROPOSED RESIDENTIAL DWELLING ON PORTION 76 OF FARM UITZICHT NO. 216, KNYSNA, WESTERN CAPE: DRAFT BASIC ASSESSMENT REPORT – COMMENTS RESPONSE LETTER

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Public Participation was undertaken during the Consultation Basic Assessment phase, as well as during the Draft Basic Assessment Report phase. Comments received from Interested and Affected Parties and Organs of State have been incorporated into the Comments and Response Report and the Draft Basic Assessment Report.

No amendment to the preferred layout is proposed as part of this resubmission.

Please find below the Comments and Responses as captured in the Comments and Response Report.

Buffelsbaai Inwonersvereniging (BIV)	
Comment	Response
<p>Dear Bianca Portion 76 of the farm Uitzicht, Knysna, Western Cape. We as Buffelsbaai Inwonersvereniging would like to commit and reiterate that we do not support development of Portion 76 of the farm Uitzicht. We stand by our petition against any form of development on the above-mentioned property. Attached, please find a document previously submitted.</p>	<p>The objection is noted. The continued opposition by the Buffelsbaai Inwonersvereniging and reference to their petition is acknowledged and forms part of the public participation record. The concerns raised are considered together with all other authority and I&AP comments in the environmental assessment process.</p>
<p>Draft Basic Assessment Report - The Proposed Development on Portion 76 (A Portion of Portion 54) of Farm 216 Uitzicht, Knysna, Western Cape Eco Route Reference: DFFE Reference number: 14/12/16/3/3/1/3114 - Portion 76 of the Farm Uitzicht, Knysna, Western Cape</p> <p>The WHGC does not dispute the owner's primary land use right to a residence. However, the WHGC object to the illogical selection of the proposed site location as well as the enormous building footprint. The WHGC is extremely concerned about the high environmental impact of the proposed internal road that is required to access the proposed site. The WHGC objections are based primarily due to illogical conclusions in the BAR that result in large & severe biodiversity loss, ecosystem fragmentation and aesthetic/visual impact. Various Stakeholders have pointed out a very feasible and low environmental impact location on the northern boundary; however, this option was not evaluated or presented by the BAR. The WHGC request that the Regulator consider the comprehensiveness of the due process and proposals in the BAR specific to:**</p>	<p>The objection is noted in full. The WHGC's position that the owner's primary right to a residence is not disputed is acknowledged. The DBAR concludes that the preferred alternative represents the most feasible option when biodiversity, geotechnical, access, services, and practical development constraints are assessed together. The proposal has also already been materially reduced from the earlier concept to a single dwelling of approximately 1000 m², with the farm manager's dwelling no longer forming part of the preferred alternative. The development remains subject to strict footprint limitation and environmental controls.</p>
<p>a. The selection of the proposed location of the primary residence and required internal road as it has the highest ecological and aesthetic impact of all the alternatives due to the need for an internal road. The selection of the preferred location is irrational from an environmental impact perspective. It appears that the selection was made based on the desire of the owner to have the primary residence as close to the beach as possible. This location has the highest biodiversity loss and ecological impact.</p>	<p>The comment is noted. The preferred location was not selected simply to place the residence as close to the beach as possible. It was identified through the alternatives assessment as the most feasible option when all specialist and technical constraints were considered together. Importantly, the southern option was selected to avoid direct placement of the dwelling within the more sensitive northern Critically Endangered Knysna Sand Fynbos, while the dwelling footprint itself has been significantly reduced. The internal road does introduce a residual impact, but the applicant's position is that the total impact of the reduced southern option remains capable of mitigation and does not outweigh the environmental constraints associated with the northern alternatives.</p>

<p>b. The evaluation of all the “site alternatives” for the primary residence that ignores the proposed “northern border”. Also consider that the presented site alternatives are practically identical and does not consider a low ecological impact site alternative(s).</p>	<p>The comment is noted. The alternatives assessment did consider the northern portion of the property, including development options in the north-western area. The final preferred alternative differs from the northern option because the northern portion supports more sensitive and intact Critically Endangered Knysna Sand Fynbos. The EAP’s conclusion was therefore not that the northern option was ignored, but that it was not preferred once biodiversity sensitivity, geotechnical considerations, and practical site constraints were assessed together.</p>
<p>c. the large building footprint size of the “residence” that is excessive due to a “spread out design”. Considering the proposed residence of >3000sqm is excessive especially bearing in mind the requirement to minimise disturbance in a CBA.</p>	<p>The comment is noted. The currently preferred proposal is no longer a residence of greater than 3000 m². The preferred alternative has been substantially reduced to approximately 1000 m², including covered verandas and integrated garage. This downscaling materially reduces the development footprint and responds directly to the requirement to minimise disturbance within a CBA.</p>
<p>d. The absence of building designs, levels and building aesthetics that are key attributes required for a Visual Impact Assessment. This is compounded by the fact that the proposed location is very visible from various public and tourist locations.</p>	<p>The comment is noted. The DBAR includes a description of the proposed dwelling as a low-profile, single-storey structure with earth-toned, non-reflective materials intended to reduce visual contrast. The concern regarding visibility from public and tourist viewpoints is acknowledged. The applicant’s position remains that the scale and design of the proposed dwelling, together with landscaping and siting controls, will reduce visual intrusion; however, the sensitivity of the visual receiving environment is recognised.</p>
<p>e. the large Visual impact that was discounted by the BAR.</p>	<p>The comment is noted. The BAR did not intend to discount visual impact entirely, but rather concluded that the visual impact of the reduced preferred alternative would be localised and capable of mitigation through scale reduction, low-profile design, muted materials, and indigenous landscaping. The concern that the visual impact may be greater than initially assessed is acknowledged as a legitimate issue raised by I&APs.</p>
<p>f. the BAR’s conclusion of an “ignorable visual impact” of the proposed site relying on a scoping document and without the required Visual Impact Assessment (VIA).</p>	<p>The comment is noted. The visual conclusions in the BAR are based on the available site context, specialist input, and the characteristics of the revised dwelling proposal. The applicant’s position remains that the reduced scale and design treatment of the dwelling are intended to minimise visual intrusion. Nevertheless, WHGC’s concern regarding the absence of a standalone VIA is acknowledged and the visual sensitivity of the site remains an important consideration for the competent authority.</p>
<p>g. the BAR’s illogical conclusion that the proposed location of the primary residence and required road will not set a precedent or change the character of this untouched area. The WHGC point out that the WCSPF guidelines were</p>	<p>The comment is noted. The concern regarding precedent and character change is acknowledged. The applicant’s position is that each application must be assessed on its own merits and based on the specific</p>

<p>not considered, and the proposal will result in the first and only primary residence on the primary dune between Brenton and Buffels Bay.</p>	<p>environmental assessment undertaken for that site. The proposal is for a single dwelling only, with a limited disturbance footprint, and is not an application for broader corridor development. However, the issue of precedent and landscape character is accepted as a material consideration in the decision-making process.</p>
<p>h. to various key specifications and terms that are ambiguous or missing in the BAR and EMPr that could result in an ambiguous EA and Environmental management E.g. building footprint, disturbance footprint, key aesthetic details of the proposed building, internal road exact path and total disturbance footprint, 110kl water storage tanks and supply pipeline disturbance footprints, Septic Tank & Soak away location and footprint, the management (use, removal and storage) of topsoil & subsoil from proposed substantial site and road excavations.</p>	<p>The comment is noted. The applicant accepts that clarity regarding all disturbance-related components is important to ensure enforceable authorisation conditions and practical environmental management. The development proposal is, however, defined as a single dwelling and associated infrastructure within a strictly demarcated footprint, and the EMPr includes controls for excavation, topsoil handling, road construction, services installation, and rehabilitation. These elements form part of the total development footprint and environmental management framework for the proposal.</p>
<p>i. the unquantified “upgrading” of Kerk Laan with high risk of severe environmental impact as it currently is a “low key” road in a CBA1 and conservation area.</p>	<p>The comment is noted. The use of Kerk Laan is based on the existing access servitude and no major public road upgrade forms part of the current application. Should any localised access improvement be required to accommodate construction traffic safely, such works would need to remain as limited as possible and would be subject to environmental controls. The concern regarding unnecessary widening or environmental degradation of Kerk Laan is acknowledged.</p>

We trust that the above responses adequately address the comments raised. All comments received have been considered as part of the environmental assessment process and have informed the specialist assessments, impact assessment, and Environmental Management Programme.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned.

Yours sincerely,

Bianca Gilfillan (Ms)

EAPASA: 2023/2792

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EcoRoute Ref.: 001

30 March 2026

Bruce Olden

Dear Sir

PROJECT: PROPOSED RESIDENTIAL DWELLING ON PORTION 76 OF FARM UITZICHT NO. 216, KNYSNA, WESTERN CAPE: DRAFT BASIC ASSESSMENT REPORT – COMMENTS RESPONSE LETTER

The Basic Assessment process for the proposed residential dwelling on Portion 76 of Farm Uitzicht No. 216, Knysna, Western Cape, has progressed through multiple public participation and submission phases due to the lapsing of previous applications and subsequent resubmissions to the Department of Forestry, Fisheries and the Environment (DFFE). Previous application processes were undertaken under DFFE reference numbers 14/12/16/3/3/1/3114 and 14/12/16/3/3/1/3185. The application lapsed due to administrative timeframes and was subsequently resubmitted. A new application is now being submitted to the DFFE and a new DFFE reference number will be issued upon acceptance of the application.

Public Participation was undertaken during the Consultation Basic Assessment phase, as well as during the Draft Basic Assessment Report phase. Comments received from Interested and Affected Parties and Organs of State have been incorporated into the Comments and Response Report and the Draft Basic Assessment Report.

No amendment to the preferred layout is proposed as part of this resubmission.

Please find below the Comments and Responses as captured in the Comments and Response Report.

Bruce Olden – 11 November 2025

Comment	Response
<p>In summary we note that this DBAR contains many inaccuracies, inconsistencies and obfuscations. We acknowledge the land owners right to construct a dwelling unit on portion 76/216 Uitzicht, however, we object to the “Preferred Alternative”, and any of the proffered alternatives. We further suggest that this DBAR is fatally flawed and should be withdrawn to ensure accuracy and to seriously implement proposals as suggested by SANParks and others for the construction of a dwelling unit on the Northern Boundary.</p>	<p>The objection is noted. The applicant’s primary right to one dwelling is acknowledged by the objector and likewise recognised in the DBAR. The DBAR is not considered fatally flawed; however, the concerns regarding accuracy, alternatives and clarity are acknowledged. The preferred alternative was selected following an integrated assessment of biodiversity, geotechnical, access, engineering and planning considerations. The proposal has also been materially reduced from earlier concepts, including the reduction of the dwelling footprint to approximately 1000 m² and the exclusion of the manager’s dwelling from the current preferred proposal.</p>
<p>A. The DBAR doesnt explore any realistic alternative that would entail creating the dwelling unit on the northern boundary only and thus from an ecological point of view having the least impact. This DBAR reverts to using previously rejected proposals as alternatives for the development.</p>	<p>The comment is noted. The northern boundary option was considered in the alternatives assessment and in specialist input. The preferred alternative differs from that option because the final assessment considered not only biodiversity, but also geotechnical feasibility, access, services and practical development constraints. The DBAR therefore does not ignore the northern option, but reaches a different conclusion on the preferred layout when all factors are read together.</p>
<p>B. Based on the limited information provided for the proposed internal road construction and the construction of the preferred alternative for the dwelling unit it would be essential that Kerk Laan be upgraded. No details have been provided as to how the upgrade would be funded and who would be responsible for upgrading this road as well as the impact on the environment. This upgrade would additionally require a full EIA as there are many plant species that would be impacted. Knysna municipality has no funds to assist with such an upgrade.</p>	<p>The comment is noted. The proposal makes use of an existing servitude road and does not include a major municipal road upgrade as part of the application. If limited maintenance or localised improvement is required to enable construction access safely, such work would need to be undertaken by the applicant at its own cost and subject to environmental controls. The concern regarding the sensitivity of Kerk Laan and any associated environmental impacts is acknowledged.</p>
<p>C. As previously commented, the proposed building layout suggests that this development is for a boutique hotel. This has not been denied or refuted in the responses to previous DBAR’s. If a boutique hotel is the intention then a broader assessment would need to be properly undertaken.</p>	<p>The comment is noted. The current application is for a single residential dwelling only and not for a boutique hotel, tourism facility or any form of commercial accommodation. Any future change in land use or application for commercial use would require separate statutory approval and, if applicable, a separate environmental assessment process.</p>
<p>D. All considered alternatives in the DBAR and the preferred alternative require the construction of a massive 830m internal road cutting across the south most dune. This will negatively impact the entire Critical Biodiversity Area (CBA) permanently on portion 76/216 Uitzicht. We object to the construction of the internal road in its entirety and the development on the foremost dune (south western region).</p>	<p>The objection is noted. The internal road remains one of the main issues in the application and its impact has been assessed in the DBAR and specialist reports. The road alignment has been limited as far as practicable, follows natural contours where possible, and is subject to mitigation measures relating to erosion control, footprint demarcation, stormwater management, construction supervision and rehabilitation. The</p>

	<p>objector's opposition to both the road and the south-western siting is fully recorded.</p>
<p>1. Access. Refer to Page 7– under Access sub paragraph, the writer refers to the preferred proposed internal road ...”with a short internal driveway linking to the house.” The definition of a driveway is “a short road or paved area leading from a public road to a house or garage”. Our understanding is that the preferred option is the one with an 830m internal road/driveway. This can in no way be described as a short internal driveway unless the writer is deliberately trying to create a distinction between a driveway and an internal road in order to obfuscate the extent of the impact of the “internal road”. Refer to page 18. Under sub paragraph “Access to Portion 76 of the Farm Uitzicht 216” Again the writer refers to “A short internal driveway will be constructed, providing access from the existing servitude road off Kerk Laan to the dwelling footprint....” The current proposal has the dwelling located 830 m away. Clearly this is intended to obscure the extent of the significant impact of the 830m internal road/driveway will have as a result of the “preferred option”. This DBAR does not fully reflect the preferred proposal and appears to still reference some of the original proposals where there was a second dwelling unit located in the north western area.</p>	<p>The comment is noted. The access route to the dwelling is approximately 830 m in length and should consistently be described as an internal access road / driveway rather than suggesting a very short access link. The concern regarding wording is acknowledged. The preferred proposal is for a single dwelling only, and the report should clearly and consistently reflect that the current proposal no longer includes the second dwelling in the north-western area.</p>
<p>2. Water Supply. Refer to page 7 under sub paragraph Water supply. The proposed water storage of a minimum of 20,000 litres was suggested specifically for the storage of water from one or more boreholes. Further under the same section the writer states “Borehole abstraction will only be used as a supplementary source,...” . However referring to page 39. “The main building will make provision for 110kl rainwater/borehole storage” Which of the two water storage statements are correct? The DBAR estimated water usage of approximately 2400 litres of water per day (72,000 litres per month) the provision of 20,000 litres of water storage is hopelessly inadequate if the statement on page 7 is correct. This implies that the borehole water abstraction will be the primary source for water. If the proposal is to create 110,000 litres of water storage then no details have been provided showing where or how provision has been made for the storage of 110,000 litres of water as this alone would impact a large area of the CBA. Knysna is a water scarce region with council recommendations to restrict water usage to 6000 litres per month per dwelling unit.</p>	<p>The comment is noted. The water supply strategy must be stated clearly and consistently. The intention is that rainwater harvesting will form the primary on-site storage strategy, with borehole abstraction used as a supplementary source only if required and if lawful. The concern regarding inconsistencies between 20 000 litres and 110 kl storage is acknowledged and must be clarified in the final reporting and layout documentation so that the full disturbance footprint associated with tanks and pipelines is transparent.</p>
<p>3. Construction impacted area. Refer to page 8 under bullet point – Construction. The writer suggests that the total construction will not exceed</p>	<p>The comment is noted. The concern relates to the distinction between building footprint and total construction disturbance footprint. The total disturbance area must clearly account for all components of the</p>

<p>2500sqm however the construction of the internal road/driveway in itself would exceed 4500sqm of the CBA.</p>	<p>development, including the access road and associated works. The objector's concern regarding the scale of the road disturbance is acknowledged.</p>
<p>4. Pre-existing disturbance of the Proposed Site. Refer to page 30. "EIA is currently in the process and the mapping has to be "ground-truthed" and motivated. The Proposed Site A has been disturbed and is suitable for building a dwelling house." Also referring to page 37. "The proposed footprint in the building line area is an existing disturbed area." These statements are to our knowledge fundamentally untrue. Please provide evidence (size and nature of the pre-existing disturbance) for the statement "The Proposed Site A has been disturbed" as we are unable to establish any evidence of significant "disturbance" as suggested other than a limited area of alien vegetation that should already have been managed and removed. No evidence can be found in this DBAR to support these statements. We, from a family perspective, have inhabited the area for approx 50 years and have not seen a disturbed area on the property as stated. A review of previous Google earth images shows no man-made disturbance in that area.</p>	<p>The comment is noted. The concern regarding the meaning of "disturbed area" is acknowledged. The use of that term should be clearly supported by mapped and site-based evidence and not rely on generalised wording. The presence of alien vegetation or previous localised disturbance does not automatically equate to a broadly transformed footprint, and this distinction should be made clearly.</p>
<p>5. Bee Farming. There are many references to "bee farming" with bolding to underscore the significance thereof. However the writer also concludes "Bee farming may occur as a small-scale complementary use" Not bolded. Refer to page 37. "This proposed agricultural activity is anticipated to contribute to the global effort of bee repopulation, addressing a significant environmental concern". This statement is countered by the "Bee farming may occur as a small-scale complementary use" and will certainly not be able to address a "significant environmental concern" Refer to page 39. "Bee farming may occur as a small-scale complementary use, but the farmhouse is the primary right being exercised." This can be read as a deliberate attempt as misrepresentation. The writer's focus aims to include activities which are not viable to attempt to justify the development in its broadest context. Please note that the bees in the token bee hive have either absconded or died on the North-western corner of the property.</p>	<p>The comment is noted. The current application is assessed on the basis of the exercise of the primary right to one dwelling. Any reference to bee farming should not be overstated or relied upon as the principal justification for the application. The objector's concern that bee farming is only a minor complementary activity is acknowledged.</p>
<p>6. NEMBA Compliance. Page 35 refers . "The proposed development will also aim to conserve, rehabilitate and strengthen the existing biodiversity properties to achieve a higher conservation value, which would be beneficial to surrounding property owners." On page 52 amongst other pages states "The loss of such vegetation is considered irreplaceable and irreversible" however there is no evidence that the land owner is actively managing the alien vegetation to minimise such loss. Existing legislation requires that Land</p>	<p>The comment is noted. Compliance with NEM:BA and the duty to manage listed invasive alien species is acknowledged. The objector's concern regarding the current alien infestation and the need for active management is valid. Alien invasive control should form part of the environmental management of the property irrespective of the outcome of the application.</p>

<p>owners to comply with The National Environmental Management: Biodiversity Act (NEMBA) to control/eliminate alien invasive plant species. The entire northern boundary of the property adjacent to Kerk Laan is severely impacted by alien vegetation. No evidence can be seen of any activity to “conserve, rehabilitate and strengthen the existing biodiversity”. The assessment by Confluent Environmental in 2023 clearly showed lack of management of the alien vegetation. The situation has simply worsened. Now in 2025 it can be seen by a simple walk along Kerk Laan.</p>	
<p>7. Precedent Setting. Page 40 refers. “Will the proposed land use/development set a precedent for similar activities in the area (local municipality)?” Approval for the construction of the main dwelling unit as proposed with the 830m internal road WILL create a precedent for other adjacent properties and other potential land owners to do the same.</p>	<p>The comment is noted. The issue of precedent is acknowledged as a material planning and environmental concern. The applicant’s position remains that each application must be assessed on its own merits and site-specific facts; however, the concern that approval could influence expectations for similar development in the corridor is fully recorded.</p>
<p>8. Proposed Development Size. The preferred choice has radically reduced the development size from 3000sqm or 4000sqm to “approximately 1000sqm” however no consideration of an alternative proposal to construct an appropriately sized dwelling unit on the North-western area appears to have been considered. This would be preferable. This would minimise the impact for the entire property. The critically endangered region of the northern area has already been severely impacted by the lack of compliance with NEMBA and is overrun with alien vegetation as reported in the review by Confluent Environmental in “Appendix D5 Terrestrial Biodiversity SSV.pdf” and can easily be seen adjacent to Kerk Laan on the northern boundary of the property (portion 76/216) Please share full details of how the size reduction from the previous stated 3000sqm, 4000sqm to approximately 1000sqm has been achieved as there is no disclosure in the DBAR to confirm this significant reduction.</p>	<p>The comment is noted. The size reduction from earlier concepts is material and should be clearly reflected in the final documentation. The objector’s continued support for a north-western option is acknowledged. The preferred alternative differs from that option because the final recommendation was based on an integrated assessment of biodiversity, geotechnical, access and service considerations rather than footprint size alone.</p>
<p>9. Inconsistency of Alternatives offered. Referring to Pages 42,43 and 45-53, 74 and 78 amongst others. The various alternatives are inconsistently referenced creating confusion of exactly which limited alternatives were considered by each specialist. The Complexities and inconsistencies are outlined in the following example:- Page 42 and 43 states Preferred alternative : Construction of the 1000 sqm dwelling on southwestern corner with the 830m internal road. Alternative 1 : Back to the construction of the 3000sqm dwelling on south western corner with the 830m internal road. Alternative 2 : Back to the construction of a 4000sqm dwelling with a distributed array of what appears to be bedrooms on south western corner with the 830m internal road as well as a 1200sqm farm managers house on</p>	<p>The comment is noted. The objector’s concern regarding inconsistent naming and cross-referencing of alternatives is valid. The alternatives assessment must be presented clearly, consistently and transparently so that each option can be understood and commented on. The concern regarding incomplete or repetitive appendices is also acknowledged.</p>

the north western boundary. Alternative 3 : Construction of the 3000sqm dwelling on the northern corner(?) with access from “public access Bushy Way” Bushy Way is not referenced on ANY of the drawings, or maps. (is this a cut and paste error again). Please share full details of exactly where is “Bushy Way” as we are unable to locate it. However Page 74 shows : Alternative 1 presumably been referenced as Preferred alternative on page 42/43 Alternative 2: Not described as one of the options on page 42/43 but appears have access via the neighbouring property Portion 39/216. Alternative 3: appears to be the alternative 2 on page 42/43 Page 78 refers to an alternative 4, “Alternative 4 as the best layout,” which was recommended by Confluent Environmental however this has not been described in the DBAR. Where is this described or layout provided in an unambiguous manner? Is this perhaps the “no-go option” or perhaps the development in the north western area only? Please provide full details of this alternative and why it has not been properly considered. Additionally : On Pages 45-53 All references to the Alternatives and text are confused. e.g. Alternative 3 sub heading concludes with a statement Alternative 2 not viable etc. Page 52 : Under Alternative 2 sub heading the writer concludes “Alternative 1 is not viable and cannot be supported in terms of national legislation or provincial biodiversity planning frameworks” Similarly under Alternative 3 sub heading the writer concludes “Alternative 2 is not viable and cannot be supported in terms of national legislation or provincial biodiversity planning frameworks (WCBSP).” On page 53, the writer references Alternative 3 as the no-go option. There are similar discrepancies in other sections of this DBAR which makes it exceedingly difficult to realistically respond to all the views proffered by the various specialists. Please note the appendix files for the alternatives are incomplete and “Appendix Alternative Layout 1.pdf” and “Appendix B1 Preferred Layout.pdf” are exactly the same file. Another error. No Appendix “B” layouts have been provided for ALL alternatives considered especially no layout has been provided for alternative 4 as recommended by Confluent Environmental. Was this a deliberate omission? All of the above and other discrepancies show a fundamental lack of attention to accuracy and detail, as a result the DBAR should be withdrawn and fully reworked.

10. Capital Expenditure. Please note that on page 91, as previously reported, the following has not corrected, “What is the expected capital value of the activity on completion?” it is stated as R800,000.00 in the DBAR. We suspect that it is the writers intention to declare the capital value for this project as R8,000,000.00 i.e. R8Mil. The value in the DBAR is missing one “0”.

The comment is noted. The concern relates to an apparent typographical or numerical discrepancy in the reported capital value. This should be corrected for consistency and accuracy in the final reporting.

<p>11. Construction footprint. Additionally it is unclear if the preferred construction of approx 1000sqm specifies the actual disturbance area or the size of the actual dwelling unit. Please share full details of how the size of the dwelling unit has been reduced from 3000-4000sqm to approximately 1000sqm.</p>	<p>The comment is noted. The distinction between actual building footprint and total disturbance footprint must be clearly stated. The objector's request for clarity on how the dwelling size was reduced from earlier concepts is acknowledged and supports the need for clear final reporting.</p>
<p>12. Swimming Pool. A 160,000 litre swimming pool in a water scarce area needs reconsideration together with sharing of full details on the swimming pool waste water management as chlorinated pool water is neither good for the environment nor good for disposal in Septic tanks.</p>	<p>The comment is noted. The concern regarding water use and pool backwash / wastewater management is acknowledged. Pool-related water demand and disposal must be properly specified and managed to avoid adverse environmental effects.</p>
<p>13. North Western corner consideration. No alternatives proposals were submitted where there is no construction on the foremost south dune. All considerations for the construction in the North-western corner were summarily rejected predominately due the desktop biodiversity review. The insistence on a combination of larger front dune foot print together with an additional managers "cottage" when alternatives were considered created an intentional obfuscation. However the impact of the construction of the 830m road which traverses a large portion of this critically endangered vegetation area as well as the proposed locations for the drilling of the borehole/s which are also in the northern area together have a substantially larger impact on the overall CBA. These impacts have largely not been considered or discussed except in the report from Confluent Environmental. The proposed internal road traverses the north facing side of the foremost south dune. As per Google Earth views this area took more than 5 years to recover after the 2017 fires. The cutbacks into the dune to support the internal road will create an eyesore for many years to come and will be visible from the lookout point on CR Swart Road and elsewhere. We cannot support the DBAR as presented with the construction of the 830m internal road and the associated dwelling unit construction on the foremost south dune or any of the alternatives provided in the DBAR. Due to the number of discrepancies and errors and the lack of viable alternatives we suggest that this DBAR be withdrawn and corrected to ensure that proper public participation/review can be undertaken. An alternative that should be properly considered is for the construction of an appropriately sized dwelling unit on the North-western corner of portion 76/216 Uitzicht which will minimise the impact on the CBA for this development. This would surely be preferable to a "no-go option" and would still support the land owners right to construct an appropriately sized dwelling unit on the property.</p>	<p>The objection is noted in full. The objector's support for a north-western option, opposition to the 830 m internal road, and concerns regarding visual scarring, dune recovery and CBA impacts are fully acknowledged. The applicant's position remains that the preferred alternative was selected through an integrated assessment of specialist findings and site constraints; however, the concern that the north-western option should have been more clearly presented and comparatively assessed is acknowledged.</p>

We trust that the above responses adequately address the comments raised. All comments received have been considered as part of the environmental assessment process and have informed the specialist assessments, impact assessment, and Environmental Management Programme.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned.

Yours sincerely,

Bianca Gilfillan (Ms)

EAPASA: 2023/2792

Eco Route Environmental Consultancy



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30 March 2026

Breda Lombard Town Planners
on behalf of Belvidere Homeowners Association (BHOA)

Dear Madame

PROJECT: PROPOSED RESIDENTIAL DWELLING ON PORTION 76 OF FARM UITZICHT NO. 216, KNYSNA, WESTERN CAPE: DRAFT BASIC ASSESSMENT REPORT – COMMENTS RESPONSE LETTER

The Basic Assessment process for the proposed residential dwelling on Portion 76 of Farm Uitzicht No. 216, Knysna, Western Cape, has progressed through multiple public participation and submission phases due to the lapsing of previous applications and subsequent resubmissions to the Department of Forestry, Fisheries and the Environment (DFFE). Previous application processes were undertaken under DFFE reference numbers 14/12/16/3/3/1/3114 and 14/12/16/3/3/1/3185. The application lapsed due to administrative timeframes and was subsequently resubmitted. A new application is now being submitted to the DFFE and a new DFFE reference number will be issued upon acceptance of the application.

Public Participation was undertaken during the Consultation Basic Assessment phase, as well as during the Draft Basic Assessment Report phase. Comments received from Interested and Affected Parties and Organs of State have been incorporated into the Comments and Response Report and the Draft Basic Assessment Report.

No amendment to the preferred layout is proposed as part of this resubmission.

Please find below the Comments and Responses as captured in the Comments and Response Report.

**Breda Lombard Town Planners – on behalf of Belvidere Homeowners Association (BHOA)
Letter dated 5 December 2025**

Comment	Response
1. We refer to the attached notice in respect of the public participation process. The closing date for comments / objections is 11 December 2025.	The comment is noted. The public participation process was conducted in accordance with the requirements of the NEMA EIA Regulations (2014, as amended), and the closing date for the comment period was confirmed as 11 December 2025.
2. We represent the Belvidere Homeowners Association (BHOA).	The Belvidere Homeowners Association has been registered as an Interested and Affected Party and their comments have been captured in the Comments and Response Report.
3. Belvidere Estate is located within the demarcated boundaries of the Western Heads / Goukamma Conservancy.	Noted. The conservancy status of the surrounding area is acknowledged in the BAR and associated specialist reports. Environmental sensitivities have been considered through specialist assessments and site planning to ensure that development occurs within the least sensitive portion of the property.
4. The application site is also located within the Western Heads / Goukamma Conservancy.	Noted. The ecological importance of the broader conservancy area has been considered in the environmental assessment. The proposed development footprint has been limited to the designated disturbance area identified through specialist studies in order to minimise impacts on the surrounding environment.
5.1 The site is located in an area demarcated as a critical “biodiversity area”.	The site falls within a Critical Biodiversity Area according to the regional biodiversity planning tools. This has been confirmed through specialist biodiversity assessments which informed the site sensitivity verification. The development footprint has therefore been restricted to the least sensitive portion of the property and designed to minimise disturbance to surrounding natural habitat.
5.2 The development potential of the site is therefore extremely limited.	The environmental sensitivity of the site is acknowledged. The proposed development has been carefully designed and located based on the outcomes of specialist investigations, including geotechnical and biodiversity studies, to ensure that the development occurs within the most feasible and least sensitive area of the property.
5.3 The “farming” potential of the site is even more restricted and limited.	The property is not proposed to be developed for intensive agricultural purposes. The application relates to the construction of a residential dwelling and associated infrastructure. The land capability and environmental constraints of the site have been taken into account in determining the scale and location of the proposed development.
5.4 The application proposes the construction of two dwellings – a main house and a farm manager’s cottage.	The application relates to the development of a primary residential dwelling. Any reference to additional structures in earlier conceptual

	layouts has been clarified in the updated BAR. The proposed development footprint and layout are clearly illustrated in the final site layout plans.
5.5 The proposal of a main house and a farm manager's cottage is misleading and an attempt to create the impression that "farming activities" will require accommodation for a "farm manager".	The comment is noted. The application is for a residential dwelling and associated infrastructure. The environmental assessment evaluates the development proposal as submitted and the scale of development has been kept consistent with residential land use rights applicable to the property.
5.6 The BHOA objects to the attempt to create two "separate" dwellings on the site.	The concerns raised are acknowledged. The final development proposal and associated environmental assessment documentation clearly define the nature and extent of the development being applied for.
5.7 We acknowledge the fact that a main and a second dwelling can be permitted on the site in terms of the applicable zoning.	Noted. The applicable zoning provisions allow for residential development in accordance with municipal planning regulations. The environmental assessment process evaluates the environmental implications of the proposed development within the applicable land-use framework.
5.8 The site is furthermore subject to a very specific "disturbance area" where structures must be located.	Correct. Specialist assessments have identified a designated disturbance area within which development should be located. The proposed dwelling has been positioned within this disturbance area in order to minimise environmental impacts.
5.9 Both the dwellings must be located in the "disturbance area".	The proposed development footprint is located within the disturbance area identified through specialist investigations and geotechnical analysis.
5.10 No structures should be allowed on the primary dune facing the Buffalo Bay / Brenton Beach.	No development is proposed on the primary dune system. The dwelling footprint is located landward of the dune system and outside areas identified as being susceptible to coastal erosion or dune instability.
5.11 A substantial six-bedroom "lodge" is proposed on the primary dune.	The comment is noted; however, the development footprint assessed in the Basic Assessment Report is located outside the primary dune system and within the identified disturbance area. The design and placement of the dwelling have been informed by specialist studies to ensure that sensitive dune systems remain undisturbed.

We trust that the above responses adequately address the comments raised. All comments received have been considered as part of the environmental assessment process and have informed the specialist assessments, impact assessment, and Environmental Management Programme.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned.

Yours sincerely,

Bianca Gilfillan (Ms)

EAPASA: 2023/2792

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30 March 2026

Brede-Olifants Catchment Management Agency (BOCMA)

Dear Sir / Madame

PROJECT: PROPOSED RESIDENTIAL DWELLING ON PORTION 76 OF FARM UITZICHT NO. 216, KNYSNA, WESTERN CAPE: DRAFT BASIC ASSESSMENT REPORT – COMMENTS RESPONSE LETTER

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Public Participation was undertaken during the Consultation Basic Assessment phase, as well as during the Draft Basic Assessment Report phase. Comments received from Interested and Affected Parties and Organs of State have been incorporated into the Comments and Response Report and the Draft Basic Assessment Report.

No amendment to the preferred layout is proposed as part of this resubmission.

Please find below the Comments and Responses as captured in the Comments and Response Report.

Breede-Olifants Catchment Management Agency (BOCMA) – 11 December 2025	
Comment	Response
1. The Breede-Olifants Catchment Management Agency has reviewed the Draft Basic Assessment Report and Aquatic Compliance Statement and has no objections to the proposed development.	Noted with appreciation. The BOCMA's confirmation that it has no objection to the proposed development is recorded.
2. Please note that the comments issued by BOCMA on the 24 March 2025 for the Draft Basic Assessment Report are still valid and must be adhered to.	The comment is noted. The earlier BOCMA comments remain applicable and will continue to be adhered to together with the present comments.
3. As required by section 22 of the National Water Act, 1998 (Act No. 36 of 1998), a Water Use Authorisation is required prior to commencement with any water use activity contemplated in section 21 of National Water Act. Moreover, commencement with any water use activity without an authorisation as required by section 22 of National Water Act constitutes an offence in terms of section 151(1) (a) of the National Water Act. In terms of section 151(2) of the National Water Act, any person who contravenes is guilty of an offence and liable, on first conviction to a fine or an imprisonment of a period not exceeding five years or both such a fine and imprisonment.	The comment is acknowledged. The applicant notes that compliance with the National Water Act is required and that, should any Section 21 water use be triggered by the proposed development, the necessary Water Use Authorisation will be obtained prior to commencement of such activity. No water use may commence unlawfully.
4. In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of National Water Act that is associated with the proposed development.	Noted. The property owner remains responsible for ensuring full compliance with the National Water Act prior to commencement of any water use associated with the proposed development.
5. Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.	Noted.
6. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.	Noted. The contact details provided by BOCMA will be used should further clarification or engagement be required regarding water use authorisation.
7. Should you wish to apply for a water use authorisation for unregistered water uses triggered by the proposed activities, you may apply electronically by logging onto the Department of Water and Sanitation (DWS) website at http://www.dws.gov.za/e-WULAAS .	Noted. The applicant / EAP will make use of the prescribed application platform if a water use authorisation becomes necessary.
8. Should you have further enquiries, the office can be contacted or alternatively contact Mr. SI Ndlovu at the above-mentioned contact number or on sndlovu@bocma.co.za	Noted with thanks.

We trust that the above responses adequately address the comments raised. All comments received have been considered as part of the environmental assessment process and have informed the specialist assessments, impact assessment, and Environmental Management Programme.

Should you require any additional information or clarification, please do not hesitate to contact the undersigned.

Yours sincerely,

Bianca Gilfillan (Ms)

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