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Dear Madam

SANPARKS COMMENTS, PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT, RE of ERVEN 1339 AND 1316 KNYSNA, WESTERN CAPE

DFFE Ref No: 2026-01-0014 (Pre-Application)

RE of Erven 1339 and 1316, Knysna, are situated in the Buffer Zone of the Garden Route National Park (GRNP), are directly bordering the Knysna Estuary, and fall within the Development Control Area (DCA) of the Knysna Protected Environment (KPE) **(Fig.1 & 6)**. The Estuarine Functional Zone (EFZ) **(Fig. 2)**, Coastal Management Line (CML), and Coastal Protection Zone (CPZ) **(Fig.3)** extend well landward of the erven.

The CML was included in the Knysna Spatial Development Framework 2020, is shown on the Knysna GIS Viewer and the Western Cape Department of Environmental Affairs & Development Planning's (DEA&DP) Coastal Management Map Viewer. Risks associated with developing in this area are known and have been published. The CPZ is designated in terms of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008) (NEM: ICMA). The CPZ's purpose is to manage, regulate, and restrict the use of land that is adjacent to Coastal Public Property (CPP), or that plays a significant role in the coastal ecosystem.

Garden Route Shale Fynbos is mapped by Mucina and Rutherford, 2006[1] and as revised by SANBI, 2018[2] across most of both erven (**Fig. 4**). This vegetation type is listed as Endangered (EN) in the National Environmental Management Biodiversity Act (Act No. 10 of 2004), Revised National List of Ecosystems that are Threatened and in Need of Protection GNR No. 2747, 18 November 2022. It is however acknowledged that the erven are highly transformed.

Slopes are 0.15% and the erven fall below the 5m contour **(Fig. 5).**

[1] Mucina, L. and Rutherford, M.C. (editors) 2006. Vegetation map of South Africa, Lesotho and Swaziland: an illustrated guide. Strelitzia 19, South African National Biodiversity Institute, Pretoria.
[2] South African National Biodiversity Institute 2018 Final Vegetation Map of South Africa, Lesotho and Swaziland [Vector] 2018.

Fig. 1: Location of RE of Erven 1339 and 1316, Knysna (CapeFarmMapper3).

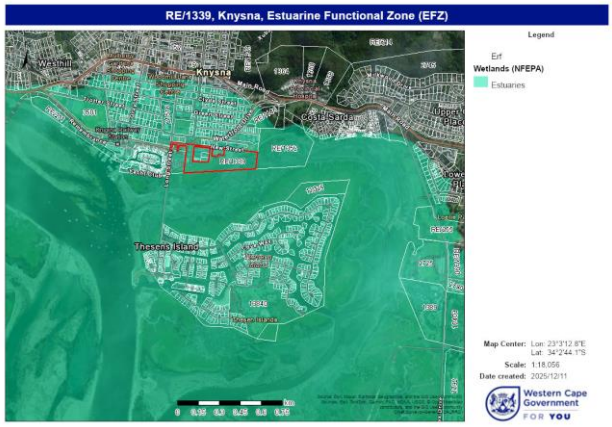

Fig. 2: The Estuarine Functional Zone extends over the erven (CapeFarmMapper3).

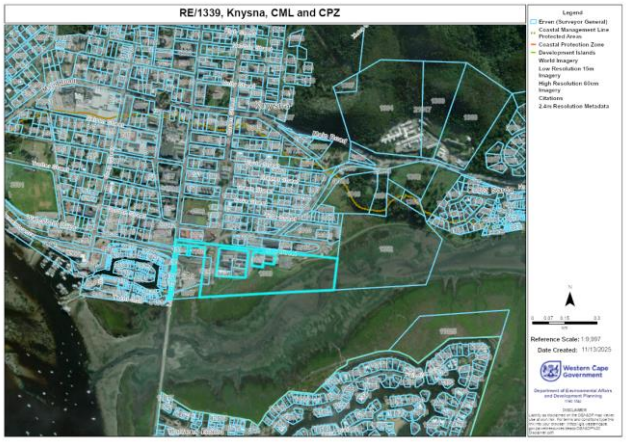

Fig. 3: The Coastal Management Line (green dotted line) and Coastal Protection Zone (orange line) extend well landward of the erven (DEADP Coastal Management Map viewer).

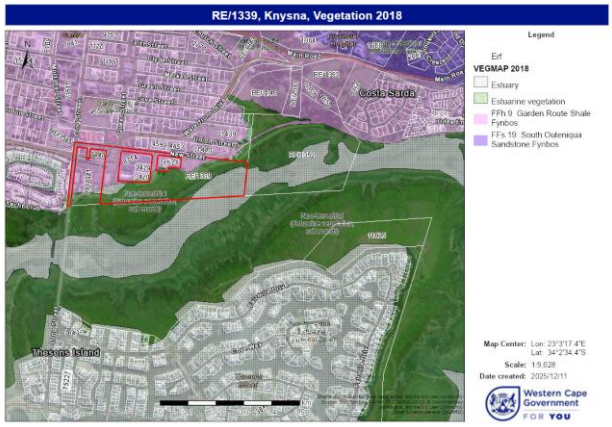

Fig. 4: Garden Route Shale Fynbos (EN) (FFh 9) is mapped on the erven; however, it is noted that the erven are largely transformed (CapeFarmMapper3).

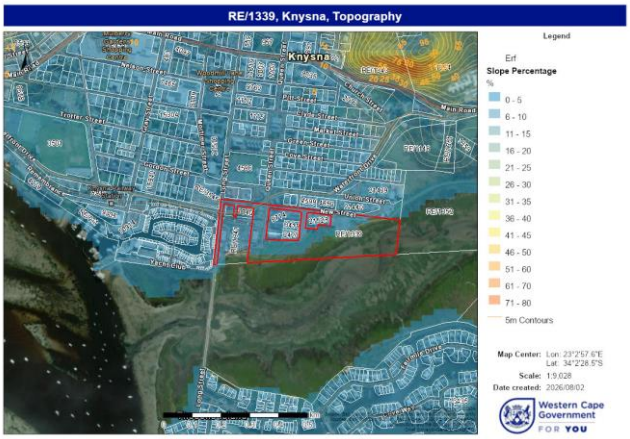

Fig. 5: Slopes are 0.15% and the erven fall below the 5m contour (CapeFarmMapper3).

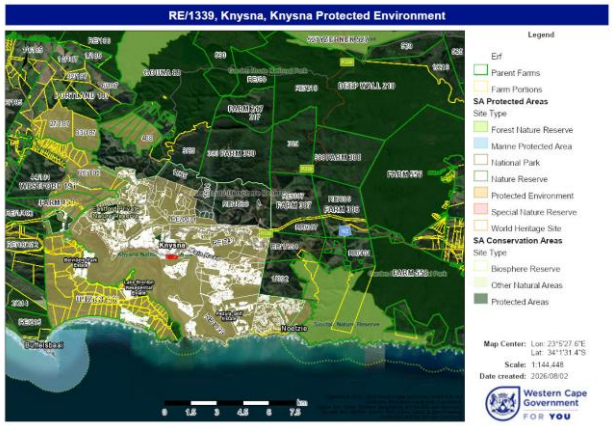

Fig. 6: RE of Erven 1339 and 1316, fall within the Knysna Protected Environment (CapeFarmMapper3).

Critical Biodiversity Areas (CBAs) in terms of the 2023 Western Cape Biodiversity Spatial Plan (WC BSP), which was adopted on the 13 December 2024 (Gazette Extraordinary 9017) in alignment with the Western Cape Biodiversity Act (Act No. 6 of 2021), are no longer mapped for the KPE, as this area is declared a Protected Area in terms of the National Environmental Management: Protected Areas Act (Act No. 57 of 2003) (NEM: PAA) (**Fig. 6**).

The erven are located within Knysna Municipality's mapped 'Urban Edge'; however, this has not been adopted by the Competent Authority, i.e., the Minister of the Department of Forestry Fisheries and Environment (DFFE).

The erven are zoned, "Undermined Use Zone" and "Transport Zone II" (Knysna Municipality GIS Viewer).

The landowner is Kinetic Catamarans SA (Pty) Ltd. (Kinetic), represented by Mr. L. Scheepers.

Several site visits have been conducted by SANParks, more recently a site visit was held on 3 March 2026, attended by Dr. V. Weyer (SANParks), Mr. T. Kgaphola (SANParks), Ms. E. Petersen (SANParks), Ms. M. Mudau (DFFE), Ms. P. Makitla (DFFE), Ms. A. Matamela, (DFFE), Ms. N. Lekalakala (DFFE), Mr. J. Brittion (Eco Route), and Mr. L Scheepers (Kinetic) **(Figs. 7 - 10)**.

Fig. 7. Knysna Municipality, Drivers Testing Ground, where the Kinetic catamaran factory will be expanded over.

Fig. 8. A drainage channel runs through the testing ground and enters the estuary via a culvert.

Fig. 9. Knysna Sea Cadets facilities form part of the development application.

Fig. 10. Knysna Sea Cadets' slipway and jetty in need of repair and upgrading.

The application is a "*PRE-APPLICATION BASIC ASSESSMENT REPORT (BAR) FOR PROPOSED DEVELOPMENT OF KINETIC CATAMARANS INDUSTRIAL FACILITY ON ERF 1339, AS WELL AS DEVELOPMENT / REDEVELOPMENT OF THE SOUTH AFRICAN SEA CADET CORPS INFRASTRUCTURE ON ERF 1316, KNYSNA, WESTERN CAPE*", refer to extracts below from the report prepared by Eco Route Environmental Consultancy, dated October 2025.

The proposed development includes:

1. OVERVIEW OF PROPOSED DEVELOPMENT (PREFERED ALTERNATIVE – ALTERNATIVE A)

The proposed development involves the construction of a new yacht manufacturing facility and associated site upgrades for Kinetic Catamarans SA (Pty) Ltd on portions of the Remainder of Erven 1339 and 1316, Knysna, situated adjacent to the Knysna Estuary within the established Lower Industrial Precinct. The development forms part of a municipally initiated land revitalisation project, through which underutilised municipal land is being transferred to Kinetic Catamarans to enable the expansion of its existing marine manufacturing operations currently located on Erven 3416 and 3417. In addition to the yacht factory, the proposal includes the refurbishment and upgrade of the existing South African Sea Cadet building, located on the eastern portion of the site. The building, which currently serves as a training and storage facility, will undergo aesthetic and structural improvements to enhance its functionality and alignment with surrounding developments, while maintaining its existing educational and maritime training role. Together, these interventions aim to revitalise the lagoon-front precinct, converting a previously paved and fenced vehicle testing ground and adjacent underutilised land into a modern, environmentally managed industrial and community-oriented space that supports Knysna's long-standing boat-building heritage and local economic development.

Table 6: Summary of key infrastructure and environmental integration

Infrastructure component	Design Description	Environmental Integration Measure
Yacht Factory (12 m high, 2056 m²)	Steel structure with administrative mezzanine	Reuses existing disturbed footprint; height stepped to minimise lagoon visibility
Sea Cadets Facility (495 m²)	Refurbished existing structure	Retains existing footprint; future redevelopment to comply with EMPr
Public Park	Lagoon-front landscaped open space	Enhances public access and ecological buffer
Water Supply	Municipal link + 7 × 10 kL rainwater tanks	Rainwater reuse, reduced potable demand
Sewer	Connection to existing municipal network	No new servitude required; all underground
Stormwater	Upgraded catchpits and permeable paving	Improved runoff quality, controlled flow
Electricity	60 A three-phase + solar PV	Reduced reliance on grid power
Solid Waste	Sealed skips, private disposal	No on-site burning or open dumping

2. PROJECT COMPONENTS

2.1. Yacht factory building (Portion A – 020-103 Rev H New SDP Yacht Factory-103 SDP DTA)

The primary component of the development if for the establishment of a new yacht manufacturing building located on RE/1339, indicated on the site development plan (SDP) as Portion A. The proposal was designed to accommodate the production of large luxury catamarans up to 90 feet (27 meters) in length.

According to the provided documentation, the building footprint measures approximately 2,056 m², comprising:

- Factory floor area ± 1,560 m²
- Mezzanine level (administration & offices): ±496 m²
- Overall height: up to 12 m, in line with approved height departure
- SANS occupancy classification: D2 (Moderate risk industrial)
- Design capacity: ±137 employees (1 person per 15 m² industrial floor space)

The structure is designed using steel framing with AZ200 IBR cladding and Kliptite 700 roof sheeting, with integrated roof insulation, polycarbonate translucent panels for daylighting, and solar PV installations to reduce grid dependency. The factory includes a loading bay, refuse handling area, and paved circulation areas suitable for light- and medium-duty vehicles. A single 12 m-wide access gate will serve the main delivery and dispatch area, while internal service circulation connects to New Street, which will be converted into a private access and parking area. The factory's southern façade, facing the Knysna Lagoon, has been visually softened through stepped rooflines and darker material tones to reduce glare and visual bulk when viewed from the water.

2.2. Sea Cadets Building (Portion B – 020-103 Rev H New SDP Yacht Factory-103 SDP DTA)

Portion B of the SDP currently accommodates the existing South African Sea Cadet Corps building, currently a 495 m² single-storey structure with an enclosed yard area used for boat storage and training. The current phase includes only refurbishment and external improvements to the building and its surroundings. A future mixed-use redevelopment is envisaged, potentially introducing a restaurant, retail units, and upper-level accommodation while maintaining the Sea Cadets' activities on the ground floor. This portion will be rezoned to Business Zone 1 to allow future flexibility. Access to Portion B will be from Union Street, with 20 parking bays provided on-site.

2.3. Public Park and Lagoon Interface

A public open space corridor will be established along the lagoon edge, forming part of a broader linear park system envisioned in the Knysna Spatial Development Framework.
The area will include:

- Indigenous landscaping and seating areas
- Low-level lighting for safety and evening use
- A pedestrian linkage between Union Street and the existing lagoon walkway

This intervention replaces the current degraded and uninviting lagoon frontage with a landscaped buffer that enhances public access and ecological interface.

3. SITE ACCESS AND TRAFFIC CIRCULATION

The development incorporates a reconfiguration of New Street, currently a public road traversing the site, into a privately maintained internal access route.
The proposal includes:

- Closure of ±185 m of New Street, to be repurposed as internal circulation and parking.
- Private servitudes securing access to adjacent properties (Erf 21440 and Erf 4653).
- 108 parking bays provided across the site (including factory, staff, and visitor bays).
- 1 x loading bay (4.5 m × 12 m) for the industrial section.

A Traffic Impact Assessment (ITS Engineers, 2025) confirmed that the development will not result in significant additional congestion or require road upgrades, with adequate capacity remaining across adjacent intersections.

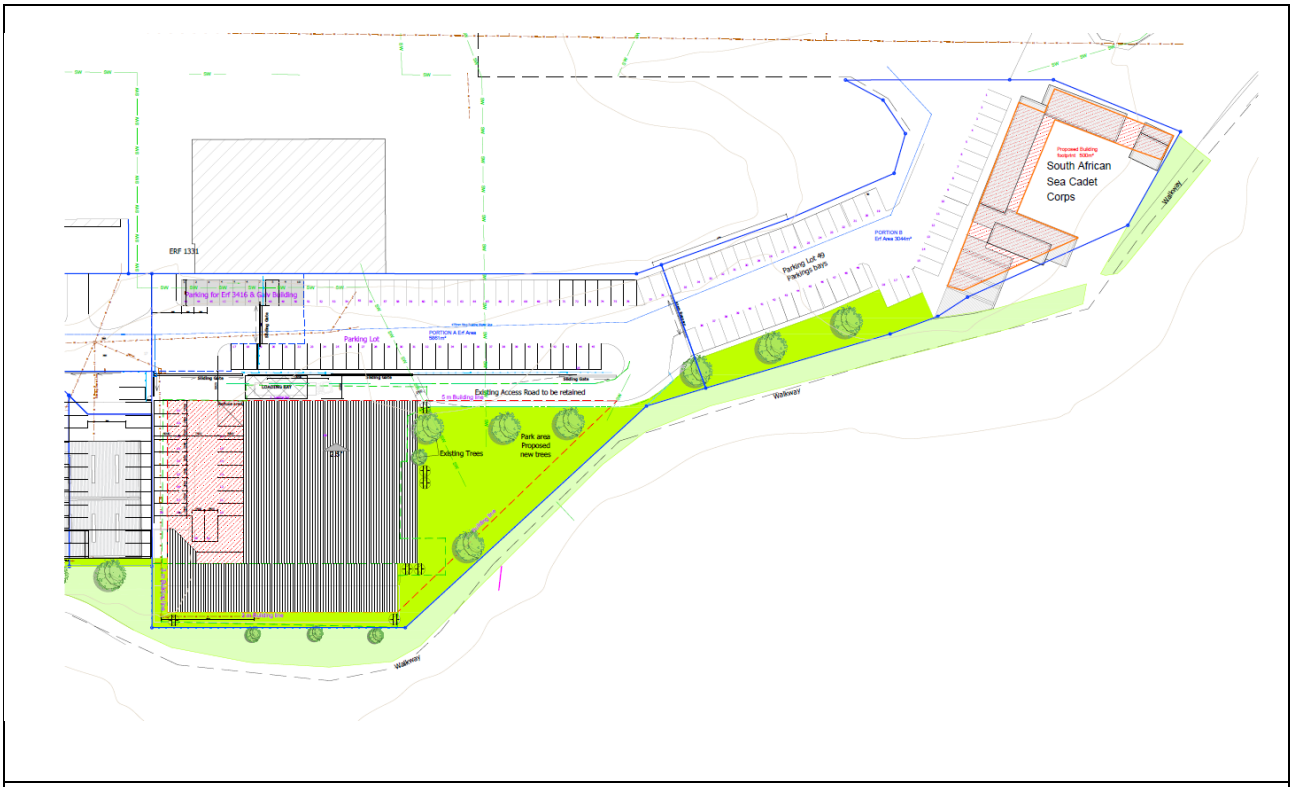

Fig. 11: Site Development Plan, MarkiTec, 1 April 2023

Architectural sections indicate that the building's lagoon-facing side is lower in elevation than the inland side to reduce visual prominence.

Figure 13: 3D Render from the Southeast Perspective of the proposed development on Portion A of the SDP (Mark Gale, 2024)

Fig. 12: 3D Render from the Southeast Perspective of the proposed development on Portion A of the SDP (Mark Gale, 2024), extracted from the Pre-application Basic Assessment report, October 2025.

A Land Use Application is being undertaken as a separate application; refer to SANParks' comments, dated 9 February 2026.

Point 1: Site Servicing

As the Kinetic factory and its proposed expansion area are situated directly adjacent to the Knysna Estuary, attention needs to be given toward ensuring that the estuary is not impacted by water quality, i.e., pollution, and quantity, i.e., stormwater runoff impacts.

It is noted that it is proposed that the development will connect to the Knysna Municipality municipal sewerage network in New Street, and that the landowner proposes to ensure the upkeep of the utilised sewer line.

4.2. Sewerage

The proposed development area for Portion A is not currently connected to the municipal sewer network but can be connected to the existing 160 mm diameter municipal sewer in New Street. This will be done through an existing manhole on the northwestern side of Portion A. The sewer outflow will correspond proportionally with the calculated water demand for the facility. Two larger municipal sewer rising mains, with diameters of 350 mm and 375 mm, also traverse the property. These pipelines will not be relocated but rather retained in situ and protected within a registered municipal services servitude, ensuring long-term accessibility and compliance with municipal engineering standards.

The Sea Cadets building (Portion B) is already connected to the municipal sewer network. No alterations are required at this stage, and the existing connection will remain functional until such time as the building undergoes a more substantial redevelopment in a later phase.

Extract from the report prepared by Eco Route Environmental Consultancy, dated October 2025.

SANParks requires sight of a Service Level Agreement with the Knysna Municipality, with assurance that sewage will be well managed and not pollute the Knysna Estuary.

Should the Knysna Municipality be unable to provide this assurance, it is suggested that the landowner investigate an alternative on-site, self-sufficient, non-polluting sewerage treatment facility, and/or an emergency sewage treatment option, in the event of a municipal sewerage treatment system failure.

Due to the proximity of the Kinetic factory to the estuary, extreme care should be exercised to prevent harmful substance from entering the estuary during normal factory operations or should a hazardous risk event occur, for example as a worst-case scenario, a factory fire event.

Suggested mitigation could include storing hazardous chemicals/ fuels as far away from the estuary as possible, and in a secure bunded facility. An additional measure could include the design and construction of pollution sump catch pits, which would catch and treat any harmful substances before these enter the stormwater system/ estuary. Extreme care would need to be exercised with the drainage channel that currently runs through the testing ground and enters the estuary via a culvert **(Fig. 8)**. These mitigation measures should be incorporated into Engineering designs, and into the Construction and Operation EMPr.

Should any soil be found to be contaminated during site clearing, from any historic use, this should be removed to an approved Hazardous waste facility.

Stormwater should be carefully managed on the site. Sustainable Urban Drainage Systems (SuDS) principles should be implemented. Hard surfaces should be reduced, and grass blocks utilised where possible.

- The project includes stormwater and wastewater management upgrades that will improve runoff quality and prevent pollution of the lagoon.

4.3. Stormwater

The existing stormwater system on site consists of a combination of catchpits, underground pipes, and open channels that drain directly toward the Knysna Lagoon. The system will be upgraded and formalised to manage runoff from the new industrial building and associated parking areas in accordance with municipal standards. All new hard surfaces will be brick-paved and gently graded to channel runoff into the existing stormwater infrastructure. A series of kerbs and surface drains will prevent uncontrolled overland flow, while overflow from the rainwater tanks, designed to discharge at 70% capacity, will provide additional attenuation during high rainfall events. The existing natural depression south of Portion A will continue to function as an informal soakaway to accommodate peak flows. Overall, the proposed changes will improve stormwater quality by reducing sedimentation and siltation currently entering the lagoon from the unpaved and degraded areas.

Stormwater	Upgraded catchpits and permeable paving	Improved runoff quality, controlled flow

4. TOPOGRAPHY

According to the topographical mapping (Figure 11), the entire development area is situated below the 5 m contour line, which places it within the low-lying coastal platform directly associated with the Knysna Estuary. The site exhibits a gentle southward slope toward the estuarine margin, creating a natural surface-water drainage gradient that channels stormwater runoff in the direction of the estuary. Due to extensive historical levelling and surfacing for industrial use, the terrain is now highly compacted and impervious, which limits infiltration and increases the potential for surface runoff and localised erosion if drainage is not properly managed.

Although the current hardened and grassed surfaces have reduced the likelihood of active soil erosion, the site's elevation relative to the estuary makes it sensitive to stormwater discharge and sediment transport. The grassed strip along the estuary edge provides a minor but functional buffer that helps dissipate runoff energy and capture sediment before water reaches the estuarine zone. Consequently, future development works must integrate effective stormwater attenuation and erosion control measures to maintain the stability of this low-lying platform and prevent indirect impacts on the Knysna Estuary's intertidal habitats.

Extracts from the report prepared by Eco Route Environmental Consultancy, October 2025.

Designs should include the inclusion of sustainable building designs, including solar systems and rainwater harvesting tanks.

Point 2: Social Benefits

SANParks supports Kinetic's proposal to retain and enhance the South African Sea Cadet Corps' (Sea Cadets) facility on the western section of the site. The facility provides valuable training and social benefits.

It is suggested that the slipway on the estuary side of the Sea Cadets building be included as a listed EIA activity in the application, to enable it to be upgraded in the future, dependent on the need and availability of funding, and the Environmental Authorisation's validity period. Discussions in this regard should occur between Kinetic, the Competent Authority (DFFE), Knysna Municipality, Sea Cadets, and SANParks.

From a heritage perspective, no formal heritage sites or archaeological resources are recorded within the development footprint according to the South African Heritage Resources Information System (SAHRIS) and municipal databases. The property itself has been historically disturbed and developed since before the 1970s. However, the South African Sea Cadet Corps facility located on the western portion of the site carries local cultural significance due to its long-standing role in maritime youth training. This historical association will be retained and enhanced through proposed facility upgrades, ensuring the continuation of its educational and social value within the community.

A Notice of Intent to Develop (NID) under Section 38(1) and (8) of the NHR Act will be submitted to Heritage Western Cape. Heritage Western Cape will determine whether the proposed development might have an impact on heritage resources. Comment will be included in the final Basic Assessment Report.

Extracts from the report prepared by Eco Route Environmental Consultancy, October 2025.

It is noted in the application that the park area which borders the estuary will be enhanced.

2.3. Public Park and Lagoon Interface

A public open space corridor will be established along the lagoon edge, forming part of a broader linear park system envisioned in the Knysna Spatial Development Framework.
The area will include:

- Indigenous landscaping and seating areas
- Low-level lighting for safety and evening use
- A pedestrian linkage between Union Street and the existing lagoon walkway

This intervention replaces the current degraded and uninviting lagoon frontage with a landscaped buffer that enhances public access and ecological interface.

Extract from the report prepared by Eco Route Environmental Consultancy, October 2025.

Discussions are required between Kinetic, Knysna Municipality and SANParks on how this area should be improved, its aesthetics, maintenance, security interventions that may be required and required lighting. Outcomes of discussions should be incorporated into the Operational EMPr.

Point 3: Climate Change Adaptation & Resilience

As stated in the Pre-application BAR, the high-water mark (HWM) survey undertaken by Eden Geomatics, during November 2024 to February 2025 established the current HWM as, "*south of the existing paved surface and fenced boundary of the former vehicle testing facility, confirming that the proposed yacht factory will be situated landward of the surveyed HWM and entirely within an already transformed and elevated platform approximately two metres above mean sea level"*.

Climate change adaptation and resilience strategies as mitigation towards predicted sea level rise, storm surge events, and coastal erosion may involve: (1) A retreat strategy, where development moves away from the threat; (2) An elevation strategy, where buildings are built high enough to not be affected; and (3) A defence strategy, where structures are built to withstand the threat and defend buildings and infrastructure behind the defence wall/ structure.

The landowner has advised that the building and infrastructure will be elevated to withstand climate change, with meters above mean sea level (m.a.m.s.l.) to be guided by an engineer/ architect. A retreat strategy is not feasible due to space constraints. The raised walkway to the south of the site may provide a further defence strategy and could be used as a stormwater management swale. It is suggested that this be included as an EIA listed activity in the application; to facilitate any future works to this walkway, should this be deemed necessary (within the Environmental Authorisation's validity period), and dependent on approvals and discussions between Kinetic, the Competent Authority (DFFE), Knysna Municipality, Sea Cadets, and SANParks. Coastal flooding risks may require specialist evaluation at the time of implementation. The inclusion of changes to the walkway as a listed EIA activity may further enable future park upgrades in this area.

Fig. 13. Walkway to the south of the site, which could act as a defence strategy to mitigate climate change risks.

Point 4: Specialist Studies

It is noted that no Visual Impact Assessment has been undertaken, and that the landowner has stated that the building will be designed to blend with the existing factory and to create elements of interest, so as not to resemble a typical factory structure. SANParks suggested that colours be chosen to blend into the estuary interface. Care should be taken not to position any solar panels on the rooves that could create glint or glare as seen from across the estuary. Special attention should be paid to night lighting, that may be necessary for security, but that however does not produce night pollution of the estuary.

A coastal erosion specialist study may be required to inform any decisions around the use of the boardwalk as a climate change defence strategy structure. It is possible that this study could be undertaken when and if the walkway is used for this purpose, i.e. prior to construction activities commencing on the walkway and to inform designs. Discussions in this regard should be held with the Competent Authority (DFFE).

Point 5: Summary & Way Forward

In principle SANParks supports the proposed development, provided development is undertaken in a responsible, sustainable, future climate smart manner, and that negative impacts are mitigated adequately.

SANParks supports Kinetic's proposal to retain and enhance the South African Sea Cadet Corps' (Sea Cadets) facility on the western section of the site. The facility provides valuable training and social benefits.

SANParks requires sight of a Service Level Agreement with the Knysna Municipality, with assurance that sewage will be well managed and not pollute the Knysna Estuary. Should the Knysna Municipality be unable to provide this assurance, it is suggested that the landowner investigate an alternative on-site, self-sufficient, non-polluting sewerage treatment facility, and/or an emergency sewage treatment option, in the event of a municipal sewerage treatment system failure.

Due to the proximity of the Kinetic factory to the estuary, extreme care should be exercised to prevent harmful substance from entering the estuary during normal factory operations or should a hazardous risk event occur, for example as a worst-case scenario, a factory fire event. Suggested mitigation could include storing hazardous chemicals/ fuels as far away from the estuary as possible, and in a secure bunded facility. An additional measure could include the design and construction of pollution sump catch pits.

Extreme care would need to be exercised with the drainage channel that currently runs through the testing ground and enters the estuary via a culvert.

It is suggested that the slipway on the estuary side of the Sea Cadets building be included as an EIA listed activity in the application, to enable it to be upgraded in the future, dependent on the need and availability of funding, and the Environmental Authorisation's validity period. Discussions in this regard should occur between Kinetic, the Competent Authority (DFFE), Knysna Municipality, Sea Cadets, and SANParks.

The raised walkway to the south of the site may provide a defence strategy and could further be used as a stormwater management swale. It is suggested that this be included as a listed EIA activity in the application; to enable any future works to this walkway, should this be deemed necessary in the future (within the Environmental Authorisation's validity period), and dependent on approvals and discussions between Kinetic, the Competent Authority (DFFE), Knysna Municipality, Sea Cadets, and SANParks. Coastal flooding risks may require specialist evaluation at the time of implementation. The inclusion of changes to the walkway as a listed EIA activity may further enable future park upgrades in this area.

A coastal erosion specialist study may be required to inform any decisions around the use of the boardwalk as a climate change defence strategy structure. It is possible that this study could be undertaken if the walkway is used for this purpose, i.e. prior to construction activities commencing on the walkway and to inform designs. Discussions in this regard should be held with the Competent Authority (DFFE).

Discussions are required between Kinetic, Knysna Municipality and SANParks on how the park area may be improved, its aesthetics, maintenance, security interventions required and on lighting requirements.

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

1. Stormwater should be carefully managed on the site. Sustainable Urban Drainage Systems (SuDS) principles should be implemented. Hard surfaces should be reduced, and grass blocks utilised where possible.

2. Designs should include the inclusion of sustainable building designs, including solar systems and rainwater harvesting tanks.

3. SANParks suggested that colours be chosen to blend into the estuary interface. Care should be taken not to position any solar panels on the rooves that could create glint or glare as seen from across the estuary. Special attention should be paid to night lighting, that may be necessary for security, but that however does not produce night pollution of the estuary.

4. The EMPr, by Eco Route, dated November 2025, should be updated to include new mitigation measures pertaining to this application.

5. A suitably qualified Environmental Control Officer (ECO) should be appointed to monitor the EMPr.

6. Should any resources of suspected heritage value be uncovered during clearing, Heritage Western Cape (HWC) must be contacted immediately for instructions.

7. 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 estuary vegetation.

SANParks is responsible for the Proper Administration of the Knysna Protected Environment (GN 1175 of 2009) Regulations, and for the authorisation of any development (as defined in the Regulations) in the Development Control Area, as per Section 8. This area extends 50m from the high-water mark into RE of Erven 1339 and 1316, Knysna, and as such SANParks' authorisation is required for development to proceed in these areas.

As per Section 9 and 10 of the Regulations SANParks may request additional studies to be undertaken, should it be deemed that these are necessary.

SANParks will comment further on the next phase of public participation, as part of the Draft Basic Assessment Report phase.

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

Yours sincerely

DR VANESSA WEYER
PRINCIPAL PLANNER
GARDEN ROUTE NATIONAL PARK

DATE: 2 April 2026

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	Justin Britton	EcoRoute
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	Leon Scheepers	Kinetic Catamarans SA (Pty) Ltd.