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DRAFT - APPLICATION BASIC ASSESSMENT REPORT

PROPOSED DEVELOPMENT ON PORTION 59 OF FARM 216, UITZICHT, KNYSNA, WESTERN CAPE.

PREPARED FOR:	Kobus Smit
PREPARED BY:	Eco Route Environmental Consultancy Janet Ebersohn (EAPASA 2019/1286); assisted by Justin Brittion (Can. EAPASA 2023/6648)
DOCUMENT REFERENCE:	2025.17.11 – Draft Basic Assessment Report – Featherbed
DFFE REF NO:	TBC
DATE:	April 2026
SUBMITTED TO:	Competent Authority (DFFE) I&AP's

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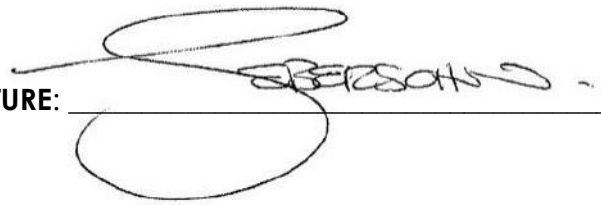
STATEMENT OF INDEPENDENCE

I, ***Janet Ebersohn***, of Eco Route Environmental Consultancy, in terms of Regulation 13 of the Environmental Impact Assessment Regulations, 2014 (as amended), hereby declare that I provide services as an independent Environmental Assessment Practitioner ***(EAPASA Reg: 2019/1286)*** and receive remuneration for services rendered for undertaking tasks required in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), and the Environmental Impact Assessment Regulations, 2014 (as amended). I have no financial or other vested interest in the project.

EAP SIGNATURE: 

GENERAL PROJECT DESCRIPTION

The Applicant (Kobus Smit) has proposed development on Portion 59 of Farm 216 (Referred to as the property throughout the report. The property has been investigated by a team of specialists (Terrestrial, Plant, Faunal, and Aquatic) in correlation with the Environmental Assessment Practitioner.

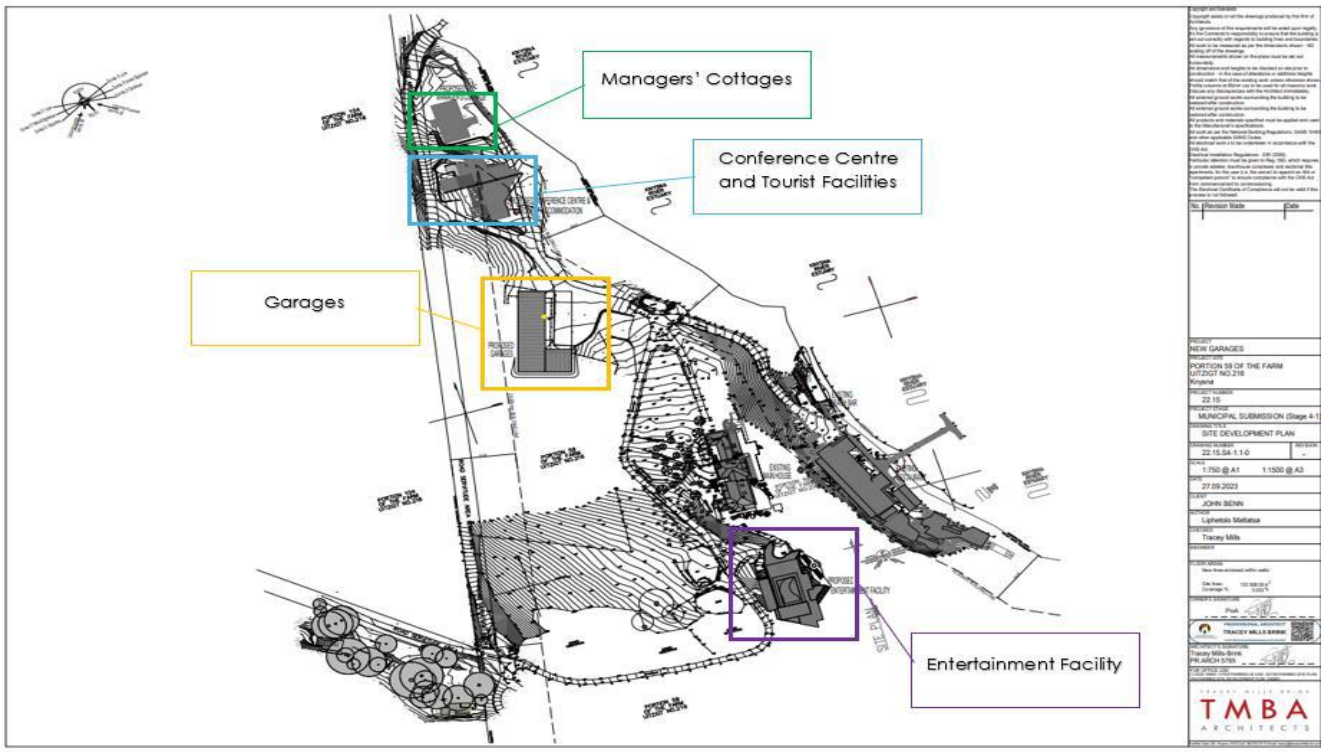
The following holds relevance to the environmental considerations:

- The current vegetation in areas proposed for development is highly modified.
- Apart from the adjacent Knysna Estuary, no additional aquatic sensitivities have been identified.
- No faunal SCC have been identified on the property.

Four distinct structures will be developed as part of the proposed project, all collectively referred to as "the proposed development." These structures are outlined in the Basic Assessment as follows:

- Manager's Accommodation Units
- Conference Centre and Tourist Facilities
- Garages
- Entertainment Facilities

The majority of the proposed development will take place on areas that have already been disturbed. Consequently, no alternative plan was considered more suitable. This option presents the least environmental impact and does not necessitate changes to the current planning and design.



ASSUMPTIONS & LIMITATIONS

This section provides a brief overview of specific assumptions and limitations having an impact on this environmental application process:

- It is assumed that the information on which this report is based (specialist studies and project information, as well as existing information) is correct, factual and truthful.
- The proposed development is in line with the statutory planning vision for the area (namely the Local Spatial Development Plan), and thus it is assumed that issues such as the cumulative impact of development in terms of character of the area and its resources, have been considered during the strategic planning for the area.
- It is assumed that all the relevant mitigation and management measures and agreements specified in this report will be implemented in order to ensure minimal negative impacts and maximum environmental benefits.
- It is assumed that Stakeholders and Interested and Affected Parties notified of the availability of draft reports during the PPP will submit comments within the designated 30-days review and comment period, for consideration in the environmental assessment process.

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ATTACHMENTS

Table 1: Applicable Basic Assessment Report Attachments

Appendix	Description
Appendix A	Locality map of Erf 59 of Farm 216
Appendix B	Site development Plans (Alternative A)
Appendix C	Environmental consideration Maps
Appendix D1	Terrestrial Biodiversity Impact Assessment Report and Plant Species Compliance statement
Appendix D2	Aquatic Biodiversity Site Sensitivity Verification and Impact Assessment
Appendix D3	Terrestrial Animal Species Specialist Assessment: Site Sensitivity Verification Report and Compliance Statement
Appendix E	Site Sensitivity Verification Report
Appendix F	DRAFT Application EMPr
Appendix G	Screening Tool Report (*Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property)*.
Appendix H	Janet Ebersohn CV
Appendix H1	Justin Brittion CV (Can. EAPASA 2023/6648)
Appendix I	Coastal Stability Assessment (Inanda Port and Coastal Engineers, Rev A, 17 October 2025
Appendix J	Stormwater Management Plan REV.1 (Hofmeyr & Associates Consulting Engineers, 15 April 2026
Appendix K	Service Report (Engineers, 15 April 2026)
Appendix L	Alien Invasive Vegetation Species Control Plan (Eco Route, 2025.17.13, 20 October 2025) approval letter

SCOPE OF ASSESSMENT AND CONTENT OF BASIC ASSESSMENT REPORT

Appendix 1 of Regulation 982 of the 2014 EIA Regulations describes the contents required to complete a basic assessment report. The below table indicates how Appendix 1 requirements were incorporated into the basic assessment report:

Scope of assessment and content of basic assessment reports	**Index**
(1) A basic assessment report must contain the information that is necessary for the competent authority to consider and come to a decision on the application, and must include -	
(a) Details of – (i) The EAP who prepared the report; and (ii) The expertise of the EAP, including curriculum vitae.	**Appendix H and H1**
(b) The location of the activity, including – (i) The 21 digit surveyor General Code of each cadastral land parcel. (ii) Where available the physical address and farm name. (iii) Where the required information items (i) and (ii) is not available, the co-ordinates of the boundary of the property.	(i) **Section B** (ii) **Section B** (iii) **Section B**
(c) a plan which locates the proposed activity, or activities applied for as well as the associated structures and infrastructure at an appropriate scale, or, if it is (i) A linear Activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or (ii) On land where the property has not been defined, the coordinates within which the activity is to be undertaken.	**Section B** (i) N/A (ii) N/A
(d) a description of the scope of the proposed activity, including – (i) All listed and specified activities triggered and being applied for; and (ii) A description of the activities to be undertaken including associated structures and infrastructure	**Section E** (i) **Section F** (ii) **Section E**
(e) A description of the policy and legislative context within which the development is proposed, including – (i) An identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this	**Section G** (i) **Section G**

activity and have been considered in preparation of the report; and (ii) How the proposed activity complies with and responds to the legislation and policy context, plans, guidelines, tools frameworks and instruments.	(ii) **Section G**
(f) A motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred location.	**Section E**
(g) A motivation for the preferred site, activity and technology alternative	**Section E**
(h) A full description of the process followed to reach the proposed preferred alternative within the site including: (i) Details of all alternatives considered. (ii) Details of the public participation process undertaken in terms of regulation 41 of the regulations, including copies and supporting documents and inputs. (iii) A Summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them. (iv) The environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects. (v) The impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts – (aa) can be reversed (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated. (vi) The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives. (vii) Positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects.	(i) **Section E** (ii) **Section J** to be completed in Draft and Final BAR. (iii) **Section J** to be completed in Draft and Final BAR. (iv) **Section E** (v) **Section H** (vi) **Section H** (vii) **Section H** (viii) **Section H** and **Section K**

(viii) The possible mitigation measures that could be applied and level residual risk (ix) The outcome of the site selection matrix (x) If no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and (xi) A concluding statement indicating the preferred alternatives, including the preferred location of the activity.	(ix) **Section H** (x) N/A (xi) **Section E**
(i) A full description of the process undertaken to identify, assess and rank the impacts the activity will impose on the preferred location through the life of the activity, including - A description of all environmental issues and risks that were identified during the basic assessment process; and An assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures	**Section H**
(j) An assessment of each identified potentially significant impact and risk, including - Cumulative impacts; The nature, significance and consequences of the impact and risk; The extent and duration of the impact and risk; The probability of the impact and risk occurring; The degree to which the impact and risk can be reversed; The degree to which the impact and risk may cause irreplaceable loss of resources; and The degree to which the impact and risk can be mitigated	**Section H**
(k) Where applicable, a summary of the findings and impact management measures identified in any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final assessment report.	**Section H** and **Section K**
(l) An environmental impact statement which contains: • A summary of the key findings of the environmental impact assessment; • A map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and • A summary of the positive and negative impacts and risks of the proposed activity and identified alternatives	**Section C** **Appendix D1, D2, and D3** **Section E** **Section F**
(m) Based on the assessment, and where applicable, impact management measures from specialist reports, the recording of proposed impact management objectives, and the impact	To be completed in Draft and Final BAR

management outcomes for the development for inclusion in the EMPr.	
(n) Any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation.	To be completed in Draft and Final BAR
(o) A description of assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed	To be completed in Draft and Final BAR
(p) A reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation.	To be completed in Draft and Final BAR
(q) Where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required, the date on which the activity will be concluded and the post construction monitoring requirements finalised.	To be completed in Draft and Final BAR
(r) An undertaking under oath or affirmation by the EAP in relation to: The correctness of the information provided in the reports; The inclusion of comments and inputs from stakeholders and I&APs; The inclusion of inputs and recommendations from the specialist reports where relevant; and Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties	To be completed in Draft and Final BAR
(s) Where applicable, details of any financial provisions for the rehabilitation, closure and ongoing post decommissioning management of negative environmental impacts	**N/A**
(t) Any specific information that may be required by the competent authority.	To be completed in Draft and Final BAR
(u) Any other matters required in terms of section 24(4)(a) and (b) of the Act.	To be completed in Draft and Final BAR

SECTION A – ADMINISTRATIVE DETAILS

Applicant details:

Title	Mr
Name of the Applicant	Kobus
Surname of the Applicant	Smit
Name of contact person for applicant (name and surname) (if other)	Kobus Smit
Company/ Trading name (if any)	Phambi Properties (Pty) Ltd
Company Registration Number	2006/006062/07
Physical address	FEATHERBED, UITZICHT 59/216, BRENTON ON LAKE, Knysna District, 6570, Western Cape, South Africa
Postal address	POSTNET SUITE 146, PRIVATE BAG X13130, HUMEWOOD, PORT ELIZABETH, 6013
Postal code	6013
Telephone	041- 585 0234
Cell phone	082 8555509
E-mail	kobus@gecko.na

Landowner details:

Name of the Landowner	Phambi Properties (Pty) Ltd
Surname of the Landowner	N/A
Postal address	POSTNET SUITE 146, PRIVATE BAG X13130, HUMEWOOD, PORT ELIZABETH, 6013
Postal code	6013
Telephone	041- 585 0234
Cell phone	082 8555509
E-mail	kobus@gecko.na

Provincial Authority details:

Provincial Environmental Authority:	Provincial Environmental Authority:
Name of contact person in Environmental Section (name and surname)	Danie Swanepoel
Postal address	4th Floor, York Park Building, 93 York Street,
Postal code	6529
Telephone	044 814 2002
Cell phone	-
E-mail	Danie.Swanepoel@westerncape.gov.za

Local Municipal details:

Municipality	Knysna Municipality
Name of contact person in Environmental Section (name and surname)	Pam Booth
Postal address	P O Box 21. Knysna
Postal code	6570
Telephone	+27 (0)44 302 6300

Cell phone	060 9986967
E-mail:	pbooth@knysna.gov.za

Environmental Assessment Practitioner details:

Company of Environmental Assessment Practitioner (EAP)	Eco Route
EAP name and surname	Janet Ebersohn (registered EAP - 2019/1286) assisted by Justin Brittion (candidate EAP – 2023/6648)
EAP Qualifications and Professional affiliations	Janet Ebersohn – Janet Ebersohn (B.Sc. Hons. Environmental Management) Justin Brittion – MSc Environmental Science – Can. EAPASA
Physical address	6 Parakiet Road, Sedgefield, Western Cape
Postal address	PO BOX 1252 Sedgefield
Postal code	6573
Telephone	-
Cell phone	082 557 7122 (Janet) / 081 208 2170 (Justin)
E-mail	janet@ecoroute.co.za / justin@ecoroute.co.za / admin@ecoroute.co.za

SECTION B – DESCRIPTIVE DETAILS

1. LOCATION DESCRIPTION

Portion 59 of Farm 216, Knysna, Western Cape (hereafter referred to as "the property") is situated on the western head of the Knysna Heads.

Table 2: Western Cape SG information of the property

SG Region:	KNYSNA
Erf Nr:	Portion 59 of the Farm Uitzigt 216
Area (Ha):	13.58
SG Code:	C03900000000021600059

The property is partially protected by the Featherbed Nature Reserve, a private reserve. To the east, the property is bordered by the Knysna Estuary, which lies along its northern boundary.

Table 3: Coordinates of the property boundaries

FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Western Boundary	34°	04'	24.75˝	23°	02'	56.45˝
Southern Boundary	34°	04'	37.08˝	23°	02'	59.01˝
Eastern Boundary	34°	04'	33.29˝	23°	03'	05.60˝
Northern Boundary	34°	04'	22.41˝	23°	03'	03.26˝

Figure 1: Locality Map of Portion 59/216

2. PROPERTY DESCRIPTION

The earliest available Google Earth imagery indicates the presence of existing structures on the property, which appeared to be overgrown, likely with Alien Invasive Plant Species (AIPS). The property was significantly impacted by the 2017 Knysna veld fires, after which the owner rebuilt the structures on the same development footprint. With sperate OSCAE permits approved by the Knysna Municipality in 2017 (File ref: 216 BE) and again in 2023 (File ref: 17/14/5/2), the owner planned to construct what was referred to as the "pool house" and "new garages." Although vegetation clearance for the pool house (now referred to as the "entertainment facility") has commenced under the OSCAE permit, no excavation work for construction has begun.

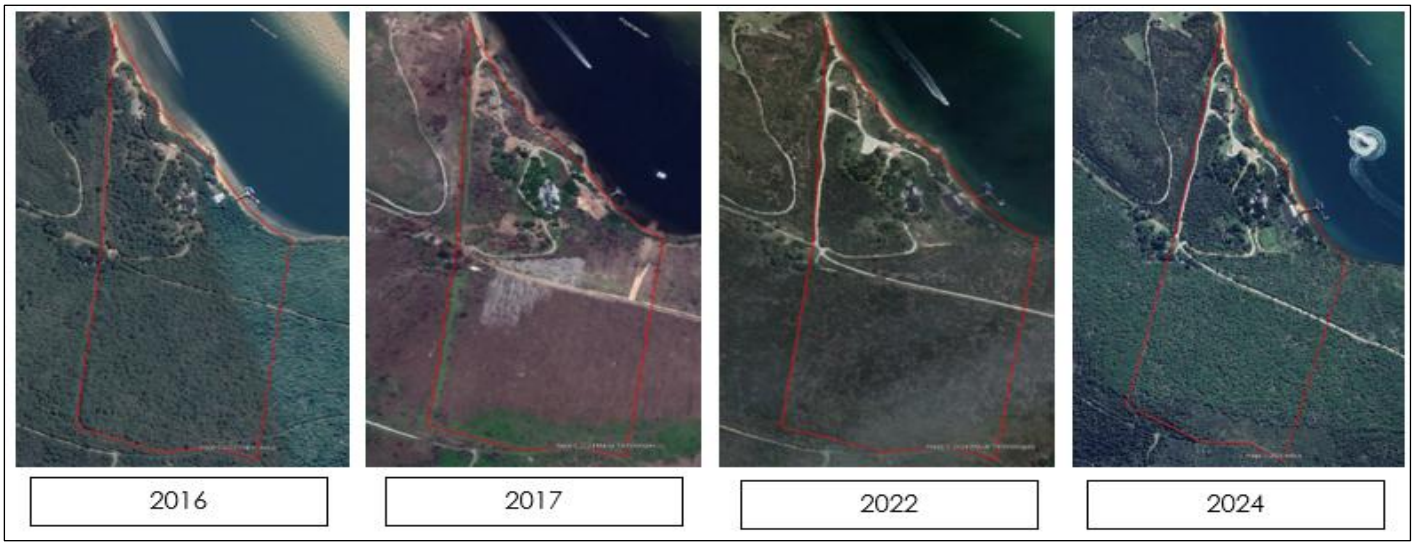

Figure 2: Brief overview of the property between 2016 and 2024 (Google Earth Pro)

The property is zoned as Open Space Zone IV, with consent for tourist facilities. This zoning significantly influences the area by attracting the public to the Knysna Heads, which are a key part of the region's historical and natural heritage.

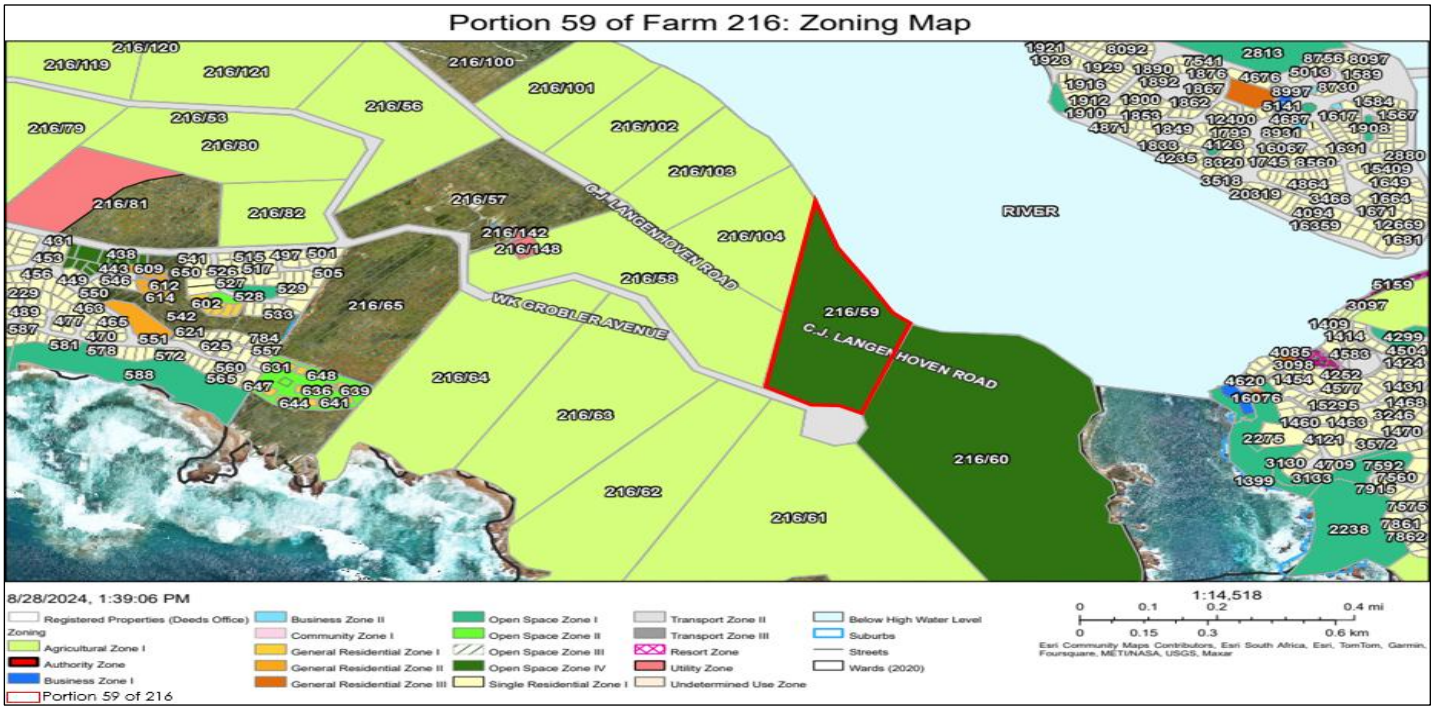

Figure 3: Zoning Map of the proposed property and the surrounding properties

SECTION C – RECEIVING ENVRIONMENTAL CONCIDERATIONS

This section reviews the available environmental data in conjunction with the specialist reports to provide an overview of the current state of the receiving environment. It considers historical classifications and identifications while incorporating ground-truthing data to contextualize the existing conditions. This method is crucial because desktop data may sometimes differ from actual on-site findings.

1. VEGETATION

The National Vegetation Map produced by SANBI (VEGMAP, 2018) indicates that the property predominantly sustains the capability of hosting Knysna Sand Fynbos and Goukamma Dune Thicket (Figure 4). The characteristics of these classified vegetation types include distinct landscape features and plant communities specific to the region –

- Knysna Sand Fynbos

"Garden Route 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. Undulating hills and moderately undulating plains covered with a dense, moderately tall, microphyllous shrubland, dominated by species more typical of sandstone fynbos".

- Goukamma Dune Thicket

"Coastal stretches from Victoria Bay near Wilderness to the Knysna Heads, with smaller areas along the coast from Robberg Peninsula near Plettenberg Bay eastward to Keurboomstrand. A mosaic of low to tall (1-5 m), dense thicket, dominated by small trees and woody shrubs with lianas abundant, in a mosaic of low (1-2 m) asteraceous fynbos. Thicket clumps are best developed in fire-protected dune slacks, which occasionally also support pockets of coastal forest. The fynbos shrubland occurs on upper dune slopes and crests where succulents may be common in more open areas"

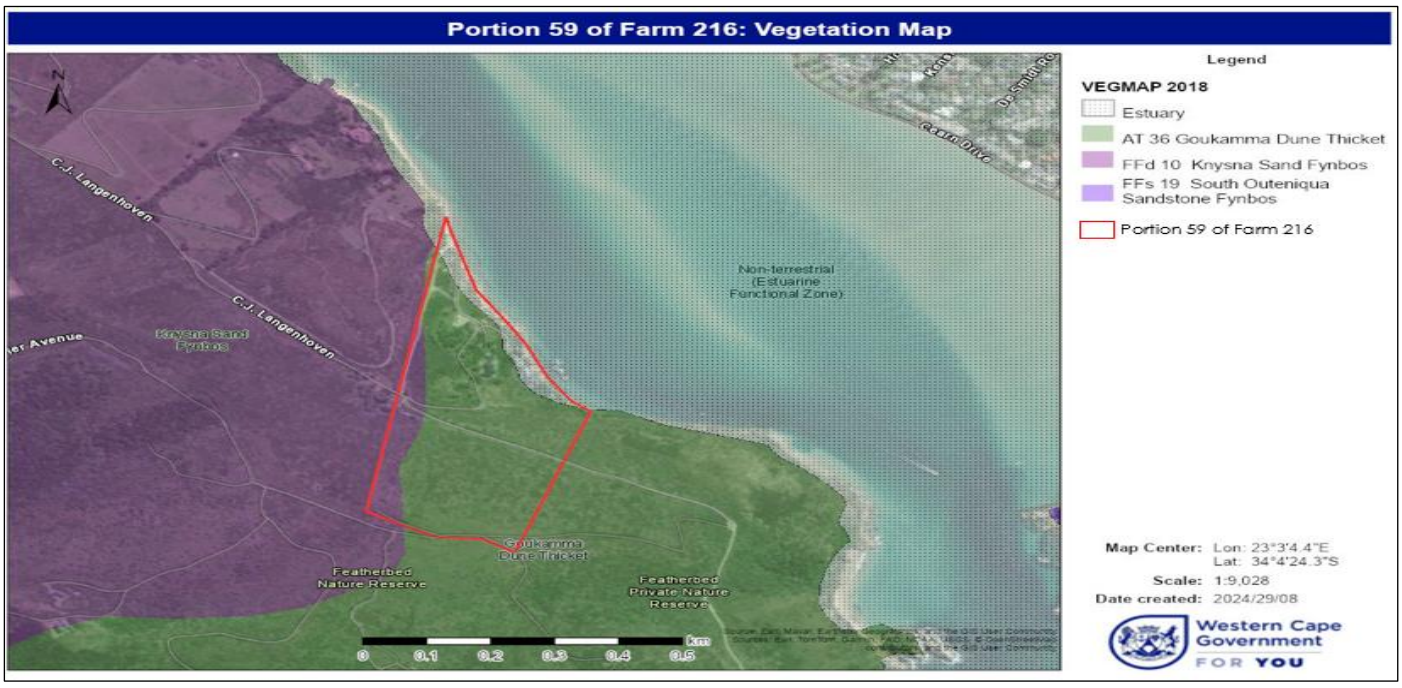

Figure 4: VEGMAP 2018 indicating Knysna Sand Fynbos and Goukamma Dune Thicket on the Property

These two vegetation types respectively possess a Critically Endangered (Knysna Sand Fynbos) and Least Concern (Goukamma Dune Thicket) threat status (Figure 5).

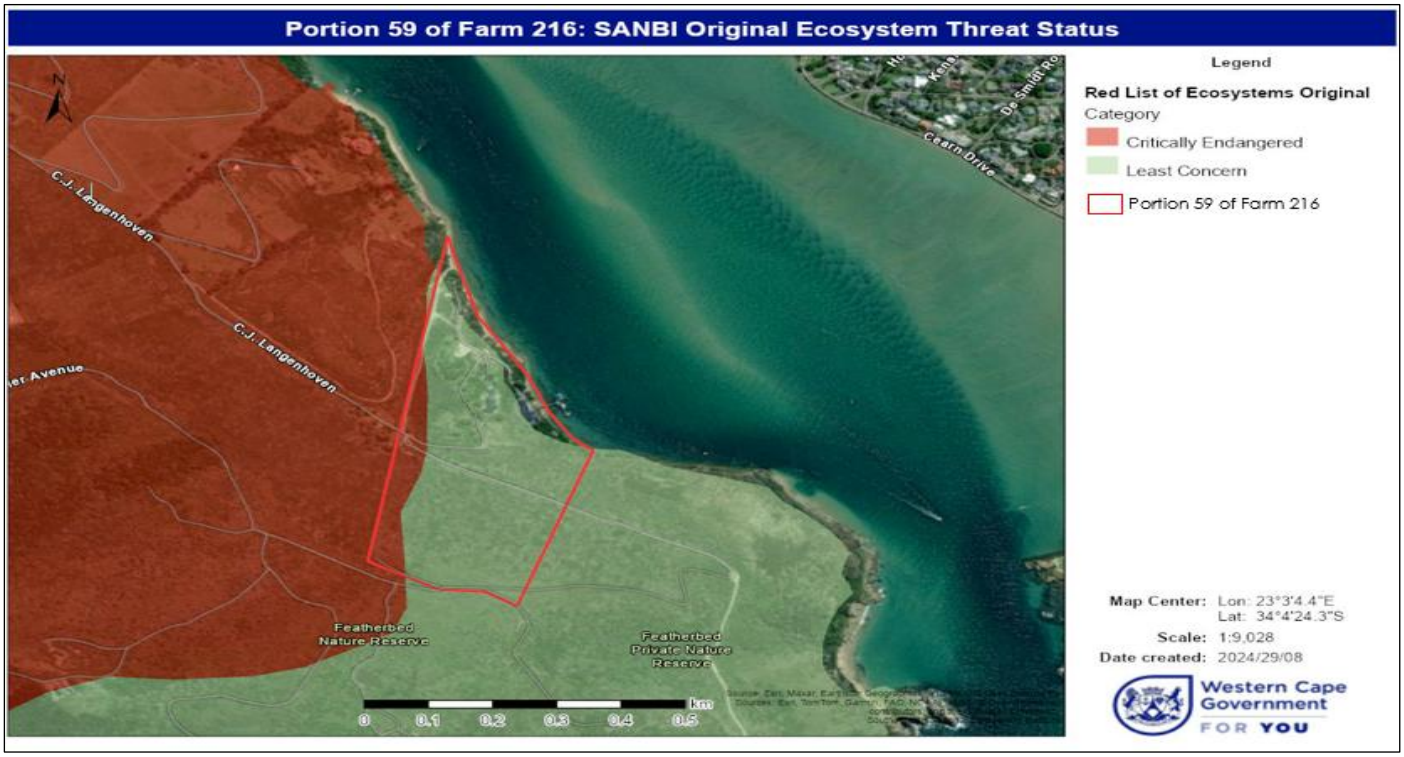

Figure 5: SANBI Original Ecosystem Threat Status

According to the Terrestrial Biodiversity and Plant Species specialist assessment done by Capensis (2024), the current vegetation on the site is highly modified, but the remnants that do occur suggest that a mosaic of Dune Thicket (which contains fynbos elements) and Forest patches were originally present. The habitat map (Figure 6) distinguishes between Forest, Dune Thicket and their condition. The habitats categories include (1) Degraded Forest, (2) Highly degraded Forest, (3) Degraded Dune Thicket, (4) Highly degraded, (5) Highly degraded – Landscaped areas and (6) Transformed.

Figure 6: Identification of Habitats (Capensis, 2024)

1.1. Degraded Forest

This habitat occurs just south of the proposed garages and intersects slightly with the footprint. The habitat is dominated by large shrubs, medium sized trees and climbers which are all indigenous and a fair representation of the original forest patches that likely occurred in this region in fire protected areas. Disturbances are related to the existing developments on the site including the concrete slab, roads and landscaped areas. Species include crossberry Grewia occidentails, bastard currant Allophyllus decipiens, small knobwood Zanthoxylum capense, coastal camphorbush Tarchonanthus littoralis, candlewood Pterocelastrus tricuspidatus, bridal asparagus Asparagus asparagoides, poison starapple Diospyros dichrophylla, pock ironwood Chionanthus foveolatus, clausena Clausena anisata, common glossy currantrhus Searsia lucida, white pear Apodytes dimidiata, Cape buckhorn Cynanchum cf. africanum, Cape ivy Delairea odorata, white ironwood Vepris lanceolata, shiny leaf Rhamnus prinoides, tree fuschia Halleria lucida and white milkwood Sideroxylon inerme. This is a small patch of forest, and most if it will remain undisturbed, but the vegetation adjacent to the proposed garages may be disturbed during construction. The ecological functioning of the forest habitat is already highly altered in its current state, mainly due to the close proximity of other developments and the landscaped gardens. The ecological functioning in the adjacent areas (the nature reserve beyond the developed areas) is moderate to high, with moderate plant species diversity and therefore suitable habitat for all forms of animal life. However, high densities of Invasive Alien Plants (IAPs) are present in the nature reserve, and this threatens the species diversity and ecological functioning.

1.2. Highly Degraded Forest

This habitat occurs on the site of the proposed garages and to the west. It has been cleared of the original vegetation, with the exception of a few individual indigenous trees found in forest habitats. The rest of the area is open and grassy, scattered with planted trees, some of which are protected yellowwood trees. Indigenous species noted here include white stinkwood Celtis africana, pock ironwood Chionanthus foveolatus, white ironwood Vepris lanceolata, Cape kooboo berry Mystroxylon aethiopicum ssp. aethiopicum, coastal camphorbush Tarchonanthus littoralis, candlewood Pterocelastrus tricuspidatus and drunken berry Solanum africanum. Planted species include: real yellowwood Podocarpus latifolius, Outeniqua yellowwood Afrocarpus falcatus, Henkel's yellowwood Podocarpus henkelii (all protected trees), African plum Harpephyllum caffrum and the invasive common guava Psidium guajava (NEMBA category 3).

1.3. Degraded Dune Thicket

This habitat occurs on the steep slopes between the current developments and transformed habitat and the lagoon, along with a small patch to the west of the existing shed, in the area proposed for the conference centre. This habitat also occurs to the south of the proposed entertainment facility and is extensive from this area into the greater part of the Featherbed Nature Reserve. The only part of this habitat likely to be impacted by the proposed development is the area to the west of the shed. This small area contains a moderate number of indigenous species, mostly representing fynbos elements, but also with some thicket elements. Species noted here include common storksbill Pelargonium capitatum, Cape coast cabbagetree Cussonia thyrsiflora, num-num Carissa bispinosa, bitou Osteospermum moniliferum, Cape boxwood Myrsine africana, poison starapple

Diospyros dichrophylla, Eastern thatchreed Thamnochortus glaber, common gonna Passerina corymbosa, cobra lily Chasmanthe aethiopica, crossberry Grewia occidentalis, sour fig Carpobrotus edulis, common burbleaf Knowltonia vesicatoria, axil hardleaf Phylica axillaris, round leaf buckhorn Cynanchum obtusifolium, candlewood Pterocelastrus tricuspidatus, dune olive Olea exasperata, coastal camphorbush Tarchonanthus littoralis, garlic buchu Agathosma apiculata, silver everlasting Helichrysum petiolare, Cape moonseed vine Cissampelos capensis, pock ironwood Chionanthus foveolatus and warty indigo Indigofera verrucosa. One species of conservation concern was found in this patch of Degraded Dune Thicket, the Vulnerable dune bitterbush Selago villicaulis, however, only two individuals were found in this area. The ecological functioning of this habitat is moderate, and most ecological processes will still persist especially in the areas adjacent to the lagoon and to the south of the site. The small patch adjacent the shed is isolated from other remnant vegetation by the existing buildings and the road on the west. A low density of the invasive rooikrans Acacia cyclops (NEMBA category 1b) occurs in this habitat within the study area, but the density increases further to the south in other parts of the property.

1.4. Transformed and Highly Degraded Landscape Areas

These habitats contain very few indigenous plants. The Transformed habitat contains open grassy areas, buildings or roads. The Highly degraded landscaped areas have been converted to ornamental gardens using both indigenous and exotic species. Some of the original forest trees have been incorporated into these areas. The ecological integrity and functioning of these habitats are highly modified. In the case of the Highly degraded habitat, very few indigenous species are present, and this limits the ecological functionality. However, the landscaped areas support a moderate diversity of species, and this still supports ecological activity. Potential threats are the spread of landscaped extralimital indigenous and exotic plants ('horticultural escapes') into the natural areas of the nature reserve. Examples of this is the dune felicia Felicia echinata which occurs extensively outside of its natural range in natural areas. The ecological functioning within the Transformed habitat is very low.

1.5. Species of Conservation Concern (SCC)

The relative plant species theme sensitivity for the site is rated as High and Medium by the Screening Tool Report (Section D). One SCC, the Vulnerable dune bitterbush Selago villicaulis occurs in area 1 (Figure 7), however, only two individuals were found here. This population occurs on a small and isolated fragment of vegetation and is unlikely to persist in the long-term due to edge effects of the nearby roads and domestic activities. Conservation efforts would be better directed at the expansive protected areas on the property which contain similar habitat, and almost certainly contain more sub-populations of this species (https://www.inaturalist.org/observations/16227241). The impact of this loss is rated as Low negative, and no mitigation is proposed. Mitigation is described in detail in Section H.

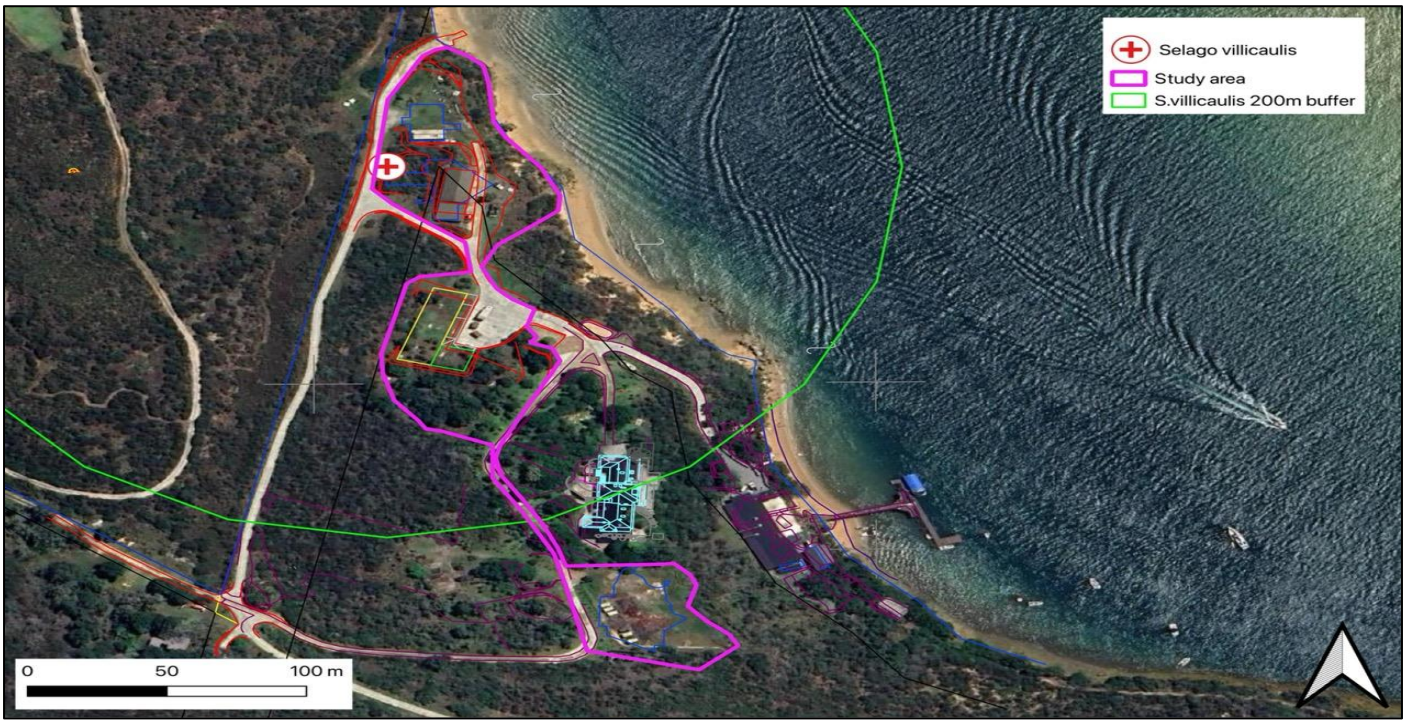

Figure 7: The map of the study area showing the SCC

2. SENSITIVE AREAS (CBA, ESA, and PA)

The property forms wholly part of a Protected Area (Featherbed Private Nature reserve) (Figure 8). According to the Western Cape Biodiversity Spatial Plan (WCBSP, 2023) the following definition and management objective applies.

Definition:	Areas that are formally protected by law and recognised in terms of the NEMPAA. This includes gazetted private Nature Reserves and Protected Environments concluded via a stewardship programme
Management objective:	Must be kept in a natural state with a management plan focussed on maintaining or improving the state of biodiversity.

Figure 8: Western Cape Biodiversity Spatial Plan (WCBSP 2017) Sensitive areas

The property is a Private Nature Reserve declared in 1985 (P.N. 660/1985) under the Nature and Environmental Conservation Ordinance, 1974 (Ordinance 19 of 1974). Sections 12 and 23(5) of the National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003) (NEM:PAA) recognise such pre-1985 declarations as nature reserves. SANParks (10 December 2024) and CapeNature have noted that the property has not yet completed the verification and validation process required under NEM:PAA, namely a formally appointed Management Authority, an approved Management Plan, and a notarial title-deed endorsement.

The Knysna Municipality has informally confirmed that it is not the Management Authority for the Featherbed PNR. The applicant accepts, in principle, the encouragement from SANParks and CapeNature to engage CapeNature in respect of the regularisation process. The applicant proposes that the conclusion of a validation agreement and the appointment of a Management Authority be addressed as a condition of Environmental Authorisation (refer to the EAP's recommended conditions, Section K).

3. AQUATIC SENSITIVITIES

No watercourses are present on the property. The main aquatic sensitivity relates to the Knysna Estuary, which lies directly adjacent to Portion 59 of Farm 216. The estuary is managed in terms of the Knysna River Estuary Management Plan (2017), which identifies a Development Control Area (DCA) extending 100 meters inland from the water's edge. Within this buffer, proposed developments are subject to environmental assessment processes to ensure ecological integrity is maintained.

Figure 9: Aquatic Sensitivities Associated with Portion 59 of Farm 216

The Regulations for the Proper Administration of the Knysna Protected Environment (Gazette No. 32797 – Notice 1175 of 11 December 2009) provide that developments within the DCA must be consistent with applicable environmental authorisation requirements. SANParks, as a stakeholder in

the management of the Knysna Protected Environment, has raised concerns regarding shoreline stability and stormwater management. These matters have been addressed through specialist input, including a Coastal Stability Assessment and a Stormwater Management Plan.

The competent authority will determine whether additional approvals or management interventions are required in relation to the estuarine buffer and protected environment regulations. At present, the application proceeds on the basis that all identified sensitivities have been assessed and mitigation measures incorporated into the EMPr.

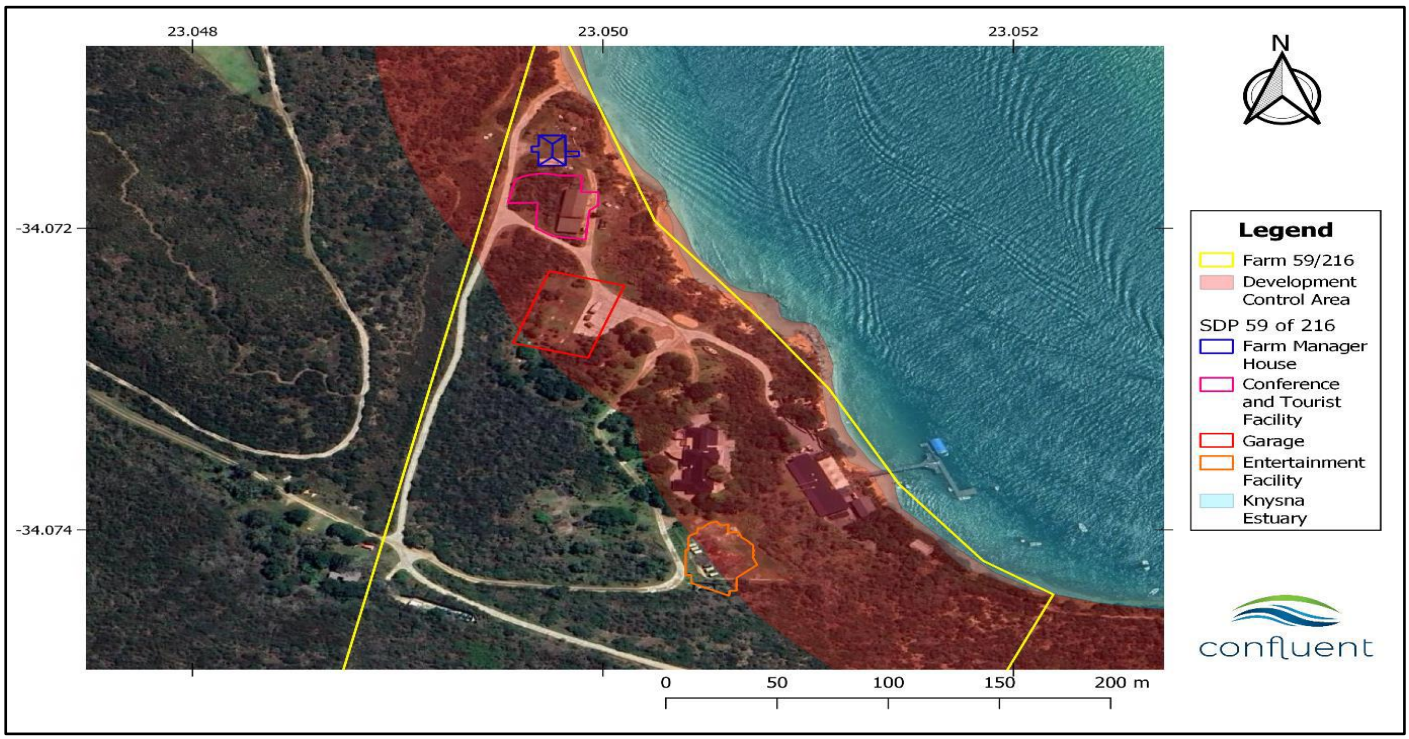

Figure 10: Proposed development in relation to the Development Control Area of the Knysna Estuary (Confluent, 2024)

3.1. Coastal Environment

To further clarify the primary environmental sensitivities associated with the property, it is essential to note that the entire proposed development falls within the Coastal Management Protection Zone (CPZ) and Coastal Management Protected Areas. In this context, Section 63 of the National Environmental Management: Integrated Coastal Management Act (NEM: ICMA) must be considered when an authorisation is required under Chapter 5 of the National Environmental Management Act (NEMA). Additionally, Section 62 of the NEM: ICMA mandates that all state organs involved in land-use planning must apply the relevant legislation in a way that upholds the purpose of the CPZ. Consequently, local authorities should consider Section 63 when making land use decisions. According to Section 63(1)(c) of the ICMA, if environmental authorisation is required for coastal activities under Chapter 5 of NEMA, the competent authority must evaluate all pertinent factors, including whether the coastal public property, the CPZ, or coastal access land will be impacted. If so, they must assess how consistent the proposed development or activity is with the objectives of establishing and safeguarding those areas.

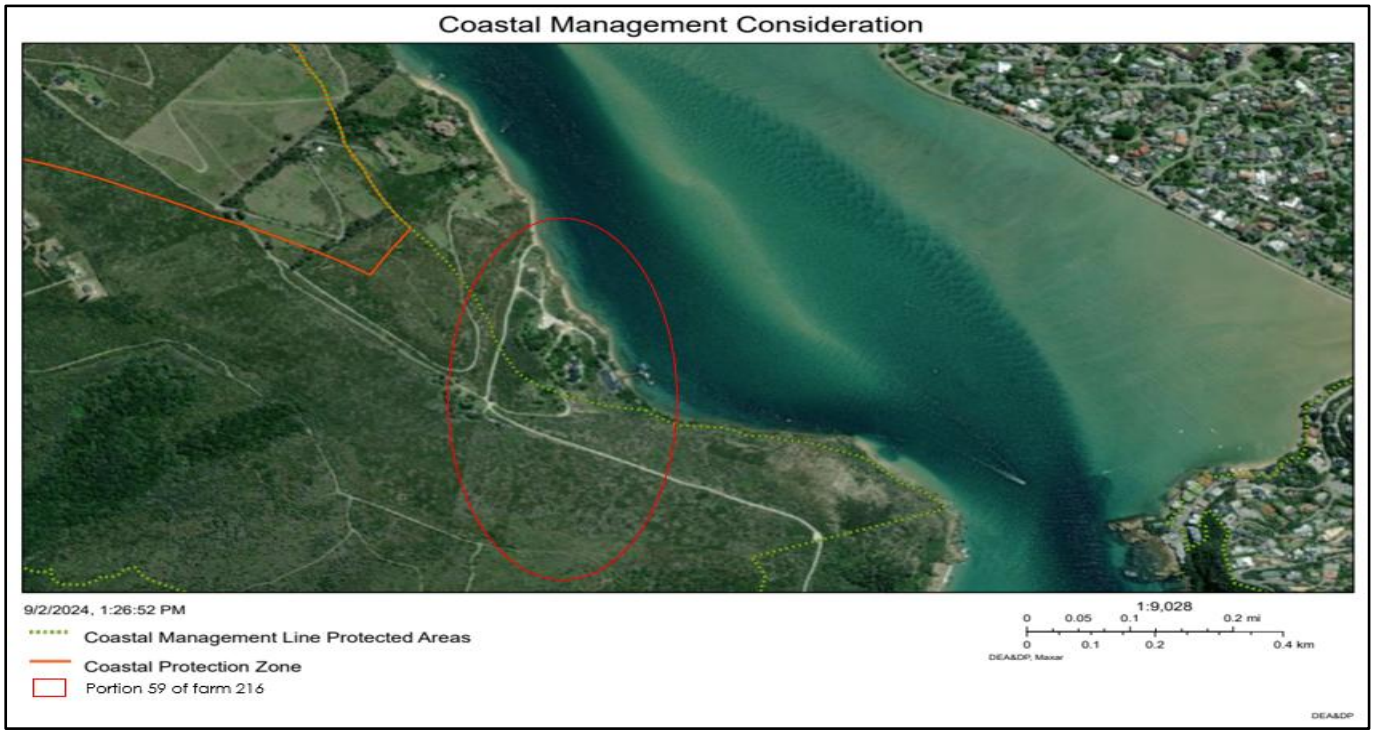

Figure 11: Provincial Coastal Management Considerations for Portion 59 of Farm 216

3.2. Coastal Stability and Erosion

SANParks (10 Dec 2024) and CapeNature (4 Dec 2024) raised shoreline stability, slope risk and the potential for coastal erosion to impact the Knysna Estuary. The applicant therefore appointed Inanda Port and Coastal Engineers (Pty) Ltd to undertake a Coastal Stability Assessment (refer to Appendix I, Coastal Stability Assessment, Inanda Port and Coastal Engineers, 17 October 2025, Rev A). The assessment was completed by Craig Johnson, Pr.Eng. The C&R Report (2025.17.09) initially indicated that this work would be carried out by Mr Laurie Barwell, who was unable to undertake the assignment. Inanda Port and Coastal Engineers was appointed in his place. Mr Barwell's January 2018 shoreline note is acknowledged as background information only.

The assessment establishes that the Featherbed shoreline shows well-vegetated dunes with localised exposed dune sand attributable to isolated slope slippage and, to a lesser extent, the 2017 Knysna fires. The toe of the dune exhibits a near-vertical scarp of up to 1m, averaging approximately 0.5m, attributed to a long-term erosion trend driven by boat-generated wake waves, dune soil composition and stormwater. The estimated long-term toe retreat is in the order of 1m every 5–15 years.

The proposed development, in its current form and provided stormwater is properly managed, is not expected to increase shoreline accretion or erosion at the site (Inanda Port and Coastal Engineers, 2025, section 4.2). Improperly managed stormwater from existing driveways has already produced erosion gulleys, demonstrating that stormwater control at the top of the embankment is the principal management lever available to the applicant. The Stormwater Management Plan (Appendix J, Hofmeyr & Associates Consulting Engineers, 15 April 2026) has been prepared to address this directly.

3.3. Climate Change Considerations

The Coastal Stability Assessment (Appendix I, section 2.4) addresses sea-level rise, wind and cyclonic activity, and rainfall and precipitation. For long-term planning at the property a sea-level rise scenario of up to 1.4 m by 2100 has been considered. The Inanda assessment confirms that, given the elevation of the proposed structures relative to the estuary embankment, climate-driven sea-level rise is not expected to materially affect the development envelope within the design life of the structures but is a relevant ongoing consideration for shoreline maintenance and stormwater design.

4. FAUNA

Confluent Environmental Pty (Ltd) (2024) was consulted do undertake a specialist assessment on the property regarding the faunal sensitives. The following has been extracted from the impact assessment report –

4.1. Avifauna

No SCC was encountered during the site visit. Two bird counts were conducted across the property, in addition to opportunistic sightings noted throughout the meander and searching for nests/roosting sites in suspected habitat. A total of 13 bird species were identified during the site visit.

4.2. Mammals

No SCC were found during the site visit. A bushbuck was seen, and signs of caracal, rodents, and baboons were present at the site.

4.3. Terrestrial Invertebrates

No SCC were found during the site inspection. Carton nests of cocktail ants (Crematogaster sp.) were found at the site as well as spiderwebs (Araneae). Other invertebrates were directly observed. The baited pitfall trap set out with to determine presence of the dung beetle SCC attracted flies (Calliphoridae) but no beetles. Host plants for butterfly species were not observed.

4.4. Amphibians

No SCC were encountered during the site visit and no amphibians were found, which is not surprising given the lack of any waterbodies/watercourses present on site. Consequently, there was no suitable habitat for the Knysna Leaf-folding Frog SCC (A. knysnae).

4.5. Reptiles

No reptile SCC were highlighted for this site by the DFFE Screening Tool or any of the public platforms. As such, no targeted sampling took place for this group.

After the site visit and fauna surveys, it is determined that the site sensitivity for the terrestrial animal theme of Portion 59 of Uitzigt Farm 216 is LOW in contrast to the high and medium sensitivities highlighted by the DFFE Screening tool.

As per the Published Government Notice No. 1150, Government Gazette 43855 (30 October 2020), the LOW sensitivity allows for a Terrestrial Animal Species Compliance statement to be issued. This is however issued with the following conditions as precautionary measures:

- Due to the low likelihood of detection of the golden mole SCC, an Environmental Compliance Officer must be appointed to monitor for the presence of any golden moles in the footprint of the project prior to any earthworks (construction phase) of the project.
- Should any golden moles be found (See Box 1. For guidelines on encountering fauna during construction and operation) or suspected to occur on site through the observation of subterranean tunnels, construction should be paused until such time that their presence can be confirmed by a relevant fauna expert.
- If the golden mole SCC are confirmed to occur on site (following positive identification by a relevant expert), this Compliance Statement will be revoked, and construction is to be paused until such time that a Terrestrial Animal Species Specialist Report is produced.

5. TOPOGRAPHY

The topography of Portion 59 of Farm 216 (Figure 12), as depicted in the map, shows a varying landscape with elevations ranging from approximately 5 meters near the shoreline to about 185 meters inland. The contour lines, spaced at 5-meter intervals, highlight a steep gradient, particularly in the central and southern parts of the property, with slopes becoming less steep as you approach the water's edge.

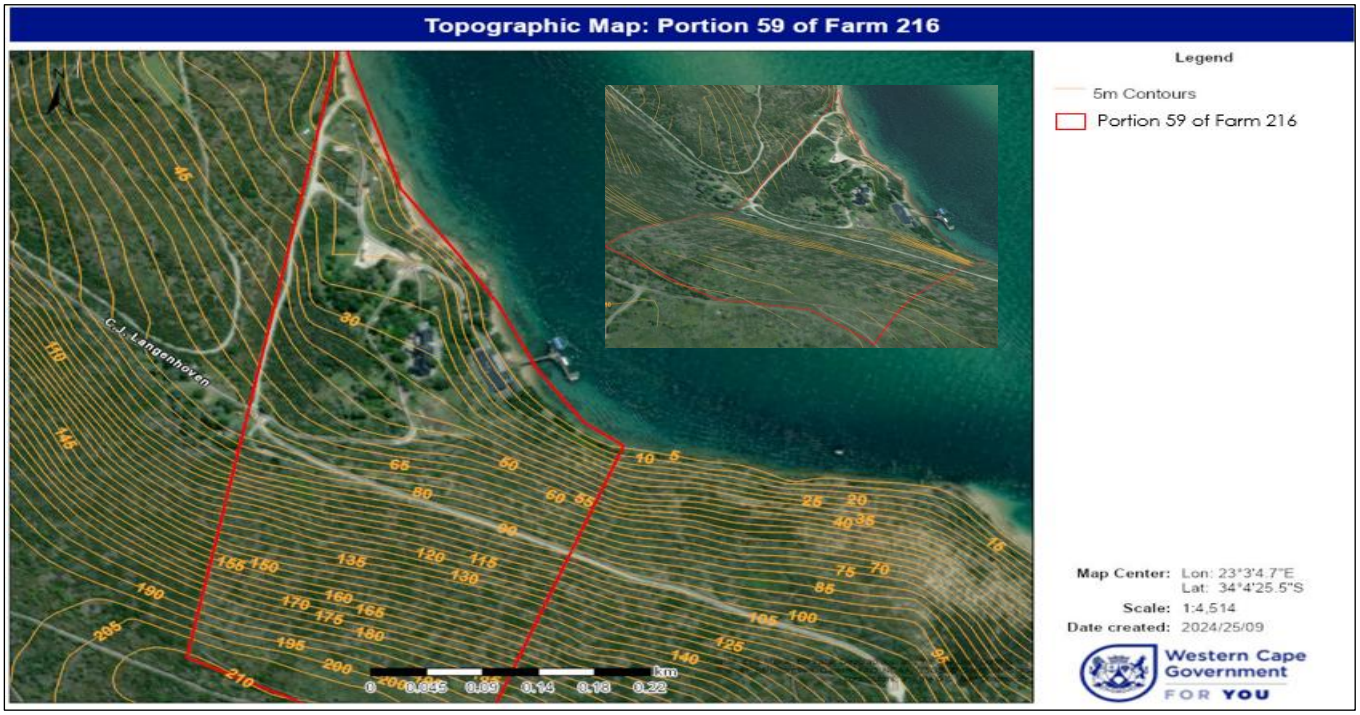

Figure 12: Topography map of Portion 59 of Farm 216

6. HERITAGE

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.

SECTION D – ENVRIONMENTAL SCREENINING TOOL INPUT

A Department of Forestry, Fisheries, and the Environment (DFFE) national web-based screening tool was generated (03 May 2024 and regenerated 17 October 2024) to review the environmental sensitivities for *Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property.*

The screening report list a variety of specialist studies to be undertaken based on the data informants of the tool at the study area.

The application classifications selected for the screening report was –

- *Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property*

1. ENVIRONMENTAL MANAGEMENT FRAMEWORKS RELEVANT TO THE APPLICATION

The Garden Route Environmental Management Framework is applicable to the proposed development.
(https://screening.environment.gov.za/ScreeningDownloads/EMF/gardenroute_finalreport.pdf)

The Basic Assessment process should consider impacts on biodiversity, water resources, soil stability, air quality, and noise. It must also address socio-economic factors, such as effects on the local community and cultural significance, while ensuring compliance with the National Environmental Management Act (Act 107 of 1998) and local zoning laws. Mitigation measures should include an Environmental Management Plan and continuous monitoring. Public participation is essential to involve and address concerns from stakeholders and the community.

2. RELEVANT DEVELOPMENT INCENTIVES, RESTRICTIONS, EXCLUSIONS OR PROHIBITIONS

The proposed site is within both a South African Conservation Area (SACAD) and a South African Protected Area (SAPAD). Conservation Areas are currently not regulated through national or provincial legislation. However, Protected Areas are.

In consideration of this governance and the proposed development, the property is within the Featherbed Private Nature Reserve, which is declared a Protected Area under Section 9 of the National Environmental Management Protected Areas Act (Act 57 of 2003).

In Section 50(5) it further states that –

- No development, construction or farming may be permitted in a national park, nature reserve or world heritage site without the prior written approval of the management authority.

Thereby, Knysna Municipality will be consulted for approval as they have been identified as the management authority of Featherbed Private Nature Reserve

The Garden Route National Park boarders the proposed development area, however no development will occur within the SANParks area. They will however be consulted during Public Participation.

3. PROPOSED DEVELOPMENT AREA ENVIRONMENTAL SENSITIVITY

The Screening Tool Report generated for *Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property* identifies the following summary of environmental sensitivities related to the property, highlighting only the highest sensitivity areas. These identified environmental sensitivities for the proposed development footprint are indicative and have been verified on-site by registered qualified specialists.

Table 4: Environmental Sensitivities according to the DFFE screening tool report (05 Feb 2024)

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture		X		
Animal Species		X		
Aquatic Biodiversity	X			
Archaeological & Cultural Heritage				X
Civil Aviation			X	
Defence				X
Palaeontology			X	
Plant Species		X		
Terrestrial Biodiversity	X			

For a more detailed understanding of the environmental sensitivities of the property, it is recommended that the Site Sensitivity Verification Report (SSVR) in APPENDIX E be read in conjunction with the Basic Assessment Report.

4. IDENTIFIED SPECIALIST INPUT REQUIRED

Based on the selected classifications (*Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property*). Including considerations of the environmental sensitivities of the proposed development footprint). The following specialist assessments have been identified for inclusion in the assessment report.

Table 5: Identified specialist assessments (Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property).

No:	Specialist Assessment	Assessment Protocol
1	Landscape/Visual Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
2	Archaeological and Cultural Heritage Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
3	Palaeontology Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
4	Terrestrial Biodiversity	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Terrestrial_Biodiversity_Assessment_Protocols.pdf

	Impact Assessment	
5	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Aquatic_Biodiversity_Assessment_Protocols.pdf
6	Marine Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
7	Avian Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Avifauna_Assessment_Protocols.pdf
8	Geotechnical Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
9	Socio-Economic Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
10	Plant Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Plant_Species_Assessment_Protocols.pdf
11	Animal Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Animal_Species_Assessment_Protocols.pdf

The Site Sensitivity Verification Report (Appendix E) confirmed that terrestrial biodiversity, plant species, and aquatic biodiversity sensitivities require specialist input, which has been undertaken. Other themes flagged by the screening tool (e.g. agriculture, civil aviation, faunal biodiversity) were verified as low sensitivity and do not warrant specialist studies. Archaeological, cultural heritage, and palaeontology sensitivities will be addressed through submission of a Notice of Intent to Develop to Heritage Western Cape, who will determine whether further specialist input is required. This approach ensures compliance with the gazetted protocols while avoiding unnecessary duplication of studies.

It is after consideration of site sensitivity verification that the following specialist assessments where done –

Table 6: Executed specialist assessments (Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property).

No:	Specialist Assessment	Assessment Protocol
4	Terrestrial Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Terrestrial_Biodiversity_Assessment_Protocols.pdf
5	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Aquatic_Biodiversity_Assessment_Protocols.pdf
10	Plant Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Plant_Species_Assessment_Protocols.pdf
11	Animal Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Animal_Species_Assessment_Protocols.pdf

SECTION E – PROJECT SCOPE

1. PROPOSED DEVELOPMENT (PREFERED ALTERNATIVE – ALTERNATIVE A)

The preferred alternative includes the construction of four distinct structures: the manager's accommodation units, a conference centre, new garages, and an entertainment facility. Each structure will be detailed separately in the following sections, with a clear explanation of the specific proposal for each. This breakdown ensures clarity in the scope of development and how each element contributes to the overall project plan.

1.1. Managers' Accommodation Units

*** Note** - The proposed structure historically referred to as "Manager's Cottages" is hereafter referred to as the Manager's Accommodation Units. This terminology change is made to clarify that these units constitute on-site operational and management accommodation associated with the tourism use of the property. They do not constitute second dwellings or independent residential units under the Knysna Municipal zoning scheme and have not been assessed against second-dwelling size limitations.

Before the 2017 Knysna fires, the manager's accommodation units were located towards the northern boundary of the property. During the fires, the entire manager's accommodation units structure was completely destroyed. It is now proposed that the manager's accommodation units be reinstated within the same general area as they previously existed. However, without the original structure as a reference, it has been challenging to demonstrate that the reinstatement will align exactly with the former footprint. As a result, this will be assessed and included as part of the application for Environmental Authorisation. This reinstatement will once again present the opportunity for housing on site, and further on-site management for the duration of the activities on site.

This reinstatement will consist of:

Ground floor:

- Garage
- Staffroom
- Bathroom
- Kitchen

First floor:

- Bedroom 1 + Dressing + Bathroom 1
- Bedroom 2
- Bathroom 2
- Bedroom 3
- Bedroom 4
- Dining area
- Kitchen
- Pantry
- Living room

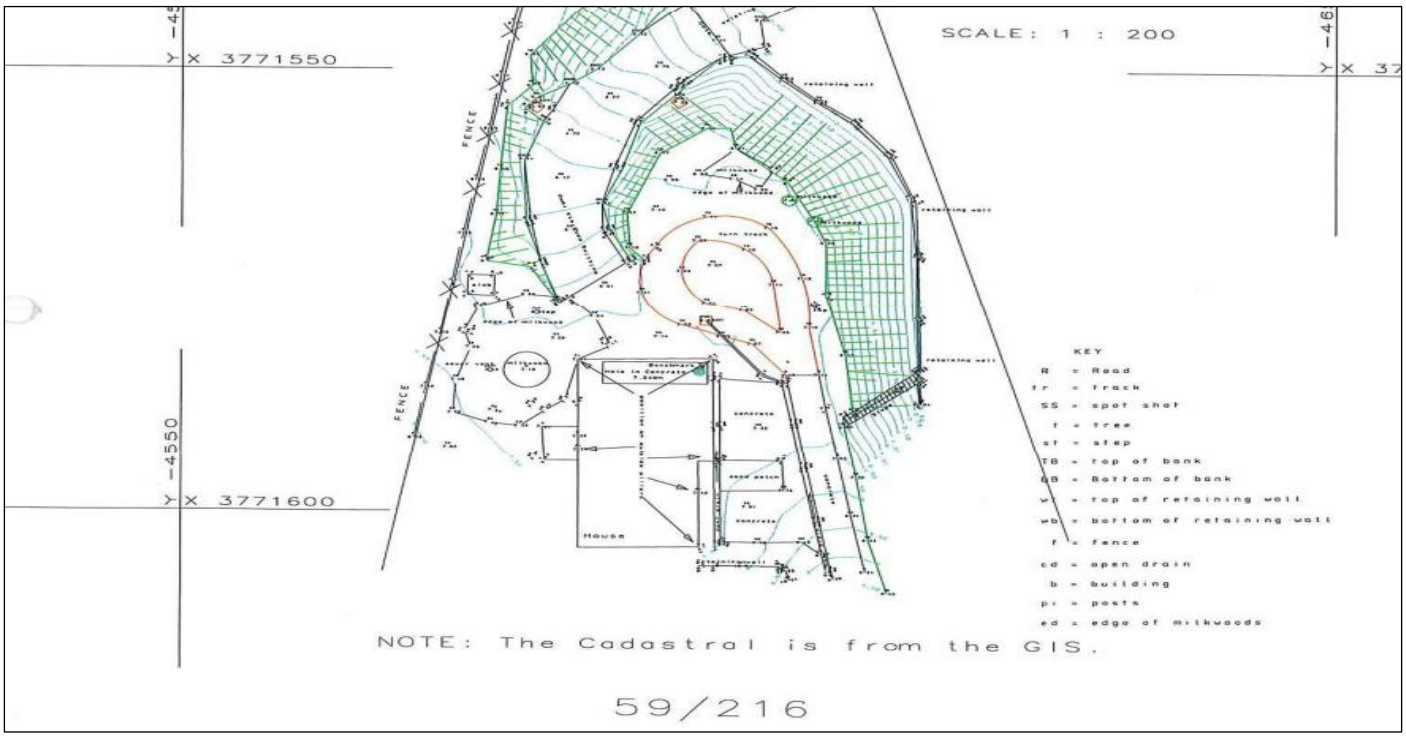

Figure 13: Proposed manager's accommodation units (Louw Designs, 2023)

The following graphics serve as an indication of elevation profiles of the proposed manager's accommodation units (take note that the elevation profiles have been sized to fit the document and must rather be viewed directly on the SDPs for a relevant indication) –

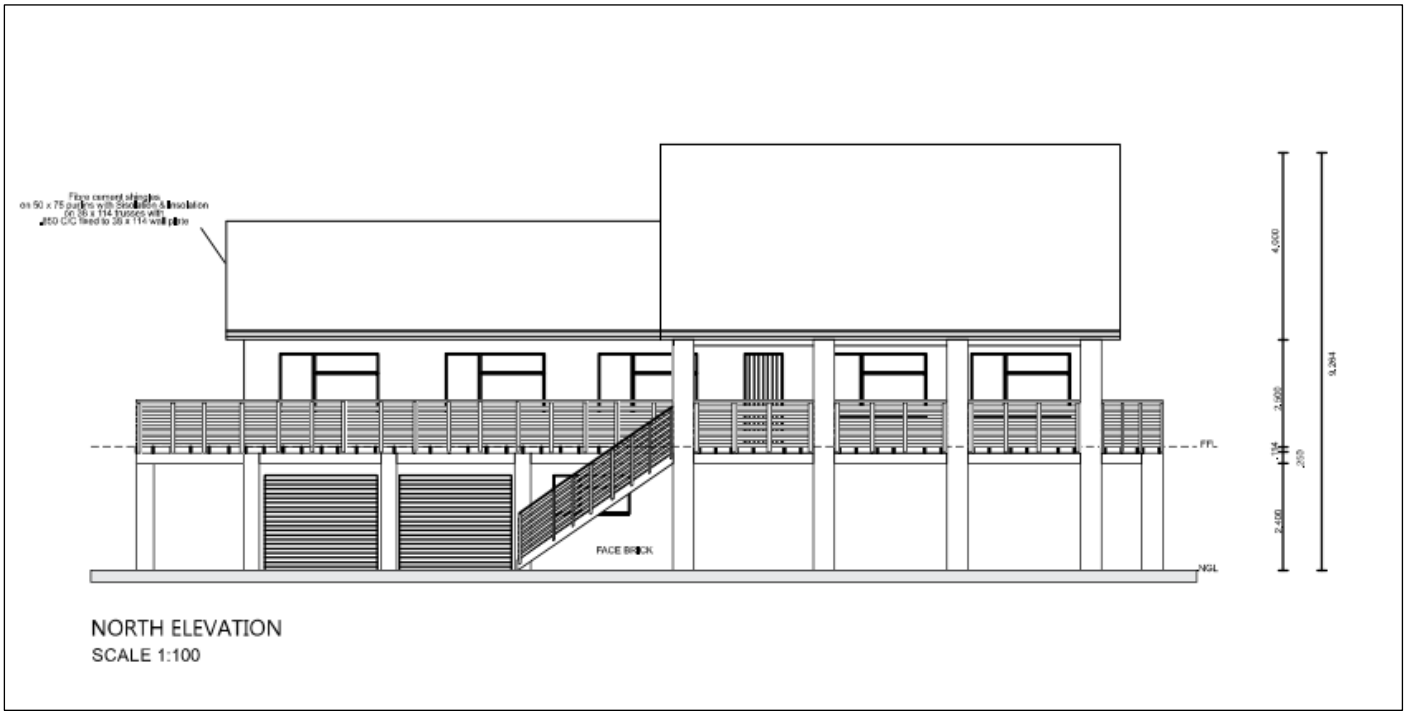

Figure 14: North Elevation of Proposed manager's accommodation units (Louw Designs, 2023)

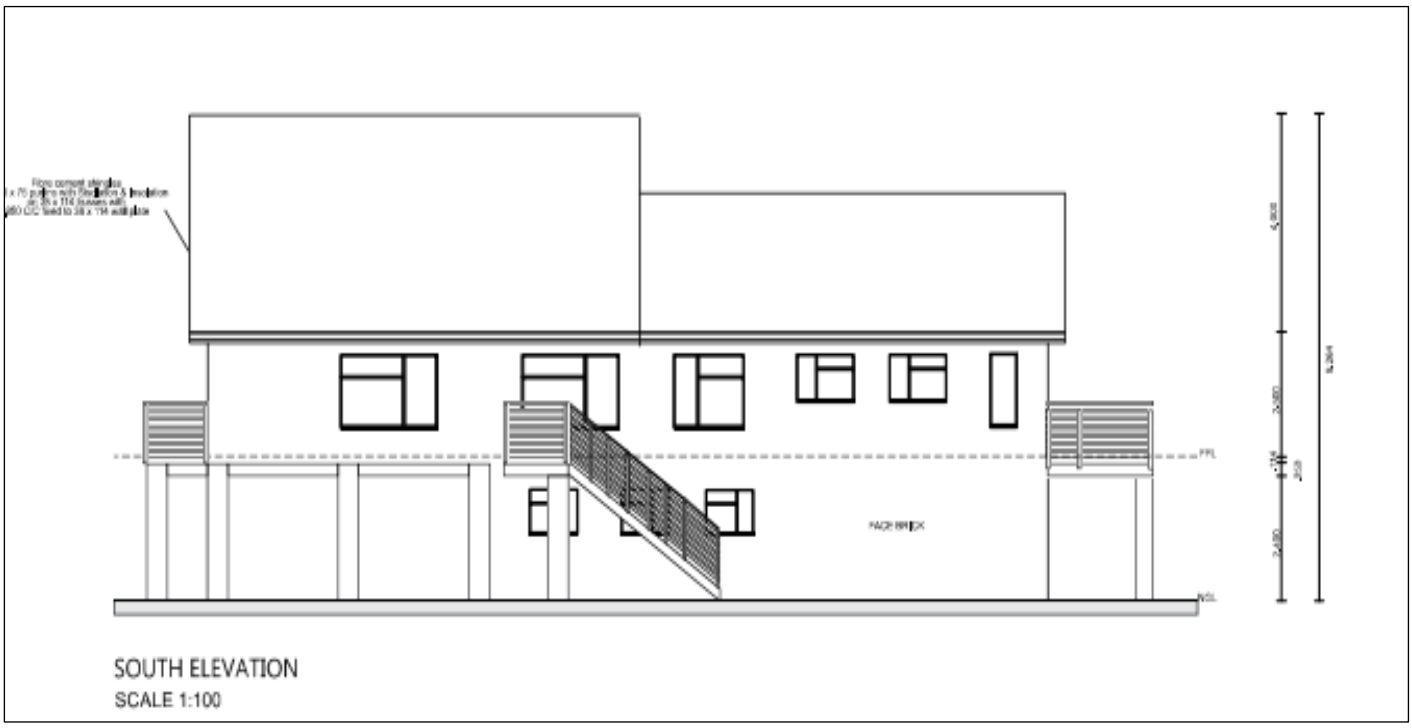

Figure 15: South Elevation of Proposed manager's accommodation units (Louw Designs, 2023)

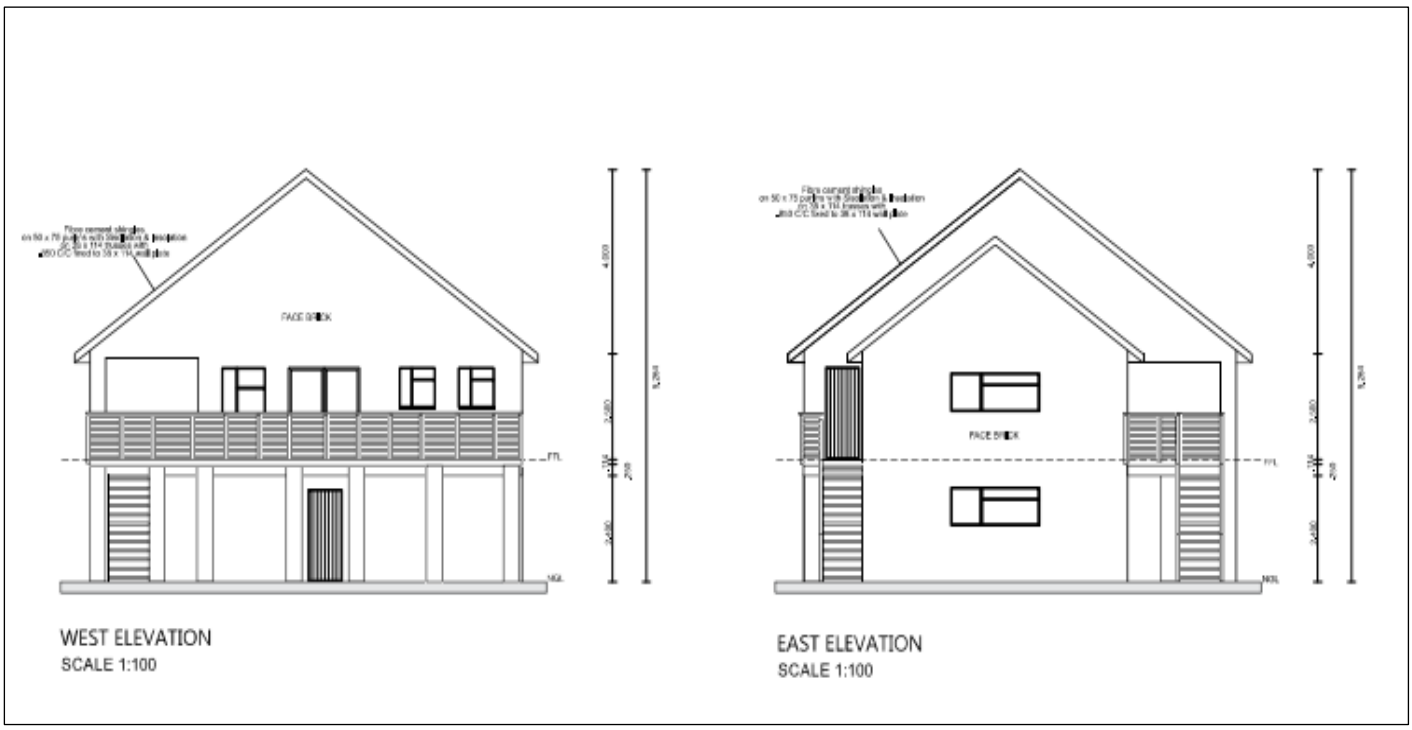

Figure 16: West and East Elevation of Proposed manager's accommodation units (Louw Designs, 2023)

The area designated for reinstatement aligns with confirmed (Figure 6) transformed land. Following the justification that reinstatement of the manager's accommodation units will commence in a very low sensitivity area.

External considerations:

- Landscaping:

The proposed plans do not include additional landscaping features. Although, the terrestrial biodiversity and plant species impact assessment report had identified protected trees towards the coastal area, directly adjacent to the proposed development. These trees are not likely to be impacted. An ECO must oversee to this and make sure that the tree is not affected. If it be the case that they need to be moved / disturbed / damaged, **a National Forestry Act (NFA) license be required for this specific proposed activity**.

- Access

Access to the property is provided by an existing road, C.J. Langenhoven, with general driveways being utilized to reach the proposed development. A minor extension is planned to provide access to the open space beneath the first floor of the proposed manager's accommodation units s.

- Services:

The manager's accommodation units will be connected to a proposed 8 500-litre septic tank to be constructed adjacent to the building. The septic tank will also serve the proposed conference centre and tourist accommodation facility. Liquid effluent from the septic tank will be pumped to the proposed on-site sewage treatment plant. Potable water will be supplied via the existing on-site borehole reticulation system, which has been upgraded to include filtration and UV/chlorine sterilisation prior to distribution. Rainwater harvested from the roof of the manager's accommodation units (approximately 285m²) will be collected in dedicated rainwater storage tanks positioned adjacent to the building. Harvested rainwater will be pumped through sand filters to the proposed 320 kilolitre rainwater storage reservoir. The building will be connected to the existing on-site electrical supply infrastructure. Solid waste generated at the facility will be managed in accordance with the existing on-site waste separation and removal system, which provides for the separation of general refuse, recyclables, compostable material, and food waste, each of which is removed from the reserve by appropriate means.

Louw (2023) indicates square meterage of the development for manager's accommodation units highlighted in Table 7, however, from a perspective of disturbance, only 193.61 m² will be disturbed. This is because the rest of the coverage does not constitute towards the triggering of listed activities according to Environmental Impact Assessment Regulations Listing Notice 1 of 2014, Government Notice No. 983 of 4 December 2014 (as amended).

Table 7: Total development (m²) for manager's accommodation units as indicated (Louw, 2023)

Description	Total (m²)
Ground floor	73.58
First Floor	138.52
Open Space	120.03
Covered Verandah	25.85
Open Balcony	15.09

Total footprint (73.58 + 120.03)	193.61

*** Note** - The position of the Manager's Accommodation Units has been considered in light of the Coastal Stability Assessment (Appendix I, Inanda Port and Coastal Engineers, 17 October 2025). The assessment concludes that the proposed development, in its current configuration and subject to proper stormwater management as specified in the Stormwater Management Plan (Appendix J), is not expected to result in increased shoreline erosion at the site (Inanda, 2025, section 4.2). On this basis, and given the existing disturbed footprint, the applicant proposes to retain the Units in their current location, with stormwater management as the principal mitigation. Should coastal stabilisation structures ever be required, the applicant acknowledges that Section 15 of NEM:ICMA applies and that no such structures may be constructed without the applicable authorisations.

1.2. Conference Centre and Tourist Facilities

An existing shed located in the northern section of the property sustained damage during the 2017 Knysna fires but has since been refurbished to its original capacity. The current proposal is to replace this shed with a combined conference centre and tourist facility. The new development will use the space currently occupied by the shed. However, environmental authorisation is required because the development exceeds the minimum threshold for exemption based on furtherance and commencement.

According to Tracey Mills Brink Architects (2023), the combined structure will extend into the slope on the western side of the site. The conference facility will primarily occupy the area where the shed currently stands, while the proposed guest units will extend into the western slope. This development is expected to boost economic activity in the greater Knysna area and provide a controlled environment for a wider audience to experience the Featherbed Nature Reserve.

The development will consist of:

Ground floor –

- Double garage
- Nature Workshop area
- Three (3) bedrooms with joining bathrooms

First floor –

- Double garage
- Five (5) open parking
- Conference facilities (Scullery, formal dining area, bar etc.,)

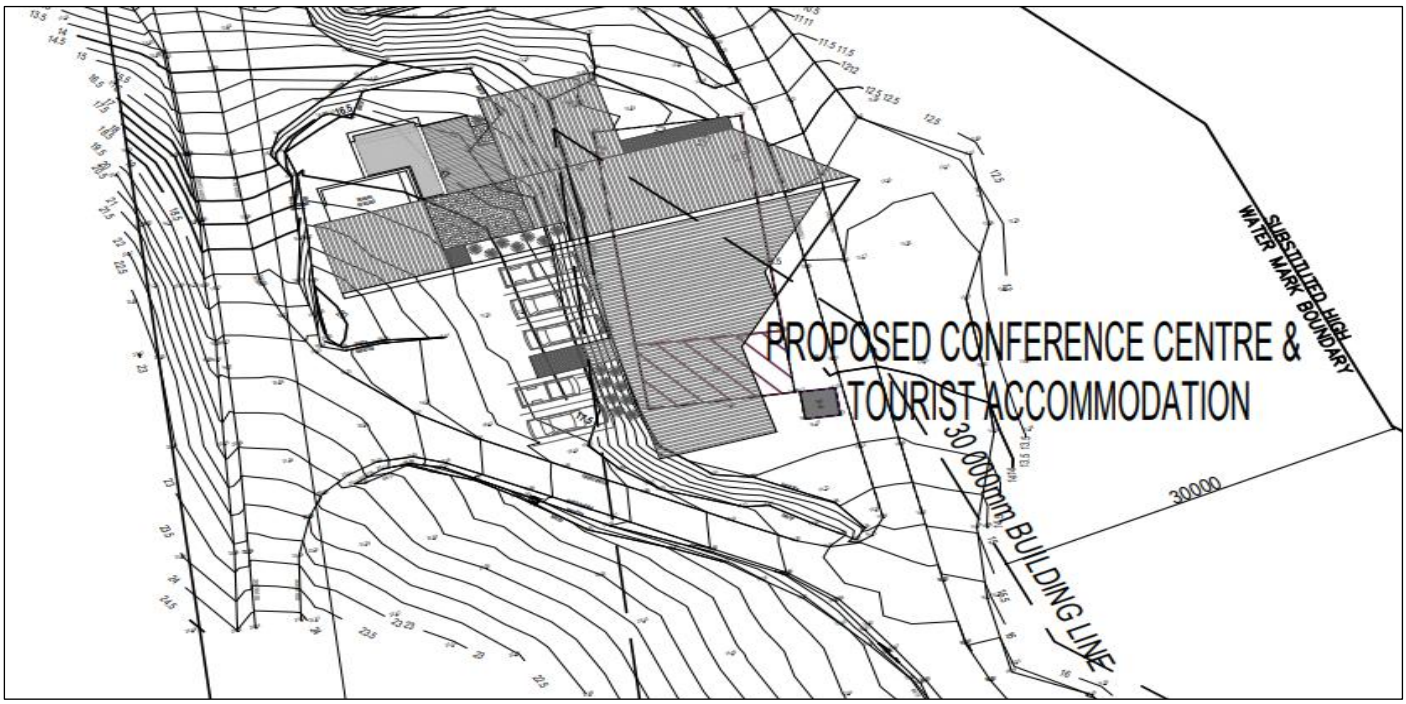

Figure 17: Proposed Conference Centre and Tourist Facilities (TMBA, 2023)

The following graphics serve as an indication of the ground and first floor of the proposed conference centre and tourist facilities –

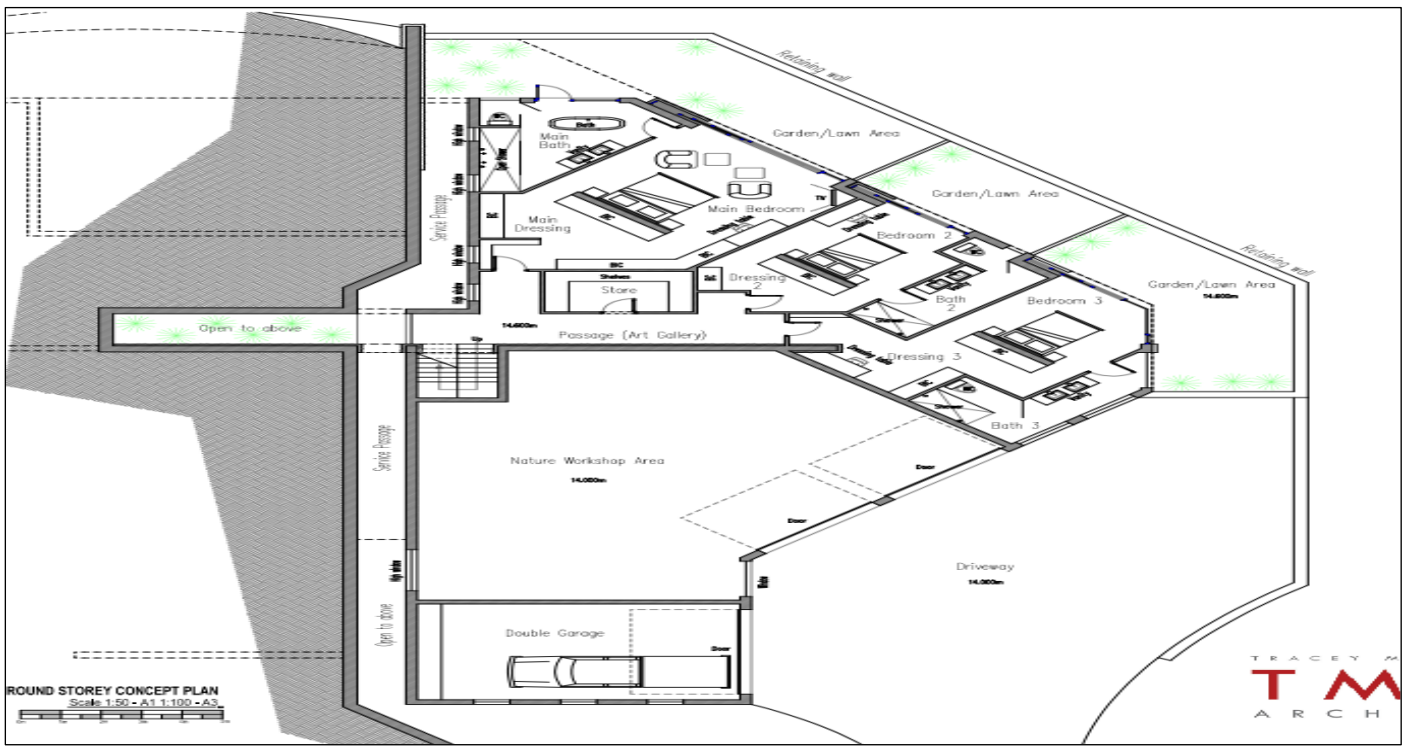

Figure 18: Concept Plan for the ground floor of the proposed conference centre and tourist facilities (TMBA, 2023)

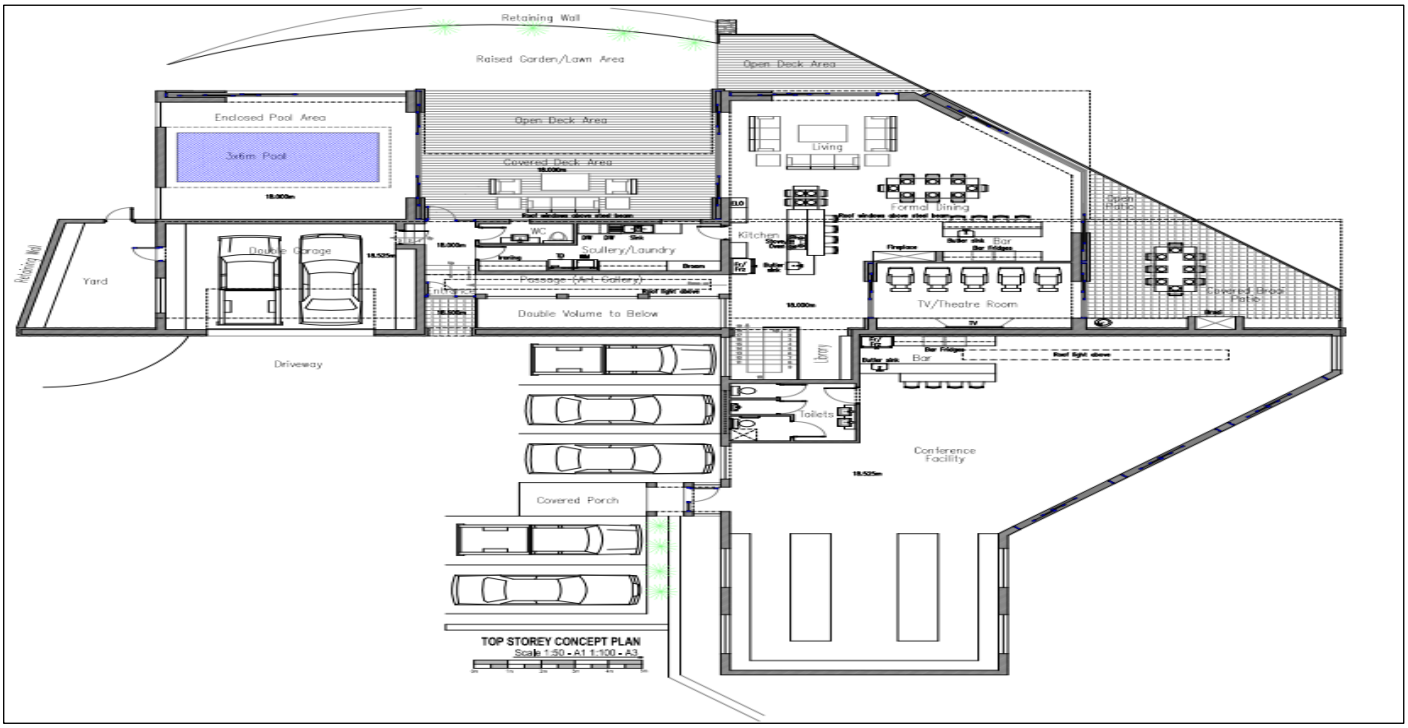

Figure 19: Concept plan for the first floor of the proposed conference centre and tourist facilities (TMBA, 2023)

Most of the development for the conference centre and tourist facilities will occur on previously transformed land. However, the extension into the western slope will encroach upon a medium sensitivity area, requiring strict adherence to all mitigation measures to minimize environmental impact.

External considerations:

- Landscaping:

  Landscaping is proposed around the northern section of the development (Figure *18*), designated as a garden/lawn area. It appears that the intention is for each bedroom to have an outdoor living space with a small green area.

  A Species of Conservation Concern has been identified that will be impacted by the development of the Conference Centre and Tourist Facilities. However, this impact will not significantly affect the overall vulnerability of the species. It has been confirmed (Capensis, 2024) that the development can proceed, and no specific mitigation measures have been proposed.

- Access

  Access to the property is provided by an existing road, C.J. Langenhoven, with general driveways being utilized to reach the proposed development. Minor extensions are planned to provide a driveway on the ground floor, with additional extensions to accommodate a parking area on the first-floor level.

- Services:

The conference centre and tourist accommodation facility will share a proposed 8 500-litre septic tank with the manager's accommodation units . The septic tank will be constructed adjacent to the manager's accommodation units , and liquid effluent will be pumped to the proposed on-site sewage treatment plant. The water demand for the conference centre and tourist accommodation is estimated at approximately 2 500 litres per day and will be met by the existing on-site borehole reticulation system. Rainwater harvested from the roof of the conference centre (approximately 615m²) will be collected in dedicated rainwater storage tanks adjacent to the building and pumped through sand filters to the proposed 320 kilolitre rainwater storage reservoir. The facility will be connected to the existing on-site electrical supply infrastructure. Solid waste will be managed in accordance with the existing on-site waste separation and removal system.

With respect to sewage treatment, it is noted that the existing on-site sewage treatment plant was assessed by a specialist and found to be non-operational and non-compliant with applicable legislative requirements. In response, a new purpose-built modular biological wastewater treatment plant with a design capacity of 65 kilolitres per day is proposed. The plant will comprise inlet screening, anaerobic digestion, aerobic bioreactor, clarifier, and disinfection contact tank phases, and is designed to meet the General Limits prescribed by the Department of Water and Sanitation for treated effluent discharge. Treated effluent will be discharged to a soak-away system utilising the permeable in situ sandy substrate. Periodic effluent quality testing will be conducted to ensure ongoing compliance with applicable standards.

According to the information provided by TMBA (2023), the proposed conference centre and tourist facilities will be comprising a total area of 700m².

1.3. Garages

Towards the centre of the property, south of the newly proposed manager's accommodation units s and conference centre/tourist facilities, there was once a fully vegetated area that sustained damage during the 2017 Knysna Fires. In 2023, an OSCAE permit (Knysna Ref: 17/14/5/2) was issued, allowing for the disturbance of this vegetation. Whereby the area has since been modified, featuring a mix of hard surfaces and landscaped sections. This modification is visible in the most recent aerial imagery.

New garages are now proposed to be built in this area. Although there has been prior disturbance, the new garages will not align entirely with the previously disturbed section (Figure 20) . Instead, the construction will extend slightly to the west of the existing hard surface, as visible in the most recent aerial imagery.

The infrastructure of the proposed new Garages will include –

- 7 Garage Units
- Cafeteria
- Workshop
- Storeroom
- Boat / Golf Cart unit

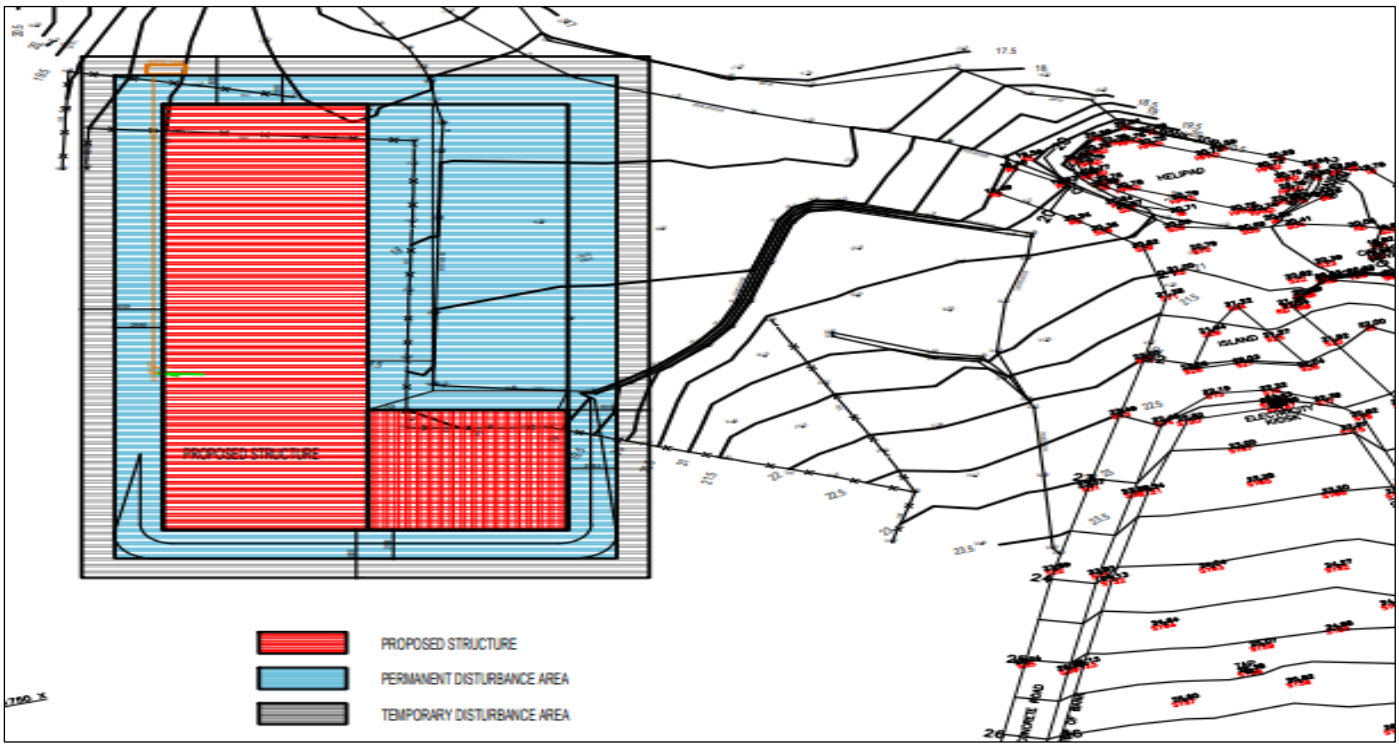

Figure 20: Location of proposed new garages relevant to the previously disturbed area (TMBA, 2024)

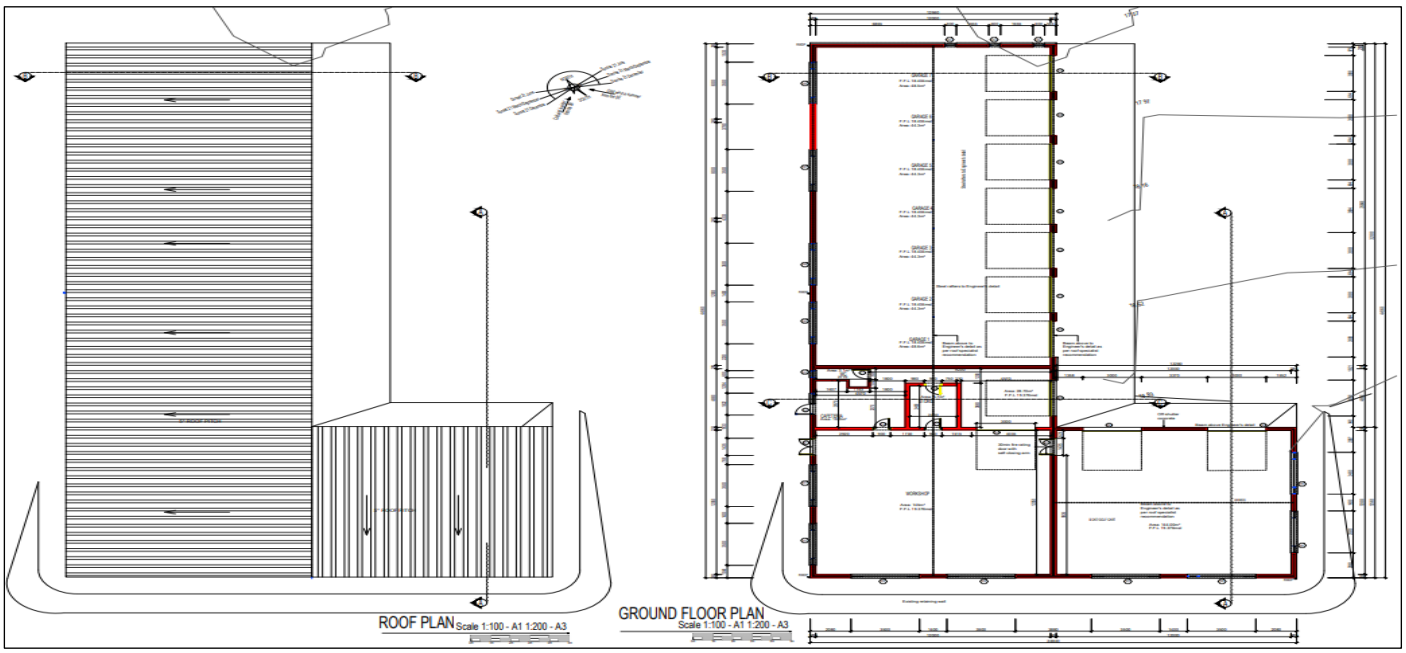

Figure 21: Layout plan for proposed new Garages (TMBA, 2023)

The following graphics serve as an indication of the elevation profiles of the proposed new garages (take note that the elevation profiles have been sized to fit the document and must rather be viewed directly on the SDPs for a relevant indication) –

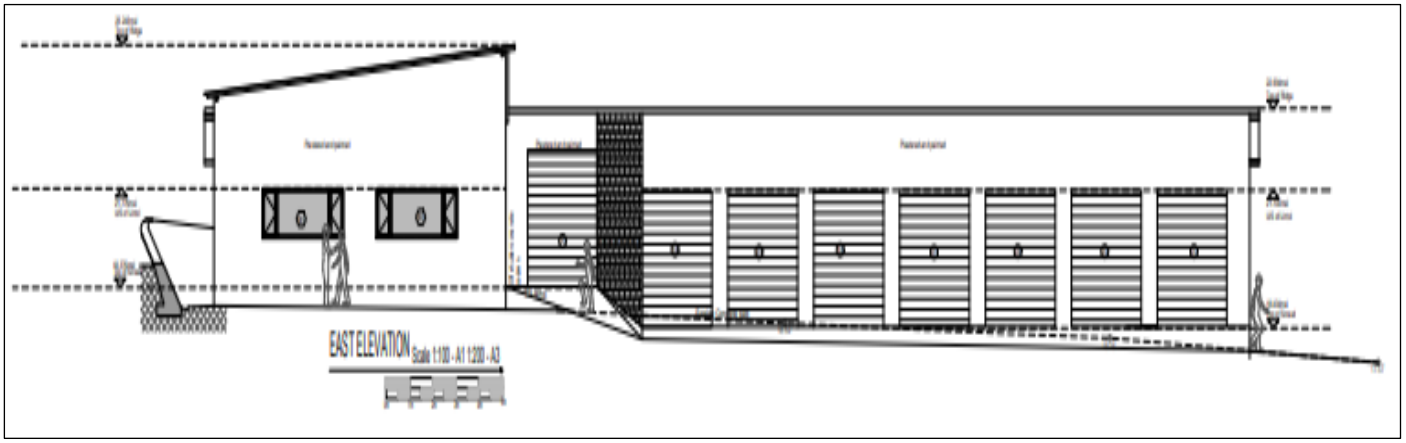

Figure 22: East elevation of the proposed new garages (TMBA, 2023)

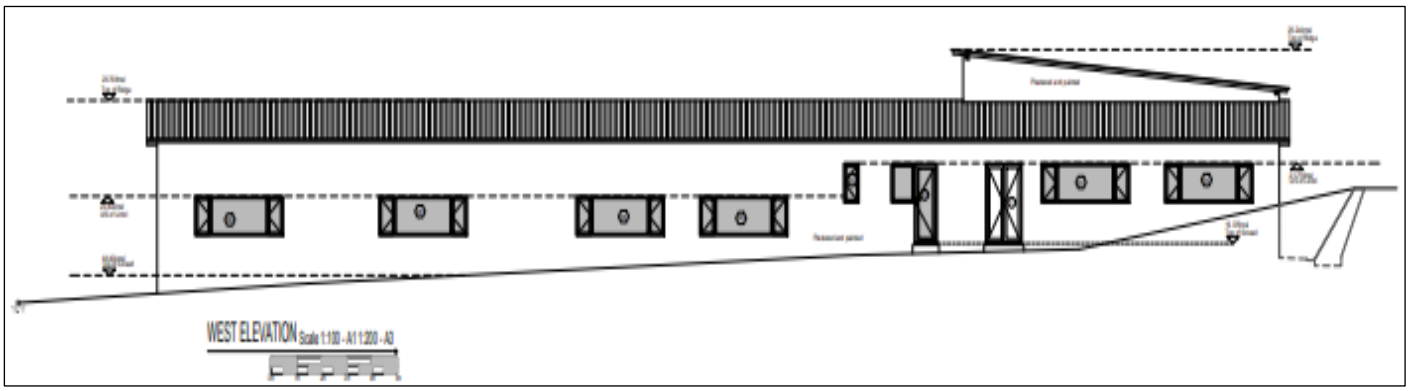

Figure 23: West elevation of the proposed new garages (TMBA, 2023)

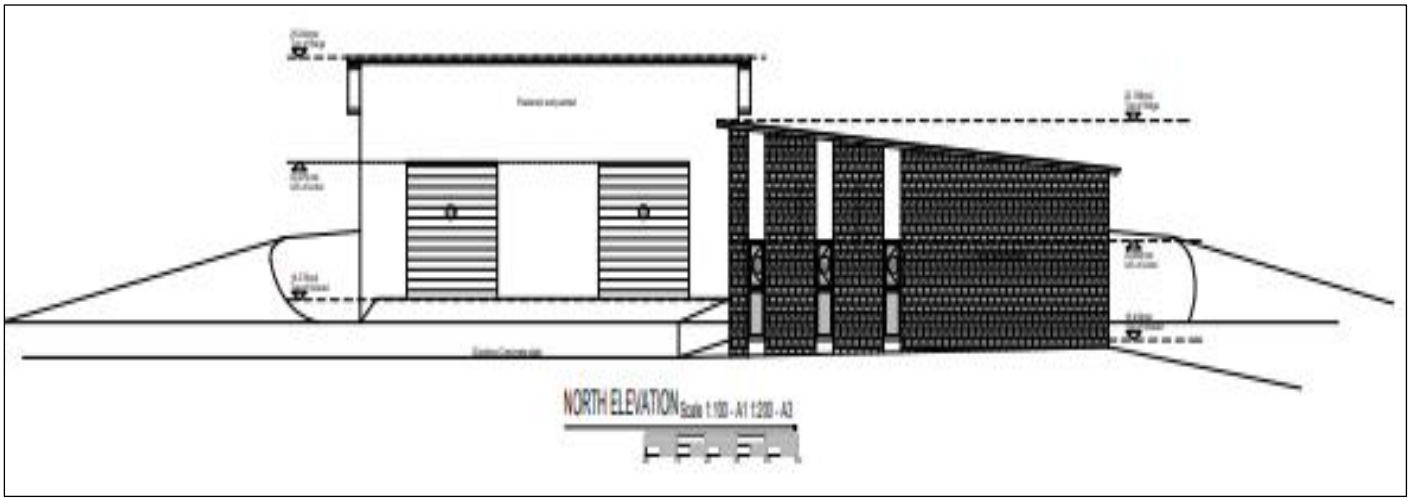

Figure 24: North elevation of the proposed new garages (TMBA, 2023)

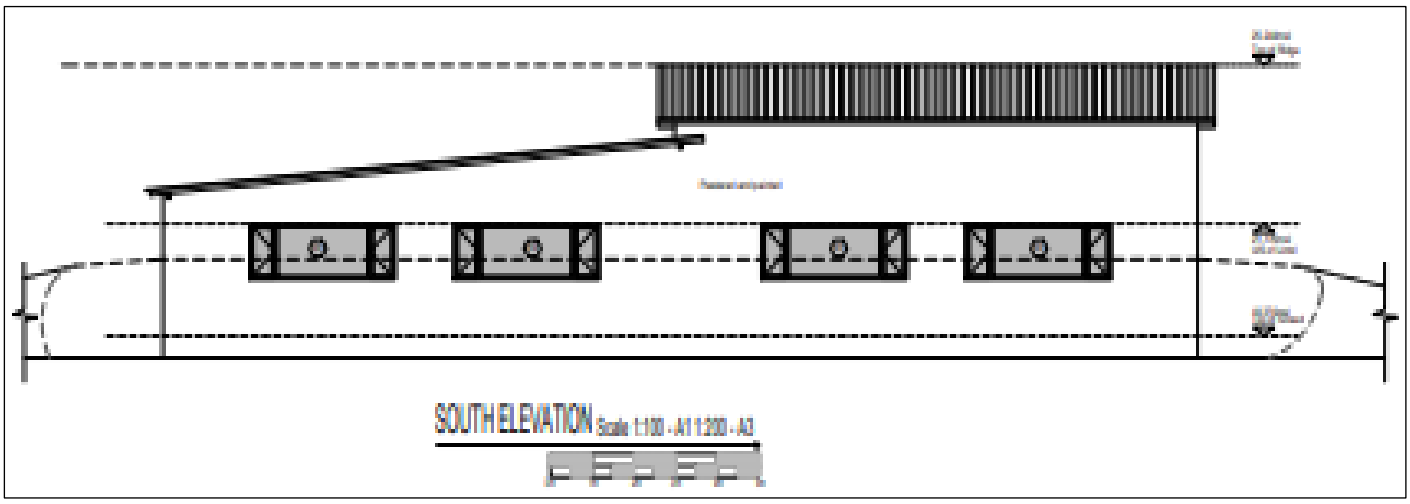

Figure 25: South elevation of the proposed new garages (TMBA, 2023)

A portion of the proposed new garages is designed to be developed in an area identified as highly degraded forest (Figure 6). In light of this, the following additional considerations must be included as part of the project scope.

External considerations:

- Landscaping:

The intended use of this area is to provide sufficient space for vehicle storage and servicing. No formal landscaping is planned. However, based on the site development plans and the Terrestrial Biodiversity and Plant Species report, several Yellowwood Trees will need to be disturbed to accommodate the proposed garage construction. As a result, a **National Forestry Act (NFA) license will be required for this activity.**

- Access

Access to the property is provided by an existing road, C.J. Langenhoven, with general driveways being utilized to reach the proposed development. There will be no extension or deviation to the existing driveways to accommodate the development of the new garages.

- Services

The garages, staff toilets, and associated facilities will generate staff-related sewage which will be directed via gravity sewer to the proposed 8 500-litre septic tank shared with the manager's accommodation units and conference centre. Liquid effluent will be pumped from the septic tank to the proposed on-site sewage treatment plant. The water demand for the garages, staff toilets, and car wash facilities is estimated at approximately 1 000 litres per day and will be met by the existing on-site borehole reticulation system. Rainwater harvested from the roof of the garage building (approximately 714m²) will be collected in

ten 10 000-litre rainwater storage tanks positioned alongside the building. Overflow from these tanks will be directed to a soak-away, while harvested rainwater will be pumped at a rate of 20 000 litres per hour through sand filters to the proposed 320 kilolitre rainwater storage reservoir. The facility will be connected to the existing on-site electrical supply infrastructure. Solid waste will be managed in accordance with the existing on-site waste separation and removal system.

The SDP (TMBA, 2023) outlines three areas: the proposed structure for the new garages, a permanent disturbance area, and a temporary disturbance area around the site that may be affected during the construction phase. By these separations, the SDP indicates specifically the surface area that will be affected.

Description	**Total (m^2)**
New Garages	713.9
Total footprint	713.9

1.4. Entertainment Facility

South of the existing main house, an area was cleared following the 2017 Knysna Veld fire for the intended construction of a pool house. This work was initiated under an OSCAE permit (Knysna Ref: 216), but only partial excavation was completed. The owners (who are also the applicants) then decided to pursue a new plan and apply for an entertainment facility through a basic assessment process instead.

Development of the entertainment facility will entail the following –

Ground floor:

- Gaming / snooker / table tennis area
- Dining area
- Bar
- Relaxation area
- Plant rooms
- Spa (sauna and treatment room)
- Squash court (and viewing area)
- Indoor pool
- Gym (and dressing room)

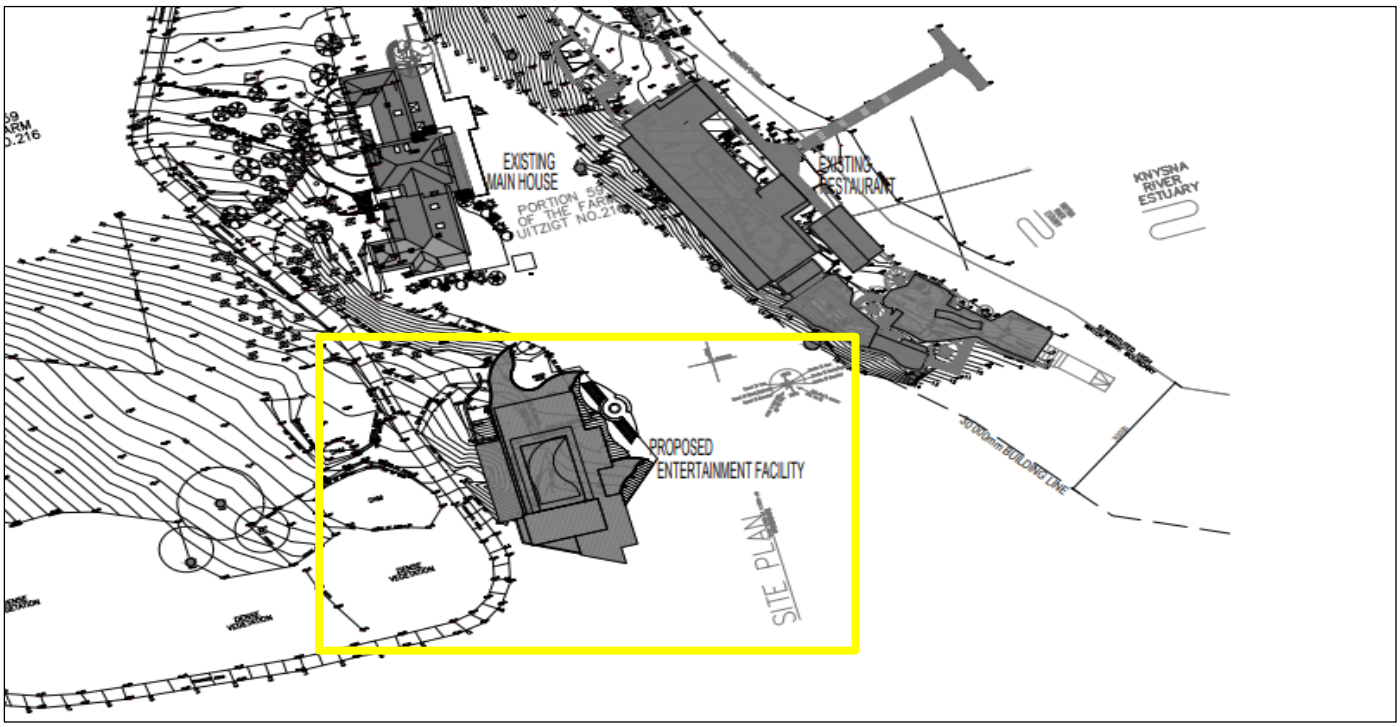

Figure 26: Proposed Entertainment facility (TMBA, 2024)

The following graphics serve as an indication of elevation profiles of the proposed entertainment facility (take note that the elevation profiles have been sized to fit the document and must rather be viewed directly on the SDPs for a relevant indication) –

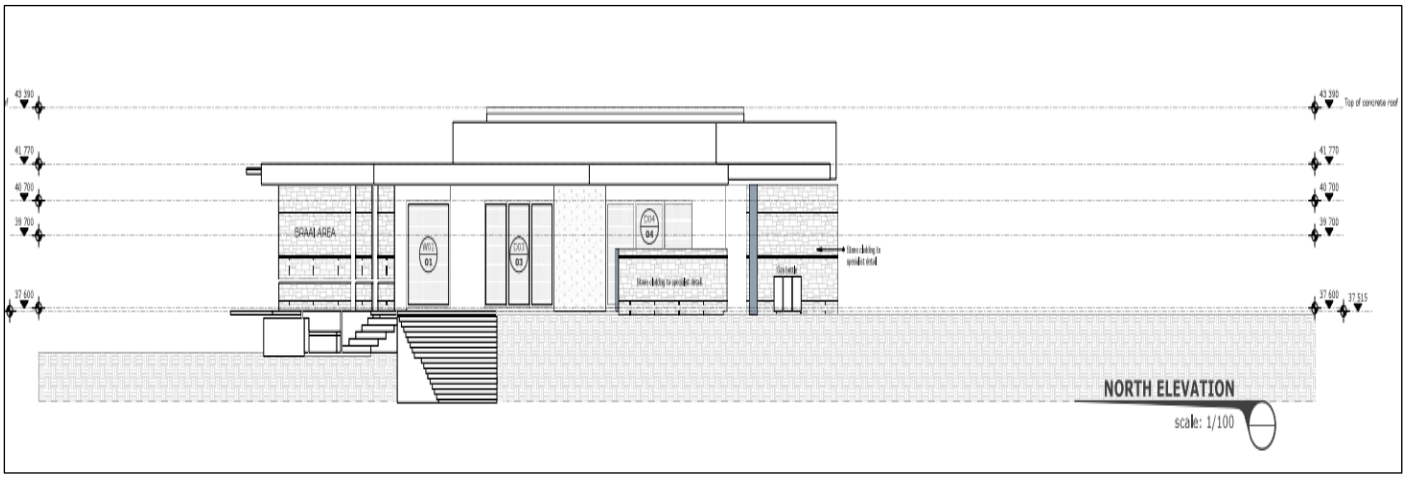

Figure 27: North elevation of the proposed entertainment facility (TMBA, 2018)

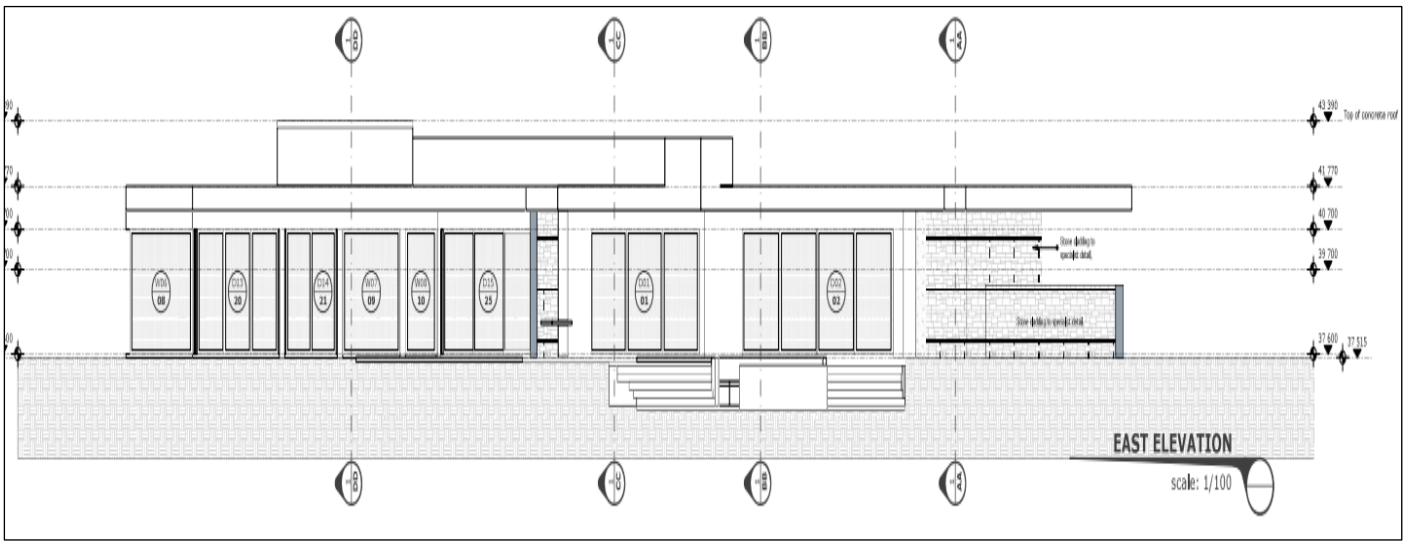

Figure 28: East elevation of the proposed entertainment facility (TMBA, 2018)

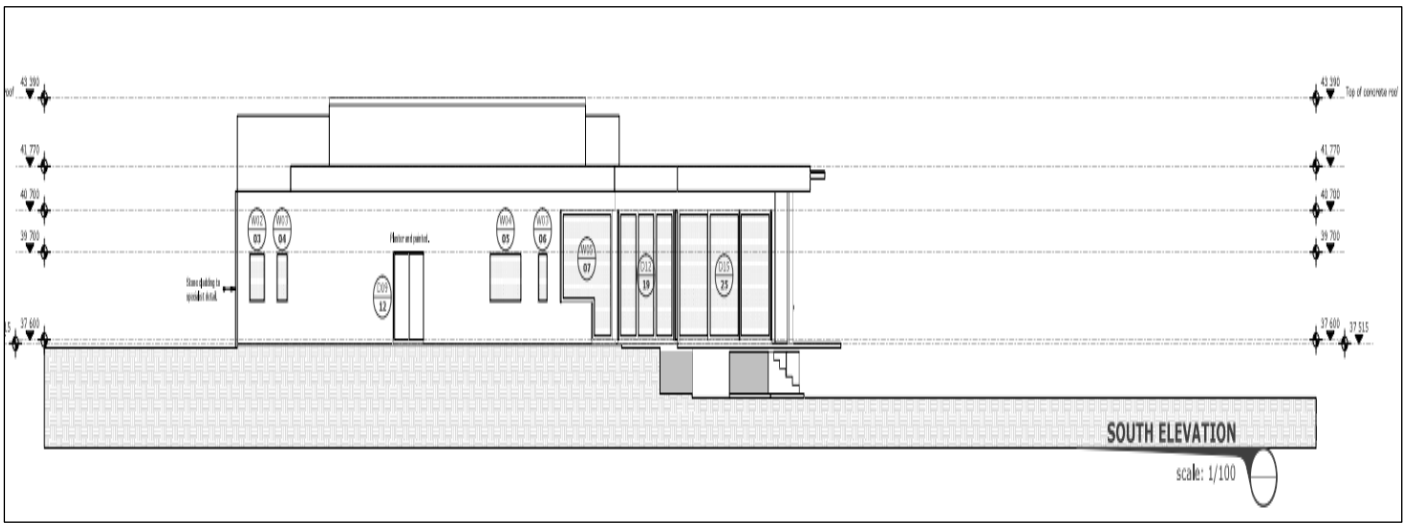

Figure 29: South elevation of the proposed entertainment facility (TMBA, 2018)

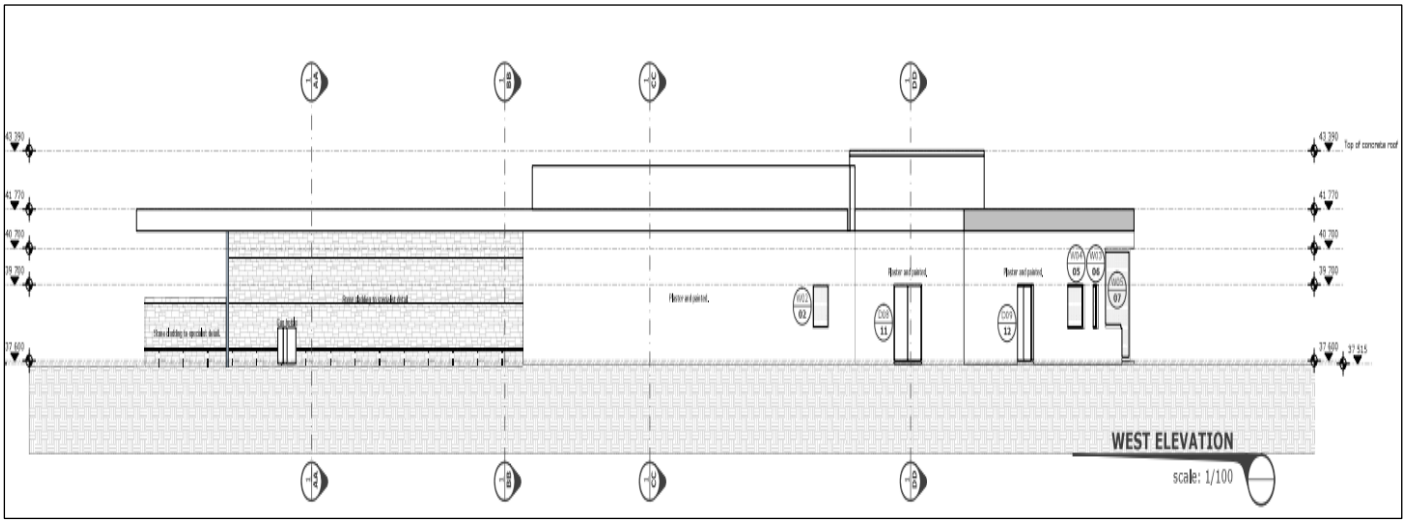

Figure 30: West elevation of the proposed entertainment facility (TMBA, 2018)

The majority of the area identified for the development of the entertainment facility is located on previously disturbed land. However, several additional features must be taken into account.

External Considerations:

- Landscaping

The proposed infrastructure will be located on a lawn area, with no noted formal landscaping or gardening around the entertainment facility. However, the design will incorporate both covered and uncovered patios, along with a pergola. Additional features include a fire pit, complemented by timber decking, to enhance the outdoor space.

- Access

According to the proposed site development plan there will be a paved area that leads from the existing road. This paving will follow the layout of a current gravel patch as seen from the latest arial imagery.

- Services

The entertainment facility, which includes a squash court, swimming pool, gymnasium, spa, steam room, bar, and associated ablution facilities, will generate an estimated water demand of approximately 2 000 litres per day. Potable water will be supplied via the existing on-site borehole reticulation system. Sewage generated by the entertainment facility will be directed via gravity sewer to the existing 40 000-litre septic tank located adjacent to the restaurant building. Liquid effluent from the septic tank will be pumped to the proposed on-site sewage treatment plant. Rainwater harvested from the roof of the entertainment facility (approximately 902m²) will be collected in ten 10 000-litre rainwater storage tanks positioned alongside the garage building. Overflow from these tanks will be directed to a soak-away, while harvested rainwater will be pumped through sand filters to the proposed 320 kilolitre rainwater storage reservoir. The facility will be connected to the existing on-site electrical supply infrastructure. Solid waste will be managed in accordance with the existing on-site waste separation and removal system.

According to the information provided by TMBA (2023), the proposed conference centre and tourist facilities will be comprising a total area of 915.54 m^2.

In total, considering the manager's accommodation units s, conference centre and tourist facility, garages, and the entertainment facilities. The combined area that will be disturbed has been calculated according to (TABLE 8) below.

Table 8: Total Calculated Area of Disturbance

Description	**Total (m^2)**
Manager's Accommodation Units	193.61
Conference Centre and Tourist Facility	700.00
Garages	713.90
Entertainment facility	915.54

Total	2 523.05
Property Size	135 800.00

By this, less than 2 % of the property will be affected by this proposed development.

1.5. Consolidated Service Note – Applicable to All Proposed Development Components

The following services information applies across all proposed development components and should be read in conjunction with the individual services descriptions provided above.

Water Supply:

The total Annual Average Daily Water Demand (AADD) for the full development, including all proposed and existing facilities, is estimated at approximately 65 500 litres per day. This demand will be met by two existing on-site boreholes. Borehole 01, situated near the existing generator, is 82 metres deep with a recommended maximum abstraction rate of 1.0 litre per second (86 400 litres per day). Borehole 02, situated at the intersection of the road to the top of the reserve and the road to the sewage treatment plant, is 73 metres deep with a recommended maximum abstraction rate of 1.2 litres per second (103 680 litres per day). The combined sustainable yield of the two boreholes significantly exceeds the estimated daily demand. Both boreholes have been subjected to aquifer sustainability testing, including step testing, constant discharge testing, and recovery testing, conducted by a registered geohydrologist. Both boreholes demonstrated good recovery rates, indicative of a well-connected fracture network. Water quality testing conducted on both boreholes identified elevated total coliform counts relative to the SANS 241 Drinking Water Standard. Accordingly, water from the boreholes will be filtered and sterilised using UV or chlorine treatment prior to entry into the reticulation system. On-site water storage of not less than 151 000 litres will be provided, incorporating a two-day AADD reserve and a one-hour fire-fighting reserve, in accordance with the requirements of the Guidelines for Human Settlement Planning and Design (the Red Book). This storage requirement will be met through the proposed 320 kilolitre rainwater storage reservoir and existing on-site storage tanks. The water reticulation system will be expanded as necessary to serve all proposed new buildings and to accommodate the installation of fire hydrants at strategic positions across the reserve.

Sewage Treatment and Disposal:

The existing on-site sewage treatment plant was assessed by a specialist and found to be non-operational and non-compliant with applicable legislative requirements. The plant is therefore being replaced in its entirety with a purpose-built modular biological wastewater treatment plant with a design capacity of 65 kilolitres per day. The new plant will be constructed on the site of the existing plant and will comprise the following treatment phases: inlet screening and collection in existing septic infrastructure, anaerobic digestion, aerobic bioreactor with fixed film media, clarifier with return activated sludge recirculation, and a disinfection contact tank. The plant is designed to meet the General Limits prescribed by the Department of Water and Sanitation for treated effluent discharge. Treated effluent will be pumped to a soak-away system, where it will infiltrate into the permeable in situ sandy substrate. Periodic sampling and laboratory analysis of treated effluent will be conducted to ensure ongoing compliance. The legal compliance associated with the use of groundwater and the discharge of treated effluent will be addressed with the Department of Water and Sanitation through the appropriate water use authorisation process.

Stormwater Management:

Stormwater management across the reserve is addressed in detail in the Stormwater Management Plan prepared by Hofmeyr and Associates (April 2026), which forms part of the application documentation. In summary, stormwater management relies on the highly permeable sandy substrate to facilitate soak-away. Rainwater harvesting from all proposed building roofs will reduce uncontrolled runoff, with harvested water directed to storage tanks and the proposed 320 kilolitre reservoir. Grassed berms and detention ponds guide and attenuate stormwater from roads and paved surfaces. Specific measures have been designed to address the slipway areas, where kerbing and controlled overflow discharge will prevent concentrated runoff from reaching the shoreline. These measures collectively address the shoreline stability concerns raised by SANParks during the public participation process.

Refuse Removal:

Solid waste generated across the reserve is sorted on-site into four streams: general refuse destined for landfill disposal, which is transported to the Knysna municipal solid waste transfer station and subsequently to the Mossel Bay landfill; recyclable material, which is transported to the Knysna recycling facility; compostable material, which is composted on-site and used for landscaping purposes; and food waste, which is removed from the reserve for use by pig farmers. This waste management approach will be maintained across all proposed new facilities.

2. CONSIDERATION OF DEVELOPMENT ALTERNATIVE(S) (ALTERNATIVE B)

According to Section 24 (4)(b)(i) of the National Environmental Management Act (Act 107 of 1998)-

24 – (4) Procedures for the investigation, assessment and communication of the potential consequences or impacts of activities on the environment - (b) must include, with respect to every application for an environmental authorisation and where applicable – (i) investigation of the potential consequences or impacts of the alternatives to the activity on the environment and assessment of the significance of those potential consequences or impacts, including the option of not implementing the activity.

To ensure compliance against Section 24 (4)(b)(i), a key factor in identifying and evaluating alternatives include their feasibility and reasonability. Therefore, the following criteria were considered to determine whether there is an alternative to the proposed development and whether the identified alternative, or the proposed development, is the most feasible and most reasonable option.

(a) Are there any alternatives that present a greater purpose than the proposed development:

Based on the information gathered, the property currently includes existing structures such as a dwelling and a restaurant facility. The proposed development is intended to complement these operations. For example, the manager's accommodation units will facilitate on-site management of both the surrounding vegetation and overall property upkeep. Off-site accommodation for managers would undermine the necessity and desirability of having them present on-site. Additionally, the new conference centre, tourist facilities, garages for increased transportation to

the Featherbed Nature Reserve, and entertainment amenities are all aimed at promoting economic growth in the broader Knysna region. Alternative considerations beyond these planned activities are less feasible and reasonable compared to the proposed development.

(b) Are there any alternatives that present the opportunity to avoid negative impact all together:

A baseline specialist assessment was conducted to evaluate the "no-go" or "no-development" alternative for Portion 59 of Farm 216. The "no-go" scenario considers the potential impacts if no construction occurs. This assessment predicts the future state of the affected area if the current or anticipated land use remains unchanged, with no construction activities taking place. If development is halted and the status quo maintained, no significant changes to the site conditions are expected, and the impact of the "no-go" scenario is deemed negligible.

While a "no-go" option would avoid all negative impacts, it is neither the most feasible nor the most reasonable alternative. Halting development entirely would contradict the broader need and desirability of the project. Additionally, any other type of development is likely to result in similar or greater impacts on the property.

(c) Are there any alternatives that present the opportunity to unavoidable negative impacts:

Currently the impacts assessed by the associated specialist confirm that the intended impact would have a low to negligible impact as development is to occur on previously disturbed or altered land. Therefore, shifting the proposed development outside the area would immediately increase unavoidable negative impacts. The current proposal is determined as the most feasible and reasonable.

3. MOTIVATION FOR PREFERRED ALTERNATIVE

The preferred alternative represents the most environmentally responsible and practically defensible option for the proposed development at Featherbed Nature Reserve (Portion 59 of Farm 216, Knysna). The motivation for this alternative is grounded in site-specific evidence, specialist assessment outcomes, applicable policy frameworks, and the technical responses to concerns raised during the public participation process. Each of these dimensions is addressed below.

Use of Previously Disturbed Land:

All four proposed development components (the manager's accommodation units , conference centre and tourist accommodation, garages and staff facilities, and entertainment facility) are sited on land that has been previously disturbed through historical development activity and the effects of the 2017 Knysna fires, which devastated more than 95% of the reserve's vegetation. The preferred footprints were deliberately selected to confine new construction to areas already impacted by these disturbances, thereby avoiding the clearance of intact natural vegetation and minimising the risk of further harm to Critically Endangered Knysna Sand Fynbos and associated biodiversity. Historical imagery confirms that the proposed building envelopes correspond to previously altered and maintained areas. By concentrating development within these already-impacted spaces, the preferred alternative avoids encroachment into undisturbed ecosystems and ensures that the broader conservation value of the reserve is preserved.

Specialist Verification of Site Sensitivities:

The project was preceded by a rigorous site sensitivity verification process, which demonstrated that the preferred alternative is appropriate in the context of the reserve's environmental sensitivities. Although the initial screening tool flagged very high sensitivities across multiple categories, specialist site verification downgraded several of these designations. Faunal biodiversity, agricultural sensitivity, and civil aviation sensitivities were all reduced following on-site assessment and specialist input. No species of conservation concern were identified in the faunal survey. The screening outcomes for terrestrial biodiversity, plant species of conservation concern, and aquatic sensitivities were retained and are addressed through appropriate mitigation measures embedded in the Environmental Management Programme. Heritage sensitivities will be managed through the submission of a Notice of Intent to Develop to Heritage Western Cape prior to any ground-disturbing activities. This evidence-based, proportionate assessment approach demonstrates that the preferred alternative is supported by substantive specialist findings rather than precautionary assumptions, and that the development can proceed without unacceptable harm to the reserve's ecological integrity.

Stormwater Management and Shoreline Stability:

SANParks raised concerns during the public participation process regarding the potential impact of the proposed development on shoreline stability, particularly in the context of the Coastal Protection Zone and the estuarine functional zone of the Knysna Estuary. These concerns were taken seriously and addressed through a dedicated Coastal Stability Assessment, which confirmed that stormwater is the primary driver of shoreline erosion on the site, predominantly through concentrated surface runoff over the highly erodible dune sand substrate. The assessment further found that toe erosion of approximately one metre in scarp height is already occurring along the shoreline, largely as a result of boat wake and spring tidal action, and that climate change, including projected sea-level rise and increased rainfall variability, will exacerbate these pressures over time.

In direct response to these findings, a comprehensive Stormwater Management Plan was developed by a professional civil engineer. The plan provides for rainwater harvesting from the roofs of all proposed new buildings, a 320 kilolitre on-site reservoir to store and regulate harvested rainwater, detention ponds to attenuate runoff from roads and paved surfaces, kerbing and controlled overflow discharge at the slipway areas to prevent concentrated runoff from reaching the shoreline, and the use of the permeable sandy substrate for soak-away infiltration where appropriate. These measures collectively ensure that the preferred alternative does not exacerbate existing erosion pressures and will in fact improve the management of stormwater across the reserve compared to current conditions. The preferred alternative therefore directly addresses the principal concern raised by SANParks and demonstrates that the development can be implemented in a manner that is resilient to current and future coastal and climatic pressures.

Protected Area Status and Regulatory Context:

The property was declared a Private Nature Reserve in 1985 under the Nature and Environmental Conservation Ordinance (Ordinance 19 of 1974), by way of Provincial Notice 660/1985 published in the Province of the Cape of Good Hope Official Gazette. In terms of Section 12 of the National Environmental Management: Protected Areas Act (Act 57 of 2003), areas reserved or protected

under provincial legislation for purposes consistent with the Act are deemed to be nature reserves for the purposes of NEMPAA. The gazette publication of the 1985 declaration satisfies the procedural requirements confirmed by the Supreme Court of Appeal in the Barberton Nature Reserve judgment, which affirmed that properly gazetted pre-NEMPAA declarations are recognised under Section 12 without further action by the landowner.

SANParks raised the question of whether regularisation of the reserve's status under NEMPAA, including the formal appointment of a Management Authority, approval of a Management Plan, and registration of a notarial deed, may be required. No directive or instruction requiring such regularisation has been received to date. Should the competent authority determine that regularisation is necessary, this process will be undertaken through the appropriate channels. The application proceeds on the basis that the property constitutes a recognised and declared Private Nature Reserve.

The property is zoned Open Space Zone IV with consent use for tourist facilities, which is consistent with the nature and scale of the proposed development. The preferred alternative aligns with this zoning and with the property's established function as a private nature reserve and eco-tourism destination. The proposed development does not alter the fundamental character of the reserve but rather replaces and upgrades facilities that are necessary to sustain and improve the reserve's operational and conservation capacity.

Comparison with Alternatives and the No-Go Option:

No viable alternative sites exist within the reserve that would achieve a materially lower environmental impact than the preferred alternative. The reserve's topography, which includes steep slopes exceeding 40% gradient across significant portions of the property, combined with the distribution of intact natural vegetation and the constraints imposed by the Coastal Protection Zone, severely limits the range of buildable areas available. The preferred footprints represent the locations that best balance development need, infrastructure accessibility, and environmental sensitivity.

The no-go alternative (under which no development proceeds) fails to satisfy the need and desirability of the proposed facilities. The existing managers' residence was destroyed in the 2017 fires and has not been replaced. The existing sewage treatment plant is non-operational and non-compliant with applicable legislation, meaning that a new treatment plant must be installed irrespective of whether the broader development proceeds. The no-go alternative would also fail to leverage the existing services infrastructure on the reserve, would not support the long-term operational and financial sustainability of the reserve as a functioning eco-tourism facility, and would not contribute to the socio-economic benefits associated with the creation and retention of employment in the Knysna area. For these reasons, the no-go alternative is not considered a reasonable or responsible outcome.

Alignment with Policy and Sustainable Land-Use Principles:

The preferred alternative is consistent with the principles of sustainable development as set out in the National Environmental Management Act (Act 107 of 1998), including the principles of integrated environmental management, pollution prevention, and the avoidance of irreversible harm to biodiversity. The development aligns with the objectives of the Knysna Estuary

Management Plan, the Western Cape Biodiversity Spatial Plan, and the Garden Route Biosphere Reserve management framework, all of which support compatible, low-impact land use within sensitive landscapes provided that appropriate mitigation measures are in place.

The Environmental Management Programme (EMPr) developed for this project embeds site-specific mitigation measures, monitoring requirements, and adaptive management provisions across all phases of the project lifecycle, from planning and construction through to operation and rehabilitation. This ensures that the preferred alternative is not simply described as the least harmful option in principle but is operationally managed to that standard in practice. The preferred alternative therefore supports the continued viability of Featherbed Nature Reserve as one of the Garden Route's premier eco-tourism and conservation destinations, while demonstrating the rigour and good faith that the environmental authorisation process demands.

4. NEED AND DESIREABILITY

Based on the Integrated Environmental Management Guideline from the Department of Forestry, Fisheries and the Environment (previously Department of Environmental Affairs (DEA)), the development on Portion 59 of Farm 216 in Knysna would need to align with the principles of sustainability and consider the need and desirability as outlined in the Guidelines.

Key points to consider:

Principle	Development Response
Ecological Sustainability	The site development planning has taken into consideration all specialist findings and recommendations.
Justifiable Economic and Social Development	The development on Portion 59 of Farm 216 is expected to enhance the local economy by creating jobs in both construction and related sectors, which will stimulate economic growth. In addition to the existing restaurant, the new conference centre, tourist facilities, and entertainment venues will further drive economic activity in Knysna. Moreover, the development will likely lead to increased property values, contributing to greater tax revenue for the municipality. This added revenue can support further investment in the community and promote continued local growth.

Furthermore, development on the property must adhere to the strategic context set by various policies and plans, such as the National Development Plan 2030 (NDP) and comply with statutory requirements. The development should serve the public interest, align with the local Integrated Development Plans (IDP), Spatial Development Frameworks (SDF), and Environmental Management Frameworks (EMF), and reflect the broader community's needs and interests.

Based on these key considerations, several assessment points will be addressed as part of this Basic Assessment Report (Table 9).

Table 9: Assessment of need and desirability

1.	Explain how the proposed development is in line with the existing land use rights of the property?

The property is currently zoned as Open Space IV, where the primary use is designated for nature reserve purposes, with tourist facilities allowed under consent use. As such, the proposed development aligns with the existing land use, aiming to enhance tourist activities while maintaining the integrity of the private Featherbed Nature Reserve. This approach supports the property's intended conservation function and enables sustainable tourism that complements the reserve's natural value.

2.	Explain how potential conflict with respect to existing approvals for the proposed site.

There is no conflict of interest.

3.	Explain how the proposed development will be in line with the following?
3.1.	The Provincial Spatial Development Framework (Western Cape Provincial Spatial Development Framework; WCPSDF).

The main purpose of the Western Cape Provincial Spatial Development Framework (PSDF) is to provide a coherent and integrated framework for the spatial development of the province. It aims to guide the location and form of public and private investment in the natural and built environment to ensure sustainable development.

Key objectives include:

- Promoting Sustainable Development:
  Ensuring that development is economically, socially, and ecologically sustainable.
- Coordinating Spatial Planning:
  Aligning and integrating the spatial implications of various sector plans, such as housing, transport, and infrastructure.
- Addressing Historical Inequities:
  Shifting from past development patterns characterized by urban sprawl and environmental degradation to more sustainable and integrated human settlements.
- Guiding Public Investment:
  Providing a common spatial reference framework to guide the location and form of public investment.

This framework helps to ensure that development in the Western Cape is well-planned, equitable, and sustainable. The proposed development aligns with sustainable development principles by being largely situated on previously disturbed areas, minimizing further environmental impact. Additionally, it integrates with other sectoral plans, ensuring that the project remains coherent within the broader development framework. This approach reinforces the sustainability of the project while promoting responsible land use.

3.2.	The Integrated Development Plan of the local municipality.

The District Municipality's IDP is a super-plan for an area that gives an overall framework for development. In the same way the District Municipality's spatial development framework provides guidance to local municipalities for future spatial planning, strategic decision-making, and regional integration.
Considering the nature of the proposal under consideration for the subject property, no conflict with the District Municipality's spatial plans were identified.

3.3.	The Spatial Development Framework of the local municipality.

Knysna Municipality has adopted and implemented a new Spatial Development Framework (June 2020). The purpose of the Knysna SDF is to provide relevant background information regarding the biophysical, economic and social context of Knysna Municipality. The Knysna Municipality Spatial Development Framework serves as a regulatory framework for spatial development within the local municipality. The Spatial Vision of the municipality is to create a long-term, sustainable land use pattern and building on the Knysna Municipality's integrated

development vision to be Inclusive, Innovative and Inspired, the complementary spatial planning vision leading the Knysna MSDF is to:

"…Establish Knysna as an authentic place that works for all of its residents and continues to attract visitors. Build an equitable and inclusive society within a sustainable and resilient ecosystem…"

The Knysna Spatial Development Framework (SDF) outlines several key objectives but does not specifically mention the Featherbed Private Nature Reserve. To ensure alignment, the proposed development was manually assessed in terms of protecting natural resources and promoting socio-economic growth. This assessment concluded that the development does not contradict any existing policies. It will take place on previously disturbed land, ensuring minimal environmental impact while creating local employment opportunities and increasing tourism. This, in turn, will generate additional revenue for the Knysna Municipality, supporting sustainable growth in the region.

3.4.	The Environmental Management Framework applicable to the area.

The most recent Environmental Management Framework (EMF) for the Garden Route outlines overarching principles binding all state organs, including local authorities and officials. These principles emphasize the avoidance or minimization and remediation of ecosystem disturbances and biodiversity loss. Specifically, ecosystems like coastal shores, estuaries, and wetlands, which are sensitive or under stress, require careful management and planning consideration. Additionally, the sustainable use of renewable resources must not exceed thresholds that jeopardize ecosystem integrity.

In the context of development on the proposed property within the Knysna private nature reserve Featherbed, adherence to the principles set out in the EMF mandates comprehensive environmental assessments. Thereby, assessments conducted by specialist will be integrated as part of this report to analyse environmental sensitivities such as botanical and aquatic aspects, crucial for informing Environmental Authorisation decisions. This process ensures that potential impacts are identified and mitigated through strategies like no-go areas, buffer zones, and ongoing management measures, safeguarding sensitive environments throughout the project's lifecycle. All these identifications and mitigations are highlighted in this report, thus falling in line with the Garden Route Environmental Management Framework.

4.	Explain how the proposed development will optimise vacant land available within an urban area.

The proposed development does not fall within the urban area.

6.	Explain how the proposed development will optimise the use of existing resources and infrastructure.

The property currently contains existing infrastructure, including a dwelling unit and restaurant facility that were operational prior to the start of this application. While some infrastructure sustained damage, the proposed development will primarily take place in areas that have already been disturbed. As a result, this will minimize the need for new resource deployment. By utilizing existing service infrastructure and previously disturbed land, the project will help optimize the use of current resources, aligning with principles of efficient land use and sustainable development.

SECTION F – APPLICABLE LISTED ACTIVITIES

In accordance with the National Environmental Management Act (Act 107 of 1998) (NEMA) and its amendments any proposal that triggers listed activities under Listing Notices 1 and 3 (R 327 & R 324) requires an Environmental Impact Assessment (EIA) process to secure Environmental Authorization (EA) from the Department of Environmental Affairs (DEA), prior to commencement.

Table 10: Relevant listed activities that require environmental authorisation

Listing Notice 1: GN No. R.327 of 2014 (as amended 2017)		
Activity	**Description**	**Development applicability**
17	Development— (i) in the sea; (ii) in an estuary; (iii) within the littoral active zone; (iv) in front of a development setback; or (v) if no development setback exists, within a **distance of 100 metres inland** of the high-water mark of the sea **or an estuary**, whichever is the greater; in respect of— (a) fixed or floating jetties and slipways; (b) tidal pools; (c) embankments; (d) rock revetments or stabilising structures including stabilising walls; or (e) **infrastructure or structures with a development footprint of 50 square metres or more** — but excluding— (aa) the development of infrastructure and structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) the development of temporary infrastructure or structures where such structures will be removed	The proposed development will exceed the minimum threshold for this listed activity and will therefore require environmental authorisation. **Applicable.**

	within 6 weeks of the commencement of development and where coral or indigenous vegetation will not be cleared; or (dd) where such development occurs within an urban area.	
19A	The infilling or depositing of any material of more than 5 cubic metres into, or the **dredging, excavation, removal or moving of** soil, sand, shells, shell grit, pebbles or rock of more than **5 cubic metres** from— (i) the seashore; (ii) the littoral active zone, an estuary or a distance of **100 metres inland** of the high-water mark of the sea or an **estuary**, whichever distance is the greater; or (iii) the sea; — but excluding where such infilling, depositing , dredging, excavation, removal or moving— (a) will occur behind a development setback; (b) is for maintenance purposes undertaken in accordance with a maintenance management plan; (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or i. where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.	Excavation quantities are to exceed the minimum threshold. **Applicable.**
Listing Notice 3: GN No. R.324 of 2014 (as amended 2017)		
Activity	**Description**	**Development Applicability**
12	The **clearance of an area of 300 square metres or more of indigenous vegetation** except where such clearance of	It is anticipated that more than 300m^2 will be cleared within 100 meters of the Knysna Estuary.

	indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. Western Cape: i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; iii. Within the littoral active zone or **100 metres inland from** high water mark of the sea or an **estuarine functional zone**, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.	**Applicable.**

SECTION G – ADDITIONAL POLICIES AND LEGISLATIVE CONTEXT

The applicant is required to comply with all the required legislation and policies for the proposed development. The following table below indicates the legislation, and guidelines of all spheres of government that are applicable to the application as contemplated in the EIA regulations

LEGISLATION	**ADMINISTERING AUTHORITY**	**TYPE** Permit / License / Authorization / Comment / Relevant consideration	**DEVELOPMENT APPLICABILITY**
NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT 107 OF 1998) AND THE 2014 EIA REGULATIONS AS AMENDED IN 2017	DFFE	Authorisation	An application will be submitted to DFFE for Environmental Authorization.
NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (ACT NO 10 OF 2004)	DFFE	Relevant consideration	The applicant will be reminded to remove Alien Invasive Plant species
NATIONAL ENVIRONMENTAL MANAGEMENT: INTEGRATED COASTAL MANAGEMENT ACT (ACT NO 24 OF 2008)	DFFE (Coastal Department)	Comment / Relevant consideration	The DFFE Coastal department will be consulted on the proposed development during the public participation process. Portions of the property fall within the Coastal Protection Zone (CPZ). Section 15 is acknowledged — no person may construct, maintain, or extend any structure on coastal public property to prevent or promote erosion except as provided for in the Act. Sections 62 and 63 inform authority decision-making.
NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE ACT (ACT 59 OF 2008)	DFFE	Relevant Consideration	The Waste Hierarchy will be adhered too during the construction and operational phase.
NATIONAL FORESTS ACT (ACT 84 OF 1998)	DFFE	Comment / Relevant consideration	There will be an application submitted to remove / disturb protected trees during the construction phase of

			the proposed development.
NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)	Heritage Western Cape	Authorisation / Comment / Relevant Consideration	A Notice of Intent to Develop will be sent to Heritage Western Cape to confirm heritage resources are present on site.
NATIONAL HEALTH ACT (ACT 61 OF 2003)	Department of Health and Wellness	Comment / Relevant consideration	In terms of this Act, a Health and Safety Officer and protocol must be implemented during the construction phase.
NEM: PROTECTED AREAS ACT, 2003 (ACT 57 OF 2003)	DFFE / CapeNature	Authorisation / Relevant consideration	The property is a NEM:PAA-recognised Private Nature Reserve. The applicant will engage regarding regularisation (validation agreement, Management Authority, Management Plan and notarial endorsement).
NATIONAL WATER ACT, 1998 (ACT 36 OF 1998)	Breede-Olifants CMA / DWS	Authorisation	No water is to be derived from any water resource on Portion 59 without a Water Use Authorisation under Section 22 of the NWA. Rainwater harvesting does not trigger a water use. A Water Use Licence may be required for borehole supply within 500m of the high-water mark (GN 40243, 2 September 2016) — the requirement has been investigated in the Service Report (Appendix K).

*** Note** - Town planning. During an internal project review on 18 March 2025 the previously contemplated rezoning application was reassessed. The current zoning ("Open Space Zone IV") and associated consent use (tourist facilities) under the Knysna Zoning Scheme By-law, 2020 provide for the proposed tourism-related development. No rezoning application is being pursued. All design and layout proposals assessed in this Basic Assessment are based on existing lawful land use rights, and no development rights beyond those permitted by the current zoning are being relied upon.

SECTION H – IMPACT ASSESSMENT

According to the DFFE Screening Tool report, potential impacts on the receiving environment were identified (Table 4), along with the necessary specialist input required (Table 5) for assessment. Site sensitivity verification can be found in APPENDIX E, including the specialist input.

1. METHODOLOGY FOR ASSESSMENT OF IMPACTS

To assess the impact of the development on the receiving environment, the environmental considerations of the area were identified. This was followed by a detailed review of the project scope, an evaluation of its need and desirability within the Knysna region. The implications of the National Environmental Management Act (Act 107 of 1998) were accounted for, which necessitated environmental authorisation based on the triggered listed activities.

Together with the with specialist input presented, the impact will be assessed with the mentioned considerations in mind, and according to the following criteria -

Each potential environmental impact and risk identified was assessed according to specific criteria. These included the nature, extent, duration, consequence, probability and frequency of identified impacts, including the degree to which these impacts can be reversed, may cause irreplaceable loss of resources, and can be avoided, managed or mitigated. The criteria are based on the EIA Regulations, published by the Department of Forestry, Fisheries and the Environment (April 1998) in terms of the Environmental Conservation Act No. 73 of 1989. These criteria include:

Nature of the impact
This is an estimation of the type of effect the construction, operation and maintenance of a development would have on the affected environment. This description should include what is to be affected and how.

Mitigation Measures
Ways in which an impact can be avoided, minimised, or managed to reduce its environmental significance.

Extent of the impact - the scale of the impact	
Rating	**Definition of Rating**
Very Limited	Extending only as far as the development site area
Limited	Limited to the site and its immediate surroundings
Local	Extending across the site and to nearby settlements
Regional	The region, which may be defined in various ways, e.g. cadastral, catchment, topographic.
National	National scale or across international borders

Duration of the impact - the lifespan or length of time the impact will last	
Rating	**Definition of Rating**
Brief	Impact will not last longer than 1 year
Short term	Impact will last between 1 and 2 years

Medium Term	Impact will last between 2 and 15 years
Long Term	Impact will last more than 15 years
Permanent	Impact may be permanent, or in excess of 20 years
Very High	Natural and/ or social functions and/ or processes are severely altered

Intensity - the severity of the impact	
Rating	**Definition of Rating**
Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Low	Natural and/or social functions and/or processes are slightly altered
Medium	Natural and/or social functions and/or processes are notably altered
High	Natural and/ or social functions and/ or processes are significantly altered
Very High	Natural and/ or social functions and/ or processes are severely altered

Probability of occurrence - the probability of the impact occurring	
Rating	**Definition of Rating**
Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Possible	Has occurred here or elsewhere and could therefore occur
Probable	It is most likely that the impact will occur
Definite	There are sound scientific reasons to expect that the impact will occur

Potential for mitigation - the likelihood for the existence of mitigation measures	
Rating	**Definition of Rating**
Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.
Medium	There is a moderate probability that mitigation measures can be effectively implemented to reduce or manage the identified impact.
High	Mitigation measures are highly probable to be effective and can significantly reduce or eliminate the identified impact.

Reversibility - the ability of the impacted environment to return to its pre-impacted state	
Rating	**Definition of Rating**
Completely reversible	the impact can be reversed with the implementation of minor mitigation measures.
Partly reversible	the impact is reversible, but more intense mitigation measures are required
Barely reversible	the impact is unlikely to be reversed even with intense mitigation measures
Irreversible	the impact is irreversible, and no mitigation measures exist

Irreplaceable loss of resources - the degree to which resources will be irreplaceably lost	
Rating	**Definition of Rating**
Negligible	No loss of resources
Low	Marginal loss, the resource is not damaged irreparably or is not scarce
Medium	the resource is damaged irreparably but is represented elsewhere
High	Irreparable damage and is not represented elsewhere

Cumulative effect - An effect which in itself may not be significant but may become significant if added to other existing or potential impacts that may result from activities associated with the proposed development.	
Rating	**Definition of Rating**
Negligible	the impact would result in negligible to no cumulative effect
Low	the impact would result in insignificant cumulative effects
Medium	the impact would result in minor cumulative effects
High	the impact would result in significant cumulative effects

Confidence - the level of confidence in the assessment rating	
Low	Judgement is based on intuition
Medium	Determination is based on common sense and general knowledge
High	Substantive supportive data exists to verify the assessment

Significance - Significance of impacts are determined through a synthesis of the assessment criteria		
Rating		**Definition of Rating**
	Very high negative (-)	The impact will have highly significant effects and are unlikely to be able to be mitigated adequately
	High negative (-)	The impact will have significant effects and will require significant mitigation measures to achieve an accepted level of impact
	Medium negative (-)	The impact will have moderate negative effects and will require moderate mitigation
	Low negative (-)	The impact will have minimal effects and would require little mitigation
	Negligible	The impact will have negligible effects and would require little or no mitigation
	Low positive (+)	The impact will have minor positive effects
	Medium positive (+)	The impact will have moderate positive effects
	High positive (+)	The impact will have significant positive effects
	Very High positive (+)	The impact will have highly significant positive effects.

2. (ALTERNATIVE A – PREFERRED) IMPACTS ASSOCIATED WITH THE CONSTRUCTION PHASE

The following impacts may result from the construction phase for Alternative A (preferred). A brief description of potential impact, significance rating of impacts, proposed mitigation, and significance rating of impacts after mitigation will be provided.

SANParks (10 December 2024) and the WHGC (25 November 2024) requested a Visual Impact Assessment (VIA). CapeNature (4 December 2024) recommended additional input from BirdLife South Africa and an entomologist with butterfly expertise.

The Site Sensitivity Verification Report (Appendix E) addresses both matters in line with the gazetted protocols under Government Notice 320 of 20 March 2020. The proposed development is located within an existing disturbed and modified footprint with established structures. The Manager's Accommodation Units, Conference Centre, Garages and Entertainment Facility are all rebuilds within or directly adjacent to the historical pre-2017-fire footprint. On this basis, the screening-tool-indicated visual sensitivity of "Low" is consistent with the site verification, and the EAP's professional opinion is that the residual visual impact does not warrant a standalone VIA. Architectural and

operational mitigation (form, colour, texture, external lighting restrictions, indigenous screening) is captured in the EMPr (rows 8.13 and 9.4).

In relation to faunal SCC, the Terrestrial Animal Species Assessment and Compliance Statement (Appendix D3) was undertaken in accordance with the National Web-based Environmental Screening Tool and the relevant gazetted protocols. The site sensitivity for terrestrial fauna was assessed as Low, and no faunal Species of Conservation Concern were confirmed within the proposed development footprint. While additional survey effort would marginally increase detectability, the current assessment is sufficient for the purposes of a Basic Assessment process. Precautionary mitigation and ECO oversight during construction are embedded in the EMPr.

Project Phase	**Construction**			
Impact	**Disturbance of Terrestrial Biodiversity by means of clearance of terrestrial habitat, including vegetation, ecological processes, ecologically important species, terrestrial habitat, and ecological connectivity.**			
Description of impact	Loss of terrestrial biodiversity including vegetation type, ecological processes, indigenous vegetation, ecologically important species, terrestrial habitat and ecological connectivity.			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• Mark off the areas that are not going to be developed prior to undertaking any works and ensure that no unnecessary loss of adjacent vegetation occurs, especially around the Degraded Forest habitat. • Mark off all protected trees, ensure permits are obtained prior to removal. Ensure that these are not disturbed where possible. • Sites for building material stocks, vehicles, toilets etc must be clearly marked and restricted to the building footprint, exiting roads or existing disturbed areas. • Follow-up clearing of all exotic and listed IAPs is required every 6 months for the first three years,			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Low Negative		Low Negative	
Duration	Long term	More than 10 years, but impact ceases after the operational phase.	Medium term	Impact will last between 2 and 15 years
Extent	Very limited	Extending only as far as the development site area	Very limited	Extending only as far as the development site area
Intensity	Medium	Natural and/ or social functions and/ or processes are notably altered.	Medium	Natural and/ or social functions and/ or processes are notably altered.
Probability	Definite	There are sound scientific reasons to expect that the impact will occur.	Definite	There are sound scientific reasons to expect that the impact will occur.
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Barely reversible	the impact is unlikely to be reversed even	Partly reversible	the impact is reversible, but more intense

		with intense mitigation measures		mitigation measures are required
Resource irreplaceability	Low	Marginal loss - the resource is not damaged irreparably or is not scarce	Low	Marginal loss, the resource is not damaged irreparably or is not scarce
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	No essential mitigation measures are necessary to reduce the impact of the development. However, best practice mitigations must be adhered to.			
Cumulative impacts	The impact would result in very low negative cumulative effect.			

Project Phase	**Construction**			
Impact	**Clearance of vegetation for the construction of the proposed development and associated infrastructure**			
Description of impact	Loss of species of conservation concern			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• Mark off the areas that are not going to be developed prior to undertaking any works and ensure that no unnecessary loss of adjacent vegetation occurs, especially around the Degraded Forest habitat. • Mark off all protected trees, ensure permits are obtained prior to removal. Ensure that these are not disturbed where possible. • Sites for building material stocks, vehicles, toilets etc must be clearly marked and restricted to the building footprint, exiting roads or existing disturbed areas. • Follow-up clearing of all exotic and listed IAPs is required every 6 months for the first three years,			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Low Negative		Low Negative	
Duration	Long Term	More than 10 years, but impact ceases after the operational phase.	Long Term	More than 10 years, but impact ceases after the operational phase.
Extent	Very limited	Extending only as far as the development site area	Very limited	Extending only as far as the development site area
Intensity	Medium	Natural and/ or social functions and/ or processes are notably altered.	Medium	Natural and/ or social functions and/ or processes are notably altered.
Probability	Definite	There are sound scientific reasons to expect that the impact will occur	Definite	There are sound scientific reasons to expect that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	the impact is reversible, but more intense mitigation measures are required	Partly reversible	the impact is reversible, but more intense mitigation measures are required

Resource irreplaceability	Low	Marginal loss - the resource is not damaged irreparably or is not scarce	Low	Marginal loss, the resource is not damaged irreparably or is not scarce
Significance	**Low – negative (-)**		**Low – negative (-)**	
Comment on significance	No essential mitigation measures are necessary to reduce the impact of the development. However, best practice mitigations must be adhered to.			
Cumulative impacts	The impact would result in very low negative cumulative effect.			

Project Phase	**Construction**			
Impact	**Disturbance of faunal species / habitat**			
Description of impact	There is a confirmed low likelihood of occurrence of SCC species, with little natural habitat. By this, the impact of development relates to fauna (and their habitat in general)			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• General recommendation and best practice guidelines should be followed for all animal species encountered (regardless of whether they are SCC or not) during any stage of development on a site. • This includes (but are not limited to) the following - Do not bring harm to any faunal species during the construction period. - Any faunal species found on site to have limited mobility must be reported to the appointed ECO and handles with appropriate due diligence.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Very low negative		Very low negative	
Duration	Short term	Impact will last between 1 and 2 years	Short term	Impact will last between 1 and 2 years
Extent	Very limited	Extending only as far as the development site area	Very limited	Extending only as far as the development site area
Intensity	Negligible	Natural and/ or social functions and/ or processes are negligibly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	N/A	-	N/A	-
Resource irreplaceability	Negligible	No loss of resources	Negligible	No loss of resources
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	There is a low faunal species sensitivity related to the proposed development area, and therefore no cumulative impact is expected.			

Cumulative impacts	The impact would result in negligible cumulative effects.

Project Phase	**Construction**			
Impact	**Disturbance / removal of topsoil and subsoil**			
Description of impact	Loss of topsoil and potential soil erosion.			
Potential for mitigation	High	Mitigation measures are highly probable to be effective and can significantly reduce or eliminate the identified impact.		
Potential mitigation	• Prior to construction, the disturbance footprint of proposed development should be clearly defined and demarcated to prevent unnecessary additional damage to the surrounding environment. • Areas that are disturbed through construction activities should be suitably rehabilitated without delay. Failure to do so may result in erosion, soil exposure and a loss of the soil micro-organisms that are essential for plant growth. • Organic matter, such as roots, and humus/topsoil should be removed from the footprint of structures and stockpiled separately for landscaping purposes. • The stockpiling of topsoil for use in rehabilitation is required. • Stockpiles must not exceed 1.5m in height, must be covered with shade cloth or similar, to prevent erosion and any invasive alien species that begin to grow within it must be removed. • Soil disturbance during the removal of alien invasive plants must be minimised as much as possible. • The site must be stabilised where necessary using available materials, where possible. It is recommended that exposed soils are covered with wood chips, and tree branches used to create berms on steeper areas. Any cut alien vegetation on site can be utilised for this purpose if it is without seed.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low Negative	
Duration	Short term	Impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to specific isolated parts of the site
Intensity	Low	Natural and/or social functions and/or processes are slightly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Probable	It is most likely that the impact will occur	Possible	Has occurred here or elsewhere and could therefore occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	The impact is reversible but more intense mitigation measures are required	Completely reversible	The impact can be reversed with the implementation of minor mitigation measure

Resource irreplaceability	Low	Marginal loss, the resource is not damaged irreparably or is not scarce	Low	Marginal loss, the resource is not damaged irreparably or is not scarce
Significance	**Medium - negative (-)**		**Low – negative (-)**	
Comment on significance	The impact will have minimal effects and would require little mitigation			
Cumulative impacts	The impact would result in insignificant cumulative effects			

Project Phase	**Construction**	
Impact	**Stormwater runoff and erosion**	
Description of impact	Increase in the amount of stormwater runoff because of an increase of uncovered soil and hardened surfaces leading to erosion of the soil during construction.	
Potential for mitigation	High	Mitigation measures are highly probable to be effective and can significantly reduce or eliminate the identified impact.
Potential mitigation	• Do not clear vegetation outside the project area of influence. • Only use the existing access road for each development. Use the road adjacent to the western property boundary to enter the development sites. • Use the most northern road to access laydown areas 1 and 2, and all the development sites until the Farm manager house is completed. • Use the road passing by the proposed conference and tourist facility, to the south, to access laydown areas 2 and 3, the proposed entertainment area, as well as to exit the property (Note use all roads as one way in the direction of travel, as designated in the map below).  • All stockpiles must be covered at the end of the day. • Install temporary drainage controls such as swales or berms to manage runoff where necessary.	

	• All materials used during construction must follow the best practice guidelines set out for each product. • The laydown area must be constructed in the proposed areas. • Check weather reports ahead and prepare the site when rainfall is predicted. Discontinue any earthworks on the site during rainfall. • The 3 m setback line must be demarcated and marked as a no-go area. • Install silt fences or sediment barriers around the perimeter of the construction site to trap sediment-laden runoff and prevent it from entering the estuary. • Construct check dams or sediment basins for flooded construction areas to be drained into, if need be, to trap sediment, and facilitate sediment settlement before runoff reaches the estuary. • Implement phased construction to minimise the area of exposed soil at any given time and reduce the potential for erosion (suggested order: farm manager house, conference and tourist facility, garage, entertainment facility). • Apply mulch or erosion control mats on exposed slopes and disturbed areas to stabilise soils and reduce erosion rates.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low Negative	
Duration	Short term	Impact will last between 1 and 2 years	Brief	Impact will not last longer than 1 year
Extent	Very limited	Extending only as far as the development site area	Very limited	Extending only as far as the development site area
Intensity	High	Natural and/ or social functions and/ or processes are significantly altered	Medium	Natural and/or social functions and/or processes are notably altered
Probability	Definite	There are sound scientific reasons to expect that the impact will occur	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	the impact is reversible but more intense mitigation measures are required	Completely reversible	the impact can be reversed with the implementation of minor mitigation measures.
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Low- negative**		**Negligible – negative (-)**	
Comment on significance	The significance of the impact with mitigation is reduced to Negligible, implying that the impact has a possibility to be present but with good management of mitigation measures is unlike to be present.			

Cumulative impacts	With mitigation the impact would result in negligible to no cumulative effect

Project Phase	**Construction**			
Impact	**Waste Pollution**			
Description of impact	Pollution caused by waste generated by the construction process.			
Potential for mitigation	High	Mitigation exists and will considerably reduce significance of impacts		
Potential mitigation	• All construction waste generated on-site during construction must be adequately managed. Separation and recycling of different waste materials should be supported. • All construction waste materials must be collected and disposed of at a suitable waste facility. • No dumping of construction material within the site and surrounding areas may take place. • The site must be monitored on a weekly basis to clean-up any waste that may have been blown from the construction site. • Adequate sanitary facilities and ablutions must be provided for all personnel throughout the project area. Use of these facilities must be enforced.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low negative	
Duration	Short term	Impact will last between 1 and 2 years	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Extending only as far as the development site area
Intensity	Medium	Natural and/or social functions and/or processes are notably altered	Low	Natural and/or social functions and/or processes are slightly altered
Probability	Probable	It is most likely that the impact will occur	Possible	Has occurred here or elsewhere and could therefore occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	the impact is reversible but more intense mitigation measures are required	Completely reversible	the impact can be reversed with the implementation of minor mitigation measures.
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Low- negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation			
Cumulative impacts	With mitigation the impact would result in negligible to no cumulative effect			

Project Phase	**Construction**
Impact	**Construction Vehicles Pollution**

Description of impact	Pollution caused by the operation of vehicles and heavy machinery.			
Potential for mitigation	High	Mitigation exists and will considerably reduce significance of impacts		
Potential mitigation	• Construction activities must be confined to clearly demarcated areas so as to prevent unnecessary disturbance the surrounding environment. • No vehicles are to park or operate within "no-go" areas. • Excavators and all other machinery and vehicles must be checked for oil and fuel leaks daily. No machinery or vehicles with leaks are permitted to work on site. • Refuelling and fuel storage areas, and areas used for the servicing or parking of vehicles and machinery, must be located on impervious bases and should have bunds around them (sized to contain 110 % of the tank capacity) to contain any possible spills. • The contractors used for the project should have spill kits available to ensure that any fuel or oil spills are clean-up and discarded correctly.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low negative	
Duration	Short term	Impact will last between 1 and 2 years	Brief	Impact will last between 1 and 2 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Medium	Natural and/or social functions and/or processes are notably altered	Low	Natural and/or social functions and/or processes are notably altered
Probability	Probable	It is most likely that the impact will occur	Possible	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	the impact is reversible but more intense mitigation measures are required	Completely reversible	the impact is reversible but more intense mitigation measures are required
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Low- negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation			
Cumulative impacts	With mitigation the impact would result in negligible to no cumulative effect			

Project Phase	**Construction**	
Impact	**Noise pollution**	
Description of impact	Noise caused by machinery and staff	
Potential for mitigation	Low	Mitigation does not exist; or mitigation will slightly reduce the significance of impacts
Potential mitigation	• Construction activities must only take place during normal working times between 07:00-17:00 on weekdays. • Machinery may be fitted with silences to dampen noise.	

	• Staff must be reminded that they are working within a residential area and noise levels must be kept low.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low negative	
Duration	Short term	Impact will last between 1 and 2 years	Brief	Impact will last between 1 and 2 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Medium	Natural and/or social functions and/or processes are notably altered	Low	Natural and/or social functions and/or processes are notably altered
Probability	Probable	It is most likely that the impact will occur	Possible	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	the impact is reversible but more intense mitigation measures are required	Completely reversible	the impact is reversible but more intense mitigation measures are required
Resource irreplaceability	Not relevant		Not relevant	
Significance	**Low- negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation			
Cumulative impacts	With mitigation the impact would result in negligible to no cumulative effect			

Project Phase	**Construction**			
Impact	**Visual impact**			
Description of impact	Visual & aesthetic consequences of the proposed project			
Potential for mitigation	Medium	Mitigation exists and will notably reduce significance of impacts		
Potential mitigation	• Architectural design to mitigate visual impact on the landscape such as colours, heights, disturbance areas, maximum footprint, vegetation, etc. must be followed. • The necessary measures be implemented during the construction phase to control the noise, dust and visual intrusion. • Implement external lighting restrictions to mitigate visual impact.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low negative	
Duration	Short term	Impact will last between 1 and 2 years	Brief	Impact will last between 1 and 2 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings

Intensity	Medium	Natural and/or social functions and/or processes are notably altered	Low	Natural and/or social functions and/or processes are notably altered
Probability	Probable	It is most likely that the impact will occur	Possible	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	the impact is reversible but more intense mitigation measures are required	Completely reversible	the impact is reversible but more intense mitigation measures are required
Resource irreplaceability	Not relevant		Not relevant	
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The proposal will complement the existing residential character of the area.			
Cumulative impacts	No cumulative impacts exist.			

Project Phase	**Construction**			
Impact	**Employment**			
Description of impact	Empowerment of the local community members living in the area relating to temporary employment opportunities			
Potential for mitigation	Medium	Mitigation only exists to ensure that the positive impact is followed through.		
Potential mitigation	• Use existing social structures and communication channels to ensure social representation. • Use local labour and source local materials as far as possible.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Positive		Positive	
Duration	Short term	Impact will last between 1 and 2 years	Short term	Impact will last between 1 and 2 years
Extent	Local	Extending across the site and to nearby settlements	Local	Extending across the site and to nearby settlements
Intensity	Low	Natural and/or social functions and/or processes are slightly altered	Low	Natural and/or social functions and/or processes are slightly altered
Probability	Probable	It is most likely that the impact will occur	Definite	There are sound scientific reasons to expect that the impact will occur
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	N/A		N/A	

Resource irreplaceability	N/A		N/A	
Significance	**Low – negative (-)**		**Negligible – positive (+)**	
Comment on significance	Due to the proposed development being on a small-scale, there is a low difference in impacts between without mitigation and with mitigation. However, as the impact would be positive for the local community to be employed during construction, mitigation is recommended to ensure this occurs.			
Cumulative impacts	Minor upliftment for the local community.			

3. (ALTERNATIVE A - PREFERRED) IMPACTS ASSOCIATED WITH THE OPERATIONAL PHASE

Project Phase	**Operational**			
Impact	**Disturbance of Terrestrial Biodiversity by means of the use of the site for tourism regarding terrestrial habitat, including vegetation, ecological processes, ecologically important species, terrestrial habitat, and ecological connectivity.**			
Description of impact	Impacts are unlikely to be insignificant in this phase of the project, as the site is managed as a Nature Reserve and activities will be tourism and conservation oriented. The impacts are rated Negligible for the Disturbance of Terrestrial Biodiversity.			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• Based on the identified low potential operational phase impact, it is only recommended that the terrestrial biodiversity be managed in the best practice of the Nature Reserve.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Low Negative		Low Negative	
Duration	Medium Term	Impact will last between 2 and 15 years	Medium term	Impact will last between 2 and 15 years
Extent	Very limited	Extending only as far as the development site area	Very limited	Extending only as far as the development site area
Intensity	Negligible	Natural and/ or social functions and/ or processes are negligibly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Completely reversible	the impact can be reversed with the implementation of	Completely reversible	the impact can be reversed with the

		minor mitigation measures.		implementation of minor mitigation measures.
Resource irreplaceability	Low	Marginal loss - the resource is not damaged irreparably or is not scarce	Low	Marginal loss, the resource is not damaged irreparably or is not scarce
Significance	**Negligible – negative (-)**		**Negligible – negative (-)**	
Comment on significance	No essential mitigation measures are necessary to reduce the impact of the development. However, best practice mitigations must be adhered to.			
Cumulative impacts	The impact would result in very low negative cumulative effect.			

Project Phase	**Operational**			
Impact	**Disturbance of Plant Species by means of the use of the site for tourism regarding Species of Conservation Concern.**			
Description of impact	Loss of species of conservation concern			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• Based on the identified low potential operational phase impact, it is only recommended that the terrestrial biodiversity be managed in the best practice of the Nature Reserve.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Low Negative		Low Negative	
Duration	Medium Term	Impact will last between 2 and 15 years	Medium Term	Impact will last between 2 and 15 years
Extent	Very limited	Extending only as far as the development site area	Very limited	Extending only as far as the development site area
Intensity	Negligible	Natural and/ or social functions and/ or processes are negligibly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Completely reversible	the impact can be reversed with the implementation of minor mitigation measures.	Completely reversible	the impact can be reversed with the implementation of minor mitigation measures.
Resource irreplaceability	Low	Marginal loss - the resource is not damaged irreparably or is not scarce	Low	Marginal loss - the resource is not damaged irreparably or is not scarce
Significance	**Negligible – negative (-)**		**Negligible – negative (-)**	

Comment on significance	No essential mitigation measures are necessary to reduce the impact of the development. However, best practice mitigations must be adhered to.
Cumulative impacts	The impact would result in very low negative cumulative effect.

Project Phase	**Operational**			
Impact	**Disturbance of faunal species / habitat**			
Description of impact	There is a confirmed low likelihood of occurrence of SCC species, with little natural habitat. By this, the impact of development relates to fauna (and their habitat in general)			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• General recommendation and best practice guidelines should be followed for all animal species encountered (regardless of whether they are SCC or not) during any stage of development on a site. • This includes (but are not limited to) the following - Do not bring harm to any faunal species during the construction period. - Any faunal species found on site to have limited mobility must be reported to the appointed ECO and handles with appropriate due diligence.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Very low negative		Very low negative	
Duration	Short term	Impact will last between 1 and 2 years	Short term	Impact will last between 1 and 2 years
Extent	Very limited	Extending only as far as the development site area	Very limited	Extending only as far as the development site area
Intensity	Negligible	Natural and/ or social functions and/ or processes are negligibly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	N/A	-	N/A	-
Resource irreplaceability	Negligible	No loss of resources	Negligible	No loss of resources
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	There is a low faunal species sensitivity related to the proposed development area, and therefore no cumulative impact is expected.			
Cumulative impacts	The impact would result in negligible cumulative effects.			

Project Phase	**Operational**
Impact	**Stormwater runoff and erosion**

Description of impact	Increase in the amount of stormwater runoff because of an increase in hardened surfaces including: roofs, roads, and pavement associated with the proposed developments. An increase in stormwater runoff will increase the likelihood of erosion around the proposed developments.			
Potential for mitigation	High	Mitigation measures are highly probable to be effective and can significantly reduce or eliminate the identified impact.		
Potential mitigation	• Rainwater harvesting tanks must be installed on the western side of the developments and stormwater runoff from the roof must be directed to the tanks. • Rainwater harvesting tanks must be interconnected with the plumbing of the developments to reduce the likelihood of the tanks overflowing (can be limited to the bathrooms only). • Use of permeable paving must be implemented in all new paving to encourage infiltration into the soil. • Maintain present vegetation cover including rehabilitate areas around all development areas within the 36 m buffer. • No landscaping or establishment of a new lawn may occur around any of the development areas within the 36 m buffer only indigenous vegetation may be planted. • Maintain the 36 m buffer area. • Control of alien invasive plant species must be carried out within buffer areas to encourage recolonisation by indigenous vegetation and improve the structural integrity of the buffer. • Only use the existing access road for access to the developments. • Only use the existing road to access the beach. • Control of alien invasive plant species must be carried out within buffer areas to encourage recolonisation by indigenous vegetation and improve the structural integrity of the buffer.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low Negative	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Permanent	Impact may be permanent, or in excess of 20 years
Extent	Very limited	Extending only as far as the development site area	Very limited	Extending only as far as the development site area
Intensity	High	Natural and/ or social functions and/ or processes are significantly altered	Low	Natural and/or social functions and/or processes are slightly altered
Probability	Definite	There are sound scientific reasons to expect that the impact will occur	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	the impact is reversible but more intense	Completely reversible	the impact can be reversed with the

		mitigation measures are required		implementation of minor mitigation measures.
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Medium - negative (-)**		**Negligible – negative (-)**	
Comment on significance	The significance of the impact with mitigation is reduced to Negligible, implying that the impact has a possibility to be present but with good management of mitigation measures is unlike to be present.			
Cumulative impacts	With mitigation the impact would result in negligible to no cumulative effect			

Project Phase	**Operation**			
Impact	**Visual / Sense of place**			
Description of impact	Visual impacts of structures / aesthetic consequences due to incorrect or excessive lighting, especially outdoor lighting			
Potential for mitigation	Medium	There is a moderate probability that mitigation measures can be effectively implemented to reduce or manage the identified impact		
Potential mitigation	• Install downward-facing, shielded lighting to focus light only where it's needed, minimizing light spill into surrounding natural areas and reducing its impact on wildlife. • Use low-intensity or dimmable lights in outdoor areas to reduce the brightness and glare that could affect both the visual environment and nocturnal animals. • Implement motion sensors to ensure lights are only on when necessary, reducing unnecessary lighting and limiting nighttime disturbance to the natural setting. • Implement materials and colours that blend with the natural landscape, minimising the visual impact of the development on the surrounding environment. • Maintain or plant indigenous vegetation around the development to act as a natural barrier, softening the visual impact of the structures and mitigating light exposure beyond the immediate area. • Municipal by-laws need to be adhered to.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Very high	Natural and/ or social functions and/ or processes are severely altered	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Extending only as far as the development site area
Intensity	Medium	Natural and/or social functions and/or processes are notably altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered

Probability	Probable	It is most likely that the impact will occur	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	Partly reversible	The impact is reversible but more intense mitigation measures are required	Completely reversible	The impact can be reversed with the implementation of minor mitigation measures
Resource irreplaceability	Not applicable		Not applicable	
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	Lighting, specifically outdoor lighting is not only aesthetic, but it provides a level of security to property owners. Therefore, outdoor lighting is essential but should be implemented in a way which does not cause negative impacts to neighbours. Open spaces and a wide private road are incorporated into the design to enhance the quality of the neighbourhood.			
Cumulative impacts	Without mitigation the development would not be meeting design guidelines enforced by the municipality. Specifically design guidelines for the local area.			

Project Phase	**Operation**			
Impact	**Eradication of Alien Vegetation**			
Description of impact	Alien plant management can have positive impacts for the property as well as the broader surrounding landscape.			
Potential for mitigation	High	Mitigation exists and will considerably reduce significance of impacts		
Potential mitigation	• All invasive alien plants should be completely cleared from the property, and where a tree or bush cover is desired, replaced with suitable indigenous species. • Rehabilitation of disturbed areas, as well as previously invaded areas, should promote establishment of site-appropriate indigenous species. • A suitable planting list of trees and shrubs must be compiled and incorporated into the landscape planning. • Reduce fire hazard on site.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Positive	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Very high	Natural and/ or social functions and/ or processes are severely altered
Extent	Local	Extending across the site and to nearby settlements	Limited	Limited to the site and its immediate surroundings

Intensity	Very high	Natural and/ or social functions and/ or processes are severely altered	Medium	Natural and/or social functions and/or processes are notably altered
Probability	Certain / Definite	There are sound scientific reasons to expect that the impact will definitely occur	Certain / Definite	There are sound scientific reasons to expect that the impact will definitely occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	High	The affected environmental will be able to recover from the impact	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Not relevant		Not relevant	
Significance	**Low – negative (-)**		**Low – positive (+)**	
Comment on significance	With mitigation the impact is likely to have more beneficial impact on natural biodiversity.			
Cumulative impacts	Without mitigation this impact could result in the spread of alien invasive plants.			

4. NO GO' OR NO DEVELOPMENT SCENARIO

The 'No Go' or no development scenario takes into consideration the impacts associated with the no construction option. It is a prediction of the future state of the affected area in the event of no construction activities taking place and is based on the current and/or anticipated future land use. If no construction were to take place and the status quo would remain the same, and no significant changes to site condition would be expected. The impact of the No-Go scenario is Negligible (Capensis, 2024).

SECTION I – CONSIDERATIONS REGARDING OFFSETS

The DFFE guidelines on offsets, published in Government Gazette 48841 (Notice No. 3569), outline in section 6 when biodiversity offsets are required. It is state that biodiversity offsets need to be considered if the proposed listed or specified activities are likely to have residual negative impacts on biodiversity of medium or high significance. This requirement is visually demonstrated by the mitigation hierarchy in the WCBSP (2017) (Figure 31).

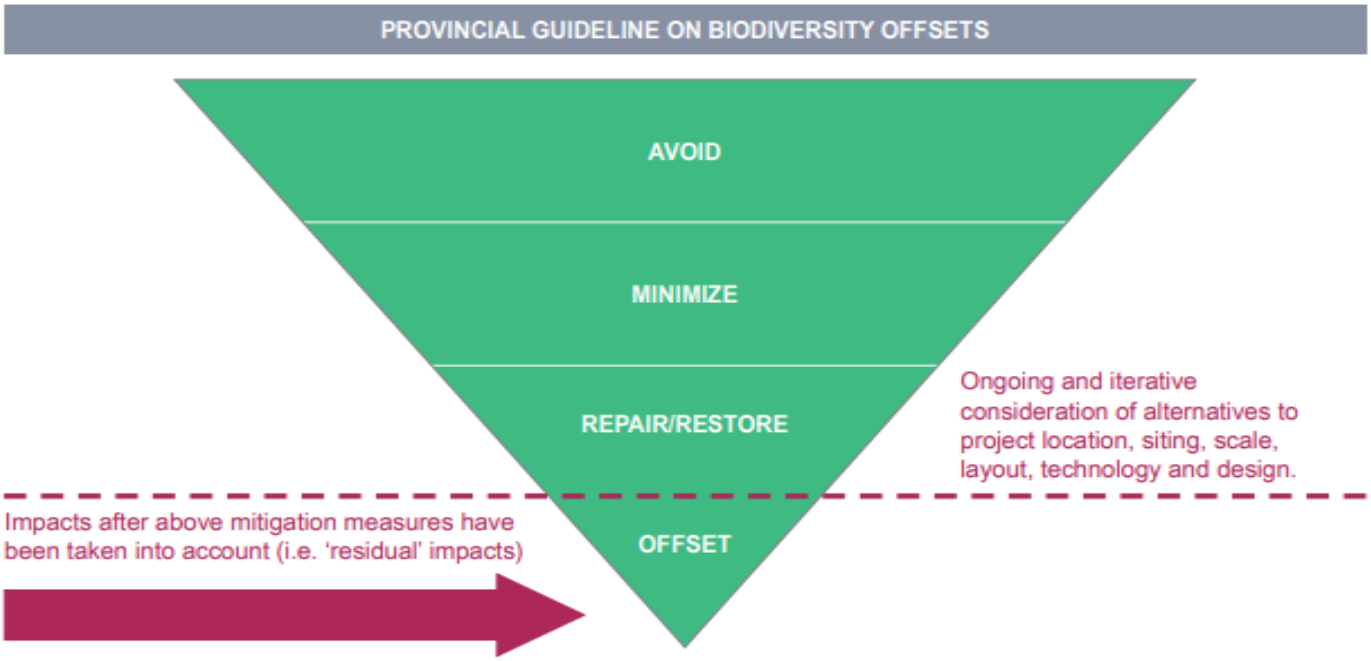

Figure 31: The mitigation hierarchy (WCBSP, 2017)

The proposed development includes the construction of several infrastructures—manager's accommodation units s, a conference centre with tourist facilities, garages, and an entertainment facility. Biodiversity specialists (Capensis, 2024) evaluated the potential impacts of the development activities and determined that the impact on biodiversity would be low (negative) prior to any mitigation measures. To maintain this low impact, the specialists have provided recommendations

for implementing environmental best practices, ensuring the development proceeds in a way that minimizes harm to the surrounding natural environment.

Therefore, no biodiversity offsets are required.

SECTION J – DETAILS OF THE PUBLIC PARTICIPATION PROCESS

Section 41 in Chapter 6 of regulation 982 details the public participation process that needs to be adhered to as part of an environmental process. Compliance of the Public Participation Process as per the Legislated Requirements will be confirmed during the Final Basic Assessment Report in the table below:

The Public Participation Process (PPP) for this application has been undertaken in accordance with Chapter 6 of the Environmental Impact Assessment Regulations, 2014 (as amended), and in particular Regulation 41. The PPP is being undertaken in two rounds: a pre-application Round 1 PPP, which has been completed, and an application-phase Round 2 PPP, which accompanies this Draft Basic Assessment Report.

1. ROUND 1 - PRE-APPLICATION PUBLIC PARTICIPATION PROCESS

The Round 1 PPP ran for a 30-day commenting period from **24 October 2024 to 25 November 2024**, accompanying the Pre-Application Basic Assessment Report (Document Reference 2024.17.06) and its supporting appendices. The purpose of the Round 1 PPP was to identify interested and affected parties, to provide them with reasonable opportunity to comment on the proposed development, and to allow their input to inform the Draft Basic Assessment Report submitted for the application phase.

Notification methods. The following notification methods were used during Round 1, consistent with Regulation 41(2):

- A site notice complying with Regulation 41(4) (minimum 60 cm × 42 cm) was fixed at a location conspicuous to and accessible by the public on the boundary of Portion 59 of Farm 216.
- Written notice was given to (i) the owners, persons in control, and occupiers of land adjacent to the site, (ii) the relevant ward councillor of the Knysna Municipality, (iii) the Knysna

Municipality, (iv) the organs of state listed in Table 2 below, and (v) other parties identified during stakeholder mapping.
- An advertisement was placed in the **Knysna Plett Herald** (a free local newspaper) on **22 October 2024**, inviting public comment.
- An alternative-site advertisement under Regulation 41(2)(d) was not required as the proposed activity has no impact extending beyond the boundaries of the Knysna local municipality.

Organs of state and parties notified. Notice was provided to, inter alia: the Department of Forestry, Fisheries and the Environment (DFFE) — Directorate Biodiversity Conservation; DFFE Oceans and Coasts; the Department of Environmental Affairs and Development Planning (DEADP) — Biodiversity and Coastal Management; the South African Civil Aviation Authority (SACAA); the Breede-Olifants Catchment Management Agency (BOCMA); South African National Parks (SANParks); CapeNature; Heritage Western Cape (HWC); the Knysna Municipality; the Western Heads Goukamma Conservancy (WHGC); and identified neighbouring landowners and members of the public.

2. COMMENTS RECEIVED DURING ROUND 1

Written comments were received from the following parties during the Round 1 commenting period (24 October 2024 – 25 November 2024). A short summary of each commenter's principal points is provided below. The full text of all comments received, together with the Environmental Assessment Practitioner's response to each comment, is contained in the Comments and Response Report (Document Reference 2025.17.09) attached as Appendix [X] to this Draft Basic Assessment Report.

State Departments

- **DFFE — Directorate: Biodiversity Conservation** (Portia Makitla / Nompumelelo Lekalakala, 23 November 2024). Confirmed that the property is mostly Goukamma Dune Thicket (Least Concern) and Non-terrestrial (Estuarine Functional Zone). Noted that the entire development falls within the Coastal Management Protection Zone and directed referral to DFFE Oceans and Coasts. Required: NEM:ICMA-aligned mitigation, NFA permits prior to clearing, SCC demarcation under ECO oversight, no-go area treatment for wetlands and riparian areas, an Erosion / Maintenance / Rehabilitation Plan in the EMPr, a Stormwater Management Plan, vehicle servicing and refuelling controls, and on-site spill response capability.
- **DEADP — Biodiversity and Coastal Management** (Mercia Liddle, 15 November 2024). Registered the sub-Directorate Coastal Management as an I&AP and reserved comment for the application-phase Draft BAR.

Organs of State

- **SACAA — Aviation Environmental Compliance** (Nrateng Mashiloane, 31 October 2024). No comment; advised of the obstacle assessment requirement should any structures be deemed too tall (not applicable to this proposal).
- **Breede-Olifants Catchment Management Agency** (SI Ndlovu, 22 November 2024). No objection. Confirmed that no watercourses are affected and that an estuary is not a watercourse for the purposes of section 21(c) and (i) of the National Water Act. Noted requirements applicable to municipal service agreements, abstraction from water resources, rainwater harvesting, and any future application for a Water Use Authorisation.

- **SANParks** (Dr Vanessa Weyer, 10 December 2024). Provided a detailed multi-point comment letter. Principal matters: regularisation of the Private Nature Reserve under NEM:PAA; clarification of the Management Authority; the Invasive Species Control Plan; SCFPA registration and veld and forest fire compliance; KPE Section 8 DCA authorisation for the 50 m strip; NEM:ICMA Section 15, 62 and 63 considerations within the Coastal Protection Zone; the requirement for a detailed Stormwater Management Plan (incorporating SUDs); a Sewage Management Plan covering existing and proposed infrastructure; a Coastal Erosion / Shoreline Stability Assessment; reconsideration of the Manager's Accommodation Units position relative to the EFZ and CML; a Climate Change Response; protected tree permitting under the NFA; clarification of "actual disturbance areas" rather than building footprint only; and a request that the SANParks comment letter be reproduced in the body of all subsequent BAR stages. SANParks indicated that, on the information then available, it did not support the proposed development in its current form. The SANParks letter has been considered in full in the preparation of this Draft Basic Assessment Report.
- **CapeNature** (Megan Simons, 4 December 2024). Required an Alien Control Plan; raised concerns regarding steep slopes, climate-event risk, post-2017-fire habitat rehabilitation, the protection of Selago villicaulis individuals, the 36 m aquatic buffer, sewer-infrastructure impact assessment, the Strategic Water Source Area, ongoing invasive alien plant control through the EMPr, the adequacy of single-site-visit faunal sampling for SCC determination, and the assessment of indirect and cumulative impacts on surrounding Protected Areas and CBAs.

Municipality

- **Knysna Municipality — Town Planning** (Kate Southey, 7 November 2024). Requested that all relevant design and layout considerations be reflected in the SDP, and flagged the town planning restrictions applicable to properties along the lagoon. A subsequent internal project review on 18 March 2025 confirmed that the existing zoning ("Open Space Zone IV") and associated consent use provisions for tourist facilities provide for the proposed development, and that no rezoning application is being pursued.

Non-Governmental Organisations

- **Western Heads Goukamma Conservancy (WHGC)** (Johan Labuschagne, Chairman, 25 November 2024). Provided detailed comments on the faunal specialist qualifications and survey methodology; the management of invasive alien plants on the property; the calculation of the full development and disturbance footprint (estimated by the WHGC at >17,000 m² using the Knysna Public Viewer); the description and visitor capacity of the proposed structures; the absence of detail on sewage management; the requirement for stormwater mitigation; the regulatory requirement for SANParks consultation under the KPE Regulations; the requirement for an NHRA Section 38 Notice of Intent to Develop; architectural matters relating to the SDP, building plans, the Conference Centre and Tourist Facility, the Entertainment Facility, parking, and the Table 8 disturbance area schedule; the Knysna Outdoor Advertising, Heritage and Building Aesthetics approval requirement for plans; the completeness of the SDP regarding sewage works, effluent discharge and wastewater infrastructure; and the verification and validation of the Featherbed PNR under NEM:PAA.

Public

- **Mr John Macey** (19 November 2024). Raised traffic concerns relating to the Western Heads brick-paved road, including pavement degradation, pedestrian safety, and the equitable allocation of road maintenance costs between landowners and commercial operators.

3. HOW THE COMMENTS RECEIVED HAVE BEEN ADDRESSED

Every comment received during Round 1 has been recorded in the Comments and Response Report (Document Reference 2025.17.09), together with the Environmental Assessment Practitioner's response. The Comments and Response Report identifies, for each commitment made by the EAP, the document and section in which the commitment has been discharged. A consolidated Commitment Closeout Register (Document Reference 2026.17.15) is appended to this Draft Basic Assessment Report as the audit trail. Where commitments are appropriately discharged as conditions of Environmental Authorisation rather than as pre-submission deliverables, this is identified in the closeout register and reflected in the EAP's recommended conditions in Section K.

4. ROUND 2 — APPLICATION-PHASE PUBLIC PARTICIPATION PROCESS

A second 30-day commenting period is being undertaken concurrently with the release of this Draft Basic Assessment Report, in accordance with Regulation 19(1)(b) read with Regulation 41(5). The Round 2 PPP retains the I&AP register established during Round 1, expanded to include parties identified during Round 1 comment review (notably the DFFE Oceans and Coasts Directorate, the DEADP Coastal Management sub-Directorate, and Heritage Western Cape). Notification of registered I&APs of the availability of this Draft Basic Assessment Report, the updated EMPr and supporting specialist reports will be given in writing, together with information on how comments may be lodged. All Round 2 comments and the EAP's responses will be incorporated into the Final Basic Assessment Report submitted to the competent authority for decision.

Regulation with regard to conducting a Public Participation Process	**Description to adherence of the Legislated Requirements**
1) If the proponent is not the owner or person in control of the land on which the activity is to be undertaken, the proponent must, before applying for environmental authorisation in respect of such an activity, obtain written consent of the landowner or person in control of the land to undertake such activity on that land	TBC
2) The person conducting a public participation process must take into account any relevant guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties on an application or proposed application which is subjected to public participation by -	
(a) Fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of –	TBC

(i) The site where the activity to which the application or proposed application relates or is to be undertaken; (ii) Any alternative site	
(b) Giving written notice, in any of the manners provided for in section 47D of the Act, to – (i) The occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site where the activity is to be undertaken and to any alternative site where the activity is to be undertaken. (ii) Owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken and any alternative site where the activity is to be undertaken. (iii) The municipal councillors of the ward in which the site and alternative site is situated and any organisation of ratepayers that the represent the community. (iv) The Municipality which has jurisdiction in the area (v) Any organ of state having jurisdiction in respect of any activity; and (vi) Any other party as required by the competent authority	TBC
(c) Placing an advertisement in – (i) One Local Newspaper; or (ii) Any official Gazette that is published specifically for the purpose of providing public notices of applications or other submissions made in terms of these Regulations;	TBC

(d) Placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond its boundaries of the metropolitan or district municipality in which it is or will be undertaken: Provided that this paragraph need not to be complied with if an advertisement has been placed in an official gazette referred to in paragraph (c)(ii); and	TBC
(e) Using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to – (i) Illiteracy (ii) Disability; or (iii) Any other disadvantages	TBC
3) A notice, notice board or advertisement referred to in sub regulation (2) must – (a) Give details of the application or proposed application which is subjected to public participation ; and (b) State – (i) Whether basic assessment or S&EIR procedures are being applied to the application; (ii) The nature and location of the activity to which the application relates; (iii) Where further information on the application or proposed application can be obtained; and (iv) The manner in which and the person to whom representations in respect of the application or proposed application may be made.	TBC
4) A notice board referred to in sub regulation (2) must – (a) Be of a size of at least 60cm by 42cm; and (b) Display the required information in lettering and in a format as may	TBC

be determined by the competent authority	
5) Where public participation is conducted in terms of this regulation for an application or proposed application, sub regulation (2)(a), (b), (c) and (d) need not be complied with again during the additional public participation process contemplated in regulations 19(1)(b) or 23(1)(b) or the public participation process contemplated in regulations 21(2)(d), on condition that – (a) Such a process has been preceded by a public participation process which included compliance with sub regulation (2)(a), (b), (c) and (d); and (b) Written notices is given to registered I&AP's regarding where the – (i) Revised basic assessment report or , EMPr or closure plan, as contemplated in regulation 19(1)(b); (ii) Revised environmental impact assessment report or EMPr as contemplated in regulation 23(1)(b); or (iii) Environmental impact assessment report and EMPr as contemplated in regulation 21(2)(d); (iv) May be obtained, the manner in which and the person to whom representations on these reports or plans may be made and the date on which such representations are due.	TBC
6) When complying with this regulation, the person conducting the public participation process must ensure that – (a) Information containing all relevant facts in respect of the application or proposed application is made available to potential interested and affected parties; and	TBC

(b) Participation by potential or registered interested and affected parties is facilitated in such a manner that all registered interested and affected parties are provided with a reasonable opportunity to comment on the application or proposed application.	
7) Where an environmental authorisation is required in terms of these Regulations and an authorisation, permit or licence is required in terms of a specific environmental management Act, the public participation processes contemplated in this Chapter may be combined with any public participation processes prescribed in terms of a specific environmental management Act, on condition that all relevant authorities agree to such a combination of processes.	TBC

SECTION K – CONCLUSION AND RECOMMENDATIONS

This report constitutes the Draft Application Basic Impact Assessment of the proposed development for construction of manager's accommodation units s, conference centre and tourist facilities, garages, and an entertainment facility on Portion 59 of Farm 216 (within the Featherbed Private Nature Reserve). It aligns with the National Environmental Management Act (NEMA) (Act No. 107 of 1998), and associated regulations. The following activities as per the National Environmental Management Act (Act No. 107 of 1998), Regulations Listing Notice 1 (Government Notice No. 327) and Listing Notice 3 (Government Notice No. 324) require environmental authorisation from the Department of Forestry, Fisheries, and the Environment (DFFE) prior to commencement.

- Listing Notice 1; Activity 17
- Listing Notice 1; Activity 19A
- Listing Notice 3; Activity 12

Summary of the receiving environment:

The property consists of highly modified vegetation, with remnants of Dune Thicket—containing elements of fynbos—and patches of forest that were originally present. A single species of conservation concern (SCC), the Vulnerable dune bitterbush (Selago villicaulis), was identified in Area 1 (Figure 7). However, only two individuals were found, leading the specialist to suggest that conservation efforts would be more effective in areas where this species is more abundant. No faunal species of conservation concern were detected on the property. Since the development will take place within the Featherbed Private Nature Reserve, it is essential to follow environmental best practices. The main conservation concern is the property's proximity to the Knysna Estuary,

necessitating adherence to all aquatic specialist recommendations to mitigate potential impacts on this sensitive ecosystem.

Summary of project scope:

Four distinct structures will be developed as part of the proposed project (Figure 32), all collectively referred to as "the proposed development." These structures are outlined in the Basic Assessment as follows:

- Manager's accommodation units s
- Conference Centre and Tourist Facilities
- Garages
- Entertainment Facilities

The majority of the proposed development will take place on areas that have already been disturbed. Consequently, no alternative plan was considered more suitable. This option presents the least environmental impact and does not necessitate changes to the current planning and design.

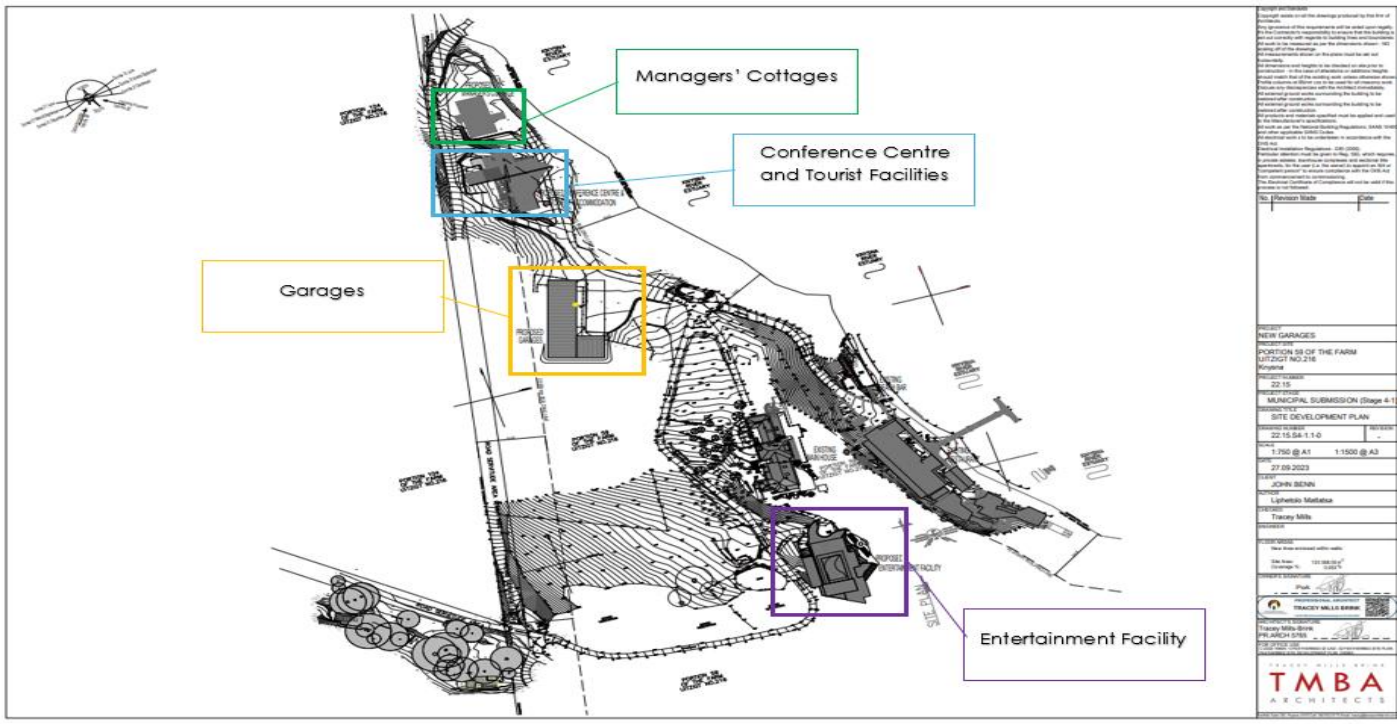

Figure 32: Proposed development (TMBA, 2024)

Impact of proposed development:

The following table (Table 11) will serve as a summary of the impacts of proposed development during the construction phase of the proposed development. It has been determined that no alternative development proposal would have a lesser impact than the current proposal, making this the only identified impacts without the need for comparison to alternatives.

Table 11: Summary of impacts of proposed development associated with alternative A – Construction Phase

Impact	Without Mitigation	With Mitigation
	Significance of Impact	Significance of Impact

Loss of terrestrial biodiversity	**Low – negative (-)**	**Negligible – negative (-)**
Loss of species of conservation concern	**Low – negative (-)**	**Low – negative (-)**
Disturbance of faunal species / habitat	**Low – negative (-)**	**Negligible – negative (-)**
Disturbance / removal of topsoil and subsoil	**Medium - negative (-)**	**Low – negative (-)**
Stormwater runoff and erosion	**Low- negative**	**Negligible – negative (-)**
Waste Pollution	**Low- negative (-)**	**Negligible – negative (-)**
Construction Vehicles Pollution	**Low- negative (-)**	**Negligible – negative (-)**
Noise Pollution	**Low- negative (-)**	**Negligible – negative (-)**
Visual Impact	**Low – negative (-)**	**Negligible – negative (-)**
Employment	**Low – negative (-)**	**Negligible – positive (+)**

The following table (Table 12) will serve as a summary of the impacts of proposed development during the operational phase of the proposed development. It has been determined that no alternative development proposal would have a lesser impact than the current proposal, making this the only identified impacts without the need for comparison to alternatives

Table 12: Summary of impacts of proposed development associated with alternative A – Operational Phase

Impact	**Without Mitigation**	**With Mitigation**
	Significance of Impact	Significance of Impact
Disturbance of terrestrial biodiversity	**Negligible – negative (-)**	**Negligible – negative (-)**
Disturbance of Plant Species	**Negligible – negative (-)**	**Negligible – negative (-)**
Disturbance / loss of faunal habitat	**Low – negative (-)**	**Negligible – negative (-)**
Stormwater runoff and erosion	**Medium - negative (-)**	**Negligible – negative (-)**
Visual Impacts Imposed by Infrastructure	**Low – negative (-)**	**Negligible – negative (-)**
Alien Plant Species Management	**Low – negative (-)**	**Low – positive (+)**

3. RECOMMENDATIONS FROM SPECIALIST INPUT

The DFFE screening tool highlights certain recommended specialist assessments to be done prior to the proposed development. This is based on the considered environmental sensitivities and corelating environmental legislation.

However, careful assessment as elaborated in the Site Sensitivity Verification Report (Appendix E) determined that the following specialist input was required –

- Terrestrial Biodiversity and Plant Species assessment
- Aquatic Biodiversity assessment
- Faunal Species assessment

Summary of Terrestrial Biodiversity and Plant Species Impact mitigations

Mitigation options are generally considered in terms of the following mitigation hierarchy: (1) avoidance, (2) minimization, (3) restoration and (4) offsets. A distinction is also made between essential mitigation (non-negotiable mitigation measures that lower the impact significance) and non-essential mitigation (best practise measures that do not lower the impact significance).

In this instance, no essential mitigation measures are necessary to reduce the impact of the development. However, the following best practise mitigation is proposed.

1. Mark off the areas that are not going to be developed prior to undertaking any works and ensure that no unnecessary loss of adjacent vegetation occurs, especially around the Degraded Forest habitat.
2. Mark off all protected trees, ensure permits are obtained prior to removal. Ensure that these are not disturbed where possible.
3. Sites for building material stocks, vehicles, toilets etc must be clearly marked and restricted to the building footprint, exiting roads or existing disturbed areas

Summary of Aquatic Biodiversity Impact mitigations

Design and Layout Phase:

1. Establish a 3 m setback line from the edge of the cliff for 160 m from the edge of the road in the north till 21.5 m past the corner of the proposed garage (as indicated on the map below Figure 33).

Figure 33: Proposed development in relation to laydown areas and sensitive features.

2. Rehabilitate two areas of lawn within the 3 m setback line with indigenous vegetation of the area by ceasing mowing the lawn and clearing sections for planting (one plant per 1m2).
3. Replace the pavement with permeable paving at the northern section of the road that leads down to the estuary. From the estuary for approximately 42 m towards the south.
4. Install gutters and rainwater harvesting tanks associated with the workshop/store in the northern corner of the property.

Construction Phase:

1. Do not clear vegetation outside the project area of influence.
2. Only use the existing access road for each development. Use the road adjacent to the western property boundary to enter the development sites (Green; Figure 34). Use the most northern road to access laydown areas 1 and 2, and all the development sites until the Farm manager house is completed (Turquoise; Figure 34). Use the road passing by the proposed conference and tourist facility, to the south, to access laydown areas 2 and 3, the proposed entertainment area, as well as to exit the property (Orange; Figure 34). (Note use all roads as one way in the direction of travel, as designated in the map below; Figure 34).
3. All stockpiles must be covered at the end of the day.
4. Install temporary drainage controls such as swales or berms to manage runoff where necessary.
5. All materials used during construction must follow the best practice guidelines set out for each product.
6. The laydown area must be constructed in the proposed areas (Figure 34).
7. Check weather reports ahead and prepare the site when rainfall is predicted. Discontinue any earthworks on the site during rainfall.
8. The 3 m setback line must be demarcated and marked as a no-go area.
9. Install silt fences or sediment barriers around the perimeter of the construction site to trap sediment-laden runoff and prevent it from entering the estuary.

10. Construct check dams or sediment basins for flooded construction areas to be drained into if need be, to trap sediment, and facilitate sediment settlement before runoff reaches the estuary.
11. Implement phased construction to minimise the area of exposed soil at any given time and reduce the potential for erosion (suggested order: farm manager house, conference and tourist facility, garage, entertainment facility).
12. Apply mulch or erosion control mats on exposed slopes and disturbed areas to stabilise soils and reduce erosion rates.

Figure 34: Proposed developments in relation to access roads and Laydown areas

Operational Phase

1. Rainwater harvesting tanks must be installed on the western side of the developments and stormwater runoff from the roof must be directed to the tanks.
2. Rainwater harvesting tanks must be interconnected with the plumbing of the developments to reduce the likelihood of the tanks overflowing (can be limited to the bathrooms only).
3. Use of permeable paving must be implemented in all new paving to encourage infiltration into the soil.
4. Maintain present vegetation cover including rehabilitate areas around all development areas within the 36 m buffer.
5. No landscaping or establishment of a new lawn may occur around any of the development areas within the 36 m buffer only indigenous vegetation may be planted.
6. Maintain the 36 m buffer area.
7. Control of alien invasive plant species must be carried out within buffer areas to encourage recolonisation by indigenous vegetation and improve the structural integrity of the buffer.
8. Only use the existing access road for access to the developments.
9. Only use the existing road to access the beach.
10. Control of alien invasive plant species must be carried out within buffer areas to encourage

Summary of Animal Species Impact mitigations

The specialists have confirmed that the property has low sensitivity and have therefore provided recommendations focused on best practices and mitigation, rather than specific conditions that must be strictly followed.

1. Recommendation made within the Aquatic Specialist Report (F. de Ridder, Confluent Environmental) should be implemented to minimize impacts to any aquatic environments, thereby reducing impacts to associated fauna species.
2. General recommendation and best practice guidelines should be followed for all animal species encountered (regardless of whether they are SCC or not) during any stage of development on a site. These are summarised in the specialist report.

4. RECOMMENDATIONS FROM THE EAP

Based on the information provided and specialist findings it is the opinion of the EAP that no fatal flaws have been identified regarding the proposed development and associated infrastructure. It is the EAP's opinion that the Preferred Alternative can be considered for Environmental Authorisation.

Recommended conditions for inclusion in the Environmental Authorisation, should it be granted:

1. The Environmental Management Programme (Appendix F) and all specialist recommendations must be adhered to.
2. NFA permits must be obtained from DFFE for the removal, trimming or disturbance of any protected trees prior to commencement of site clearing.
3. An independent Environmental Control Officer (ECO) must be appointed at the applicant's cost to monitor compliance with the Environmental Authorisation and EMPr.
4. The Stormwater Management Plan prepared by Hofmeyr & Associates Consulting Engineers (Appendix J, 15 April 2026) must be implemented in full, with monitoring during the construction and operational phases.
5. The Coastal Stability Assessment by Inanda Port and Coastal Engineers (Appendix I, Rev A, 17 October 2025) must inform ongoing shoreline management, including stormwater discharge controls at the top of the embankment.
6. The Alien Invasive Vegetation Species Control Plan (Appendix L, Eco Route Environmental Consultancy, 2025.17.13) must be implemented and reviewed annually.
7. The applicant must engage CapeNature regarding the regularisation of the Featherbed Private Nature Reserve under NEM:PAA, including the conclusion of a validation agreement, the appointment of a Management Authority, the preparation of an approved Management Plan, and the recording of the agreement by notarial deed registered against the title deed. Subsequently this should not hold back the environmental authorisation, it should form part as one of the conditions of authorisation.

8. The applicant must register with the Southern Cape Fire Protection Association (SCFPA) and comply with the National Veld and Forest Fire Act, 1998 (Act 101 of 1998), including required firebreaks, agreements and/or exemptions.

9. SANParks' authorisation under Section 8 of the KPE Regulations (GN 1175 of 2009) must be obtained for any development activity in the KPE Development Control Area (the 50m strip landward of the high-water mark).

10. No coastal stabilisation structures may be constructed without the authorisations required under Section 15 of NEM:ICMA.

11. No water may be derived from any water resource on the property without a Water Use Authorisation under Section 22 of the NWA.

12. Should the proposed borehole supply exceed 1kl/day/ha, or the property fall within 500m of the high-water mark requirement, a Water Use Licence must be applied for as advised by the Breede-Olifants CMA.