
The EAP
Eco Route Environmental Consultancy
PO Box 1252
Sedgefield
6573

Attention: Ms. Samantha Teeluckdhari

Tel: 072 773 5397

E-mail: samantha@ecoroute.co.za

Good day Madam

RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE PRE-APPLICATION BASIC ASSESSMENT PROCESS FOR THE PROPOSED RESIDENTIAL DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF ERF 1180, KEURBOOMSTRAND, PLETTENBERG BAY, WESTERN CAPE

Your request for comment from the Sub-directorate: Coastal Management pertaining to the notice of the pre-application Basic Assessment Report (BAR) for the above-mentioned application received on 17 November 2025, refers.

1. CONTEXT

1.1. The Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("NEM: ICMA") is a Specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"). The NEM: ICMA sets out to manage the nation's coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment. In terms of Section 38 of the NEM: ICMA, the Department of Environmental Affairs and Development Planning ('the Department') is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the "Management of public launch sites in the coastal zone (GN No. 497, 27 June 2014) "Public Launch Site Regulations."

- 1.2. The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme ("PCMP"). The Western Cape Provincial Coastal Management Programme ("WC: PCMP 2022-2027) is a five (5) year strategic document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the Province. This WC: PCMP 2022-2027 was adopted by the Provincial MEC for Local Government, Environmental Affairs and Development Planning on 19 May 2023 and available upon request.
- 1.3. A key priority of the PCMP is the Estuary Management Programme, which is implemented in accordance with the NEM: ICMA and the National Estuarine Management Protocol ("NEMP"). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The Department is in the process of approving a series of Estuarine Management Plans of which over 20 Estuarine Management Plans have already been approved.
- 1.4. The facilitation of public access to the coast is an objective of the NEM: ICMA as well as a Priority in the WC PCMP. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 ("PCASP") and commissioned coastal access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NEM: ICMA. The PCASP as well as the coastal access audits are available upon request.

2 COMMENT

- 2.1. The sub-directorate: Coastal Management ("SD: CM") has reviewed the information as specified above and have the following commentary:
 - 2.1.1. The proposal is to develop two (2) double-storey residential units with a double garage and a shared swimming pool on the eastern portion (referred to as "Erf 1180", previously Erf 155) of Erf 1236. The proposal is to subdivide a portion ($\pm 5000\text{m}^2$) off from Erf 1180, and to rezone this portion from "Open Space Zone 2" to "Open Space Zone 3" for "Nature conservation area" to allow for the two dwelling units and a swimming pool. Approximately 2000m^2 of the $5\ 000\text{m}^2$ subject site is earmarked for development.

- 2.1.2. The BAR does not explain the need for the rezoning to from “Open Space Zone 2” to “Open Space Zone 3” for “Nature Conservation Area” in order to allow for the construction of the dwelling units and swimming pool. The limitations or conditions of each zoning is not specified and as such the merits and implications of the application is unclear.
- 2.1.3. The Keurbooms River Vegetation Sensitivity Analysis study (prepared by Conservation Management Services, dated October 2018, page 3) revealed that the site contains highly sensitive vegetation (disturbed Scrub Forest/former Fynbos and pristine Coastal Scrub Forest) that are threatened vegetation types and the entire area is classified as a Critical Biodiversity Area (Keurbooms Thicket/Forest). The proposed development has high potential to cause irreversible damage to endemic species.
- 2.1.4. Considering the sensitivity of the vegetation, the Vegetation Sensitivity Analysis should be updated as the 2018 information is outdated (i.e. information older than five years old is not reflective of current conditions on the ground).
- 2.1.5. The Visual Impact Assessment (prepared by Rain Bull (Pty) Ltd t/a Filia Visual, dated October 2025, page 112) indicated that the Preferred Alternative is more responsive to visual sensitivity parameters than previous development options, but remains non-compliant (therefore impacts remain high and negative). Revision of alternatives must be considered until direct, indirect and cumulative impacts are negligible.
- 2.1.6. It is noted that , although in close proximity to the sea, the proposed site is elevated and is located inland of the draft Garden Route Coastal Management Line and wave run-up lines as modelled by the Department. However, the SD: CM is concerned that any development of this site will negatively impact the integrity of the slope. Erosion from runoff from inland sources, especially during high rainfall or coastal storm events may be hazardous. The dense vegetation is currently stabilising the slope and removal of any vegetation could exacerbate erosion.
- 2.2. Based on the above, the SD:CM does not support the proposed development on a Portion of Erf 1180, Keurboomstrand in Plettenberg Bay.
3. The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: “...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such

pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment..." together with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.

4. The SD: CM reserves the right to revise its comments and request further information from you based on any information that may be received.

Yours faithfully

leptieshaam Bekko
CONTROL ENVIRONMENTAL OFFICER
DIRECTORATE: BIODIVERSITY AND COASTAL MANAGEMENT
DATE: 19 December 2025