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Comments and Response Report

**PROPOSED DEVELOPMENT OF KINETIC CATAMARANS INDUSTRIAL FACILITY
ON ERF 1339, AS WELL AS DEVELOPMENT / REDEVELOPMENT OF THE SOUTH
AFRICAN SEA CADET CORPS INFRASTRUCTURE ON ERF 1316, KNYSNA,
WESTERN CAPE**



PREPARED FOR:	Kinetic Catamarans (Leon Scheepers and Rob Hayward)
PREPARED BY:	Eco Route Environmental Practitioners Jessica Christie (EAPASA Reg: 2019/1855); assisted by Justin Britton (Can. EAPASA 2023/6648)
DOCUMENT REFERENCE:	2026.26.15 – Application FINAL Comments and Response Report
DFFE REF NO:	14/12/16/3/3/1/3305
DATE:	August 2026
SUBMITTED TO:	Leon Scheepers Rob Hayward

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STATEMENT OF INDEPENDENCE

I, **Jessica Christie** 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: 2019/1855**) 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: _____

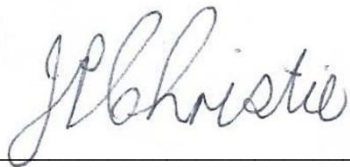


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1. INTRODUCTION

Eco Route Environmental Consultancy has been appointed by the applicant, Kinetic Catamarans (Leon Scheepers and Rob Hayward) to ensure compliance with the regulations contained in the National Environmental Management Act (NEMA, No. 107 of 1998, as amended) and the Environmental Impact Assessment Regulations, 2014 (as amended) for the proposed activities on Erven 1339 and 1316, Knysna, Western Cape.

This report serves as the Comments and Response Report accompanying the Final Basic Assessment Report (FBAR), submitted to the competent authority in support of the application for Environmental Authorisation.

It outlines the public participation conducted during both the pre-application and application phases of this Basic Assessment process.

Take note:

- The Draft BAR and associated appendices were available for a 30-day commenting period during the pre-application phase (06 November 2025 – 06 December 2025).
- The Draft BAR was made available again for a further 30-day commenting period during the application phase (28 May 2026 – 29 June 2026).
- All comments received during both periods are included in this report.

2. REQUIREMENTS OF THE PUBLIC PARTICIPATION PROCESS (PPP) IN ACCORDANCE WITH THE ACT

Section 41 of the Environmental Impact Assessment Regulations, 2014 (as amended) specifies that a person conducting a public participation process must comply with the following minimum requirements (Table 1):

Table 1: Specification of Public Participation that must be adhered to (Environmental Impact Assessment Regulations, 2014 (as amended))

Regulation Specifications	Description to adherence
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	The proponent (applicant) is the landowner and therefore consent is not required.
2) <i>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 -</i>	

(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 – (i) The site where the activity to which the application or proposed application relates or is to be undertaken; (ii) Any alternative site	(i) A site notice was placed on site. (ii) There is no 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 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	(i) The applicant is the owner of the site and is in control of the site. The site is vacant and there is only one site. (ii) The owners of the land adjacent to the site have been notified. (iii) The ward counsellor was notified. (iv) Knysna Municipality has been notified. (v) Please refer to Table 2 showing a list of organs of state notified. (vi) Please refer to Table 2 showing a list of all organisations, NGO's and public notified.
(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;	(i) Knysna Plett Herald Newspaper a local free newspaper was advertised in.

(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	(d) This is not applicable to this proposed activity as there is no impact (i.e air emissions) that extends beyond the boundaries of the district municipality.
(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	N/A at this stage. But if required will comply.
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.	The notice board was compliant with this requirement.
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 be determined by the competent authority	The notice board was compliant with this requirement.
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	This is the pre-application phase, an additional 30-day PPP will be undertaken to include all revisions for the Draft BAR.

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.	
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 (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.	These requirements have been complied with.
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	No other permit or licenses are required at this stage.

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.

3. PUBLIC PARTICIPATION PROCESS (PPP)

This report earmarks the Public Participation Process with comments received and response thereto regarding the Pre-Application Public Participation Process (PPP) according to the National Environmental Management Act (Act 107 of 1998) (NEMA).

The 30-day Pre-Application Public Participation Process commenced on 06 November 2025 – 06 December 2025.

A further 30-day Application-Phase Public Participation Process was subsequently undertaken on the Draft Basic Assessment Report, commencing on 28 May 2026 and closing on 29 June 2026. Written notification was sent by email on 28 May 2026 to all registered Interested and Affected Parties, Organs of State, and the competent authority, providing a link to the Draft Basic Assessment Report and associated appendices and confirming the 30-day comment period. The Department of Forestry, Fisheries and the Environment acknowledged receipt of the Basic Assessment Application under NEAS Number DEA/EIA/0003393/2026. Evidence of this notification is provided below.

 forestry, fisheries & the environment Department: Forestry, Fisheries and the Environment		NEAS	
NEAS Number:	DEA/EIA/0003393/2026		
Competent Authority :	DEA		
Provincial Reference Number :	14/12/16/3/3/1/3305		
Application Process :	Basic Assessment Application		
ProjectTitle :	PROPOSED DEVELOPMENT OF KINETIC CATAMARANS INDUSTRIAL FACILITY ON ERF 1339, AS WELL AS DEVELOPMENT / REDEVELOPMENT OF THE SOUTH AFRICAN SEA CADET CORPS INFRASTRUCTURE ON ERF 1316, KNYSNA, WESTERN CAPE		
Current Capturer:	Janet Ebersohn		
Current Case Officer:	Ephron Maradwa		
Current Stage :	Acknowledgement of Basic Assessment Report		
Overall Status :	Department to Respond		
Date Summary : 26/05/2026 (Received the Basic Assessment Application Form) 27/05/2026 (Waiting For Additional Report) 27/05/2026 (Received the Basic Assessment Application Form) 27/05/2026 (Acknowledgement of Basic Assessment Report)			

Figure: DFFE NEAS acknowledgement of the Basic Assessment Application (NEAS No. DEA/EIA/0003393/2026)

- Site signs were erected in proximity to the proposed development area.



- According to the Regulations, the following written Notices have been provided.
 - The landowner is the applicant and as such does not need to be notified.
 - Authorities are automatically entered as Registered I&APs (unless they indicate otherwise).
 - The local authority and ward councillor have been notified.

ENVIRONMENTAL ASSESSMENT PROCESS

Notification of Public Participation:

PROPOSED DEVELOPMENT OF KINETIC CATAMARANS INDUSTRIAL FACILITY ON ERF 1339, AS WELL AS DEVELOPMENT / REDEVELOPMENT OF THE SOUTH AFRICAN SEA CADET CORPS INFRASTRUCTURE ON ERF 1316, KNYSNA, WESTERN CAPE.

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998), the National Environmental Management Act: Environmental Impact Assessment Regulations 2014, as amended, of a 30-day Public Participation Process to be undertaken under the authority of the Department of Forestry, Fisheries, and the Environment (DFFE). The Public Participation Process will run from **06 November 2025 – 06 December 2025**

DFFE Reference Number: TBC

Location: ERF 1339 and ERF 1316, KNYSNA, WESTERN CAPE.



The following EIA Listed Activities are applicable:

Government Notice No. R327 (Listing Notice 1): Listed Activity 19A

A Pre-Application Basic Assessment Report and relevant appendices will be made available to all registered Interested and Affected Parties (I&APs) for public review and comment. All relevant documents may be accessed via our website during the public participation period. Should you wish to gain further information regarding the project or wish to register as an Interested and Affected Party please contact the Environmental Assessment Practitioner (details below).

Please provide written comments with your name, contact details and an indication of any direct business, financial, personal, or other interest which you may have in the development. Please note that information submitted by I&AP's becomes public information. In terms of the Protection of Personal Information Act 4 of 2013 (POPIA), no personal information will be made available to the public.

Environmental Assessment Practitioner: Jessica Christie [EAPASA Reg 2019/1855]

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Cell: 076 514 2701



Eco Route
Environmental Consultancy

- Other persons and organizations were informed of the need to register as I&APs in order to be entered onto the I&AP database and to continue to receive information pertaining to this application, via an advert in the Knysna-Plett Herald.

Table 2 serves as a register for all I&APs that have been included during the public participation process. It should be noted that not all I&APs have provided input and will therefore be assumed that there is no objection.

Table 2: Interested and Affected Parties contact list

State Departments			
Name	Contact Person	Contact Details	Email
Department of Environmental Affairs and Development Planning (DEA & DP)	Danie Swanepoel	Private Bag x6509, George, 6530 044 814 2013 (T)	Danie.Swanepoel@westerncape.gov.za
DFFE Directorate: Biodiversity & Conservation	Mr Seoka Lekota	Environmental House 473 Steve Biko, Arcadia Pretoria 0083	BCAdmin@environment.gov.za
DFFE Protected Areas, Planning and Management Effectiveness	Mr Thivhulawi Nethononda	Environmental House 473 Steve Biko, Arcadia Pretoria 0083	Tnethononda@dfpe.gov.za
Department of Health	Nathan Jacobs	Private Bag x6592, George, 6530 044-803 2727	Nathan.Jacobs@westerncape.gov.za
Heritage Western Cape	Noluvo Toto Stephanie Barnardt	Private Bag x9067, Cape Town, 8000 021-483 9729 (T)	Noluvo.Toto@westerncape.gov.za Stephanie.barnardt@westerncape.gov.za
Transport & Public Works / Department of Infrastructure	Vanessa Stoffels	24 th Floor, 9 Lower Burg Street, Cape Town 021 483 4669 (T)	Vanessa.Stoffels@westerncape.gov.za
Dept of Agriculture	Cor van der Walt Brandon Layman	Private Bag x1,	Cor.VanderWalt@westerncape.gov.za Brandon.Layman@westerncape.gov.za

Land Use Management		Elsenburg, 7601 021 808 5099 (T)	
Department of Water & Sanitation	John Roberts	Private Bag x16, Sanlamhof, 7532 021 941 6179 (T)	RobertsJ@dwa.gov.za
DFFE: Forestry Management	Melanie Koen	Private Bag x12, Knysna, 6570 044 302 6902 (T)	MKoen@dfpe.gov.za rmol
DFFE: Oceans and Coast	Rueben Molale		RMolale@dfpe.gov.za OCeia@environment.gov.za OCEIA@dfpe.gov.za
Coastal Management Unit, DEA&DP	leptieshaam Bekko Mercia J Liddle Hilda Hayward Ryan Apolles	Private Bag x9086, Cape Town. 8000 021 483 3370 (T) 078 744 9205 (Cell) leptieshaam Bekko)	leptieshaam.Bekko@westerncape.gov.za Mercia.Liddle@westerncape.gov.za Hilda.Hayward@westerncape.gov.za Ryan.Apolles@westerncape.gov.za

Organs of State

Breede-Olifants Catchment Management Agency	Andiswa Sam R Mphahlele SI Ndlovu	PO Box 1205, George, 6530 023 346 8000 (T) 023 347 2012 (F)	asam@bocma.co.za rmphahlele@bocma.co.za sndlovu@bocma.co.za
Cape Nature Land Use Advice	Megan Simons Colin Fordham	Private Bag x6546, George, 6530 044 802 5328 (T)	msimons@capenature.co.za cfordham@capenature.co.za
Southern Cape Fire Protection Agency	Dirk Smit	Private Bag x12, Knysna, 6570 044 302 6912 (T)	managerfpa@gmail.com
SANPARKS	Dr. Vanessa Weyer	PO Box 3542, Knysna, 6570 044 302 5600 (T)	Vanessa.Weyer@sanparks.org
SANRAL	Nicole Abrahams Rene de Kock	Private Bag x19, Bellville, 7530	AbrahamsN@nra.co.za Dekockr@nra.co.za

		021 957 4602 (T)	
South African Civil Aviation Authority	Canny Mosebjadi Mothapo	083 461 6292	environment@caa.co.za
Municipalities			
Knysna Municipality – Environmental Management	Pamela Booth Kate Southey	P.O. Box 21, Knysna, 6570	pbooth@knysna.gov.za katesouthey@gmail.com
Ward 10 Councillor Knysna Municipality	Peter Bester	P.O. Box 21, Knysna, 6570	pbester@knysna.gov.za
Knysna Municipality – Town Planning	Hennie Smit	PO Box 21, Knysna, 6530	hsmit@knysna.gov.za
Garden Route District Municipality	Dr. Nina Viljoen	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	nina@gardenroute.gov.za
Garden Route District Municipality	Mr. Lusanda Menze	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	info@gardenroute.gov.za
NGO			
Larenhill Country Estate	John Huxter	Welbedacht Laan, Welbedacht, Knysna 6571	larenhillcommittee@gmail.com
Surrounding Landowners			
Erf 19639	SA National Roads Agency	C/O Sanral Property P/Bag x928 Pretoria 0001	Penelope.Hlengwa@propwatchjv.co.za
Erf 19640	SA National Roads Agency	C/O Sanral Property P/Bag x928 Pretoria 0001	Penelope.Hlengwa@propwatchjv.co.za

Erf 19641	SA National Roads Agency	C/O Sanral Property P/Bag x928 Pretoria 0001	Penelope.Hlengwa@propwatchjv.co.za
RE/12949	SA National Roads Agency	C/O Sanral Property P/Bag x928 Pretoria 0001	Penelope.Hlengwa@propwatchjv.co.za
Erf 2925	Le Roux – Van Niekerk Family Trust / Piet van Niekerk		Plervn7@gmail.com
Erf 2923	Roodman Carolina Maria	071 881 8810	
Erf 7594	Autumn Storm Pty Ltd / Piet van Nlekerk		Plervn7@gmail.com
Erf 7595 (Eastford Street)	Isherwood Chrisopher		Chris.isherwood@gmail.com
RE/4706	SA National Roads Agency	C/O Sanral Property P/Bag x928 Pretoria 0001	Penelope.Hlengwa@propwatchjv.co.za
RE/4012 (Eastford Street)	CRABS CREEK PTY LTD	John Sayers	meyrick@global.co.za sayers.tessa@gmail.com

4. COMMENTS RECEIVED IN RESPONSE TO PRE-APPLICATION DRAFT BAR: 06 November 2025 – 06 December 2025

The following table contains all comments received during the Pre-Application Public Participation Process.

COMMENTS	RESPONSE
COMMENTS RECEIVED IN RESPONSE TO PRE-APPLICATION DRAFT BAR: 06 November 2025 – 06 December 2025	
STATE DEPARTMENTS	
Forestry, Fisheries & The Environment (DFFE) – Directorate: Biodiversity Conservation – Sibusiso Mbethe (08 December 2025)	
The Department of Forestry, Fisheries, and the Environment (DFFE); Branch Oceans & Coasts (O&C) appreciates the opportunity granted to provide comments and recommendations on the Pre-application Basic Assessment Report for proposed development of the kinetic catamarans industrial facility on Erf 1339, as well as development/ redevelopment of the South African Sea Cadet Corps Infrastructure on Erf 1316, Knysna, Western Cape. This Branch will provide comments based on the provisions of the National Environmental Management Act 107 of 1998 ("NEMA") and the National Environmental Management: Integrated Coastal Management Act 24 of 2008 ("ICM Act").	
The Branch O&C has the mandate to ensure the holistic management of the coast, estuarine areas and maintenance of the seascapes to realise the development and use of natural resources are sustainable. The Branch further ensures that the ecological integrity, natural character, and economic, social, and aesthetic value of the coastal zone are maintained to protect people, properties, and economic activities against the impacts of dynamic coastal processes.	
Based on the submitted Pre-application, the Branch O&C would like to submit the following comments for your consideration:	
1. DFFE acknowledges that in its mandate to implement integrated coastal management in the Republic of South Africa, it is also paramount important to ensure that constitutional commitments in improving quality of life of all citizens while protecting the natural environment for the benefit of present and future generations balanced and sustainable. Development cannot subsist upon a deteriorating environmental base therefore promotion of development requires protection of the environment.	The comment is noted and acknowledged. This general policy statement has been recorded in the comments register and will be considered as part of the overall environmental assessment process.
2. The main environmental feature that DFFE: Oceans and Coast branch is paying more attention to is the estuary.	The comment is noted and acknowledged. This general policy statement has been recorded in the comments register and will

There is a Directorate that specifically deals with the estuary and in the next round of the public participation, this Directorate will provide more comments.	be considered as part of the overall environmental assessment process.
3. The potential impacts of the development to the estuary are more identified in the Aquatic Assessment specialist report therefore the mitigation measures identified are conceded.	The Aquatic Biodiversity Specialist Assessment adequately identifies potential impacts on the Knysna Estuary, and the mitigation measures recommended therein have been incorporated into the Environmental Management Programme (EMPr) for implementation during construction and operation.
4. The overlaying of Coastal Climate Change Vulnerability (CoVu) Assessment dataset depicts the proposed site to be exposed to the Estuary Flood Risk. It emerged on the discussion during site visit on the 4th December 2025 that there is no historical context in which the area was flooded. DFFE has no objection to such feedback, but the project proponent must be aware of these risks as presented by the current dataset in the Coastal Viewer. Coastal Viewer is accessible through the https://ocims.environment.gov.za/Coastal%20Viewer/.	The Coastal Climate Change Vulnerability (CoVu) dataset and associated estuarine flood risk information available on the Coastal Viewer are recognised. While no historical flooding of the site has been recorded, these datasets have been considered in the planning and design of the proposed development, and potential flood-related risks will be managed through appropriate design measures and operational controls as reflected in the EMPr.
5. During the site visit, sewer overflow on the dirty road (New Street) next to the site was highlighted. The proposed new connection to the existing overflow sewer system raises concerns to the capacity of this system to handle the new connection with an estimated 137 employees. There were no discussions or indications on the plans by municipality to handle the overflow of the sewer. If the system collapse or fails, it will highlight likely drain to the nearest stormwater pipeline and onto the Knysna estuary. It is DFFE's view that before new development (Part A) is connected, there should be engagements with the municipality on how to handle the current sewer problems and how it will handle the new connections. The report speaks of other futuristic developments such as retail, restaurants etc that will also connect to the existing	The concern regarding the capacity and reliability of the existing municipal sewer infrastructure is recognised. During the application phase engineering service level agreement will be included for Municipal Consideration. No direct discharge to the estuary will occur as part of the proposed development.

sewer system therefore the pressures are anticipated to exponentially increase.	
6. There is a disjuncture where specialist report indicates that "Construction of slipway must only be undertaken under dry conditions ..." but the report indicate that slipway activities are not triggered. This need to be further clarified and any launching of vessels in other areas other than the harbour must consider the Public Launch Site regulations published in GN R497 of 27 June 2014 (PLS Regulations) and consult with the Western Cape Department of Environmental Affairs and Development Planning through coastal.enquiries@westerncape.gov.za .	The proposed development has been amended to include the existing slipway and associated launching activities within the scope of this application for environmental authorisation. This approach is in line with recommendations from SANParks, who advised that inclusion of the slipway activities would be preferable in order to ensure comprehensive assessment and avoid the need for a separate future application process. Accordingly, references to slipway construction in the Aquatic Specialist Report are retained as part of a precautionary assessment context. The inclusion of these activities ensures that all potential impacts associated with vessel launching and slipway use are appropriately considered within a single, integrated environmental authorisation process.
7. There were plans discussed that the two areas, Sea Cadet and the proposed yacht factory area would be fenced off and combined into one. One of the objects of the ICM Act is to secure equitable access to the opportunities and benefits of the coastal public property (CPP), section 7A inter alia aims to improve public access to the seashore; section 13 seeks to ensure that any natural person in the Republic has a right to reasonable access to the CPP etc. The fencing and combination of these two areas into one must not in any way restrict access of the members of the public to the CPP.	The proposed fencing relates only to the operational and safety requirements within the developed and transformed footprint of the site. No fencing is proposed within the Coastal Public Property or in a manner that would restrict existing public access to the shoreline or estuarine edge. Public access to the Coastal Public Property will be maintained in accordance with the objectives of the Integrated Coastal Management Act.
8. The mitigation measures about floor drains and sewer connections, waste management spill prevention are full concurred upon. The maintenance of the vegetation along the banks and near the estuary is a welcome reaccommodation. The proposal to use solar systems is a welcome move.	The mitigation measures relating to floor drains, sewer connections, waste management, and spill prevention are confirmed and will be implemented as prescribed in the EMPr. The maintenance of vegetation along the estuarine edge and the incorporation of solar energy systems form part of the proposed development and are supported.

9. In overall, DFFE has no objection to the proposed development with full implementation of the proposed mitigation measures and consideration of the comments provided therein.	The comment is noted and acknowledged. This general policy statement has been recorded in the comments register and will be considered as part of the overall environmental assessment process.
Forestry, Fisheries & The Environment (DFFE) – Directorate: Biodiversity Conservation – Mr Seoka Lekota (12 December 2025)	
1. The proposed development is situated in a very highly sensitive area due to the site overlays entirely in a Protected Area. In accordance with the report, most of the development area has been largely transformed, therefore development in sensitive areas is permitted to preserve the ecological function of the area and SANParks must issue written permission per the National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003). NEMPAA section 50(5).	The comment is appreciated. The site is located within a Protected Area as defined under the National Environmental Management: Protected Areas Act; however, the proposed development is confined entirely to a historically transformed footprint. This approach is intended to preserve the ecological function of the surrounding area. Engagement with SANParks will be undertaken as required in terms of the applicable legislative processes.
2. To ensure the continued persistence of ecosystems and that national conservation targets are achieved, it is essential that impacts on very highly sensitive i.e. highly localised habitats are minimized or avoided altogether. Furthermore, the following recommendations must be considered in the final report: • Confine all development strictly to the transformed footprint and outside the Estuarine Functional Zone (EFZ). • An alien invasive control management plan for regular monitoring and removal of invasive plant species must be implemented and prohibit all invasive alien plant species (as per NEMBA AIS Regulations). • Disturbed areas must be rehabilitated as soon as possible after construction with locally indigenous plants to enhance the conservation of existing natural vegetation on site.	The recommendations are supported and have been incorporated into the project design, specialist assessment findings, and the Environmental Management Programme (EMPr). Development is confined to the transformed footprint and outside the Estuarine Functional Zone. Measures relating to alien invasive plant control, rehabilitation, stormwater management, no-go areas, and protection of estuarine habitats and avifauna are addressed through binding EMPr requirements and will be implemented during construction and operation.

• A construction-phase monitoring program must be developed to assess and document the impacts of infrastructure installation on local bird communities. • Avoid any encroachment into salt marsh, reedbeds, supratidal marsh or any natural estuarine vegetation. • Implement a no-go area along the lagoon edge, clearly demarcated before construction begins. • Protect estuarine birds by preventing disturbance in the salt marsh and mudflat foraging areas. • Avoid high-noise activities during peak bird breeding/foraging seasons where possible. • A stormwater management plan must be implemented to ensure all runoff is pre-treated before reaching the estuary. • Implementation of an Estuarine Buffer Protection Plan, including fencing, demarcation, and no-go areas to ensure no work, stockpiling, or access within the estuarine functional zone.	
3. Furthermore, the Directorate: Biodiversity and Conservation recommends comments from Department of Forestry, Fisheries and the Environment : Protected Areas Management Planning Directorate (MaMudau@dfre.gov.za) must be obtained due to the property is within and near the Garden Route National Park.	Engagement with the Department of Forestry, Fisheries and the Environment: Protected Areas Management Planning Directorate will be undertaken as part of the ongoing consultation process, given the site's proximity to the Garden Route National Park. Any comments received will be incorporated into the assessment where relevant.
Forestry, Fisheries & The Environment (DFRE) – Directorate: Forestry Management – Ms. TF Gwala (08 December 2025)	
Forestry has the following comments:	
1. Forestry has a co-operative governance relationship with various Authorities as well as stakeholders, and thus will take their concerns into consideration if such should arise	

2. Forestry request the following: • That a site inspection be conducted together with Consultant in order to determine whether Forestry's mandate is affected or not; • Section 15 of the National Forest Act (NFA) (Act No. 84 of 1998) as amended prohibits the cutting, disturbing, damaging or destroying of protected tree species without a licence. Section 7 of the National Forest Act (NFA), act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a license.	A joint site inspection with the Forestry authority can be facilitated to confirm whether the Forestry mandate is applicable to the proposed development. The proponent confirms that no protected tree species or natural forest will be disturbed as part of the proposed activities. Should any protected trees be identified during site verification, the relevant licensing requirements in terms of the National Forests Act will be complied with.
ORGAN OF STATE	
Breede-Olifants Catchment Management Agency (BOCMA) – SI Ndlovu – 08 December 2025	
Reference is made to the above mentioned Pre-Application Draft Basic Assessment Report made available to Breede-Olifants Catchment Management Agency (BOCMA) for comments. The following are BOCMA comments relating to Pre-Application Basic Assessment Report for the proposed development of Kinetic Catamarans Industrial Facility on Erf 1339 and Development/Redevelopment of the South African Sea Cadet Corps Infrastructure on Erf 1316, which should be adhered to:	
1. The Breede-Olifants Catchment Management Agency has reviewed the Draft Basic Assessment and Aquatic Biodiversity Impact Assessment and has no objections to the proposed development.	The comment is noted and acknowledged. This general policy statement has been recorded in the comments register and will be considered as part of the overall environmental assessment process.
2. The property is located within the Estuarine Functional Zone of the Knysna Estuary and there are no watercourses on site. An estuary is not defined as a watercourse, therefore no section 21(c) and (i) water uses are triggered, and no water use authorisation required in terms of the National Water Act, (Act No. 36 of 1998).	
3. The tariffs/charges for water and sanitation services that will be provided by the Water Services Provider (WSP) i.e. Knysna Municipality, must be paid directly to the municipality.	

4. The harvesting of rainwater and storing in tanks does not trigger any water use(s) in terms of section 21 of the National Water Act, 1998 (Act No. 36 of 1998) and it doesn't require an authorisation.	
5. No water shall be derived from a water resource and used on Erf 1339 & Erf 1316 without prior approval by means of a water use authorisation in terms of section 22 of the National Water Act, 1998 (Act No. 36 of 1998), if activities exceed Schedule 1 limits.	
6. As required by section 22 of the National Water Act, 1998 (Act No. 36 of 1998), a Water Use Authorisation is required prior to commencement with any water use activity contemplated in section 21 of National Water Act. Moreover, commencement with any water use activity without an authorisation as required by section 22 of National Water Act constitutes an offence in terms of section 151(1) (a) of the National Water Act. In terms of section 151(2) of the National Water Act, any person who contravenes is guilty of an offence and liable, on first conviction to a fine or an imprisonment of a period not exceeding five years or both such a fine and imprisonment.	
7. In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of National Water Act that is associated with the proposed development.	
8. In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of National Water Act that is associated with the proposed development.	

9. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.	
10.Should you wish to apply for a water use authorisation for unregistered water uses triggered by the proposed activities, you may apply electronically by logging onto the Department of Water and Sanitation (DWS) website at http://www.dws.gov.za/e-WULAAS .	
11.Should you have further enquiries, the office can be contacted or alternatively contact Mr. SI Ndlovu at the above-mentioned contact number or on sndlovu@bocma.co.za	
South African National Parks (SANParks) – Dr Vanessa Weyer	
SANParks will submit comments on this application at the Draft Basic Assessment stage.	
MUNICIPALITIES	
Garden Route District Municipality (GRDM) - Dr NS Viljoen	
1. Protected Area Mapping – Serious Concern The Western Cape Biodiversity Spatial Plan (WCBSP 2023) maps the entire development area inside a Protected Area. Even though the report argues that the site is transformed, the BAR does not include written confirmation from SANParks as management authority. The following are recommended: • Formal SANParks approval / consent, as required under NEMPA s50(5); • A map overlay demonstrating where the actual Protected Area boundary lies versus the transformed footprint.	Engagement with SANParks is ongoing. SANParks is currently involved in matters relating to the existing Kinetic Catamarans facility and was consulted during the first round of pre-application public participation for the proposed development. SANParks indicated that comments on the proposed development will be submitted at the Draft Basic Assessment stage. <u>A map overlay illustrating the relationship between the Protected Area boundary and the transformed development footprint will be included in the BAR to provide clarity.</u>
2. Estuary Risk Underestimated – Need Stronger Aquatic Impact Controls	The proximity of the site to the Knysna Estuary and its drainage context are recognised and were the basis for commissioning the Aquatic Biodiversity Specialist Assessment. While detailed stormwater quality modelling is not considered necessary given

The aquatic specialist confirms the site drains directly into the Knysna Estuary and lies within FEPA/NWI datasets. The following concerns are noted: • No detailed stormwater quality modelling; • No plan for pollution capture from fibreglass/resin-based manufacturing; • Rainwater tank overflow is mentioned, but no contamination control systems are described; • No final lagoon buffer management plan. The following are recommended: • A detailed Stormwater Pollution Prevention Plan (SPPP) for construction & operation; • Resin, chemical and fibreglass waste spill-response plan; • Confirmation of zero direct discharge into estuary; • Buffer management plan outlining vegetation, erosion prevention, and maintenance.	the fully transformed footprint and absence of direct discharge points, stormwater quality and pollution risks will be managed through design and operational controls. <u>A Stormwater Pollution Prevention Plan (SPPP), resin and chemical spill-response measures, confirmation of zero direct discharge to the estuary, and an estuarine buffer management approach are included in the EMPr and will be implemented during construction and operation.</u>
3. Sewer Rising Mains – High-Risk Infrastructure Constraint Two major municipal rising mains (350 mm & 375 mm) run through the site. The following concerns are noted: • No structural load impact study (heavy catamarans, cranes, transport); • No protection measures or municipal sign-off; • No emergency response plan if a rising main ruptures (serious estuary pollution hazard). The following are recommended: • Civil engineering confirmation of safe loading and protection zones; • Updated servitude plan and maintenance access plan; • A Sewer Emergency Contingency Protocol.	The presence of municipal sewer rising mains traversing the site is recognised as an existing infrastructure constraint. The proposed development will obtain all required municipal service approvals prior to construction, including confirmation of conditions of connection.
4. Missing Specialist Studies Required by Screening Tool	The comment is respectfully disputed.

The Screening Tool required 11 specialist studies, yet only one (Aquatic) was undertaken. The following studies was not done, but are required: • Landscape/Visual Assessment; • Archaeological & Cultural Heritage Impact Assessment; • Palaeontology Assessment; • Terrestrial Biodiversity Assessment; • Marine Impact Assessment; • Avifaunal Study; • Geotechnical Study; • Socio-economic Assessment; • Plant & Animal Species Assessments It is not acceptable to skip all specialists based on internal judgement. Visual, heritage, avifauna, and geotechnical impacts remain unassessed. The following are recommended: • Minimum: Visual, Heritage, Geotechnical, Marine/Estuary interface, Socio-economic; • Justification for excluding others must include formal specialist motivation letters, not EAP assumptions.	In terms of the Protocols for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes, promulgated under Government Notice No. 320 of 2020 (Government Gazette No. 43110), the outputs of the DFFE Screening Tool are required to be verified through a Site Sensitivity Verification process prior to commissioning specialist studies. The Screening Tool is a decision-support tool and does not, on its own, mandate the automatic appointment of all identified specialists. A Site Sensitivity Verification Report (SSVR) was compiled for this project in accordance with GN 320, confirming that, except for Aquatic Biodiversity, the site sensitivities identified by the Screening Tool are not supported by current site conditions due to the entirely transformed nature of the development footprint. The SSVR therefore constitutes the formal motivation for the exclusion of additional specialist studies, as provided for by the regulations. The statement that exclusions must be supported by "formal specialist motivation letters" is not a requirement of GN 320, which explicitly places the responsibility for sensitivity verification and specialist scope determination with the Environmental Assessment Practitioner. Notwithstanding the above, and as a measure of procedural good faith, a meeting with the Department of Forestry, Fisheries and the Environment is scheduled for 3 February 2026 to confirm the adequacy of the specialist scope applied. Based on the verified site conditions, no further specialist studies are considered necessary at this stage.
5. Listed Activities – Insufficient Justification	The comment regarding clarity is accepted. <u>The BAR will be updated to include a consolidated table clearly identifying the</u>

The BAR lists activities but does not clearly demonstrate which construction actions trigger Listing Notice 1 (e.g., infrastructure within 100 m of estuary, rezoning, earthworks) or whether LN2 or LN3 apply. The following are recommended: • Clear table: "Activity triggered → Why triggered → Evidence → Site location"; • Confirmation whether any activity falls within critical biodiversity or protected area (LN3 triggers likely).	<u>listed activities triggered</u>, the specific components of the proposed development giving rise to each trigger, supporting evidence, and the spatial location of the activities. Based on the verified site sensitivities and confined, transformed footprint, no Listing Notice 2 or Listing Notice 3 activities are triggered, and no activities fall within Critical Biodiversity Areas or protected area features requiring LN3 authorisation.
6. Stormwater and Drainage Engineering – Too High Level Although the site is paved and drains to the lagoon: • No oil/water separators are specified; • No containment for chemical spills; • No stormwater discharge point design; • No indication of pre- and post-development runoff volumes. The following are recommended: • Stormwater drawings (in/out flows); • Hydrocarbon traps, sediment traps; • Lagoon-edge erosion protection plan; • Stormwater maintenance schedule.	Stormwater management for the proposed development has been considered at an environmental assessment level, with mitigation measures secured through the EMP. Given that the site is fully paved and drains via an existing municipal stormwater system, detailed stormwater engineering drawings, discharge point design, and runoff calculations will be finalised during the detailed design phase and subject to municipal approval prior to construction. Measures including hydrocarbon separation, spill containment, sediment control, lagoon-edge protection, and routine maintenance are addressed through the EMP and associated management plans.
7. Visual Impact – Major Omission The building is 12 m high, located directly on the estuary edge. The 3D render is not a visual impact assessment. Lagoon-facing users (tourists, watercraft, residents) will experience major visual change.	The comment is respectfully disagreed with. The proposed development is located within an established industrial precinct characterised by existing large-scale buildings, paved yards, parking areas, and service infrastructure. The site is already visually transformed, and the proposed building replaces an open paved area currently used for parking and informal transport activity.

The following are recommended: • A formal Visual Impact Assessment with photomontages from lagoon view-points; • Lighting plan addressing nighttime glare and estuary fauna disturbance.	The proposed building height and massing are consistent with the surrounding industrial context and will not introduce a visually discordant element into the landscape. Given the transformed nature of the site, the industrial setting, and the absence of high-sensitivity visual receptors, a formal Visual Impact Assessment is not considered necessary. Visual considerations have been addressed through building design, layout, and lighting controls included in the EMPr.
8. Sea Cadets Building – Heritage Not Assessed The BAR states it has community/cultural importance, but: • No HWC NID response is included; • No heritage specialist assessment. The following are recommended: • HWC early comment; • Heritage Statement of Significance; • Assessment of redevelopment impacts.	Heritage Western Cape has been consulted regarding the Sea Cadets building. Written confirmation has been received from HWC indicating that no structures older than 60 years are present on the property and that the provisions of Section 34(1) of the National Heritage Resources Act are therefore not applicable. Based on this confirmation, a Heritage Impact Assessment and Heritage Statement of Significance are not required for the existing building. The development will, <u>however, follow the procedural requirements of Section 38(1)(b) of the NHRA</u>, and any further engagement required by HWC will be undertaken as part of the Basic Assessment process.
9. Control and Monitoring • Construction Phase Controls - No vegetation removal or soil excavation within lagoon buffer; - Mandatory hydrocarbon spill kits; - Silt curtains or sandbags where drainage leads to lagoon; - No work allowed during spring high tides or storm surge events. • Operational Controls	The intent of the proposed control, monitoring, and reporting measures is supported. Construction and operational phase controls aimed at preventing pollution, protecting the estuarine edge, and managing stormwater and hydrocarbon risks are addressed through the EMPr and will be implemented accordingly. Measures such as spill kits, sediment control, restricted working areas, and appropriate stormwater pre-treatment are included as standard site management requirements. Monitoring and reporting will be undertaken in a manner proportionate to the scale and risk profile of the development, with ECO oversight

- Mandatory oil-water separator on all runoff; - Monthly inspection of resin, chemical, and fibreglass handling areas; - Annual estuary water quality testing for turbidity, suspended solids, hydrocarbons; - Solar PV glare assessment if panels face the lagoon. • Monitoring & Reporting - Environmental Control Officer (ECO) on site weekly; - ECO sign-off required for foundation excavations (due to sewer mains); - Quarterly compliance reports submitted to the Authority & SANParks.	implemented during construction. Detailed monitoring frequencies and reporting requirements will be aligned with permit conditions and regulatory requirements, where applicable.
10. Summarised Recommendation • SANParks written approval (Protected Area governance requirement); • All key specialist studies completed (Visual, Heritage, Geotechnical, Marine/Estuary, Socio-economic); • Submission of a full Stormwater Pollution Prevention Plan; • Sewer servitude and engineer sign-off on rising main protection; • Detailed Estuary Buffer Management Plan; • Updated Listed Activity Table with proper justification; • Confirmation of zero contamination pathways from industrial operations to the estuary; • Revised EMPr including all mitigation and monitoring commitments.	The comment is noted and acknowledged. This general summary statement has been recorded in the comments register and will be considered as part of the overall environmental assessment process.

5. COMMENTS RECEIVED IN RESPONSE TO THE APPLICATION PHASE PUBLIC PARTICIPATION PROCESS (28/05/2026 – 29/06/2026)

COMMENTS RECEIVED IN RESPONSE TO DRAFT BAR: 28 May 2026 – 29 June 2026	
The following table contains all comments received during the Application Public Participation Process.	
STATE DEPARTMENTS	
Forestry, Fisheries & The Environment (DFFE) – Directorate: Biodiversity Conservation – Ms Portia Makitla – 08 July 2026	
The Directorate: Biodiversity Conservation has reviewed and evaluated the reports.	Noted with thanks. Eco Route confirms the Directorate's review is acknowledged.
The proposed development is confined entirely to an existing historically transformed industrial and institutional footprint and will not result in the direct loss of indigenous vegetation, threatened ecosystems, wetlands, or other intact terrestrial habitats.	Confirmed. The development footprint is confined to the existing historically transformed industrial/institutional platform (former vehicle testing facility and Sea Cadets site); no indigenous vegetation, threatened ecosystems or wetlands are cleared as part of the proposal (DBAR Section B, Site Sensitivity Verification Report).
Although the Western Cape Biodiversity Spatial Plan (2023) maps the property within a Protected Area, field verification confirmed that the development footprint comprises existing buildings, hardstand areas, parking facilities and associated infrastructure, with no remaining natural habitat or ecological features characteristic of a protected area.	Confirmed. Although the Western Cape Biodiversity Spatial Plan (2023) maps the site within a Protected Area, the Site Sensitivity Verification Report and subsequent field verification found the footprint to comprise existing buildings, hardstanding, parking and associated infrastructure, with no remaining natural habitat (DBAR Sections C and D).

The specialist assessment therefore concluded that the mapped biodiversity sensitivity does not reflect the current ecological condition of the site.	Noted and agreed. The desktop sensitivity mapping does not reflect the current, historically transformed, ecological condition of the site, as set out in the DBAR and confirmed by the aquatic specialist assessment (Upstream Consulting, 2025).
The report also confirms that no development activities will occur below the high-water mark of the Knysna Estuary, no estuarine or saltmarsh habitat will be reclaimed or infilled, and no works are proposed within natural aquatic habitat.	Confirmed. The high-water mark survey undertaken by Eden Geomatics (2024-2025) established that all built development is landward of the surveyed HWM, on an elevated platform approximately 2m above mean sea level. No estuarine or saltmarsh habitat is reclaimed or infilled, and no works are proposed within natural aquatic habitat (DBAR Section C).
Manage the potential indirect impacts on the adjacent Knysna Estuary through the implementation of the Environmental Management Programme (EMPr). These measures include the management of stormwater runoff, erosion and sediment control, spill prevention and emergency response procedures, waste management, demarcation of environmentally sensitive areas prior to construction, and rehabilitation of any temporarily disturbed areas. These measures are intended to ensure that the ecological functioning and water quality of the estuary are maintained throughout the construction and operational phases.	Confirmed. Stormwater runoff, erosion and sediment control, spill prevention and emergency response, waste management, demarcation of sensitive areas, and rehabilitation are addressed in the Environmental Management Programme (EMPr), with detailed operational protocols set out in Annexure A (Stormwater Pollution Prevention Plan) and Annexure B (Spill Prevention, Control and Countermeasure Plan).
Based on the above, the Directorate does not have any objections to the proposed development provided all mitigation measures as proposed in the EMPr will be adhered to.	Noted with thanks. The EMPr and its annexures (SPPP, SPCC) form part of the application and, once authorised, are binding on the Applicant. Implementation will be monitored by the appointed Environmental Control Officer (ECO) throughout construction and operation.

**Department of Forestry, Fisheries & the Environment (DFFE) – Directorate: Protected Areas Planning & Management Effectiveness
– Mashudu Mudau – 29 June 2026**

Background and Discussion	Background and Discussion
The Directorate: Protected Areas Planning and Management Effectiveness would like to thank you for the opportunity to review the Draft Basic Assessment report and the Environmental Programme report for the aforementioned project. The proposed project will entail the expansion of the kinetic catamarans manufacturing facility and development of south African sea cadet corps, within the Knysna Protected Area, in the Knysna Local Municipality, Western Cape Province.	Noted with thanks.
<u>Comments on the Draft Basic Assessment Report (DBAR) for the Proposed Development of Kinetic Catamarans Industrial Facility on Erf 1339, as well as Development/ Redevelopment of the South African Sea Cadet Corps Infrastructure on Erf 1316, Knysna, Western Cape</u>	Noted.
Following a review of the submitted documentation, it is noted that the proposed development is located within the Knysna Protected Environment and immediately adjacent to the Knysna Estuary. The site falls within a Protected Area declared in terms of the National Environmental Management:	Confirmed. The DBAR identifies the site as falling within the Knysna Protected Environment, declared under the National Environmental Management: Protected Areas Act, 2003 (NEMPAA), and adjacent to the Knysna Estuary (DBAR Section C).
Protected Areas Act, 2003 (Act No. 57 of 2003) (NEMPAA), and forms part of the broader conservation landscape associated with the Garden Route National Park.	Noted.
The BAR and specialist reports acknowledge that the development site falls within the Knysna Protected Environment.	Noted. The DBAR's reliance on the historically transformed nature of the site relates specifically to biodiversity/vegetation

However, the assessment primarily relies on the transformed nature of the site to justify the proposed development. While the site may be historically transformed, the assessment does not adequately evaluate the implications of the proposed industrial development on the conservation objectives, ecological functioning, landscape character, and management objectives of the Protected Area.	impact (i.e. no further loss of natural habitat), not to a claim that Protected Area status is immaterial. Section C and the EMPr set out the management measures applicable specifically because of the Protected Area and estuary-adjacent context; refer to responses below on indirect impacts, stormwater and hazardous substances.
The Protected Environment was declared to conserve biodiversity and ecological processes associated with the Knysna Estuary and surrounding landscapes. The assessment should therefore clearly demonstrate how the proposed development aligns with the objectives of the Protected Area and how these objectives will not be compromised by the proposed land use.	Noted. The DBAR does not contend that the development is exempt from the Protected Environment's conservation objectives; the mitigation hierarchy applied (avoid via confinement to the transformed footprint, then manage residual impacts through the EMPr) is Eco Route's basis for concluding compatibility. This is elaborated in the EMPr's aims and objectives section.
SANParks has indicated that the site falls within the Development Control Area of the Knysna Protected Environment and within the buffer of the Garden Route National Park. The final BAR should clearly indicate whether all approvals required in terms of The Regulations for the Proper Administration of the Knysna Protected Environment have been obtained or will be obtained prior to commencement of development.	SANParks' Knysna Protected Environment (KPE) authorisation, required under Sections 8-10 of the Regulations for the Proper Administration of the Knysna Protected Environment (GN 1175 of 2009) for activities within the 50m Development Control Area, is a separate statutory process to this NEMA Basic Assessment and runs in parallel with it (see SANParks' own comment below, this table).
The Directorate notes that the proposed development includes a large industrial building, associated parking areas, infrastructure, and future operational activities within a protected area context. Potential indirect impacts such as visual intrusion, lighting, noise, increased human activity, invasive species spread, and long-term	Confirmed. Visual intrusion, lighting, noise, increased activity, invasive species and cumulative impacts are addressed through EMPr mitigation measures (shielded low-level lighting, façade treatment, alien-invasive monitoring per the Alien Invasive Management Control Compliance Statement, noise-

cumulative impacts on the protected area should be adequately assessed and managed through the EMPr.	generating equipment controls) and via the ECO's ongoing monitoring role.
Knysna Estuary	Knysna Estuary
The Directorate notes that the proposed development is situated immediately adjacent to the Knysna Estuary and that existing drainage channels and stormwater infrastructure discharge towards the estuary. The estuary is recognized as one of South Africa's most important estuarine ecosystems and has been identified as having Very High Aquatic Biodiversity Sensitivity.	Noted. The DBAR and aquatic specialist assessment (Upstream Consulting, 2025) confirm the site's adjacency to the estuary and its Very High Aquatic Biodiversity Sensitivity rating, and this sensitivity has informed the mitigation measures adopted in the EMPr and SPPP.
The aquatic assessment concludes that impacts on the estuary can be reduced through mitigation measures. However, the Directorate remains concerned that the engineering services report proposes the continued use of existing stormwater systems and open drainage channels that ultimately discharge into the estuary. Additional detail is required regarding stormwater treatment measures, pollution interception infrastructure, and long-term maintenance requirements to ensure that contaminated runoff does not enter the estuarine environment.	Noted. The engineering services report (Hofmeyr & Associates, 9 April 2026) confirms the existing municipal stormwater and drainage infrastructure will continue to be used, upgraded with Sustainable Urban Drainage System (SuDS) measures including rainwater harvesting tanks, permeable paving, catchpits and pollution sump interceptors. Long-term maintenance responsibilities are set out in the SPPP (operational controls O-1 to O-15) and assigned to the Facility Manager/ECO with periodic Municipality joint inspection.
It is recommended that, the applicant provide confirmation of adequate sewage management arrangements. Given the sensitivity of the receiving environment, assurance should be provided that sewage generated by the facility will not adversely affect the	The project engineer (Hofmeyr & Associates, letter dated 9 April 2026) has confirmed the technical feasibility of connecting to the existing 160mm municipal sewer line, with sufficient network capacity; formal engineering drawings will be submitted to Knysna Municipality for approval prior to construction, which will serve as the municipality's confirmation of the connection (DBAR, Sewer Connection Approval

estuary under normal operational conditions or during infrastructure failures.	Process). The SPPP includes a dedicated Sewer Rising Main Emergency Protocol (Annexure A, control O-12) requiring immediate notification of Knysna Municipality, SANParks and DFFE Oceans & Coast in the event of a rupture, deployment of containment measures, and a 14-day incident report to DFFE. The structural integrity and operating condition of the existing municipal sewer rising mains and pump stations is a matter for Knysna Municipality's Technical Services Department; written confirmation of this will be sought by the project engineer as part of the standard building-plan approval process (DBAR, Existing Sewer Infrastructure Integrity).
The proposed Sustainable Urban Drainage Systems (SuDS), rainwater harvesting initiatives, and stormwater management measures are supported and should be incorporated as binding commitments within the EMPr and engineering design specifications.	Noted with thanks. The SuDS measures, rainwater harvesting tanks and stormwater management measures are recorded as binding operational commitments in the EMPr and SPPP (Annexure A).
Any future upgrades or modifications to the Sea Cadets slipway, jetty, or other estuarine infrastructure should be subject to the necessary environmental approvals and the submission of detailed method statements to ensure that impacts on estuarine habitats and ecological processes are avoided or minimized.	Noted and agreed. The EMPr records that any future upgrade to the Sea Cadets slipway or other estuarine infrastructure is subject to a method statement and the necessary environmental/SANParks KPE approvals prior to implementation (DBAR Section B.2.3; EMPr commitments).
Climate Change and Coastal Risk	Climate Change and Coastal Risk
Given the low-lying nature of the site and its proximity to the estuary, the final design should incorporate climate resilience	Noted. The DBAR records that the yacht factory platform is already elevated approximately 2m above mean sea level, landward of the surveyed HWM (Eden Geomatics, 2024-2025), and that final building/infrastructure elevation will be guided

measures that demonstrate the long-term sustainability of the proposed infrastructure.	by the project engineer/architect. A retreat strategy was assessed as not feasible due to site constraints (DBAR Section C).
The handling and storage of fuels, resins, paints, solvents, lubricants, and other hazardous substances pose a potential risk to estuarine water quality should accidental spills or leaks occur. All hazardous substances must be stored in appropriately designed bunded facilities, and that engineering designs incorporate pollution containment measures, including spill interception systems and pollution sump catch pits where necessary.	Confirmed. The SPCC (Annexure B to the EMPr) requires bunded storage for fuels, resins, paints, solvents and lubricants, together with pollution sump catch-pits and spill interception systems, and sets out a tiered spill classification and response protocol.
The final EMPr should include contingency measures for extreme weather events, flooding, hazardous material spills, and emergency response procedures to minimize risks to the estuary and surrounding protected area.	Confirmed. The SPCC includes a three-tier spill classification (minor/moderate/major) with defined emergency response procedures, and the SPPP includes protocols for extreme weather, sewer rising main failure and hazardous material spills, including notification chains to DFFE, SANParks, BOCMA and Knysna Municipality for Tier 3 incidents.
The Directorate acknowledges that the proposed development is located on a historically transformed site. However, the site remains situated within the Knysna Protected Environment and immediately adjacent to the highly sensitive Knysna Estuary. The Directorate is therefore of the view that strict implementation of all mitigation measures, environmental management commitments, engineering controls, and monitoring requirements will be essential to ensure that the ecological integrity, biodiversity value, and conservation	Noted with thanks. Eco Route confirms that strict implementation of the EMPr, SPPP and SPCC, and ongoing ECO monitoring, are the mechanisms through which the Directorate's concerns regarding the Protected Area and Knysna Estuary will be managed.

objectives of both the Protected Area and the Knysna Estuary are maintained.	
ORGANS OF STATE	
CapeNature – Marianne de Villiers – 26 June 2026	
CapeNature would like to thank you for the opportunity to comment on the above report. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.	Noted with thanks.
Our comments are as follows:	Noted.
1. The proposed development involves construction for the development/expansion of the Kinetic Catamarans manufacturing facility, and upgrades to the South African Sea Cadet Corps – TS Knysna facilities on portions of the Remainder of Erven 1339 and 1316, Knysna, situated adjacent to the Knysna Estuary within the established Lower Industrial Precinct.	Confirmed, consistent with the DBAR's description of the proposed development (DBAR Section B).
2. The Knysna Estuary is a key component of the Garden Route National Park. According to the updated Western Cape Biodiversity Spatial Plan (WCBSP 2023), the entire development area is mapped within a Protected Area.	Confirmed. The DBAR records the WCBSP (2023) Protected Area mapping over the site (DBAR Section C).
3. The National Vegetation Map (VEGMAP, 2018 and 2024) shows that the proposed development site contains Garden Route Shale Fynbos (Endangered), however, the proposed development is confined to a transformed footprint, with no remnant natural vegetation.	Confirmed. The DBAR notes the VEGMAP classification but confirms the development footprint contains no remnant natural vegetation, being confined to the existing transformed platform (DBAR Section C, Site Sensitivity Verification Report).

4. Despite falling in Knysna Estuary's urban-industrial zone, the site is located within the Estuary Functional Zone and maintains key natural features and ecological functions. The site has "Very High" aquatic biodiversity sensitivity due to the nearby presence of the Knysna Estuary, a Freshwater Ecosystem Priority Area (FEPA) Subcatchment, and a Strategic Water Source Area. Mitigation to prevent any deterioration to the estuarine conservation zone is essential.	Noted and agreed. The Very High aquatic biodiversity sensitivity rating is acknowledged in the DBAR and has directly informed the mitigation measures in the EMPr, SPPP and SPCC.
5. Although the proposed development will result in temporary impacts on biodiversity, appropriate mitigation should result in Low impact significance. Key mitigation measures must include:	Noted with thanks.
• Confinement of work to the existing transformed footprint, minimization of the construction footprint, and clear demarcation of no-go areas;	Confirmed. The EMPr requires confinement of construction activities to the existing transformed footprint, minimisation of the construction footprint, and demarcation of no-go areas prior to commencement (EMPr construction-phase controls).
• Maintenance of a 5-m buffer around all saltmarsh habitat, with no mowing of vegetation;	Confirmed. A 5m buffer around saltmarsh habitat, with no mowing, is recorded in the EMPr.
• Proper stormwater management through the implementation of Sustainable Urban Drainage System principles to improve water quality and reduce discharge volumes;	Confirmed. SuDS principles (permeable paving, rainwater harvesting, catchpits, soakaway retention) are incorporated in the engineering design and recorded as binding EMPr/SPPP commitments.
• Prevention of trampling of tidal habitats;	Confirmed. The EMPr requires fencing/demarcation of no-go areas adjacent to tidal habitat to prevent trampling during construction.
• Containment and proper disposal of any hazardous waste developed during the operational phase, in accordance with SANParks' requirements and the recommendations of the aquatic specialist;	Confirmed. Hazardous waste containment and disposal during operation is addressed in the EMPr and SPCC (Annexure B),

	consistent with SANParks' and the aquatic specialist's recommendations.
• Proper sewage management, through connection to the municipal networks, with on-site rainwater harvesting supplementing municipal water supply, with formal engineering drawings for the internal sewer reticulation submitted to Knysna Municipality for approval prior to construction;	Confirmed. The project engineer (Hofmeyr & Associates) has confirmed connection to the municipal sewer network is feasible, with rainwater harvesting supplementing (not replacing) municipal water supply. Engineering drawings for internal sewer reticulation will be submitted to Knysna Municipality for approval prior to construction, as a standard municipal building-plan process requirement.
• Minimization of disturbance to the normal current flow of the river and prevention of the creation of stagnant water areas;	Confirmed. The DBAR and aquatic assessment confirm no direct interference with estuary current flow; stormwater design retains the existing natural depression as an informal soakaway rather than channelling flow in a way that would create stagnant water.
• No artificial stabilisation and infilling below the high-water mark outside of the current design;	Confirmed. No artificial stabilisation or infilling below the HWM beyond the current design is proposed or authorised under this application (DBAR Section C).
• Continuous monitoring for and removal of newly established alien plant and animal species;	Confirmed. Alien invasive plant monitoring and removal is committed to in the Alien Invasive Management Control Compliance Statement and the EMPr's operational monitoring schedule.
• Maintenance of the jetty in a serviceable condition (note that the Draft Basic Assessment Report and Draft Environmental Management Programme refer to the instructions set by "CapeNature"; this should be changed to "SANParks");	CapeNature's correction is accepted. The DBAR (Section H, jetty/slipway maintenance provisions) and EMPr currently attribute jetty-maintenance instructions to 'CapeNature'; this is a drafting error and should read 'SANParks', consistent with SANParks' Knysna Protected Environment authority over this structure.

Avoidance of disturbance to estuarine birds and fauna using the saltmarsh and mudflat margins adjacent to the site;	Confirmed. Avoidance of disturbance to estuarine birds and fauna on the saltmarsh/mudflat margins is addressed through the no-go area demarcation, construction timing controls and ECO oversight recorded in the EMPr.
Consultation with DFFE regarding the necessity for a coastal erosion specialist study;	Confirmed - this consultation has taken place. CapeNature's comment is noted within the same application-phase Public Participation round in which DFFE (Directorate: Protected Areas Planning and Management Effectiveness) also reviewed the DBAR and commented specifically on climate change and coastal risk (see DFFE's comment above). DFFE's comment requests climate-resilient design and EMPr contingency measures, but does not itself request a dedicated coastal erosion specialist study. The DBAR's position - that a separate coastal erosion study is not required, given the confirmed high-water mark survey (Eden Geomatics, 2024-2025) and the yacht factory's elevated platform landward of the HWM - has therefore been placed before DFFE as part of this round and has not attracted a request for further study. No further action is proposed on this point.
Appointment of a suitably qualified Environmental Control Officer, with at least two site visits per month during the construction phase and on visit per month during the operational phase.	Confirmed. The EMPr records the appointment of a suitably qualified ECO, with a recommended site visit frequency of two visits per month during construction and one per month during operation (EMPr, Site Visit Frequency), matching CapeNature's request.
Breede-Olifants Catchment Management Agency – S. Ndlovu – 23 June 2026	
The following are BOCMA comments relating to Draft Basic Assessment Report for proposed development of Kinetic	Noted.

Catamarans Industrial Facility on Erf 1339 and the South African Sea Cadet Corps infrastructure on Erf 1316, which should be adhered to:	
1. The Breede-Olifants Catchment Management Agency has reviewed the Draft Basic Assessment Report and has no objections to the proposed development.	Noted with thanks.
2. The comments dated 08 December 2025 issued by BOCMA for the proposed development are still relevant and must be adhered to. Please note that BOCMA will not issue further comments, unless there is consultation on the necessity to apply for a water use authorisation.	Confirmed. Eco Route reconfirms BOCMA's 08 December 2025 comments as recorded and answered in the pre-application Comments and Response Report: the site lies within the Estuarine Functional Zone and there are no watercourses on site; an estuary is not defined as a watercourse and no Section 21(c) or (i) water use is triggered; rainwater harvesting for storage does not trigger a Section 21 water use. This position is unchanged in the DBAR (Section G, National Water Act row), which confirms no water abstraction or discharge triggering a Water Use Licence.
3. As required by section 22 of the National Water Act, 1998 (Act No. 36 of 1998), a Water Use Authorisation is required prior to commencement with any water use activity contemplated in section 21 of National Water Act. Moreover, commencement with any water use activity without an authorisation as required by section 22 of National Water Act constitutes an offence in terms of section 151(1)(a) of the National Water Act. In terms of section 151(2) of the National Water Act, any person who contravenes is guilty of an offence a liable, on first conviction to a fine or an imprisonment of a period not exceeding five years or both such a fine and imprisonment.	Noted. The onus on the property owner under Sections 21/22 of the National Water Act is acknowledged.
4. Considering the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any	Confirmed and acknowledged. As per the position in response to comment above, no water use activity contemplated in

water use contemplated in section 21 of National Water Act that is associated with the proposed development.	Section 21 is currently triggered by the proposed development; should this change during detailed design, the Applicant acknowledges the requirement to obtain a Water Use Authorisation prior to commencement of any such activity.
5. Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.	Noted.
6. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.	Noted with thanks.
SANRAL – Vuyo Wandile Ntuli – 25 June 2026	
It is noted that the development area is situated within the established industrial and maritime precinct of Knysna along New Street under the jurisdiction of the Knysna Local Municipality, Western Cape Province and sits more than 350m away from the N2 Section 8.	Confirmed.
The South African National Roads Agency SOC Limited (SANRAL) has no jurisdiction.	Noted with thanks. No further response required.
SANPARKS – Dr Vanessa Weyer – 29 June 2026	
SANParks has provided comment on the following applications for Remainders of Erven 1339 and 1316 Knysna:	Noted.
1. Land Use Application (LUA) for the Subdivision, Rezoning, Consolidation, Road Closure and Departure, prepared by Planning Space Town & Regional Planners, dated 19 August 2025 - SANParks comments of 9 February 2026 (Annexure 1) .	Noted. SANParks' 9 February 2026 comments on the Land Use Application are acknowledged as Annexure 1 to this comment.
2. Pre-application Basic Assessment for proposed development of Kinetic Catamarans Industrial Facility on Erf 1339, as well as the development/ redevelopment of the South African Sea Cadet Corps Infrastructure on Erf 1316, Knysna, prepared by Eco Route Environmental	Noted. SANParks' 2 April 2026 comments on the Pre-application Basic Assessment are acknowledged as Annexure 2 to this comment, and have informed the DBAR.

Consultancy, dated October 2025 – SANParks comments of 2 April 2026 (Annexure 2).	
Please refer to these comments which describe the landscape context of Remainders of Erven 1339 and 1316 Knysna, site visits undertaken, development proposals at these times, points raised by SANParks, as well as summaries and the way forward.	Noted.
A Draft Basic Assessment Report (DBAR) by Eco Route Environmental Consultancy, dated April 2026, has been circulated for further public participation. Proposed development details are as extracted below.	Noted.

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

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

The scope of works has been expanded to explicitly include the existing Sea Cadets slipway. While no immediate upgrade plans have been prepared, the slipway has been incorporated into this Basic Assessment to ensure that any future works are authorised under the current application. It is recommended that a condition be attached to the authorisation requiring the submission of a detailed method statement to the competent authority for approval prior to implementation of any slipway upgrade. This approach ensures that potential impacts associated with vessel launching and slipway use are comprehensively addressed within a single, integrated authorisation process, avoiding the need for separate future applications.

Engineering services have been confirmed through the Site Development Plan and supporting engineering inputs. The development will connect to the municipal water and sewer networks, supplemented by seven 10 kL rainwater harvesting tanks to reduce potable demand and provide emergency supply for hose reels. Sewer connections have been designed with appropriate gradients to ensure reliable flow, while stormwater management will be upgraded through new catchpits, permeable paving, and controlled discharge to prevent estuarine contamination. Electrical supply will be provided via a 60 A three-phase connection, supported by solar PV installations to reduce reliance on grid power. Solid waste will be managed through sealed skips and private disposal, with no on-site burning or dumping permitted.

Table 6: Summary of key infrastructure and environmental integration

Infrastructure component	Design Description	Environmental Integration Measure
Yacht Factory (12 m high, 2056 m²)	Steel structure with administrative mezzanine	Reuses existing disturbed footprint; height stepped to minimise lagoon visibility
Sea Cadets Facility (495 m²)	Refurbished existing structure	Retains existing footprint; future redevelopment to comply with EMPr and method statement

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Public Park	Lagoon-front landscaped open space	Enhances public access and ecological buffer
Water Supply	Municipal link + 7 × 10 kL rainwater tanks	Rainwater reuse, reduced potable demand
Sewer	Connection to existing municipal network	No new servitude required; all underground
Stormwater	Upgraded catchpits and permeable paving	Improved runoff quality, controlled flow
Electricity	60 A three-phase + solar PV	Reduced reliance on grid power
Solid Waste	Sealed skips, private disposal	No on-site burning or open dumping

2. PROJECT COMPONENTS

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

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

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

- Factory floor area ± 1,560 m²
- Mezzanine level (administration & offices): ±496 m²
- Overall height: up to 12 m, in line with approved height departure
- SANS occupancy classification: D2 (Moderate Risk Industrial)

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- Design capacity: ±137 employees (1 person per 15 m² industrial floor space)
- Proposed finished floor level: 2.89 m above mean sea level (m.a.s.l.), approximately 800 mm above existing natural ground level (±2.29 m a.m.s.l.), in accordance with climate change adaptation and coastal flood resilience requirements as guided by the project engineer and architect
- Approximate building ridge height: ±14.1 m a.m.s.l. (comprising the 12 m structure above the finished floor level of 2.89 m a.m.s.l.), with a 200 mm construction tolerance applied

The structure is designed using steel framing with AZ200 IBR cladding and Kliprite 700 roof sheeting, with integrated roof insulation, polycarbonate translucent panels for daylighting, and solar PV installations to reduce grid dependency. The factory includes a loading bay, refuse handling area, and paved circulation areas suitable for light- and medium-duty vehicles. A single 12 m-wide access gate will serve the main delivery and dispatch area, while internal service circulation connects to New Street, which will be converted into a private access and parking area. The factory's southern façade, facing the Knysna Lagoon, has been visually softened through stepped rooflines and darker material tones to reduce glare and visual bulk when viewed from the water. Architectural sections confirm that the building's lagoon-facing side is lower in elevation than the inland side to reduce visual prominence. Building colours have been selected to blend with the estuary interface, in accordance with the requirements of SANParks, and will be confirmed in the final architectural drawings prior to construction. Solar PV installations are restricted to north-facing roof surfaces only. No panels have been positioned on south-facing roof surfaces facing the Knysna Estuary, thereby eliminating the risk of solar glint or glare as viewed from across the lagoon and from within the Garden Route National Park buffer zone. External security lighting is fixed at high level on the building structure and is directed inward over the site. The lighting design has been developed to prevent light pollution over the Knysna Estuary, in accordance with SANParks' requirements and the conditions recommended for inclusion in the Environmental Authorisation.	
2.2. Sea Cadets Building (Portion B – 020-103 Rev H New SDP Yacht Factory-103 SDP DTA) Portion B of the SDP currently accommodates the existing South African Sea Cadet Corps building, a 495 m² single-storey structure with an enclosed yard area used for boat storage and training. The current phase includes only refurbishment and external improvements to the building and its surroundings. A future mixed-use redevelopment is envisaged, potentially introducing a restaurant, retail units, and upper-level accommodation while maintaining the Sea Cadets' activities on the ground floor. This portion will be rezoned to Business Zone 1 to allow future flexibility. Access to Portion B will be from Union Street, with 20 parking bays provided on-site. All refurbishment and future redevelopment activities associated with Portion B must adhere to the Environmental Management Programme (EMPr), ensuring that construction practices, operational controls, and mitigation measures are implemented to protect the adjacent estuarine environment. In particular, the management of stormwater, waste, and landscaping must comply with EMPr provisions to prevent indirect impacts on the Knysna Estuary. The scope of the Basic Assessment has also been expanded to include the existing Sea Cadets slipway. While no immediate upgrade plans have been prepared, the slipway has been incorporated into this authorisation to ensure that any future works are assessed under the current application. In line with specialist recommendations, slipway activities must adhere to precautionary measures such as limiting works to dry conditions and implementing sediment control. Importantly, no slipway upgrade may proceed without the prior submission and approval of a detailed method statement to the competent authority. This condition ensures that potential impacts associated with vessel launching and slipway use are comprehensively managed before implementation.	

2.3. Public Park and Lagoon Interface A public open space corridor will be established along the lagoon edge, forming part of a broader linear park system envisioned in the Knysna Spatial Development Framework. The area will include: • Indigenous landscaping and seating areas • Low-level lighting for safety and evening use • A pedestrian linkage between Union Street and the existing lagoon walkway This intervention replaces the current degraded and uninviting lagoon frontage with a landscaped buffer that enhances public access and ecological interface. 3. SITE ACCESS AND TRAFFIC CIRCULATION The development incorporates a reconfiguration of New Street, currently a public road traversing the site, into a privately maintained internal access route. The proposal includes: • Closure of ±185 m of New Street, to be repurposed as internal circulation and parking. • Private servitudes securing access to adjacent properties (Erf 21440 and Erf 4653). PO Box 1252 Sedgefield, 6573 www.ecoroute.co.za	
• 108 parking bays provided across the site (including factory, staff, and visitor bays). • 1 x loading bay (4.5 m × 12 m) for the industrial section. A Traffic Impact Assessment (ITS Engineers, 2025) confirmed that the development will not result in significant additional congestion or require road upgrades, with adequate capacity remaining across adjacent intersections.	
	Noted.



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

4. SERVICES INFRASTRUCTURE

4.1. Water supply

Potable water will be supplied via the existing 75mm diameter municipal water main running along the northern boundary of the property, which operates at a confirmed pressure of 6–8 bar. Engineering calculations confirm an average daily demand of approximately 3,040 litres per day, based on an estimated occupancy of 137 people at a design density of one person per 15 m² of industrial floor space, in line with Red Book guidelines. The available municipal capacity is sufficient to meet this demand without requiring off-site infrastructure upgrades. The size of the final connection will be determined in consultation with the relevant fire authority to meet fire protection requirements.

To promote sustainability and reduce reliance on municipal supply, the proposed yacht factory will incorporate seven 10,000-litre rainwater harvesting tanks, providing a total storage capacity of 70,000 litres, fed from roof runoff collected via gutters and downpipes. Captured water will be filtered and pumped into the internal reticulation system for ablutions, general cleaning, and factory floor wash-down activities. A dedicated filtration system will be fitted to the reticulation lines supplying the ablution facilities to ensure water quality compliance. The 70kL tank system will additionally be connected to hose reels to facilitate factory floor cleaning and wash-down of the manufacturing area, reducing reliance on municipal potable water for non-drinking purposes. Municipal water will supplement this system only during dry periods and for emergency fire protection systems, including hydrants and hose reels. This dual-supply approach ensures resilience, reduces potable demand, and aligns with the project's environmental integration objectives and SANParks' requirement for sustainable building design.

4.2. Sewerage

The proposed development area for Portion A is not currently connected to the municipal sewer network but will be linked to the existing 160mm diameter municipal sewer in New Street via an established manhole on the northwestern side of the site. The manhole invert level is confirmed at 0.68m above mean sea level, and a gravity connection to Portion A has been confirmed as feasible by the project engineer. The internal reticulation will comprise 100mm and 160mm diameter uPVC sewer pipes, designed at gradients of 1:40 and 1:60 respectively, ensuring effective conveyance in accordance with municipal engineering standards. The kitchen facility within Portion A has been repositioned in the revised building layout to facilitate a clean and direct sewer connection. Engineering inputs confirm that the sewer outflow will correspond proportionally with the calculated water demand of approximately 3,040 litres per day, ensuring reliable capacity within the existing municipal network.

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To safeguard long-term accessibility and compliance with municipal engineering standards, two larger municipal sewer rising mains (350mm and 375mm diameter) that traverse the property will be retained in situ and protected within a registered municipal services servitude.

The Sea Cadets building (Portion B) is already connected to the municipal sewer network, and no alterations are required at this stage. The existing connection will remain functional until such time as the building undergoes a more substantial redevelopment in a later phase. Any future redevelopment or upgrade of sewerage infrastructure associated with Portion B will be required to adhere to the Environmental Management Programme (EMPr), ensuring that construction practices and operational controls prevent contamination of the adjacent estuarine environment.

In accordance with the requirements of SANParks, the project engineer (Hofmeyr & Associates) has confirmed the technical feasibility of connecting Portion A to the existing 160mm municipal sewer in New Street, and has confirmed that the municipal network has sufficient capacity to receive and manage sewage generated by the development. It is noted that Knysna Municipality does not typically enter into formal Service Level Agreements with developers; rather, the municipality's standard practice is to review and approve engineering drawings submitted for construction. Accordingly, formal engineering drawings for the proposed internal sewer reticulation will be submitted to Knysna Municipality for approval prior to construction, and this approval will serve as the municipality's confirmation of the connection and its capacity to service the development. This approach has been confirmed as the appropriate and accepted mechanism by the project engineer. All sewage infrastructure design, construction, and operational controls will be incorporated into the Construction and Operational EMPr to ensure ongoing protection of the Knysna Estuary.

4.3. Stormwater

The existing stormwater system on site comprises a combination of catchpits, underground pipes, and open unlined channels that drain toward the Knysna Lagoon. Historically, stormwater outlets from this and surrounding areas have contributed to nutrient enrichment and eutrophication within the Ashmead Channel, resulting in the loss of eelgrass beds and degradation of saltmarsh habitat along the estuarine margin. Although the estuary margin in this area is characterised as urban-industrial, tidal flushing continues to maintain broader ecological functioning. Stormwater management has accordingly been identified as a key environmental sensitivity for this development, and a comprehensive drainage strategy has been developed in response to concerns raised by SANParks, the aquatic specialist, and other stakeholders.

The existing system will be upgraded and formalised to manage runoff from the new industrial building and associated parking areas in accordance with municipal standards. All new hard surfaces will be brick-paved and graded to direct runoff into the upgraded stormwater infrastructure. Kerbs and surface drains will be installed to prevent uncontrolled overland flow, and all stormwaters will be managed through controlled systems with no direct discharge to the Knysna Estuary.

Particular care will be exercised with respect to the existing drainage channel that runs through the former vehicle testing ground and enters the estuary via a culvert. This channel has been specifically identified by SANParks as a risk pathway for pollutants and sediment. The stormwater design ensures

that this channel is retained within the upgraded system and that any runoff entering it is managed and attenuated before reaching the estuarine environment.

In response to concerns raised by SANParks and informed by the findings of the Aquatic Specialist Report (Upstream Consulting, 2025), the stormwater design incorporates Sustainable Urban Drainage Systems (SuDS) principles to improve water quality and reduce discharge volumes. The aquatic specialist identified untreated runoff as a key risk factor for aquatic biodiversity, with the potential to increase sedimentation, nutrient loading, and contamination of the estuary. The following integrated measures have been incorporated into the stormwater management design:

- Seven 10,000-litre rainwater harvesting tanks, providing a total attenuation capacity of 70,000 litres, fed from roof runoff via gutters and downpipes. Tanks are designed to discharge at 70% of capacity, retaining a 30% buffer to absorb peak flows during high-intensity rainfall events. Tank overflow will be directed to the natural soakaway depression south of Portion A.
- Brick-paved surfaces with kerbs and catchpits to direct and control runoff, improving water quality by eliminating sedimentation and siltation from unbound surfaces currently entering the lagoon from the degraded gravel parade ground.
- The natural depression south of Portion A will be retained and will continue to function as an informal soakaway, further slowing and filtering runoff before it reaches the estuarine margin.
- Permeable paving and grass block surfacing will be utilised where practicable to reduce hard surface runoff and promote infiltration in accordance with SuDS principles.

In addition, a 5-metre vegetated buffer zone will be maintained along the saltmarsh habitat boundary, managed in accordance with a "Grow don't Mow" policy as recommended by the aquatic specialist. This buffer will slow surface runoff, stabilise banks, and reduce the risk of sediment and nutrient transfer into the estuary.

Hazardous materials associated with factory operations, including chemicals, resins, and fuels, will be stored in a secure bunded facility positioned as far from the estuary as practicable. Pollution sump catch pits will be designed and constructed to intercept and contain any hazardous substances before they can enter the stormwater system or reach the estuary, in accordance with SANParks' requirements and the recommendations of the aquatic specialist.

All stormwater management measures will be incorporated into the Construction and Operational Environmental Management Programme (EMPr) and will be subject to monitoring and oversight by the appointed Environmental Control Officer (ECO) during both construction and operational phases. With the implementation of the above mitigation measures, stormwater impacts on the Knysna Estuary are assessed as being of Low significance, which is considered acceptable given the urban-industrial nature of the existing site and the significant improvements the proposed stormwater system represents over current conditions.

The following points were raised in SANParks comments on the Pre-application Basic Assessment Report (**Annexure 2**). These points have been revised based on new information contained in the DBAR.

Noted.

<u>Point 1: Site Servicing</u>	Point 1: Site Servicing
As the Kinetic factory and its proposed expansion area are situated directly adjacent to the Knysna Estuary, attention needs to be given toward ensuring that the estuary is not affected by changes in water quality, i.e., pollution (sewerage and chemicals) and quantity (stormwater) impacts.	Confirmed. Water quality and quantity protection of the estuary is addressed through the sewer connection confirmation, SuDS stormwater measures and the SPPP/SPCC controls, as set out below and elsewhere in this table.
<u>Sewerage Infrastructure</u>	Sewerage Infrastructure
Although confirmation has been received from the project engineer (Hofmeyr & Associates) that it is technically feasible to connect Portion A into the existing 160mm municipal sewer line in New Street and that the municipal network has sufficient capacity to receive and manage sewage generated by the development, it is stated that <u>Knysna Municipality does not enter into formal Service Level Agreements with developers</u> , but rather reviews and approves engineering drawings submitted for construction. The Applicant has stated that all sewage infrastructure design, construction, and operational controls will be incorporated into a Construction and Operational Environmental Management Programme report (EMPr) to ensure ongoing protection of the Knysna Estuary. <u>Notwithstanding this proposed mitigation, SANParks wishes to know if a Spill Contingency Plan has been developed by the Applicant in conjunction with the Knysna Municipality, which would propose a course of action should the municipal sewer line in New Street fail, or should associated pump stations be none functional at any time.</u> Several sewage spill events have taken place along this sewer line in the last two years, one severe spill directly behind the new Foodlovers parking area, and another directly outside Sea Cadets. <u>SANParks seeks confirmation from the Knysna Municipality on the structural integrity and adequate functioning of this sewer line, and associated pump stations.</u>	The project engineer's confirmation of technical feasibility and municipal network capacity for the new connection (Hofmeyr & Associates, 9 April 2026) is noted and referenced in the DBAR (Sewer Connection Approval Process). The SPPP includes a Sewer Rising Main Emergency Protocol (Annexure A, control O-12) covering rupture of the 350mm/375mm municipal rising mains, with immediate notification of Knysna Municipality, SANParks and DFFE Oceans & Coast, temporary containment, clean-up and a 14-day DFFE incident report. Regarding the structural integrity and operating condition of the existing municipal sewer line and pump stations, and the prior spill incidents referenced: this concerns existing Knysna Municipality infrastructure rather than the proposed development's own connection, and falls outside the scope of matters that can be resolved through this environmental application. The DBAR records (Existing Sewer Infrastructure Integrity) that written confirmation of the structural integrity and operational condition of these municipal assets will be sought by the project engineer from Knysna Municipality's Technical Services Department, as part of the standard

	building-plan / engineering drawing approval process prior to construction.
Stormwater Management, harmful Chemicals and Substances	Stormwater Management, harmful Chemicals and Substances
Due to the proximity of the Kinetic factory to the estuary, extreme care should be exercised to prevent harmful substance from entering the estuary during normal factory operations or should a hazardous risk event occur, for example as a worst-case scenario, a factory fire event.	Confirmed and agreed; this is precisely the basis for the SPCC's tiered spill classification and the bunded-storage, spill-interception and emergency-response requirements described below.
SANParks supports the mitigation measures proposed including:	Noted with thanks.
Development of a comprehensive drainage strategy.	Confirmed. A comprehensive drainage strategy is set out in the engineering services report (Hofmeyr & Associates) and the SPPP.
Upgrading of the existing stormwater system with no direct discharge into the Knysna Estuary.	Confirmed. The stormwater system is being upgraded with no direct discharge into the Knysna Estuary (engineering services report; SPPP).
Care undertaken with respect to the existing drainage channel that runs through the former vehicle testing ground and enters the estuary via a culvert.	Confirmed. The existing drainage channel through the former vehicle testing ground, which discharges to the estuary via culvert, is addressed in the SPPP's pollution source assessment and monitoring controls.
Incorporation of Sustainable Urban Drainage Systems (SuDS) principles.	Confirmed, SuDS principles are incorporated (see response to comment above).
The installation of seven 10,000-litre rainwater harvesting tanks.	Confirmed. Seven 10,000-litre rainwater harvesting tanks are included in the engineering design and recorded in the SPPP.

• Brick-paved surfaces with kerbs and catchpits to direct and control runoff.	Confirmed. Brick-paved surfaces with kerbs and catchpits are included in the engineering design.
• Retention of the natural depression south of Portion A, as an informal soakaway.	Confirmed. The natural depression south of Portion A is retained as an informal soakaway (engineering services report).
• The use of permeable paving and grass blocks where possible.	Confirmed. Permeable paving and grass blocks are incorporated where feasible in the engineering design.
• The maintenance of a 5m vegetated buffer along the saltmarsh habitat boundary.	Confirmed. A 5m vegetated buffer along the saltmarsh habitat boundary is recorded in the EMPr; see also response to CapeNature's comment on this point above.
• The storage of hazardous materials in a secured bunded facility as far as possible away from the estuary.	Confirmed. Hazardous materials are required to be stored in a secured, bunded facility, sited as far from the estuary as the site layout allows (SPCC, Annexure B).
• The installation of pollution sump catch-pits designed and constructed to intercept and contain any hazardous substances before they can enter the stormwater system or reach the estuary.	Confirmed. Pollution sump catch-pits designed to intercept hazardous substances before they reach the stormwater system or estuary are included in the engineering design and SPPP.
• Incorporation of stormwater management measures into the Construction and Operation EMPr	Confirmed. Stormwater management measures are incorporated into both the Construction and Operational EMPr.
<u>SANParks wishes to comment further on any Engineering designs/ drawings and the Stormwater Management Plan. This will be undertaken as part of SANParks Knysna Protected Environment (KPE) Authorisation in terms of Section 8, 9 and 10 of the KPE Regulations (GN 1175 of 2009).</u>	Noted. Eco Route acknowledges that SANParks' review of engineering designs and the Stormwater Management Plan will proceed under the separate KPE Authorisation process (Sections 8-10, GN 1175 of 2009).

<u>Point 2: Social Benefits</u>	Point 2: Social Benefits
<u>SANParks supports Kinetic's proposal to retain and enhance the South African Sea Cadet Corps' (Sea Cadets) facility on the western section of the site. The facility provides valuable training and social benefits.</u>	Noted with thanks.
SANParks welcomes that the Sea Cadet Slipway has been included in the application,	Noted with thanks.
<i>"The scope of works has been expanded to explicitly include the existing Sea Cadets slipway. While no immediate upgrade plans have been prepared, the slipway has been incorporated into this Basic Assessment to ensure that any future works are authorised under the current application. It is recommended that a condition be attached to the authorisation requiring the submission of a detailed method statement to the competent authority for approval prior to implementation of any slipway upgrade. This approach ensures that potential impacts associated with vessel launching and slipway use are comprehensively addressed within a single, integrated authorisation process, avoiding the need for separate future applications".</i>	Noted and agreed. Eco Route supports a condition of authorisation requiring submission of a detailed method statement for any future Sea Cadets slipway upgrade, for approval prior to implementation, as recommended by SANParks.
<u>Any future slipway expansion designs will be commented on and approved by SANParks as part of SANParks KPE Authorisation, in terms of Section 8, 9 and 10 of the KPE Regulations (GN 1175 of 2009).</u>	Noted. This will proceed via SANParks' KPE Authorisation process.
<i>It is noted that, "A public open space corridor will be established along the lagoon edge, forming part of a broader linear park system envisioned in the Knysna Spatial Development Framework.</i>	Confirmed, consistent with DBAR Section B.2.3 (Public Park and Lagoon Interface).
The area will include: • Indigenous landscaping and seating areas • Low-level lighting for safety and evening use • A pedestrian linkage between Union Street and the existing lagoon walkway	Confirmed, consistent with DBAR Section B.2.3.

<i>This intervention replaces the current degraded and uninviting lagoon frontage with a landscaped buffer that enhances public access and ecological interface".</i>	Noted with thanks.
<u>Discussions are required between Kinetic, Knysna Municipality and SANParks on how this area will be managed. Outcomes of discussions should be incorporated into the Operational EMPr.</u>	Agreed. The Applicant / Facility Manager will initiate engagement with Knysna Municipality and SANParks on the management of the public open space corridor within three months of commencement of operation, with the outcome to be recorded as an amendment to the Operational EMPr. Pending conclusion of a formal management arrangement between the parties, the EMPr records that the Applicant will be responsible for basic maintenance of the corridor (landscaping, litter removal, and functioning of low-level lighting) to ensure it remains in a safe and presentable condition in the interim.
<u>Point 3: Climate Change Adaptation & Resilience</u>	Point 3: Climate Change Adaptation & Resilience
As stated in the Pre-application Basic Assessment and DBAR, the high-water mark (HWM) survey undertaken by Eden Geomatics, during November 2024 to February 2025 established the current HWM as, "south of the existing paved surface and fenced boundary of the former vehicle testing facility, confirming that the proposed yacht factory will be situated landward of the surveyed HWM and entirely within an already transformed and elevated platform approximately two metres above mean sea level".	Confirmed, consistent with the Eden Geomatics HWM survey findings recorded in DBAR Section C.
Climate change adaptation and resilience strategies as mitigation towards predicted sea level rise, storm surge events, and coastal erosion may involve: (1) A <u>retreat</u> strategy, where development moves away from the threat; (2) An <u>elevation</u> strategy, where buildings are built high enough to not be affected; and (3) A <u>defence</u> strategy, where structures are built	Noted.

to withstand the threat and defend buildings and infrastructure behind the defence wall/ structure.	
The landowner has advised that the building and infrastructure will be elevated to withstand climate change, with meters above mean sea level (m.a.m.s.l.) to be guided by an engineer/ architect. A retreat strategy is not feasible due to space constraints.	Confirmed, consistent with DBAR Section C. An elevation strategy has been adopted; a retreat strategy was assessed as infeasible due to site constraints.
Although a future defence strategy of using the raised walkway to the south of the site, was suggested by SANParks, this has not been included in the revised application. The need for this intervention should be monitored and included as an action in the Operational EMPr. Environmental regulatory approvals would be required, should the walkway be raised in any way.	Noted. The raised-walkway defence strategy previously suggested by SANParks has not been included in the current application.
<u>Point 4: Specialist Studies</u>	Point 4: Specialist Studies
It was previously noted that no Visual Impact Assessment had been undertaken. <u>SANParks supports mitigation measures proposed in the DBAR to mitigate visual impacts.</u>	Confirmed. SANParks' support for the DBAR's visual mitigation measures (façade treatment, roof-mounted solar orientation, shielded low-level lighting, building colour selection) is noted with thanks; refer to DBAR Section C for the full basis on which a standalone Visual Impact Assessment was not commissioned.
As the estuary is home to the Endangered (IUCN) <u>Knysna Seahorse (<i>Hippocampus capensis</i>)</u> care will need to be exercised with any construction within the estuary waterbody and Seahorse habitat vegetation. <u>A Method Statement for Seahorse handling</u> , should they be found, should be included in the EMPr for construction and operation. <u>A Seahorse specialist study may further be requested, pertaining specifically to the Sea Cadets Slipway expansion/repair.</u> This request will be dealt with via the SANParks KPE Authorisation for this activity, as required.	Noted.
<u>Point 5: Summary & Way Forward</u>	Point 5: Summary & Way Forward

SANParks supports the proposed development, provided development is undertaken in a responsible, sustainable, future climate smart manner, and that negative impacts are mitigated adequately.	Noted with thanks.
SANParks supports Kinetic's proposal to retain and enhance the South African Sea Cadet Corps' (Sea Cadets) facility on the western section of the site. The facility provides valuable training and social benefits. SANParks welcomes that the Sea Cadet Slipway has been included in the application. Any future slipway expansion designs will be commented on and approved by SANParks as part of SANParks KPE Authorisation. Discussions are required between Kinetic, Knysna Municipality and SANParks on how the public open space corridor/park will be managed. Outcomes of discussions should be incorporated into the Operational EMPr.	Noted with thanks; see responses to comments above on the Sea Cadets facility, slipway and public open space corridor.
The need for a climate change defence intervention, of utilising the raised walkway to the south of the site should be monitored and included as an action in the Operational EMPr. Environmental regulatory approvals may be required if this intervention becomes necessary.	Noted; see response to comment above regarding the raised walkway.
SANParks supports the visual impact mitigation measures proposed. A Method Statement for Seahorse handling, should they be found, should be included in the EMPr for construction and operation. A Seahorse specialist study may further be requested, pertaining specifically to the Sea Cadets Slipway expansion/repair. This request will be dealt with via the SANParks KPE Authorisation for this activity, as required.	Noted; see responses to comments above regarding visual mitigation and the Seahorse Method Statement gap.
SANParks wishes to know if a Sewage Spill Contingency Plan will be developed by the Applicant in conjunction with the Knysna Municipality, which would propose a course of action should the municipal sewer line in New Street fail, or should pump stations be none functional at any time. Several sewage spill events have taken place along this sewer line in the last two years, one severe spill directly behind the new Foodlovers	See response to comment above (Sewerage Infrastructure) - this is flagged as requiring Justin's follow-up with Knysna Municipality and cannot be confirmed from existing documentation.

parking area, and the other directly outside Sea Cadets. SANParks seeks confirmation from the Knysna Municipality on the structural integrity and adequate functioning of this sewer line, and associated pump stations. SANParks wishes to comment further on any Engineering designs/ drawings and the stormwater management plan. This will be undertaken as part of SANParks KPE Authorisation.	
It is recommended that the following conditions of approval are considered:	Noted.
1. The EMPr, by Eco Route, dated May 2026, should be adhered to.	Confirmed. The Applicant commits to adherence with the EMPr (Eco Route, dated May 2026) as a condition of authorisation.
2. Annexure A to the EMPr, Stormwater Pollution Prevention Plan (SPPP), dated May 2026, should be adhered to.	Confirmed. The Applicant commits to adherence with Annexure A (SPPP, dated May 2026).
3. Annexure B to the EMPr, Spill Prevention, Control and Countermeasure Plan (SPCC), dated May 2026 should be adhered to.	Confirmed. The Applicant commits to adherence with Annexure B (SPCC, dated May 2026).
4. A suitably qualified Environmental Control Officer (ECO) should be appointed to monitor the EMPr during construction and operation.	Confirmed. The EMPr records the appointment of a suitably qualified ECO for both construction and operational phases.
5. Should any resources of suspected heritage value be uncovered during clearing, Heritage Western Cape (HWC) must be contacted immediately for instructions.	Confirmed and agreed as a standing condition - the chance-finds procedure recorded in the EMPr requires that Heritage Western Cape be contacted immediately should any suspected heritage resources be uncovered during clearing, regardless of prior assessment findings. Separately, Heritage Western Cape has now formally confirmed the outcome of the Section 38(8) Notification of Intent to Develop (NID) submitted for this development: following the Heritage Officers' Meeting held on 6 August 2026, HWC confirmed (Case No. 29084RB0625) that the proposed development does not trigger

	Section 38(1) of the National Heritage Resources Act and is therefore not applicable in terms of impacts to heritage resources. This is recorded in the DBAR (Section C and Table 8, Appendix 11).
6. The disturbance footprint/no-go areas should be fenced off during the construction phase with a barrier material, such as shade cloth to prevent workers from encroaching into adjacent estuary vegetation.	Confirmed. Fencing of the disturbance footprint/no-go areas with a suitable barrier material is recorded as a construction-phase EMP control.
SANParks is responsible for the Proper Administration of the Knysna Protected Environment (GN 1175 of 2009) Regulations, and for the authorisation of any development (as defined in the Regulations) in the Development Control Area, as per Section 8. This area extends 50m from the high-water mark into RE of Erven 1339 and 1316, Knysna, and as such SANParks' authorisation is required for development to proceed in these areas.	Noted. SANParks' authority for development within the 50m Development Control Area under Section 8 of the KPE Regulations is acknowledged; see response to comment above regarding KPE Authorisation status.
As per Section 9 and 10 of the Regulations SANParks may request additional studies to be undertaken, should it be deemed that these are necessary.	Noted.
SANParks reserves the right to revise comments if additional information becomes available.	Noted.
<u>ATTACHMENTS:</u>	ATTACHMENTS
<u>Annexure 1:</u> SANParks comments dated 9 February 2026 for Land Use Application, Planning Space Town & Regional Planners, 19 August 2025.	Noted; SANParks' 9 February 2026 comments (Annexure 1) are acknowledged and have been considered.
<u>Annexure 2:</u> SANParks comments dated 2 April 2026 for Pre-application Basic Assessment, Eco Route Environmental Consultancy, October 2025.	Noted; SANParks' 2 April 2026 comments (Annexure 2) are acknowledged and have been considered and carried forward into the DBAR.
MUNICIPALITIES	

Garden Route District Municipality – L Herwels – 19 June 2026

Your Draft Basic Assessment Report concerning the above mentioned have reference:	Noted.
The office subjected to the following conditions has no objection to the proposed activity -	Noted with thanks - no objection recorded.
1. Ensure that no Municipal Health Nuisance occurs during the development of the facility and redevelopment of the infrastructure.	Confirmed. Municipal Health Nuisance prevention is a standing EMPr requirement across both construction and operation.
1.1 This includes the safe storage and disposal of general waste, hazardous waste and building rubble.	Confirmed. Safe storage and disposal of general waste, hazardous waste and building rubble is addressed in the EMPr's waste management provisions and the SPCC.
1.2 This office takes note of the spill prevention, control and countermeasure plan that will address the possibility of contaminants entering the stormwater channels. This plan must be monitored by a dedicated staff member.	Confirmed. The SPCC (Annexure B) addresses contaminants entering stormwater channels.
1.3 The activities at the sea cadets include boating restoration ensure that measures are in place to contain any contaminants from the site.	Confirmed. Boat restoration activities at the Sea Cadets facility are subject to the same contaminant-containment controls in the SPCC as the main factory operations.
1.4 Standby generators to be position and operated without causing a nuisance.	Confirmed. Standby generator siting and operation to avoid nuisance is a standard EMPr operational control.
2. The public park and lagoon interface to be provided with waste bins and our office recommends that recycling bins is also planned for the area.	Noted and agreed. Waste bins and recycling bins for the public park and lagoon interface will be provided as part of the Operational EMPr.
3. Waste areas to be secured and provided with running water and a centralised drainage system connected to the wastewater system.	Confirmed. Waste areas will be secured, provided with running water, and connected to a centralised drainage system linked to the wastewater system, per the EMPr's waste management provisions.

4. The planned future businesses e.g. the restaurants must comply to the relevant Legislations. Further comments will be provided as soon as an application is submitted to the Local Authority.	Noted. Future tenant businesses (e.g. restaurants) will be required to obtain their own approvals and comply with applicable legislation at the time of application; this is noted for the record and does not require action within this Basic Assessment.
5. According to the Pre-Application Basic Assessment report the sewer outflow will correspond proportionally with the calculated water demand for the facility. It is recommended that the Knysna Municipality technical Department be consulted to ensure sufficient capacity. The specific sewer line has a history of blockages furthermore there has been an increase of development adjacent the proposed development.	Noted. This raises the same point addressed under SANParks' comment above (Sewerage Infrastructure) regarding the condition of the existing municipal sewer line. The DBAR records (Existing Sewer Infrastructure Integrity) that confirmation of the structural integrity and capacity of the existing line and pump stations, including in light of its history of blockages and increased adjacent development, will be sought by the project engineer from Knysna Municipality's Technical Services Department as part of the standard building-plan / engineering drawing approval process, rather than as a pre-condition of this Basic Assessment.
We hereby kindly request that the above recommendations be incorporated into the Environment Management Program.	Noted. The recommendations above will be incorporated into the EMPr and its annexures as flagged in the individual responses in this table.
LANDOWNERS	
Andries Fourie – Erf 4653 /Erf 21440/Erf 21439	
As you are aware, we own the following properties in the area: • Owls Head (Pty) Ltd: Erf 4653 – Nissan. • Owls Head (Pty) Ltd: Erf 21440 – Suzuki/VW and parking area. • Deep Blue See Properties (Pty) Ltd: Erf 21439 – Waterside Shopping Centre.	Noted. Mr Fourie's ownership of the adjacent Erf 4653, Erf 21440 and Erf 21439 properties is recorded.

We would like to comment as follow:	Noted.
• We would NOT allow any form of Taxi Rank in the area. We already have a High Court interdict against the Municipality and Taxies to NOT park in Union Street, and we are prepared to approach the Courts again if needs be. This area is not suitable for a Taxi rank, right next to a world class estuary... We have first-hand knowledge of how they operate and what a taxi rank means for the area, and we will oppose it at all costs.	Noted. The objection to any form of taxi rank relates to land use/zoning matters, not to activities assessed under this NEMA Basic Assessment - the proposed development under this application does not include a taxi rank. This matter has since been formally addressed by the Applicant's planning team in the parallel Land Use Application process: in a written response to Mr Fourie's objection dated 1 July 2026 (Planning Space, Response to Comments and Objections Received (RE-1316 and RE-1339 Knysna)), the Applicant confirmed that no taxi parking is proposed on the subject site, and that the landowner is in discussion with Knysna Municipality to secure a suitable alternative site for the taxi holding area, towards which the landowner has committed to contribute funding for the upgrading and development of that alternative site.
• Our access rights/right of way and use must be kept in place with regards to New Street.	Noted. Mr Fourie's existing access rights/right of way over New Street are a legal/servitude matter and are not altered by this Basic Assessment. The Applicant has since confirmed, in the same 1 July 2026 Land Use Application response, that Mr Fourie's right of way will be secured by servitude over the proposed New Street closure area for Erf 4653 and Erf 21440, as indicated on the proposed Subdivision Plan.
• We will oppose any further applications for 12.5m building heights on this site as it will not be aesthetically pleasing if you have such high buildings next to the lagoon and such a long line of such high buildings.	Noted. Building height is regulated through the zoning scheme and the concurrent Land Use Application (height departure component), not through this NEMA Basic Assessment. In the same 1 July 2026 response, the Applicant's planning team confirmed that the intention is to carry through the existing 12m building line already present on site (required to

	accommodate the yachts), articulated with a pitched roof and balconies rather than a flat mono-block form, and that Mr Fourie will be afforded the opportunity to comment on the final building plans.
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6. CONCLUSION

The Public Participation Process undertaken for the proposed Kinetic Catamarans development is now complete, comprising both the pre-application phase (06 November 2025 – 06 December 2025) and the application phase (28 May 2026 – 29 June 2026) rounds of consultation. All comments and issues raised by Interested and Affected Parties (I&APs), Organs of State, and other stakeholders during both phases have been recorded, considered, and addressed in this report. This Comments and Response Report forms part of the final documentation submitted to the Department of Forestry, Fisheries and the Environment (DFFE), together with the Final Basic Assessment Report and Final Environmental Management Programme, in support of the application for Environmental Authorisation.

Annexure A: Evidence of Comments Received