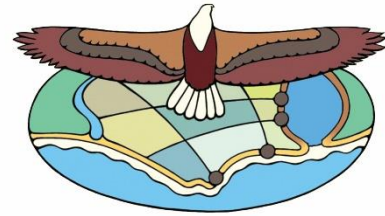


Ecoroute Environmental Consultancy
P O Box 1252
Sedgefield
6573



**WESTERN HEADS / GOUKAMMA
CONSERVANCY**

For attention: Janet Ebersohn

3 October 2020

Dear Ms Ebersohn

OBJECTIONS TO THE DRAFT BASIC ASSESSMENT REPORT PRODUCED BY ECOROUTE ENVIRONMENTAL CONSULTANCY FOR A PROPOSED DEVELOPMENT ON PORTION 76 (A PORTION OF PORTION 54) OF THE FARM UITZICHT 216

The Western Heads–Goukamma Conservancy, in its capacity as a registered “Interested and Affected Party” wishes to detail below its objections to the draft basic assessment report referred to above.

A. Threatened biodiversity

- 1) Uitzicht 216 Portion 76 is part of a **Critical Biodiversity Area (CBA)**, first proclaimed by Knysna Municipality in its Spatial Development Framework (SDF) in 2006, and reconfirmed in the Integrated Spatial Development Framework (ISDF) of 2013, and the current draft SDF (Knysna Municipality, 2020a). CBAs are terrestrial (land) and aquatic (water) areas which must be safeguarded in their natural or near-natural state because they are critical for conserving biodiversity and maintaining ecosystem functioning. These areas include:
 - a. natural areas identified as requiring safeguarding in order to meet national biodiversity thresholds.
 - b. areas required to ensure the continued existence and functioning of species and ecosystems, including the delivery of ecosystem services.
 - c. important locations for biodiversity features or rare species.

The Environmental Assessment Practitioner (EAP) recognises the significance of this classification on pages 61 and 62 of their report, and even states that the objective of a CBA is to “Maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate”.

This objective appears to have been ignored because on page 58 the EAP seems quite content to proceed with the application despite acknowledging that 4.3% of the site will be destroyed if the development is approved.

- 2) Most of the CBA on the Brenton peninsula consists of Knysna Sand Fynbos (FFd 10) – which has been proclaimed as a **Critically Endangered** ecosystem (vegetation type). The Biodiversity Act (Act 10 of 2004) provides for the listing of threatened or protected ecosystems, in one of four categories: critically endangered (CR), endangered (EN), vulnerable (VU) or protected. The purpose of listing threatened ecosystems is primarily to reduce the rate of ecosystem and species extinction. This includes preventing further degradation and loss of structure, function and composition of threatened ecosystems.

The terrestrial ecosystems were listed in the Government Gazette no. 34809 of 9 September 2011, and Knysna Sand Fynbos appears on page 52. It also states that “if any other development that requires environmental authorisation Impacts on a threatened ecosystem, that impact should be avoided, minimised, mitigated and/or offset as appropriate. In determining the significance of impact on biodiversity in an EIA process, loss of natural habitat in a **Critically Endangered** or endangered ecosystem should be ranked as highly significant”.

The proposed development would destroy 1 200 m² for the farm manager's house and 3 650m² for 80% of the 830 m access road (5.5 m wide) which is in FFd 10. This impact is not acceptable in terms of the above legislation, and less damaging alternatives need to be proposed and evaluated.

3) A Regalis Environmental Services (RES) 2005 report describes the natural vegetation of the Western Heads and splits it into 16 distinct vegetation types. Uitzicht 216/ 76 contains seven of these vegetation types (Map 4.1), mostly in pristine condition (Map 4.2), some of which only occur on the Brenton peninsula (*):

- Moist Dune Fynbos
- Goukamma Dune Thicket
- Arid Dune Fynbos*
- Brenton Dune Fynbos*
- Primary Dune Slack Fynbos*
- Primary Dune & Cliff Fynbos*
- Fore dune

In the Basic Assessment Report (BAR) prepared by the EAP the asterisked vegetation sub types have all been classified as Southern Cape Dune Fynbos (FFd 11), and "Least Threatened", without taking into account the RES (2005) report (attached).

4) The application/ BAR does not comply with "Procedures to be followed for the assessment and minimum criteria for reporting of identified environmental themes in terms of section 24(5) (a) and (h) of the National Environmental Management Act, 1998, when applying for Environmental authorisation. Protocol 3: Terrestrial animal species" Government Gazette no. 42946 dated 10 January 2020 (Knysna Municipality, 2020b).

5) No detailed biodiversity study has been done for rare and threatened plants and animals, as is required in the above legislation.

6) The property is located within the expansion footprint of the Garden Route National Park (GRNP) and is both a corridor for wildlife movement (east-west and north-south), and a buffer zone to the GRNP. The property is located between two properties that are in the process of being incorporated into the GRNP. This has not been recognised or dealt with by the EAP.

7) The primary dune is home to very special and sensitive vegetation. Removal of vegetation will cause erosion and landslides, as have been seen elsewhere along this strip of coastline.

Impact of development

1) The developers are planning to build the main residence on the primary dune. A lot of concrete and/or piles will be needed for the huge house envisaged. Will the 2.5m wide road planned provide access for construction vehicles?

2) The proposed access road to the main residence goes over the summit of the secondary dune, involving a steep climb and sharp bend. Construction vehicles such as excavators, concrete, sand and brick delivery trucks would not be able to get around such a sharp bend, and consequently more damage would have to be done to the secondary dune summit to make a wider bend.

3) It is proposed that sewerage is treated in septic tanks with a soakaway into the sandy (very permeable) substrate. It is also proposed that water is supplied from boreholes – how will contamination from sewerage be avoided?

4) The visual impact of a large house on the primary dune will be highly detrimental to the residents of Buffalo Bay, Brenton-on-Sea, and other Uitzicht properties. The natural beauty of the 5 km unspoilt beach (one of the finest in South Africa) would be defaced and there would be a loss of "sense of place". Furthermore there would be adverse impacts on tourism and property values.

- 5) A very large (160 kl) swimming pool is planned. How is it intended to dispose of the filter back wash water without harming the environment?
- 6) Why does the main dwelling have to have a footprint of 4 000 m²? That is the area of 4 residential erven in Brenton on Sea. Surely, if the largest houses being built in Brenton-on-Sea can be built on a single 1 000 m² stand there is no justification for the footprint of the main dwelling to be any more than 1 000 m².
- 7) It is proposed that water is obtained from rainwater off the roof and borehole(s). The elevation at the bottom of the primary dune slack where the borehole(s) would be drilled is c. 40m above mean sea level so it is likely that the water will be brackish and not fit for consumption. The quantity of water required would quickly lower the water table until sea water was drawn into the borehole pump. Another problem is how would the drilling equipment be got to the site to prove the water resource?

Knysna Spatial Development Framework

Zoning Scheme

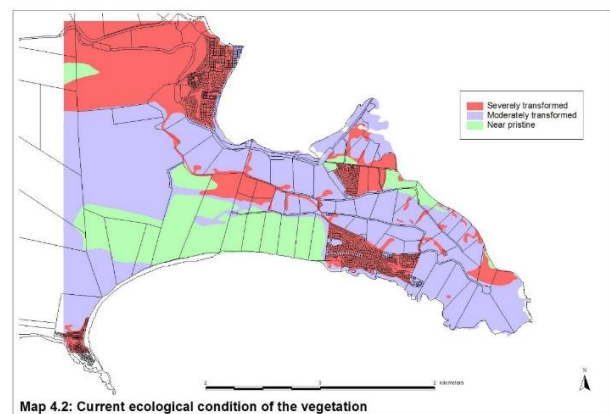
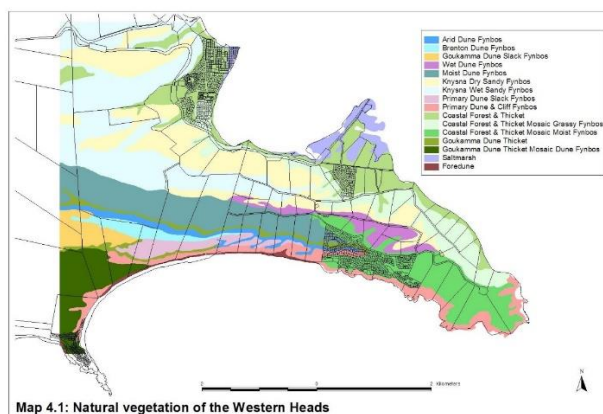
- 1) The area is located within a Core1b spatial planning category, which is the highest conservation status after formally protected areas which are located in a Core1a category.
- 2) The property is zoned Agriculture 1. The primary right is for a dwelling house and only such buildings or infrastructure that are reasonably connected with the main farming activities. As there are minimal farming activities on the property (bee keeping), no additional dwelling or unit is permitted.
- 3) Furthermore the Zoning Scheme does not permit any additional dwelling unit within 1 km of the high-water mark of the sea, unless such unit is attached to the main house and does not exceed a floor area of 60m². Since the entire property falls within 1km of the high water mark of the sea the additional unit will have to be attached to the main house and is restricted to a maximum of 60m².
- 4) The main dwelling, together with the attached additional unit should be located as close as possible to the existing public road, to minimise damage to the Knysna Sand Fynbos.

Alternatives have not been considered

Only two alternatives are considered, both of which would cause unacceptable and illegal environmental damage. An alternative that does not cause such damage has not been evaluated – namely that the main dwelling, together with the attached additional unit should be situated as close as possible to the access road on the northern boundary of the property. This alternative would destroy less than 1 000 m² of sensitive vegetation instead of over 8 000 m².

Maps

The maps below are extracted from RES (2005), with kind permission of the author.



References

Department of Environmental Affairs, 2020. Procedures to be followed for the assessment and minimum criteria for reporting of identified environmental themes in terms of sections 24(5)(a) and (h) of the National Environmental Management Act 1998, when applying for environmental authorisation. Protocol 3: Terrestrial animal species" Government Gazette no. **42946**. 10 January 2020.

https://www.gov.za/sites/default/files/gcis_document/202001/42946gon9_0.pdf

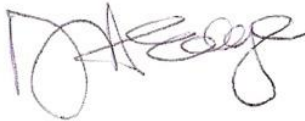
Knysna Municipality, 2020a. Draft Municipal Spatial Development Framework. May 2020.

Knysna Municipality, 2020b. Zoning Scheme By-law. 29 June, 2020. Province of the Western Cape: Provincial Gazette Extraordinary no. **8258**.

<https://www.knysna.gov.za/wp-content/uploads/2020/07/Knysna-Zoning-Scheme-By-law-2020.pdf>

Regalis Environmental Services (JHJ Vlok), 2005. The natural vegetation of the Western Heads (Knysna): notes on its ecological sensitivity and proposed future development. Unpublished report for the Western Heads Goukamma Conservancy.

OBJECTION SUBMITTED BY:



Dr David Alan Edge

Chairperson

Western Heads–Goukamma Conservancy

OBJECTION SUPPORTED BY:

- 1) Brenton Ratepayers Association
- 2) Buffalo Bay Homeowners Association
- 3) Uitzicht 216 property owners



environment, forestry
& fisheries

Department: Environment, Forestry
and Fisheries
REPUBLIC OF SOUTH AFRICA

FORESTRY WESTERN CAPE

Private Bag X 12, Knysna 6570
WCE0045/09/20-21

Tel: (044) 302 6900 Fax: (044) 382 5461 E-mail: MelanieKo@daff.gov.za

Enquiries: M Koen Ref: F13/11/2 Date: 30 September 2020

Eco Route Environmental Consultancy
Attention: Janet Ebersohn
Tel/ Cell: 044 343 2232/ 082 557 7122
Email: janet@ecoroute.co.za

**BASIC ASSESSMENT REPORT THE PROPOSED CONSTRUCTION OF AN ACCESS ROAD,
RESIDENTIAL DWELLING AND FARM MANAGERS HOUSE ON PORTION 76 OF THE FARM 216
UITZIGHT, BRENTON, KNYSNA**

- 1 Forestry is responsible for the implementation and the enforcement of the National Forest Act (NFA), Act 84 of 1998 as amended and the National Veld and Forest Fire Act, Act 101 of 1998 as amended (NVFFA). Thank you for giving Forestry this opportunity to comment on above application.
- 2 Forestry studied the supporting documents for the above mentioned application and the following points related to Forestry's mandate i.e. the implementation of the NFA are applicable
 - a. The above proposal still has to undergo a land-use planning application through the Knysna Municipality: Land-use planning Section.
 - b. Forestry will thus formally comment on the land-use application firstly before providing further comment to above application
 - c. Request that a more recent Plant Species Assessment of above property be conducted by a Specialist and that this Specialist report be forwarded to the Department for perusal with ample photo record templates of the whole study area- especially after the recent fires.
 - d. The exact location of these protected/ forest/ thicket patches/ of protected/ indigenous trees be surveyed/ GPS'd and overlaid within any developmental proposals to determine how these vegetation areas will be impacted- this information to be compiled within a report
- 3 Due to the Nation-Wide COVID-19 Lockdown, officials are working remotely for the duration of the lockdown period; and thus site inspections are not conducted at this stage. Site inspection might be required at a later stage, in due course, once safe to do so
- 4 Forestry reserves the right to revise initial comment based on any additional information that may be received or obtained

Yours Faithfully

p.p. AREA MANAGER FORESTRY: WESTERN CAPE

FW: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

From janet@ecoroute.co.za <janet@ecoroute.co.za>

Date Mon 17/02/2025 12:18

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Should you require any information please do not hesitate to contact me.



Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

From: Steve Krumm <stevek@netactive.co.za>

Sent: Wednesday, 30 September 2020 06:52

To: Janet Ebersohn <janet@ecoroute.co.za>; corne.steyn@icloud.com; constance.kapopo@investec.co.za; smallville@seanet.co.za; sucam@mweb.co.za; ejones@biothermenergy.com; craig.benadie@gmail.com; johns@elink.co.za; rob@multi-sc.co.za; nicci@futureworks.co.za; orachrysops@gmail.com; chrisandtix@telkomsa.net; 'Lorna Watt' <lornawatt@telkomsa.net>

Cc: 'Candace Myers' <candacemyers29@gmail.com>; 'Tony Rischbieter' <anthonyjames@icon.co.za>; Picca <piccascene@cyberperk.co.za>; 'Christa le Roux' <christa.a.leroux@gmail.com>

Subject: Re: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

Dear Janet,

Please register Brenton Ratepayers Association as an Interested and Affected Party in this process and we will be submitting a comment.

Thank you

Judy Harrison

Brenton Ratepayers Association

083 266 1200

From: Janet Ebersohn <janet@ecoroute.co.za>

Date: Thursday, 03 September 2020 at 13:16

To: <corne.steyn@icloud.com>, <constance.kapopo@investec.co.za>, <smallville@seanet.co.za>, <sucam@mweb.co.za>, <ejones@biothermenergy.com>, <craig.benadie@gmail.com>, <johns@elink.co.za>, Judy Harrison and stephen krumm <stevek@netactive.co.za>, <stevek@netactive.co.za>, <rob@multi-sc.co.za>, <nicci@futureworks.co.za>, <orachrysops@gmail.com>, <chrisandtix@telkomsa.net>, 'Lorna Watt' <lornawatt@telkomsa.net>

Subject: FW: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton





ECO-ROUTE ENVIRONMENTAL CONSULTANCY

EIA PROCESS

Notification of Public Participation:

Draft Basic Assessment Report

The Proposed Construction of an Access Road, Residential Dwelling and Farm Managers House on Portion 76 of the Farm 216 Uitzicht, Brenton, Knysna Local Municipality, Western Cape

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998) as amended, the National Environmental Management Act: Environmental Impact Assessment Regulations 2014 as amended of a Public Participation Process to be undertaken from **03/09/2020 – 03/10/2019** under the authority of the Department of Environmental Affairs /DEA.

The following EIA Listed Activities are applicable:

Government Notice No. R324: (Listing Notice 3 of 2014 as amended)	Activity 4: (i) ii(aa) Activity 12: (a) i. ii.
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The Draft Basic Assessment Report may be reviewed for comment from **03/09/2020 – 03/10/2020** on Eco Routes website www.ecoroute.co.za. 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.

Environmental Assessment Practitioner: Janet Ebersohn

PO. Box 1252
Sedgefield
6573

Cell: 082 55 77 122
Fax: 086 402 9562
Email: janet@ecoroute.co.za

Additionally, information may be accessed via our website: www.ecoroute.co.za

Should you require any information please do not hesitate to contact me.



Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

B.I.V
P.O. Box 930
Stellenbosch
29 September 2020

Janet Ebersohn
P.O. Box 1252
Sedgefield
6573
Sent by e-mail: janet@ecoroute.co.za

Dear madam

Draft Basic Assessment Report: The Proposed Construction of an Access Road, Residential Dwelling and Farm Manager's House on Portion 76 of the Farm 216 Uitzicht, Brenton, Knysna Local Municipality, Western Cape.

The Buffelsbaai Inwoners Vereniging (BIV) acts on the public invitation to register as an Interested and Affected Party for the environmental assessment process currently being undertaken for Portion 76 of the Farm 216 Uitzicht, Brenton, Knysna Local Municipality, Western Cape. Please thus register the Association as an I &AP. If our understanding of the status of the process is correct, a Draft Basic Assessment Report (which we assume will include a Draft Site Development Plan with description of the proposed activity) has already been prepared. Upon receipt of the aforementioned documentation the Association will hopefully get a better understanding of the nature and extent of the proposed improvements and will then be in the position to comment.

We await your urgent response in this regard.

Greetings



H Knoesen: for and on behalf of the BIV

Voorsitter: Jacques Malan

Ondervoorsitter: Denis Booysen

Sekretaris: Roelof Feenstra

Tesourier: Pieter Carstens

FW: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

From janet@ecoroute.co.za <janet@ecoroute.co.za>

Date Mon 17/02/2025 12:19

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Should you require any information please do not hesitate to contact me.



Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

From: John Sole <johnmsole@gmail.com>

Sent: Tuesday, 29 September 2020 20:14

To: Janet Ebersohn <janet@ecoroute.co.za>; Evan Jones <ejones@biothermenergy.com>; Craig Benadie <craig.benadie@gmail.com>; Owen Williams <honeychildhoney@gmail.com>

Subject: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

Due to the time restrictions, please acknowledge receipt of this email.

Name : John and Anne Sole

Contact : 083-651-0610

Email : johnmsole@gmail.com

Interest : No direct business, financial interest but
Owner of Portion 114 of the Farm 216 Uitzicht, Brenton

Note : We have previously requested to be registered as an interested and affected party.

Comments on Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton as downloaded from www.ecoroute.co.za :

1. Page 21 of the draft BAR states "*The property is currently vacant, but was used for tourist facilities that include a restaurant, and farm store.*".

Page 21 further states "*The developer intends to re develop the property into a restaurant, farm stall and residential dwelling: The property was previously used as a tourist facility that was very popular to local communities and tourist.*" All these statements are false in relation to the Portion 76 of Farm 216, the specific property for which this draft BAR is intended and leads to confusion. Is this a 'cut and paste' issue or something more sinister?

These statements are certainly not what has been presented in the rest of the draft BAR however, a statement of major concern on page 4 "*Section G of this report. The preferred alternative is a restaurant, farm stall and residential dwelling. (No re-zoning required, as consent use already in place). Alternative 1 would be a restaurant and 5 resort units (rezoning required).*"

Irrespective of the alternatives suggested an EIA would still be required for ANY development planned in the Coastal protection zone. These various statements are at odds with the rest of the draft BAR. What is the intended development plan and/or what is the intention behind these statements? Is this indicative of the quality of the physical assessment done on the property itself. Perhaps also a 'cut and paste' assessment!!

2. We disagree with the sentiment expressed on page 42 in relation to the question "Will the proposed land use/development set a precedent for similar activities in the area (local municipality)?"

The location of the "main" dwelling appears to be within the Coastal protection zone and as such the Integrated Coastal management Act is applicable. It is most definitely within 100m of the high tide mark. This is an extremely environmentally sensitive zone and construction in this zone should be rejected as approval will in all likelihood create a precedent for adjacent properties and cause irreparable damage to the region.

3. No mention has been made for the establishment of a walkway to the beach down the dune from the "main" dwelling. This must either be disclosed in detail, so the impact can be assessed or there must be an explicit condition precluding the building of a walkway to the beach due to the erosion and the sensitivity of the site (Oyster Catchers et al) in the event that this BAR recommends the development.

4. The layout of the "main" dwelling appears to be more in line with the establishment of a boutique hotel or B&B. This has not been disclosed or stated as part of the intended use, however, if this EIA process recommends/approves the development based on the current level of disclosures then there must be an explicit condition prohibiting the use as a boutique hotel or B&B as the impact for such use has not been evaluated.

5. One of the possible alternatives for the provision of electrical power is the use of an MV supply on overhead cables on Kerk Street. This needs to be rejected outright.

6. The disclosure on "managers dwelling" is extremely sparse with absolutely no indication of the number of rooms, provision for permanent staff/employees, vehicles etc and the associated usage impact cannot be fully assessed. The proposed size, essentially 1000 sqm for the "managers" dwelling raises concerns about the intended or non disclosed usage.

7. Relaxation of the building line is not justifiable based on the argument presented. The entire property is critical fynbos (Critical Biodiversity Area) and if it is acceptable to build a road >800m x 2.5m with the associated destruction then an alternative location which doesn't require the relaxation of the building line must be found. A huge double storey "managers" house of approx 1000sqm (600sqm ground floor + 400 1st floor) directly adjacent to Kerk Street requiring the permanent relaxation of the building line should be rejected. The visual and other impacts cannot be assessed due to the sparse information presented in relation to the "managers" dwelling. An alternative location for a "managers" dwelling can/must be found without encroaching on the building line.

8. Kerk Street is a sand-road/single track road which is not maintained by Knysna council and any excess traffic will have a detrimental effect so there needs to be clear disclosure on expected vehicle use and/or conditions imposed to minimise impact. Additionally any significant road works will need to be specifically environmentally assessed as there is a range of rare geophytic orchids, Brunsvigia and Haemanthus some of which are in the road reserve and will be negatively impacted.

9. Large scale building operations raise security concerns for the general area and need to be considered and addressed.

10. Page 62 refers to the expected capital value of the activity on completion? Value ± R800,000.00 Is this correct or another error?

11. The proposed bee farming operation while desirable has a very low potential at < 1 hive per hectare based on real experience of bee keeping in the Brenton fynbos area and would simply be incidental.

Yours sincerely

John and Anne Sole



Western Cape
Government

Transport and Public Works

ROAD NETWORK MANAGEMENT

Email: Grace.Swanepoel@westerncape.gov.za

tel: +27 21 483 4669

Rm 335, 9 Dorp Street, Cape Town, 8001

PO Box 2603, Cape Town, 8000

REFERENCE : TPW (Job 27968)
ENQUIRIES : Ms GD Swanepoel
DATE : 30 September 2020

Eco-Route Environmental Consultancy
PO Box 1252
SEDGEFIELD
6573

Attention: Ms J Ebersohn

Dear Madam

DRAFT BASIC ASSESSMENT REPORT: PROPOSED CONSTRUCTION OF AN ACCESS ROAD, RESIDENTIAL DWELLING AND FARM MANAGERS HOUSE ON PORTION 76 OF FARM 216 UITZICHT, BRENTON, KNYSNA LOCAL MUNICIPALITY

1. Your e-mail on behalf of Eco-Route Environmental Consultancy on 3 September 2020 to the District Roads Engineer, Oudtshoorn refers.
2. From an environmental point of view this Branch will not be opposed to the issuing of an Environmental Authorisation, provided that:
 - 2.1 The unconstructed road reserve running along the northern boundary is suitably upgraded at its intersection with Divisional Road 1600 (DR1600), for which this Branch is the Road Authority.
 - 2.2 The necessary approvals in terms of this Branch's Legislation are obtained if any external service is installed along or across DR1600 to Farm 216/76.

Yours faithfully

SW CARSTENS

For CHIEF DIRECTOR: ROAD NETWORK MANAGEMENT

ENDORSEMENTS

1. Eco-Route Environmental Consultancy
Attention: Ms J Ebersohn (e-mail: janet@ecoroute.co.za)

2. Garden Route District Municipality
Attention: Mr JG Daniels (e-mail)

3. District Roads Engineer
Oudtshoorn

4. Mr SW Carstens (e-mail)

5. Mr E Burger (e-mail)

FW: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

From janet@ecoroute.co.za <janet@ecoroute.co.za>

Date Mon 17/02/2025 12:21

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Look at all addresses

Should you require any information please do not hesitate to contact me.



Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

From: Pamela Booth <pbooth@knysna.gov.za>

Sent: Thursday, 03 September 2020 12:34

To: Janet Ebersohn <janet@ecoroute.co.za>; samantha@ecoroute.co.za

Subject: RE: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton



The banner is dark blue with white and yellow text. On the left, it says 'Inclusive Innovative Inspired' and 'Knysna Municipality | Munisipaliteit | uMasipala'. On the right, there is a logo of a hand holding a sun. Below this, it provides contact numbers: 'For enquiries contact 044 302 6300 or 087 2 KNYSNA (56 9762)' and 'For emergencies only contact 044 302 8911'. At the bottom, it lists hashtags: '#COVID19 #StopTheSpread #SaveLives'.

Hi Janet

I don't see the Basic Assessment report for 76/216 on your website?

I followed the live link provided below.

Pam

From: Janet Ebersohn <janet@ecoroute.co.za>

Sent: Thursday, 03 September 2020 12:09

To: 'Melanie Koen' <MelanieKo@daff.gov.za>; mark.lakay@pgwc.gov.za; 'Danie Swanepoel' <Danie.Swanepoel@westerncape.gov.za>; 'DEADP-EIAAdmin George' <DEADPEIAAdmin.George@westerncape.gov.za>; coastalenquiries@westerncape.gov.za;

manie.abrahams@westerncape.gov.za; Manie Abrahams <Manie.Abrahams@westerncape.gov.za>; Manabrah@pgwc.gov.za; gsmith@ruraldevelopment.gov.za; jprodehl@pgwc.gov.za; runkek@nra.co.za; Colin

Fordham <landuseadvicesouth@capenature.co.za>; 'Maretha Alant' <maretha.alant@sanparks.org>; Pamela Booth <pbooth@knysna.gov.za>; knysna.ratepayers.assoc@gmail.com; corvdw@elsenberg.com; hans@edendem.co.za; cmalgas@pgwc.gov.za

Subject: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton



ECO-ROUTE ENVIRONMENTAL CONSULTANCY

EIA PROCESS

Notification of Public Participation: Draft Basic Assessment Report

The Proposed Construction of an Access Road, Residential Dwelling and Farm Managers House on Portion 76 of the Farm 216 Uitzicht, Brenton, Knysna Local Municipality, Western Cape

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998) as amended, the National Environmental Management Act: Environmental Impact Assessment Regulations 2014 as amended of a Public Participation Process to be undertaken from **03/09/2020 – 03/10/2019** under the authority of the Department of Environmental Affairs /DEA.

The following EIA Listed Activities are applicable:

Government Notice No. R324: (Listing Notice 3 of 2014 as amended)	Activity 4: (i) ii(aa) Activity 12: (a) i. ii.
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The Draft Basic Assessment Report may be reviewed for comment from **03/09/2020 – 03/10/2020** on Eco Routes website www.ecoroute.co.za. 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.

Environmental Assessment Practitioner: Janet Ebersohn

PO. Box 1252
Sedgefield
6573

Cell: 082 55 77 122
Fax: 086 402 9562
Email: janet@ecoroute.co.za

Additionally, information may be accessed via our website: www.ecoroute.co.za

Should you require any information please do not hesitate to contact me.



Kind Regards
Janet Ebersohn
Bsc.Hon Environmental Management
EAPASA Registration Number: 2019/1286
082 5577122

FW: Portion 76 of the Farm 216 Uitzicht, Brenton-on-Sea

From janet@ecoroute.co.za <janet@ecoroute.co.za>

Date Mon 17/02/2025 12:18

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Should you require any information please do not hesitate to contact me.



Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

From: Christa le Roux <christa.a.leroux@gmail.com>

Sent: Thursday, 01 October 2020 10:08

To: Janet Ebersohn <janet@ecoroute.co.za>

Subject: Portion 76 of the Farm 216 Uitzicht, Brenton-on-Sea

Dear Janet

Please register us as an Interested and Affected Party in this process. We will be submitting a comment on the Proposed Construction of an Access Road, residential dwelling and farm managers house on Portion 76 of the Farm 216 Uitzicht, Brenton, Knysna Local Municipality, Western Cape.

Kindest regards

Christa le Roux and Owen Williams



1 October 2020

Janet Ebersohn
Eco Route Environmental Consultancy

Per email: janet@ecoroute.co.za

Dear Miss Ebersohn

RE: SANPARKS OBJECTION DRAFT BASIC ASSESSMENT REPORT PORTION 76 OF THE FARM UITZICHT NO 216

Portion 76 of Farm Uitzicht 216 is in the buffer zone the Garden Route National Park (GRNP), in the potential expansion footprint, in a Priority Natural Areas and in the Knysna Sand Fynbos Coastal Corridor. The Landowner of Portions 75 and 39 of the Farm Uitzicht 216 has already signed a Resolution consenting to the declaration of the properties as part of the GRNP. Achieving a long-term conservation outcome on Portion 76 is important to SANParks. The property contains Knysna Sand Fynbos which is an ecosystem that is Critically Endangered in terms of Section 2 of the NEMBA (Act 10 of 2004) and Goukamma Dune Thicket. The property is 21.01 ha in extent and zoned Agriculture 1.

As stated in the draft BAR, the entire property is classed as Critical Biodiversity Area (CBA) in terms of the Western Cape Biodiversity Spatial Plan 2017 which is defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure. The main objective of a CBA area is to maintain it in a natural or near natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low impact, biodiversity sensitive land uses are appropriate.

The proposal is to exercise the primary land use rights of the property, (i.e. construction of a main farmhouse and farm manager's house). The development proposal entails the following:

- (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²).
- (ii) The construction of one farm manager's house in the north-western corner of the property (600m²).
- (iii) The construction of a new internal road to provide access to the southern portion of the property.

The proposed development is approximately 8 765m² in size. SANParks representatives visited the site on 8 September 2020.

addo elephant

agulhas

augrabies falls

bontebok

golden gate highlands

karoo

kgalagadi transfrontier

knysna lake area

kruger

mapungubwe

marakele

mountain zebra

namaqua

table mountain

tankwa-karoo

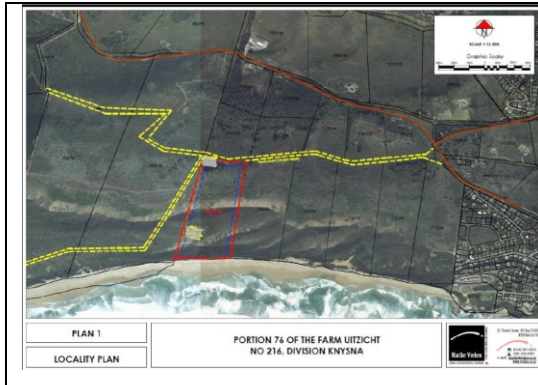
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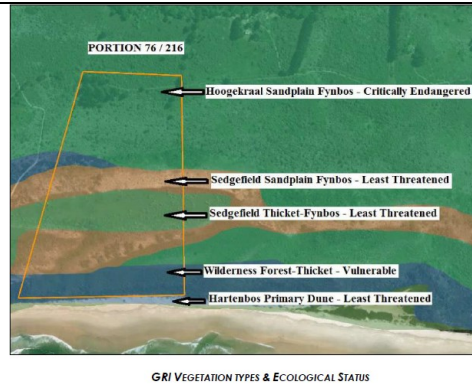
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west coast

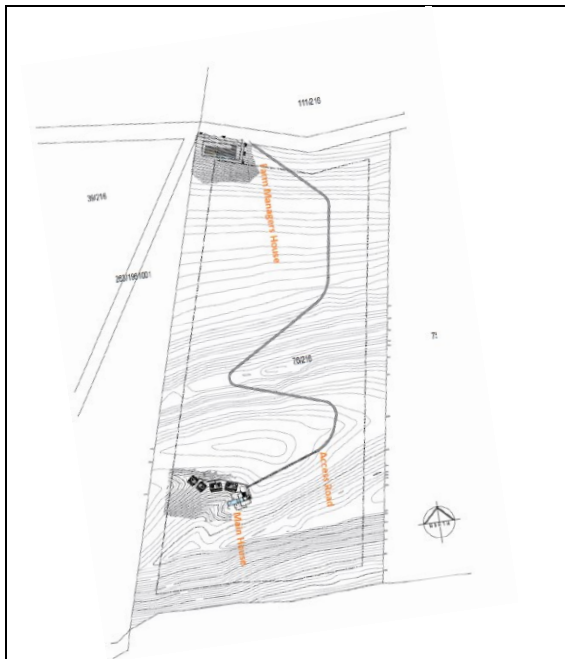
wilderness



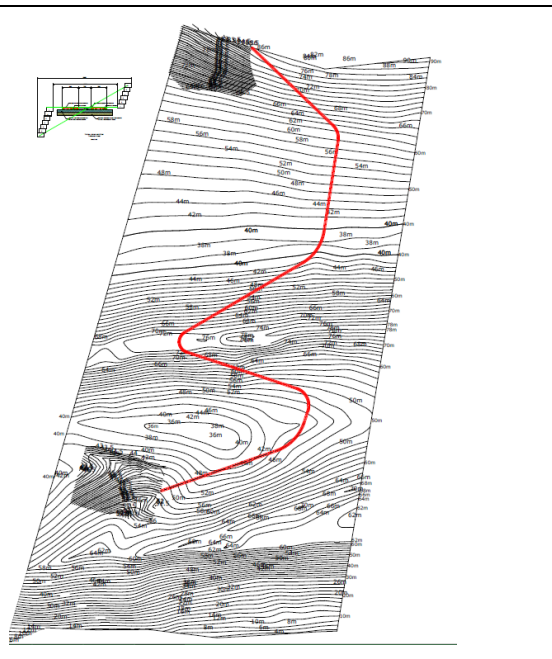
Locality Plan



Vegetation Types GRI



Site Development Plan



Site Development Plan road



The road is proposed over 2 pristine dunes



Post fire Knysna Sand Fynbos in very good condition

The Main Dwelling House:

The primary dwelling unit will be situated in the south western portion of the property consisting of the following inter leading rooms:

- Six (6) bedrooms.
- Open plan living area consisting of a kitchen, lounge area, dining area, kitchen, bar, scullery, bathroom and wine cellar.
- Open deck and swimming pool.

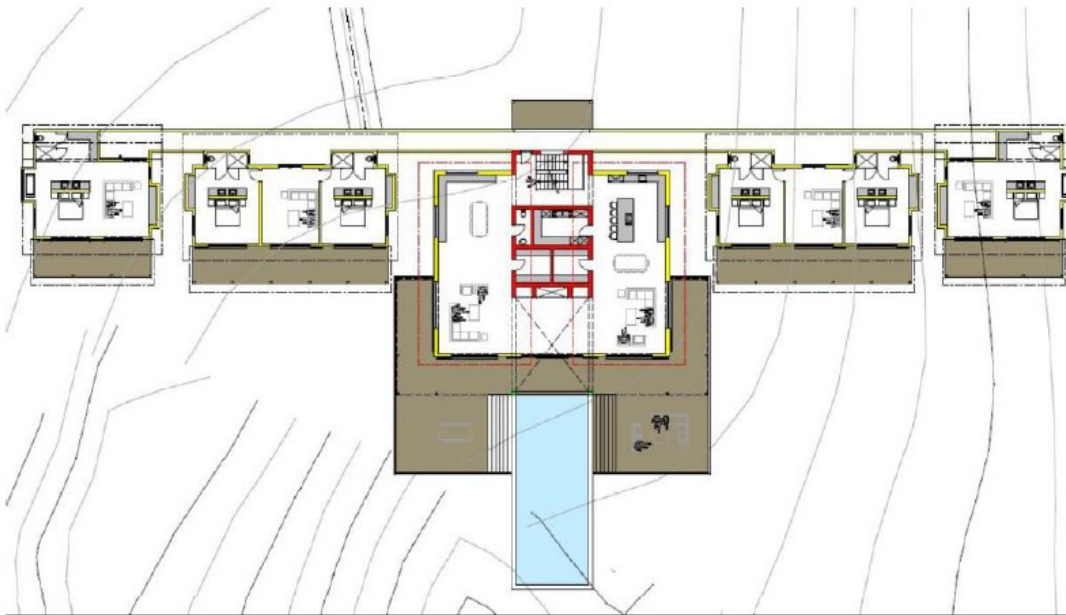


FIGURE 1: PROPOSED MAIN DWELLING HOUSE

The Farm Managers House:

The farm manager's house is to be situated in the north-western corner and will encroach the prescribed 30 meter building line, and therefore an application must be made for a permanent departure and relaxation of the northern and western building lines.

The main reason why the house encroaches the prescribed building line is to prevent unnecessary disturbance of sensitive critical endangered Knysna Sand Fynbos.

The proposed footprint in the building line area is an existing transformed area (alien vegetation present) and consist of the following:

- Ground Floor 600m²
- First floor 400m²
- Footprint 600m²
- Disturbance Area 1200m²

Access to Portion 76 of the Farm Uitzicht 216:

Access is obtained from the Northern portion of the property from an existing servitude road that runs along the boundary of the property. The current access will remain in place

Items for clarification:

- Backwash from swimming pool was not considered in the DBAR. Fynbos is not a good receiving environment for the backwash.
- Access to beach – surely desirable – no boardwalk or footpath was proposed to the beach.
- Installation of boreholes. The impact of drilling for boreholes was not discussed in the DBAR.

Water Reticulation

The applicant propose to supply water for the development by means of the following:

- Installing boreholes – an application for a water licence will have to be submitted to Breede- Gouritz Catchment Management Agency.
- A large percentage of the water demand will be provided for by collecting rainwater. The total roof areas will be 842m² and with an average rainfall for the Knysna area of 500mm per year will supply 421kl. The rainwater will only supply in the order of 87% of the demand.
- The main building will make provision for 110kl rainwater/borehole storage.

Extract from DBAR

SANParks objects to the proposal for the following reasons:

1. Site Development Plan footprint. The property is in the GRNP potential expansion footprint, as reflected in the approved GRNP Management Plan, and in a CBA in terms of the Western Cape Biodiversity Spatial Plan 2017. SANParks disagrees with the statement below that the areas chosen for development was to have the least negative impact on the environment. The proposed Site Development Plan (6 bed main dwelling with pool, farm managers house and access route) will have an unnecessary significantly negative impact on biodiversity conservation, the sense of place of the area and transform and fragment the Knysna Sand Fynbos Coastal Corridor.

The No Go Alternative

PO Box 1252 Sedgefield, 6573

www.ecoroute.co.za

{ 46 }

The proposed re-development of Portion 76 of the farm Uitzicht 216, will remain vacant and the landowner will not be able to exercise his right to develop a residential dwelling and farm manager's house.

Details of the alternatives considered

The sizes of the footprints of the farm mangers house and main residential dwelling house was options considered for alternatives. The proposed areas to construct the houses was carefully evaluated after consideration of all specialist reports and areas chosen where the least negative impacts on the receiving environment can be expected.

Extract from DBAR

2. Biodiversity Stewardship or long-term conservation outcomes were not discussed in the DBAR. The conservation of the vegetation on the property is of national importance. Without a commitment to consent to the declaration of the property as part of the GRNP or with a Biodiversity Stewardship agreement with CapeNature in place, SANParks will continue to object to the proposed development.
3. Land use rights. SANParks takes note that Marike Vreken urban and environmental planners were appointed to apply for the required land use rights from Knysna Municipality. From the information provided there was no mention of rezoning the natural portion of the property to Open Space Zone III. Further discussion in this regard is required to ensure a long-term conservation outcome. Relaxation of the building line adjacent to Kerk Laan could be supported.

The subject property is now zoned **Agricultural Zone I (AI)** in terms of *Knysna Municipality: Zoning Scheme By-Law, 2020*. According to the transition table, the method used to determine this was:

"All existing Agricultural Zones to be converted to Agriculture 1. The new definition of "Agriculture" includes "Agricultural Industries".

Objective: The objective of this zone is to promote and protect agriculture on farms as an important economic, environmental and cultural resource. Limited provision is made for non-agricultural uses to provide rural communities in more remote areas with the opportunity to increase the economic potential of their properties, provided these uses do not present a significant negative impact on the primary agricultural resource.

Member: HM Vreken
Reg. CK 2005/032114/23 VAT: 4690222106

Extract from Specialist Planning Report for EA

<p>house (agricultural worker accommodation). The new <i>Integrated Knysna Zoning Scheme Bylaw</i> provides the following definitions for a "dwelling house" and "agricultural worker accommodation":</p> <table border="1"> <tr> <td data-bbox="177 1312 352 1585"> <p>dwelling house</p> </td> <td data-bbox="352 1312 687 1585"> <p>a building containing only one dwelling unit, together with such outbuildings as are ordinarily used with a dwelling house, including:</p> <ul style="list-style-type: none"> • a storeroom and garaging; • a second dwelling or additional dwelling, with a floor area which does not exceed 60m²; provided that application for consent use must be submitted if the second dwelling or additional dwelling is larger than 60m²; • a braai room; • renewable energy structures for household purposes; • home occupation; • letting to lodgers; • a bed and breakfast establishment; and • home childcare. </td> </tr> <tr> <td data-bbox="177 1518 352 1585"> <p>agricultural worker accommodation</p> </td> <td data-bbox="352 1518 687 1585"> <p>accommodation provided for bona fide agricultural workers, including accommodation for labourers and farm managers, as determined by the Municipality based on the extent of the bona fide agricultural activities on the land unit.</p> </td> </tr> </table>	<p>dwelling house</p>	<p>a building containing only one dwelling unit, together with such outbuildings as are ordinarily used with a dwelling house, including:</p> <ul style="list-style-type: none"> • a storeroom and garaging; • a second dwelling or additional dwelling, with a floor area which does not exceed 60m²; provided that application for consent use must be submitted if the second dwelling or additional dwelling is larger than 60m²; • a braai room; • renewable energy structures for household purposes; • home occupation; • letting to lodgers; • a bed and breakfast establishment; and • home childcare. 	<p>agricultural worker accommodation</p>	<p>accommodation provided for bona fide agricultural workers, including accommodation for labourers and farm managers, as determined by the Municipality based on the extent of the bona fide agricultural activities on the land unit.</p>	<table border="1"> <tr> <td data-bbox="687 1279 927 1507"> <p>OPEN SPACE ZONE III (OSIII)</p> <p><i>The objective of this zone is to provide for the conservation of natural resources in areas that have not been proclaimed as nature areas (non-statutory conservation), in order to sustain flora and fauna and protect areas of undeveloped landscape including woodlands, ridges, wetlands and the coastline. A range of consent uses is provided to supplement and support the main objective of this zone.</i></p> </td> <td data-bbox="927 1279 1118 1507"> <p>Primary uses</p> <ul style="list-style-type: none"> • Nature conservation area </td> <td data-bbox="1118 1279 1295 1507"> <p>Consent uses</p> <ul style="list-style-type: none"> • Environmental facilities • Harvesting of natural resources • Tourist facilities • Utility service • Tourist accommodation? • Function venue? </td> </tr> <tr> <td data-bbox="687 1507 927 1731"> <p>OPEN SPACE ZONE IV (OSIV)</p> <p><i>The objective of this zone is to provide for the conservation of natural resources in areas that have been proclaimed as nature areas (statutory conservation), in order to sustain flora and fauna and protect areas of undeveloped landscape including woodlands, ridges, wetlands and the coastline. 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<p>Extract from Specialist Planning Report for EA</p>	<p>Extract from Integrated Knysna Zoning Scheme Bylaw</p>										

SANParks could support development in the node where the Managers Cottage is proposed adjacent to Kerk Laan, as discussed on-site on 8 September 2020. It would be preferable if all development is consolidated into one area (the area where the farm managers cottage is

proposed) to minimise fragmentation of the landscape and impact on the sensitive fynbos environment.

The applicant should be reminded that the main objective of Priority Natural Areas and CBAs is to maintain it in a natural or near natural state, with no further loss of natural habitat. Only low impact, biodiversity sensitive land uses are appropriate. The property is currently pristine and was not previously developed.

SANParks request to meet with the landowners to discuss a way forward that can benefit biodiversity conservation and allow for low impact development without the need for a road over the pristine dunes. The current proposal will set a very bad precedent for potential development of other properties in the Knysna Sand Fynbos Coastal Corridor. The properties on both side of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023.

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

Yours sincerely



Maretha Alant
GRNP: Environmental Planner

CC:	Megan Taplin	SANParks
	Vuyiswa Thabethe	SANParks
	Danie Smit	DEFF
	Danie Swanepoel	DEADP
	Collin Fordham	CapeNature
	Pam Booth	Knysna Municipality
	Dave Edge	Western Head-Goukamma Conservancy



28 January 2021

Janet Ebersohn
Eco Route Environmental Consultancy

Per email: janet@ecoroute.co.za

Dear Miss Ebersohn

RE: SANPARKS FOLLOW-UP COMMENT DRAFT BASIC ASSESSMENT REPORT PORTION 76 OF THE FARM UITZICHT NO 216 AFTER SITE VISIT WITH LANDOWNERS AND SOUTHERN CAPE FIRE PROTECTION ASSOCIATION

SANParks objected to the proposed development on 1 October 2020. A site visit with the landowners and EAP took place on 4 January 2021. Key points discussed:

1. Proposed footprint of the main house. The landowners were not willing to change the proposed footprint of the main house to a position adjacent to Kerk Laan. They were willing to move the house to the level area behind the frontal dune to reduce visual impact.
2. Proposed road over the sand dunes. SANParks continue to object to the construction of a road over the sand dunes. The landowners indicated that their preferred option is to use Susan Campbell's road for access. They could use Kerk Laan and access via the gate and use the steep section of the Campbell road. The proposed option to use the Campbell road will reduce the negative impact on biodiversity but will necessitate a new section of road to be constructed on the Campbell property and over Portion 76. SANParks will not support construction of new roads where there are viable alternatives.
3. Maretha Alant met with Susan Campbell. Ms Campbell is opposed to providing access for the proposed development over her land.
4. Footpath to the beach. Portion 76 of Farm Uitzicht 216 has a steep gradient to the beach and a footpath is not proposed in the BAR.
5. Drilling for water required. The proposal is that water will be supplied by a borehole. Bringing drilling equipment to the proposed site for the main house will have a negative impact on biodiversity. Previous attempts to drill for water in the area yielded poor return.
6. Contract National Park footprint. The property is in the priority protected area expansion footprint, in the Western Heads coastal ecological corridor, that can potentially link the Goukamma Nature Reserve with the Knysna Estuary. The property was included in the South African National Parks Land Inclusion Plan for the period 2020 – 2023 for the Garden Route National Park (GRNP). The landowners may be interested in incorporating the property into the GRNP but more information is required from SANParks. SANParks will further engage with the landowners when our draft documents are in place.

addo elephant

agulhas

augrabies falls

bontebok

golden gate highlands

karoo

kgalagadi transfrontier

knysna lake area

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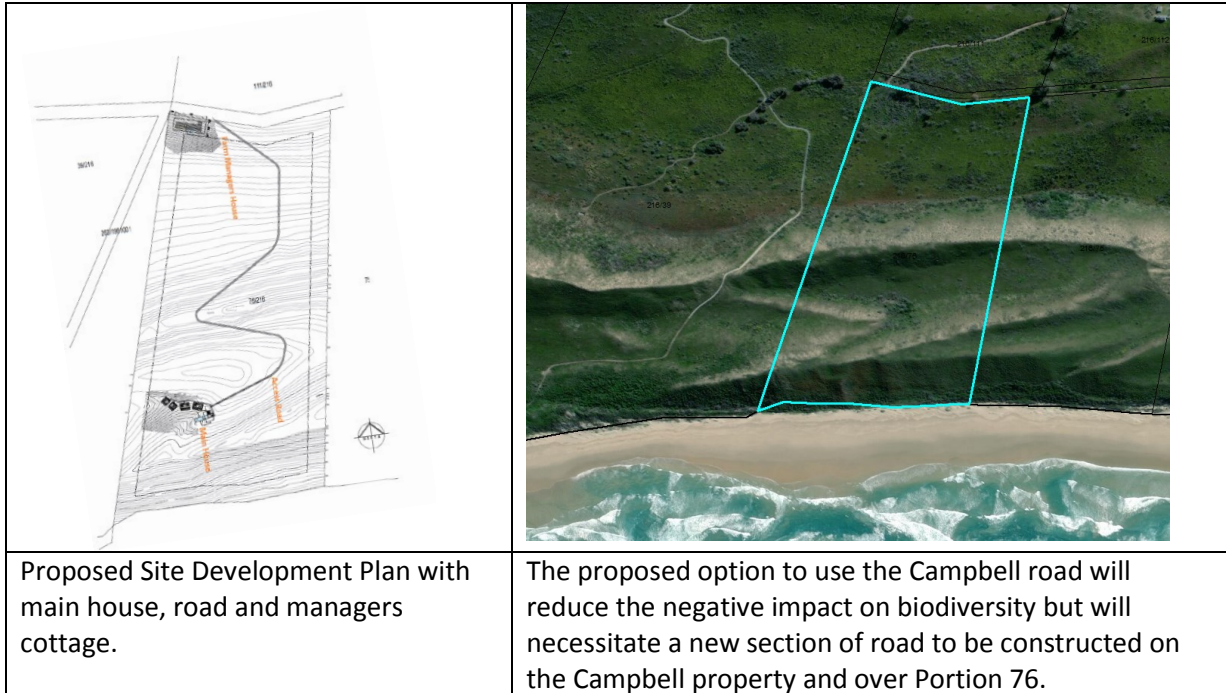
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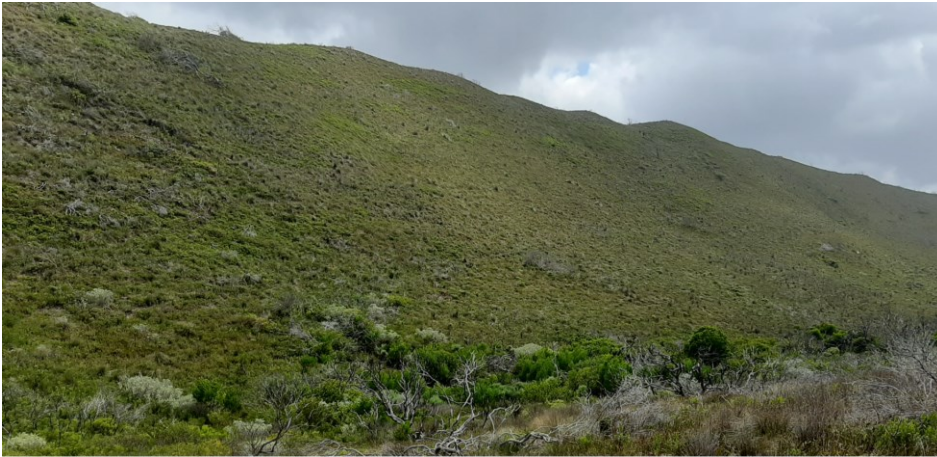
wilderness



Proposed location of main house in flat area with high biodiversity value



Area for the proposed main house in foreground



SANParks continue to object to the construction of a road over the sand dunes



Portion 76 of Farm Uitzicht 216 has a steep gradient to the beach and a footpath is not proposed in the BAR.



Susan Campbell's road

A follow up fieldtrip with SANParks and the Southern Cape Fire Protection Association (FPA) present took place on 9 January 2021. Key points discussed:

- Development adjacent to Kerk Laan. Developing the main house in a disturbed area adjacent to Kerk Laan will have the least negative impact on biodiversity and landscape functionality. Other advantages are that the drilling equipment and construction vehicles will have easy access to the site via an existing road.
- Development in the low lying area, over the two sand dunes or using the Campbell road, will compromise landscape functionality and set a bad precedent. It will create fragmentation of a pristine coastal corridor.



Disturbed area adjacent to Kerk Laan suitable for development

- Fire management. The landowners are members of the Southern Cape FPA. It is possible to make fire breaks to protect infrastructure at the landowner's preferred location for the main house. However, Kerk Laan could act as a firebreak if it is widened and slashed. In a case of emergency, it would be less risky to evacuate people from Kerk Laan than from a fynbos corridor with tricky access for fire trucks. The Campbell road and the new section of road that would need to be constructed from Campbell road to preferred site would not be ideal roads for the Knysna Fire Department as their trucks would struggle to gain access easily to the house. However, Kerk Laan would be a much easier access point for fire trucks and this should be considered for fire safety in this fire-prone area. Conducting an ecological burn in future will also be more risky with infrastructure developed in the fire path. The June 2017 fire and the ecological burn executed on 15 May 2017, that slowed the fire down dramatically before it reached Brenton, is still fresh in our memories. A functional Fire Management Unit in the Knysna Sand Fynbos will be desirable as there will be future fires.

Navigating an ecological burn on private land in the GRNP buffer zone

Objectives:

1. Restore Knysna Sand Fynbos (CR)
2. Reduce fuel load to protect plantations & infrastructure

Challenges included:

- Fire plan approval for multiple landowner involvement (signed fire-break agreements, insurance not available for damage caused by an ecological burn)
- Wild fires in other areas and unpredictable weather (complex to find a date)
- Fire breaks had to be made 3 times
- Resources involved: 3 x Fire trucks, 6 x skid units (bakkie sakkies); 85 people on day 1 to 3; 50 people week 1; 20 people week 2; 10 people week 3; standby helicopter
- 12 hour shifts as opposed to 8 hour days (overtime), rations and PPE
- The fire spotted and a helicopter had to water bomb the fire (unplanned additional R 46 848)
- The risk of burning near an urban area

Role-players

- Buffalo Bay Ratepayers: Start up R 30 000
- SC FPA: Planning, WOF teams, drone, incident command
- PG Bison (firebreaks, operations and standby)
- Knysna Municipality: Fire Department & Community Services
- SANParks: Planning, Operational personnel, BSP buffer zone teams & Honorary Rangers
- Landowners: WWF, Susan, Andre
- Brenton Ratepayers: support
- Villa Castollini: provided food

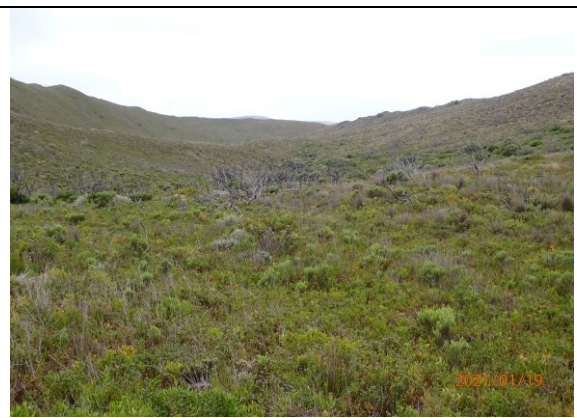
Eco-burn successfully executed on 15 May 2017 (Duration:3 weeks with mopping up)

Benefit: Eco-burn minimised the impact of 7 June 2017 fire on Brenton on Sea community

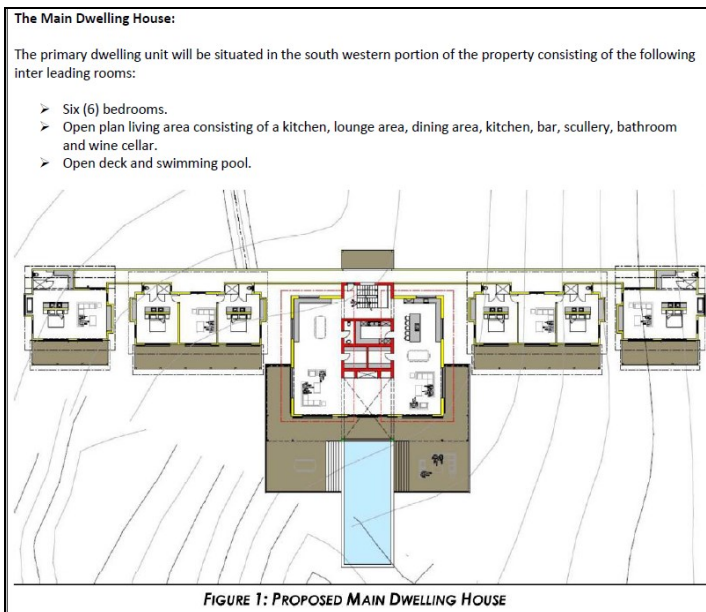
**Maretha Alant (SANParks)
Dirk Smit (SC FPA)**



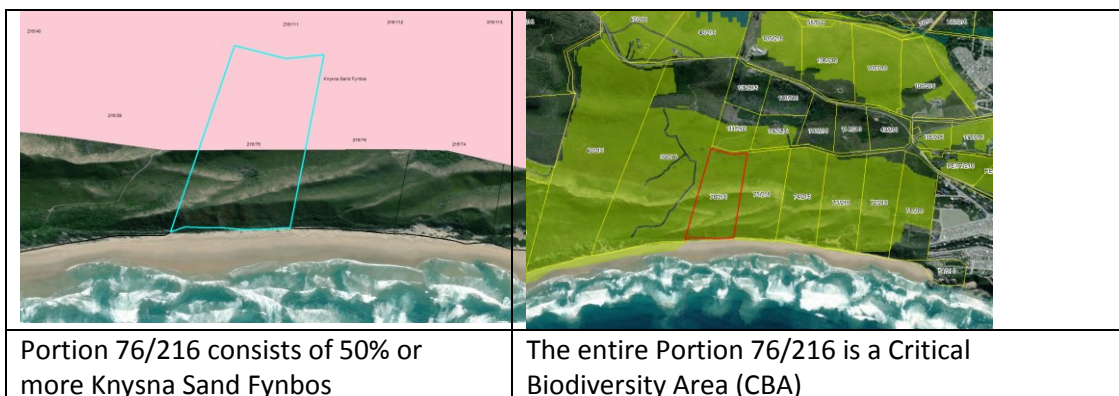
Development at Kerk Laan will have good views and limit disturbance of fynbos.

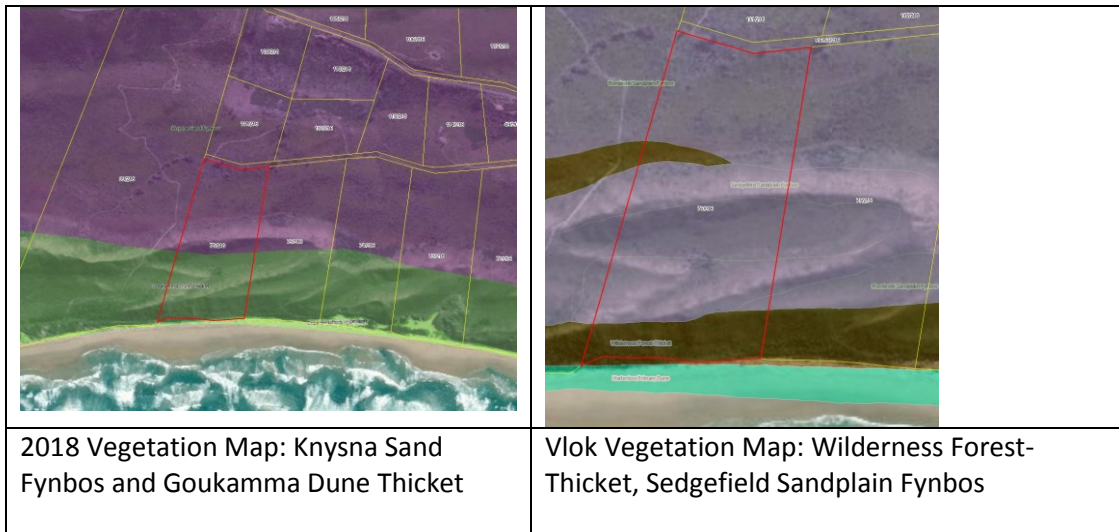


Development in the low lying area over the two sand dunes will compromise landscape functionality and set a bad precedent.



- Conservation value of property. More than 50% of the property contains Knysna Sand Fynbos and the entire property is a Critical Biodiversity Area (CBA). Although the Kerk Laan area is located in Knysna Sand Fynbos the transformation footprint can be limited with a good Site Development Plan and the current landscape functionality corridor will then be maintained. Knysna Sand Fynbos hosts threatened plant species and five threatened butterfly taxa (Mecenero *et al.* 2013), including CE taxa *Orachrysops niobe* (Brenton Blue) and *Thestor brachycerus* and is poorly protected. The original extent of Knysna Sand Fynbos was 15 355 ha. The remaining natural extent is 1 478 ha (9.6%) and the Western Cape target is 3 531ha (23%). The Knysna Sand Fynbos asset is in deficit. Not only is Knysna Sand Fynbos endemic to the Western Cape, but it is also confined to a very specific and limited geographical area along the Garden Route coast (only found from the coastal flats from Wilderness, generally to the north of the system of lakes, several patches around the Knysna Lagoon, with more isolated patches eastwards to the Robberg peninsula near Plettenberg Bay). There is excellent landscape heterogeneity on the property.





In summary, from a biodiversity conservation, landscape functionality and integrated fire management perspective developing the main house adjacent to Kerk Laan is the preferred alternative for SANParks. Developing in the core of the Knysna Sand Fynbos Coastal Corridor will set a very bad precedent and contribute to a loss of biodiversity and landscape fragmentation. The properties on both sides of Portion 76 will be included into the GRNP as per the approved SANParks Land Inclusion Plan 2020 to 2023. SANParks will continue to object to the access road over the sand dunes.

SANParks will be available for a site visit with DEFF when required in the process.

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

Yours sincerely

Maretha Alant
GRNP: Principal Planner

CC:	Megan Taplin	SANParks
	Danie Smit	DEFF
	Zama Langa	DEFF
	Danie Swanepoel	DEADP
	Dirk Smit	SC FPA
	Pam Booth	Knysna Municipality
	Dave Edge	Western Head-Goukamma Conservancy
	Andre Peach	Landowner
	Hans Swart	Landowner
	Susan Campbell	Adjacent Landowner

FW: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

From janet@ecoroute.co.za <janet@ecoroute.co.za>

Date Mon 17/02/2025 12:19

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Should you require any information please do not hesitate to contact me.

Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

-----Original Message-----

From: Steve & Barbara Gettliffe <stebar@barkly.co.za>

Sent: Monday, 14 September 2020 10:16

To: janet@ecoroute.co.za

Subject: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

Good morning Janet

We would like to register as an I and AP.

We need to be kept up dated as this is a very sensitive area, on primary dunes and could have a significant effect on the biodiversity and ecological functioning of the area.

Regards

Steve Gettliffe (WESSA Knysna- Plett)

FW: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

From janet@ecoroute.co.za <janet@ecoroute.co.za>

Date Mon 17/02/2025 12:19

To admin@ecoroute.co.za <admin@ecoroute.co.za>; bianca@ecoroute.co.za <bianca@ecoroute.co.za>

Should you require any information please do not hesitate to contact me.



Kind Regards

Janet Ebersohn

Bsc.Hon Environmental Management

EAPASA Registration Number: 2019/1286

082 5577122

From: Evan Jones <ejones@biothermenergy.com>

Sent: Tuesday, 29 September 2020 10:32

To: janet@ecoroute.co.za

Cc: John Sole <johnsole@gmail.com>; Jennifer Jones <jenny.jonescx@gmail.com>

Subject: Draft BAR Portion 76 of the Farm 216 Uitzicht, Brenton

Dear Janet

As trustee of JenEvan Property Trust (owner of portion 112 of Farm 216 Uitzicht) I hereby register as an Interested and Affected Party with respect to the above development.

Below is a summary of my main concerns are the following:

1. While power supply appears to be proposed as off grid solar there is still Eskom supply alternatives, one of which is a 1665m MV over head line following the access road. This overhead line would have significant detrimental visual impact visually and create a hazard to birds of the likes of harriers, fish eagles and herons. This alternative is strongly opposed and should not be an option, the off grid solar option is supported.
2. The proposed location of the managers house on the NW corner requires relaxation of the 30m building line based on invalid motivation of mitigating impact on the Knysna Fynbos. As scan be seen in the Ecological status map on page 57 of the BA, this NW corner has already been impacted by alien Pine vegetation and thus this motivation is inaccurate and or invalid. The true motivation is far more likely the preferable gradient and better view to the sea. Further there is no reason to create unnecessary visual impact onto the access road which is frequented by Brenton local persons walking along Kerk St on a property of this size.
3. The site road box cuts will be deep in places and require retaining support which will create significant visual disturbance of the northern face of the pristine coastal dune. Visual impact mitigation measures are not mentioned and need to be added in some suitable form eg ensuring these can be vegetated and not end up as concrete walls both a visual disaster and risk to wild life.
4. The internal roads are stated to be 2.5m concrete strip with passing lanes which is prudent (due the gradients) however paved roads are highly detrimental. It is far more environmentally prudent to limit the paving / concrete strips to areas only where necessary and not on the level valley portion.

5. The access road (Kerk St) is currently a single jeep track and carries very little traffic. Cl 5.3 of the Services Report states that the access road will need to be upgraded. While some maintenance of the access road is necessary, major road works will have severe impact on the pedestrian / dog walkers who use this road daily. What is the plan / specification for the upgrade and who will be funding this ?

Please acknowledge receipt.

Best Regards

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