



Comments and Response Report

The Proposed Construction of an Access Road, Residential Dwelling on Portion 216 of the Farm Uitzicht, Brenton, Knysna

| COMMENTS | RESPONSE |
|---|--|
| COMMENTS RECEIVED IN RESPONSE TO THE DRAFT BASIC ASSESSMENT REPORT – 3 September 2020 to 3 October 2020 | |
| STATE DEPARTMENTS | |
| Forestry, Fisheries & The Environment (DFFE) – Melanie Koen – 30 September 2020 | |
| <p>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.</p> | |
| <p>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 is applicable</p> <ol style="list-style-type: none"> 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 | <p>The land use application will be conducted by the designated town planners, Marike Vreken Urban and Environmental Planners.</p> <p>Noted.</p> <p>The findings from the specialised studies have been included in the draft Basic Assessment Report.</p> |

| | |
|---|--|
| and overlaid within any developmental proposals to determine how these vegetation areas will be impacted- this information to be compiled within a report. | The sensitivity maps and specialist reports are included in the draft Basic Assessment 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. | Noted. |
| 4. Forestry reserves the right to revise initial comment based on any additional information that may be received or obtained | Noted. |
| SANPARKS - Maretha Alant – 1 October 2020 | |
| 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. | Noted. |
| 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 entire property is classed as Critical Biodiversity Area (CBA) 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 Ecosystem Threat status indicates that the Northern Portion of the property is classed as Critical Endangered and the Southern Portion as Least Threatened. This is as a result of the vegetation found on site. The Northern Portion is identified as having Knysna Sand Fynbos with an ecological status of Critically Endangered and the Southern Portion as Goukamma Dune Thicket with an ecological status of Least Threatened. |
| 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: <ul style="list-style-type: none"> (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). | Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property. <p>The development proposal entails the following:</p> <ul style="list-style-type: none"> (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²). (ii) The construction of a new internal road to provide access to the southern portion of the property. |

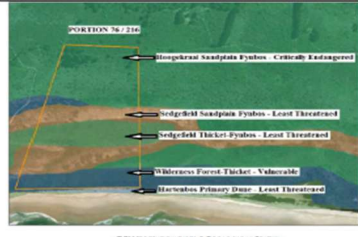
(iii) The construction of a new internal road to provide access to the southern portion of the property.

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

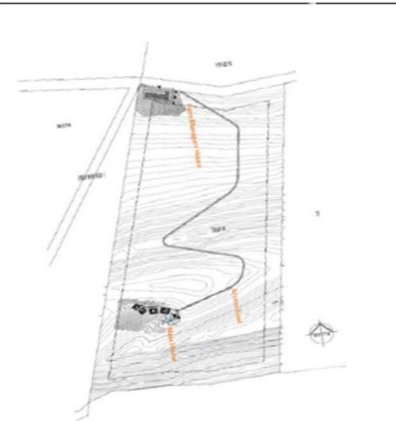
Noted.



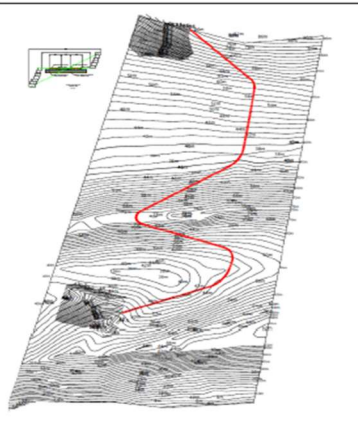
Locality Plan



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.

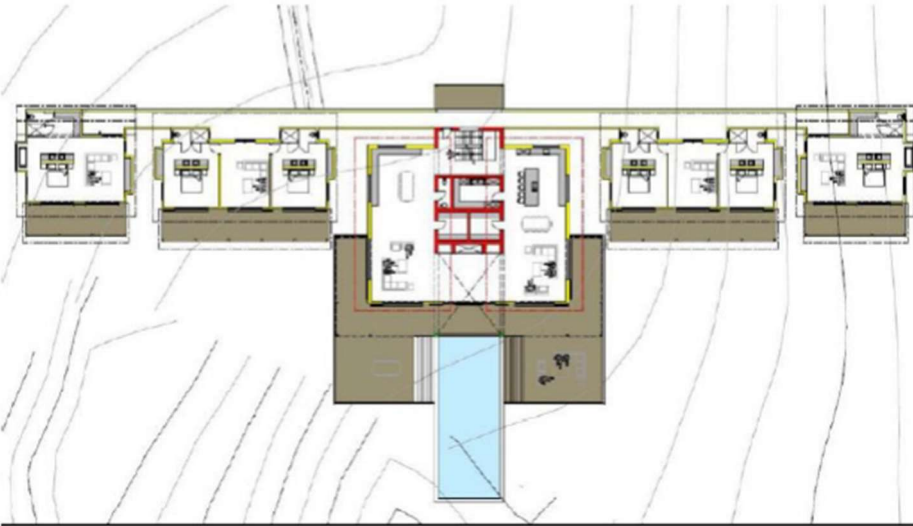


FIGURE 1: PROPOSED MAIN DWELLING HOUSE

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

| | |
|--|---|
| | |
| <p>Items for clarification:</p> <ul style="list-style-type: none"> • 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. | <p>It is recommended that the backwash water from a swimming pool be disposed of appropriately by directing it into the sanitary sewer system. Proper disposal practices are essential to ensure compliance with environmental regulations and to maintain public health standards. To clarify backwash water and return it safely to the pool is an option being considered.</p> <p>The applicant is assessing the option of including beach access in their considerations.</p> <p>The particulars concerning the drilling of the boreholes are presently under evaluation.</p> |
| <div style="border: 1px solid black; padding: 5px;"> <p>Water Reticulation</p> <p>The applicant propose to supply water for the development by means of the following:</p> <ul style="list-style-type: none"> ➢ 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. </div> <p>Extract from DBAR</p> | <p>Noted.</p> |
| <p>SANParks objects to the proposal for the following reasons:</p> | |
| <p>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.</p> | <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.</p> <p>The development proposal entails the following:</p> <ul style="list-style-type: none"> (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²). (ii) The construction of a new internal road to provide access to the southern portion of the property. |

| | |
|--|---|
| <p>The No Go Alternative</p> <p>PO Box 1252 Sedgefield, 6573 www.ecoroute.co.za</p> <hr/> <p style="text-align: center;">(46)</p> <hr/> <p>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.</p> <p>Details of the alternatives considered</p> <p>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.</p> | |
| <p>Extract from DBAR</p> <p>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.</p> | <p>The developer is evaluating this option at present.</p> |
| <p>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.</p> | <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.</p> <p>The development proposal entails the following:</p> <ul style="list-style-type: none"> (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²). (ii) The construction of a new internal road to provide access to the southern portion of the property. |

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><small>House (agricultural worker accommodation): The new Integrated Knysna Zoning Scheme provides the following definitions for a "dwelling house" and "agricultural worker accommodation":</small></p> | |
| <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 store-room and garage; • 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 30m²; • 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> |

Extract from Specialist Planning Report for EA

| | | |
|---|---|--|
| <p>OPEN SPACE ZONE III (OSIII)</p> <p>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.</p> | <p>Primary uses</p> <ul style="list-style-type: none"> • Nature conservation area | <p>Consent uses</p> <ul style="list-style-type: none"> • Environmental facilities • Harvesting of natural resources • Tourist facilities • Utility service • Tourist accommodation? • Function venue? |
| <p>OPEN SPACE ZONE IV (OSIV)</p> <p>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. A range of consent uses is provided to supplement and support the main objective of this zone.</p> | <p>Primary uses</p> <ul style="list-style-type: none"> • Nature reserve | <p>Consent uses</p> <ul style="list-style-type: none"> • Conference facility • Function venue • Tourist accommodation • Tourist facilities • Utility service |

Extract from Integrated Knysna Zoning Scheme Bylaw

Noted.

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.

Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.

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 a new internal road to provide access to the southern portion of the property.

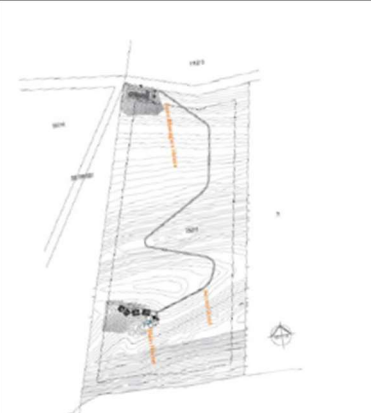

The applicant should be reminded that the main objective of Priority Natural Areas and CBAs is to maintain it in a natural or near natural state, with no further loss of natural habitat. Only low impact, biodiversity sensitive land

Noted.

| | |
|---|---|
| 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. | Noted. |
| SANPARKS FOLLOW UP - Maretha Alant – 28 January 2021 | |
| 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. | Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property. 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 (3000m ²). (ii) The construction of a new internal road to provide access to the southern portion of the property. |
| 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. | The proposed alternative is not feasible, as it necessitates access to the applicant's property through the neighbouring farmer's land. Such a scenario may give rise to disputes and could result in elevated noise levels in the future. |
| 3. Maretha Alant met with Susan Campbell. Ms Campbell is opposed to providing access for the proposed development over her land. | Noted. |
| 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. | Noted. |

| | |
|--|--|
| <p>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.</p> | <p>To minimize disruption during drilling operations, it is essential to use minimally invasive techniques, such as smaller diameter and directional drilling. Employing mud rotary systems with environmentally friendly drilling fluids will stabilize the borehole and reduce contamination risks.</p> <p>Continuous groundwater monitoring is crucial for detecting changes in water levels and quality, allowing for timely corrective actions. Additionally, utilizing noise-suppressing equipment and sound barriers will help mitigate noise pollution, while vibration-dampening systems can minimize impacts on nearby structures.</p> <p>Effective waste management practices, including the proper containment and disposal of drill cuttings and fluids, will further reduce environmental effects.</p> |
|--|--|

| | |
|--|---------------|
| <p>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.</p> | <p>Noted.</p> |
|--|---------------|

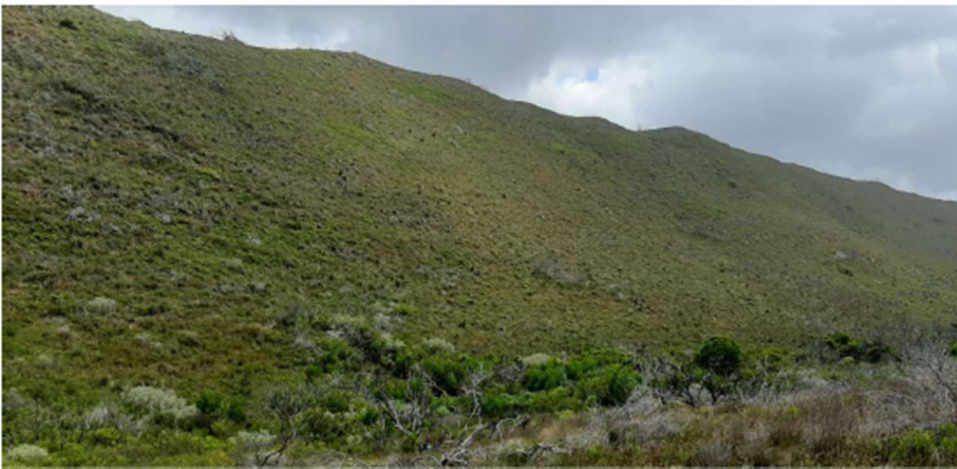
| | | |
|--|--|--|
|  |  | |
| <p>Proposed Site Development Plan with main house, road and managers cottage.</p> | <p>The proposed option to use the Campbell road will reduce the negative impact on biodiversity but will necessitate a new section of road to be constructed on the Campbell property and over Portion 76.</p> | |



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

| | |
|--|---|
| <p>A follow up fieldtrip with SANParks and the Southern Cape Fire Protection Association (FPA) present took place on 9 January 2021. Key points discussed:</p> | <p>Noted.</p> |
| <ul style="list-style-type: none"> • 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. | <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.</p> <p>The development proposal entails the following:</p> <ul style="list-style-type: none"> (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²). (ii) The construction of a new internal road to provide access to the southern portion of the property. |
| <ul style="list-style-type: none"> • 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. | <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.</p> <p>The development proposal entails the following:</p> <ul style="list-style-type: none"> (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²). (ii) The construction of a new internal road to provide access to the southern portion of the property. |



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.

Noted.

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

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

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

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

Role players

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

**Maretha Afari (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.

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.

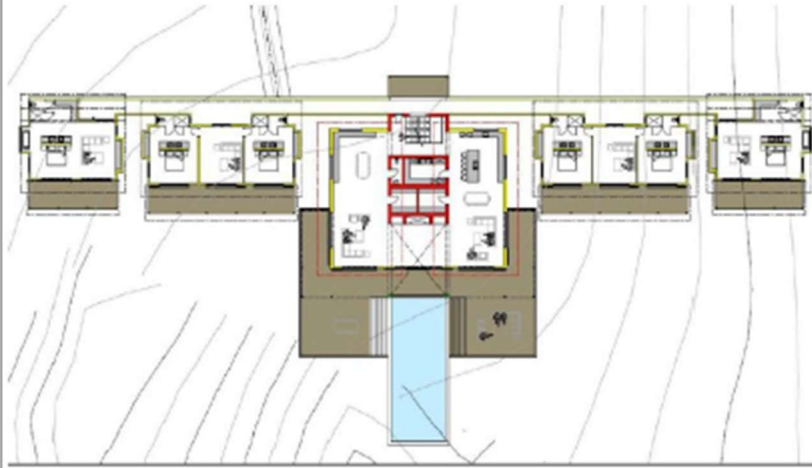

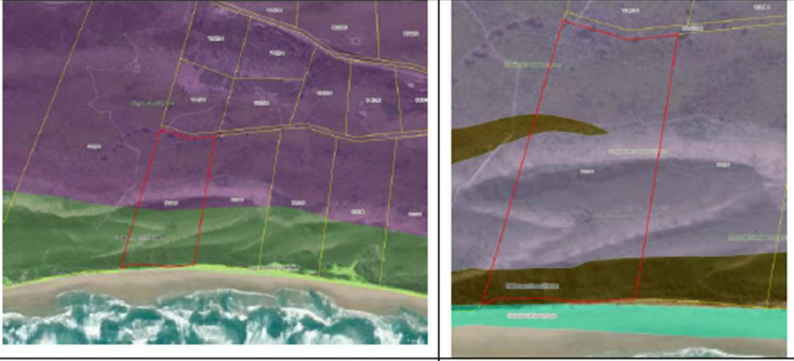


FIGURE 1: PROPOSED MAIN DWELLING HOUSE

- 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.

Noted.

| | |
|--|---|
| | |
|  <p>Portion 76/216 consists of 50% or more Knysna Sand Fynbos</p> <p>The entire Portion 76/216 is a Critical Biodiversity Area (CBA)</p> | |
|  <p>2018 Vegetation Map: Knysna Sand Fynbos and Goukamma Dune Thicket</p> <p>Vlok Vegetation Map: Wilderness Forest-Thicket, Sedgfield Sandplain Fynbos</p> | |
| <p>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.</p> | <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.</p> <p>The development proposal entails the following:</p> <ul style="list-style-type: none"> (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²). (ii) The construction of a new internal road to provide access to the southern portion of the property. |
| <p>TRANSPORT AND PUBLIC WORKS – SW CARSTENS – 30 September 2020</p> | |
| <p>1. Your e-mail on behalf of Eco Route Environmental Consultancy on 3 September 2020 to the District Roads Engineer, Oudtshoorn refers.</p> | |

| | |
|--|--------|
| 2. From an environmental point of view this branch will not be opposed to the issuing of an environmental authorisation, provided that: | Noted. |
| 3. The unconstructed road reserve running along the northern boundary is upgraded at its intersection with Divisional Road 1600 (DR1600), for which this branch is the road authority. | Noted. |
| 4. 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. | Noted. |

NGO

The Western Heads–Goukamma Conservancy - Dr David Alan Edge – 3 October 2020

A. Threatened biodiversity

| | |
|---|--|
| <p>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:</p> <p>a. natural areas identified as requiring safeguarding in order to meet national biodiversity thresholds.</p> <p>b. areas required to ensure the continued existence and functioning of species and ecosystems, including the delivery of ecosystem services.</p> <p>c. important locations for biodiversity features or rare species.</p> <p>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”.</p> <p>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.</p> | <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.</p> <p>The development proposal entails the following:</p> <p>(i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²).</p> <p>(ii) The construction of a new internal road to provide access to the southern portion of the property.</p> |
|---|--|

| | |
|---|--|
| <p>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.</p> <p>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”.</p> <p>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 legislate on, and less damaging alternatives need to be proposed and evaluated.</p> | <p>Noted.</p> <p>Noted.</p> <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property. The development proposal entails the following:</p> <ul style="list-style-type: none"> (iii) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²). (iv) The construction of a new internal road to provide access to the southern portion of the property. <p>The total footprint of the proposed development to be cleared would be 5500m²</p> |
| <p>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 (*):</p> <ul style="list-style-type: none"> • Moist Dune Fynbos • Goukamma Dune Thicket | <p>The findings of the report have been thoroughly reviewed, resulting in a proposed layout that represents the most suitable alternative from an environmental standpoint. This layout also takes into account the developer's rights concerning the site's zoning as Agriculture Zone I.</p> |

| | |
|---|---|
| <ul style="list-style-type: none"> • Arid Dune Fynbos* • Brenton Dune Fynbos* • Primary Dune Slack Fynbos* • Primary Dune & Cliff Fynbos* • Foredune <p>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).</p> | |
| <p>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).</p> | <p>The screening reports indicate that the receiving environment has a HIGH Relative Plant Species Sensitivity.</p> <p>After the site visit and fauna surveys by Confluent Environmental, it is determined that the site sensitivity for the terrestrial animal theme of Portion 76/216 Uitzicht Farm is VERY HIGH in contrast to the high and medium sensitivities highlighted by the DFFE Screening tool. Based on the information in this report during the desktop and field assessment, the following reasons support this finding:</p> <ul style="list-style-type: none"> • The discovery of the Cape Flightless Dung Beetle (<i>Circellium bacchus</i>) listed as Vulnerable, thereby resulting in the VERY HIGH sensitivity rating across the site where the SCC is expected to occur. • The high and medium likelihood of occurrence of several SCC largely owing to the longstanding natural and undisturbed state of the site over the last 88 years, as well as its placement within a greater natural area (most of the surrounding landscape) highly connected to protected areas within 5 km of the site. <p>A Terrestrial Animal Species Impact Assessment was compiled by Confluent Environmental dated February 2024.</p> |
| <p>5) No detailed biodiversity study has been done for rare and threatened plants and animals, as is required in the above legislation.</p> | <p>The screening reports indicate that the receiving environment has a HIGH Relative Plant Species Sensitivity.</p> <p>The property is a near natural site with minimal past disturbance. Several SCC were observed on the property during the site assessment by Confluent Environmental, as well as before the assessment by various members of CREW (the Custodians for Rare and Endangered Wildflowers). The parasitic cats nail's (<i>Hyobanche</i> sp.) plant on the site could possibly be the EN species, namely <i>Hyobanche robusta</i>, however it is also likely a LC species <i>H. sanguinea</i>. The precautionary principle must be followed, assuming that the species on the site is the Red Listed EN <i>H. robusta</i>. Of all of the species listed,</p> |

| | |
|--|--|
| | the following were observed nearby but not within the development footprint: <i>Gladiolus vaginatus</i> , <i>Lebeckia gracilis</i> , and <i>Oxalis pendulifolia</i> . A Plant Species and Terrestrial Biodiversity Impact Assessment was compiled by Confluent Environmental dated 22 July 2024. |
| 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 GNRN. This has not been recognised or dealt with by the EAP. | The developer is evaluating this option at present. |
| 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. | The preferred alternative has taken into account the environmental considerations of the site, as well as the recommendations provided by the specialists. |
| 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? | The road surface area will be 2.5 meters wide and the disturbed area for construction of the road varies between 4 to 5.5 meters wide. |
| 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. | The road surface area will be 2.5 meters wide and the disturbed area for construction of the road varies between 4 to 5.5 meters wide. |
| 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? | To prevent borehole contamination from septic tank soakaways in sandy, permeable soil, key measures include maintaining a safe separation distance (30–50m), drilling boreholes deep enough to access protected groundwater, and conducting hydrogeological assessments to ensure proper siting. Septic tanks should be well-designed, regularly maintained and paired with advanced soakaway systems for better filtration. Boreholes must be properly sealed and lined to prevent contamination, and regular groundwater monitoring should be conducted. If risks remain high, alternative wastewater treatment methods, such as aerobic systems, can be considered. |
| 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. | The Heritage Statement concluded that is evident portion 76/216 is only barely visible in the distance from the road leading to and from Brenton-on-Sea. Consequently, the proposed development will have no visual impact on the aesthetic value of the affected area. On heritage grounds, due to the entire absence of heritage resources or themes in and around 76/216, |

| | |
|---|---|
| | the proposed development will have negligible to no impact on the visual or aesthetic heritage value of the area. |
| 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? | It is recommended that the backwash water from a swimming pool be disposed of appropriately by directing it into the sanitary sewer system. Proper disposal practices are essential to ensure compliance with environmental regulations and to maintain public health standards. To clarify backwash water and return it safely to the pool is an option being considered. |
| 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. | The main dwelling will have a footprint of 3000m ² , that will include: <ul style="list-style-type: none"> ▪ 6 Bedrooms. ▪ Open plan living area consisting of the kitchen, lounge area, dining area, kitchen, bar, scullery, bathroom and wine cellar. ▪ Open deck and swimming pool. |
| 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? | To minimize disruption during drilling operations, it is essential to use minimally invasive techniques, such as smaller diameter and directional drilling. Employing mud rotary systems with environmentally friendly drilling fluids will stabilize the borehole and reduce contamination risks. Continuous groundwater monitoring is crucial for detecting changes in water levels and quality, allowing for timely corrective actions. Additionally, utilizing noise-suppressing equipment and sound barriers will help mitigate noise pollution, while vibration-dampening systems can minimize impacts on nearby structures. Effective waste management practices, including the proper containment and disposal of drill cuttings and fluids, will further reduce environmental effects. |
| Knysna Spatial Development Framework | |
| <u>Zoning Scheme</u> | |
| 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. | Noted. The Application area is also zoned "Agriculture Zone I" and "Agriculture" is a primary land use right in this zoning category. The proposal is to exercise the primary land use rights of the property, (i.e., construction of a farmhouse (Main dwelling unit). The dwelling unit complies with the definition of "dwelling unit" as per the Section 8 Zoning Scheme Regulations, 1988. |

| | |
|--|---|
| <p>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.</p> | <p>Noted. The Application area is also zoned "Agriculture Zone I" and "Agriculture" is a primary land use right in this zoning category.</p> <p>The proposal is to exercise the primary land use rights of the property, (i.e., construction of a farmhouse (Main dwelling unit). The dwelling unit complies with the definition of "dwelling unit" as per the Section 8 Zoning Scheme Regulations, 1988.</p> |
| <p>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.</p> | <p>Noted. The Application area is also zoned "Agriculture Zone I" and "Agriculture" is a primary land use right in this zoning category.</p> <p>The proposal is to exercise the primary land use rights of the property, (i.e., construction of a farmhouse (Main dwelling unit). The dwelling unit complies with the definition of "dwelling unit" as per the Section 8 Zoning Scheme Regulations, 1988.</p> |
| <p>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.</p> | <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.</p> <p>The development proposal entails the following:</p> <ul style="list-style-type: none"> (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²). (ii) The construction of a new internal road to provide access to the southern portion of the property. |
| <p><u>Alternatives have not been considered</u></p> | |
| <p>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.</p> | <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.</p> <p>The development proposal entails the following:</p> <ul style="list-style-type: none"> (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²). (ii) The construction of a new internal road to provide access to the southern portion of the property. |
| <p>Maps</p> | |
| <p>The maps below are extracted from RES (2005), with kind permission of the author.</p> | <p>Noted.</p> |

| | |
|---|--|
| <p>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.</p> | <p>The BIV has been officially included as an interested and affected party in the environmental process. The Draft Site Development Plan is included in the draft Basic Assessment Report.</p> |
| <p>PUBLIC</p> | |
| <p>Susan Campbell – 03 September 2020</p> | |
| <p>This is totally unacceptable. The only acceptable alternative is to build main dwelling and manager’s cottage near the existing road. I have registered.</p> | <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager’s residence in the northwestern corner of the property. 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 a new internal road to provide access to the southern portion of the property.</p> |
| <p>Steve and Barbara Gettliffe – 14 September 2020</p> | |
| <p>We need to be kept updated 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.</p> | <p>Noted. The draft Basic Assessment Report will be made available for comment.</p> |
| <p>Evan Jones (JenEvan Property Trust (owner Portion 112 of Farm 216 Uizicht) – 29 September 2020</p> | |
| <p>Below is a summary of my main concerns are the following:</p> | |
| <p>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.</p> | <p>There is currently no electrical infrastructure present on the farm or in the adjacent road reserve to the north. It is advisable to consider the installation of a solar power facility in this location. The solar plant will be developed as an off-grid installation, utilizing solar energy to supply the load during daylight hours while recharging the batteries at night. Furthermore, grid-tied photovoltaic inverters may be integrated into this micro-grid configuration through AC coupling, should the energy demand surpass the generation capacity.</p> |

| | |
|---|--|
| <p>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 can 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.</p> | <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property. The development proposal entails the following:</p> <ul style="list-style-type: none"> (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²). (ii) The construction of a new internal road to provide access to the southern portion of the property. |
| <p>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 e.g. ensuring these can be vegetated and not end up as concrete walls both a visual disaster and a risk to wildlife.</p> | <p>As per the Geotechnical Report:</p> <p>The road layout must take into account the natural contours and drainage lines present on the site to minimise the extent of earthworks required. It is essential that deep box cuts are properly retained. Typically, box cuts will not encounter rock, and excavated soil can be utilized for filling, excluding the organic-rich topsoil. The in-situ subgrade material varies in quality, generally ranging from G7 to G9. Consequently, it is advisable to provide for the importation of at least one selected subgrade layer of G7 quality, in addition to the standard layer works, which include subbase, base materials, pavers, and cement slabs, for lightly trafficked internal roads and parking areas.</p> |
| <p>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.</p> | <p>Noted. As per the Geotechnical Report:</p> <p>The road layout must take into account the natural contours and drainage lines present on the site to minimise the extent of earthworks required. It is essential that deep box cuts are properly retained. Typically, box cuts will not encounter rock, and excavated soil can be utilized for filling, excluding the organic-rich topsoil. The in-situ subgrade material varies in quality, generally ranging from G7 to G9. Consequently, it is advisable to provide for the importation of at least one selected subgrade layer of G7 quality, in addition to the standard layer works, which include subbase, base materials, pavers, and cement slabs, for lightly trafficked internal roads and parking areas.</p> |
| <p>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?</p> | <p>The details will be communicated once the plans have been finalised.</p> |

John and Anne Sole – 29 September 2020

| | |
|---|---|
| <p>1. Page 21 of the draft BAR states "<i>The property is currently vacant but was used for tourist facilities that include a restaurant, and farm store.</i>"</p> <p>Page 21 further states "<i>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.</i>" 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?</p> <p>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 "<i>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).</i>"</p> <p>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!!</p> | <p>The report has been updated and the amended draft Basic Assessment will be made available.</p> <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.</p> <p>The development proposal entails the following:</p> <ul style="list-style-type: none"> (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²). (ii) The construction of a new internal road to provide access to the southern portion of the property. |
| <p>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)?"</p> <p>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.</p> | <p>The proposed site is within a South African Conservation Area (SACAD). After Environmental Authorisation is obtained, it is required to apply for an OSCAER permit</p> <p>Noted.</p> |

| | |
|--|--|
| <p>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.</p> | <p>The applicant is assessing the option of including beach access in their considerations.</p> |
| <p>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.</p> | <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property. The development proposal entails the following:</p> <ul style="list-style-type: none"> (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²). (ii) The construction of a new internal road to provide access to the southern portion of the property. |
| <p>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.</p> | <p>Noted.</p> |
| <p>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.</p> | <p>Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property. The development proposal entails the following:</p> <ul style="list-style-type: none"> (i) The construction of one main dwelling house to be situated in the south-western corner of the property (3000m²). (ii) The construction of a new internal road to provide access to the southern portion of the property. |

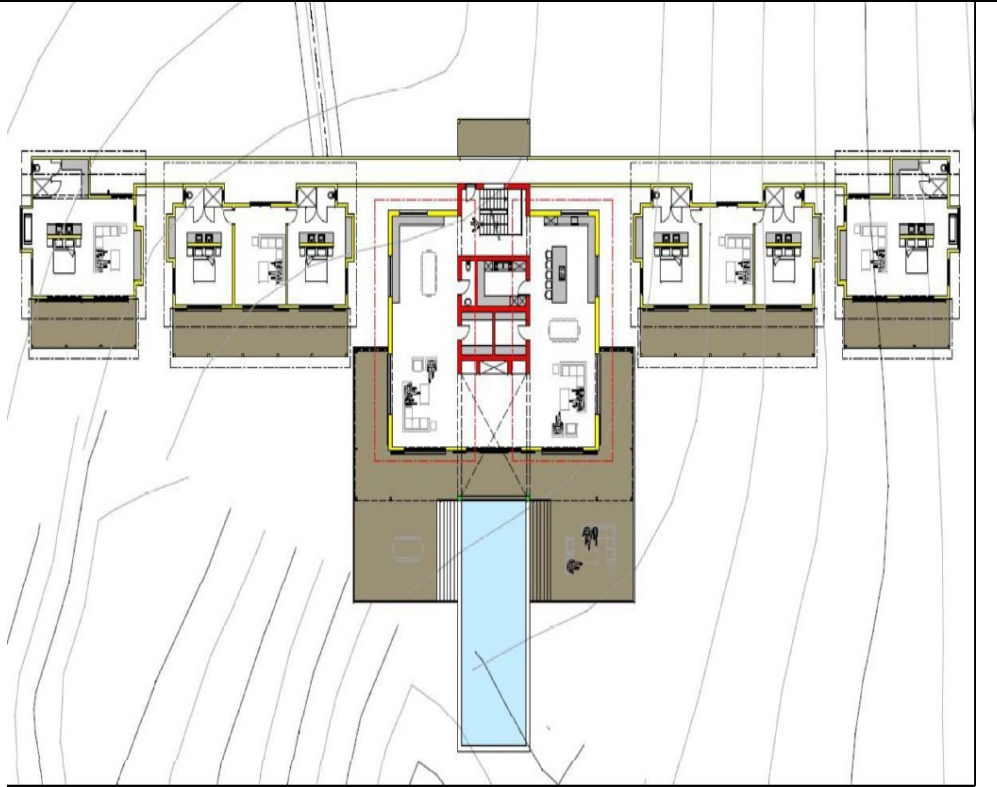


FIGURE 1: PROPOSED MAIN DWELLING HOUSE

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.

Noted. The preferred development plan has been amended to exclude the construction of a farm manager's residence in the northwestern corner of the property.

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 a new internal road to provide access to the southern portion of the property.

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

Noted. The details will be communicated once the plans have been finalised.

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