



Enquiries

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Attention: Ms Joclyn Marshall

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Dear Sir / Madam

COMMENT ON DRAFT BASIC ASSESSMENT REPORT IN TERMS OF THE NEMA ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS FOR THE PROPOSED DEEVELOPMENT ON PORTION 91 OF THE FARM MATJESFONTEIN NO. 304, KEURBOOMSTRAND, BITOU MUNICIPALITY

DEAD&P Reference Number: 16/3/3/6/7/1/D1/13/0268/22

Bitou Local Municipality would like to thank you for the opportunity to review and comment on the Draft BAR for the proposed development on Portion 91 of Farm 304, Keurboomstrand, within the Bitou Municipal area. Please note that these comments have been drafted by the Land Use and Environmental Management department within the Planning and Development directorate. Additional comments may be required from other relevant departments within the Bitou Local Municipality.

The following information was taken from the supplied report and summarise the proposed activities.

DESCRIPTION OF ACTIVITY

The proposed development involves establishing a residential estate consisting of 60 group housing stands, each with an average erf size of approximately 500m², on Portion 91 of Farm 304, Keurboomstrand. The total area allocated to the 60 residential erven is approximately 29,471m², with an internal road network covering around 12,013m², resulting in a total permanent disturbance footprint of 41,484m². Additionally, the development will include a communal Open Space II area of roughly 9,642m², featuring landscaped gardens and stormwater infiltration pond systems. The remaining 83,512m² of undeveloped land will be designated as Open Space III and managed as a conservation area under a Conservation Management Plan. This conservation area will also include an ecological corridor to facilitate wildlife movement.

LOCATION

The proposed development is located on Portion 91 of Farm Matjesfontein 304 in Keurboomstrand, within the Bitou Local Municipality of the Garden Route District. The site lies northeast of Plettenberg Bay, accessible via Keurboom Road (MR00394/PO394), about 1.8 km west of Keurboomstrand and 7 km from Plettenberg Bay's centre. The property is bordered by environmentally sensitive forest to the north, vacant land to the east and west, and partially developed residential areas to the south. It lies opposite the Milkwood Glen Residential Complex and approximately 5.8 km along the coast from the Keurbooms Estuary mouth. Topographically, it features a steep forested north and a flatter southern portion, where the development is planned between 3–6m above sea level. The development footprint is mostly below the 5 m contour and falls within the Estuarine

Functional Zone (EFZ) and a wetland corridor defined by KELASP. The site also falls within the Outeniqua Sensitive Coastal Area (OSCA) and the Coastal Protection Zone (CPZ).

Following a review of the documentation and appendices the following comments are made:

1. The Municipality acknowledges the designation of approximately 83,512 m² of land within the proposed development as Open Space III, which will serve as a conservation area and ecological corridor. To ensure the long-term protection and legal recognition of this sensitive area, it is strongly recommended that the landowner pursue the formal declaration of the Open Space III areas as a Protected Environment under Section 28 of the National Environmental Management: Protected Areas Act (Act 57 of 2003). Declaring the area as a Protected Environment will:

- Provide statutory protection for ecological corridors, forested slopes, and habitat for priority species.
- Strengthen the enforceability of the associated Conservation Management Plan.
- Ensure land use compatibility is maintained in perpetuity, even in the case of future ownership changes.

The Municipality may support this declaration process in coordination with the relevant provincial conservation authority (e.g., CapeNature). This declaration is aligned with the municipality's broader biodiversity conservation and climate resilience objectives and should be considered a condition for final development approval.

2. While the ecological surveys may indicate a lack of current estuarine habitat on the specific development footprint, the property's location within the mapped EFZ below the 5m contour and on the edge of the 1:100 year flood line presents a demonstrable risk of flooding, particularly in the context of climate change and sea-level rise. As such, flood resilience must be rigorously demonstrated prior to construction. It is therefore required that a registered geohydrological or hydrological engineer certify that:

- 2.1. All residential and service infrastructure (including the temporary wastewater treatment works, stormwater attenuation ponds, and access roads) are located above the 1:100-year flood line.
- 2.2. The design levels of the development are based on accurate flood modelling that accounts for both historic flood data and projected climate change impacts, including sea-level rise and increased storm intensity.
- 2.3. This certification must be submitted to the Municipality prior to final building plan approval and must form part of the approved Stormwater Management Plan.
- 2.4. Where portions of the development fall within flood-prone areas, appropriate engineering mitigation or exclusion from development must be demonstrated.

This requirement is essential to ensure the safety of future residents and infrastructure and to prevent the displacement of floodwaters onto neighbouring properties or public roads.

3. The Municipality notes the presence of *Brunsvigia* species on the site, a geophyte known for its seasonal emergence and ecological sensitivity. These plants typically flower in late summer to early autumn, often triggered by environmental cues such as rainfall or temperature changes. Given their cryptic lifecycle, it is essential that a seasonally timed botanical survey be conducted to accurately map and quantify individuals prior to any site clearance or earthworks. The following must be included in the development's Environmental Management Programme (EMPr):

- 3.1. A plant rescue and rehabilitation plan for *Brunsvigia* spp, compiled by a suitably qualified botanist.
- 3.2. Rescue operations must be timed to coincide with the visible phase of the plants' lifecycle, typically when leaves or flowers are present.
- 3.3. Translocated individuals should be moved to appropriate habitat within the designated conservation area (Open Space III) or Open Space II, ensuring similar soil, aspect, and drainage conditions.
- 3.4. A monitoring programme of at least three years must be implemented to assess the survival and re-establishment success of translocated plants.

The Bitou Municipality reserves the right to revise initial comments and request further information based on any additional information that might be received. The onus remains on the registered property owner to confirm adherence to any relevant legislation with regards to the activities which might trigger and/or need authorisation for.

Should you require any additional information please do not hesitate to contact this office.

Yours faithfully,

A handwritten signature in dark ink, appearing to be 'Anjé Minne', written over a horizontal line.

Anjé Minne

Environmental Management Officer

Planning and Development: Land Use and Environmental Management

Bitou Municipality