



Date: 2 October 2025

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Dear Joclyn,

PART 2 AMENDMENT APPLICATION FOR THE ATHINA ESTATE ON PORTION 66 & 67 OF THE FARM BRAKKLOOF 443, PLETTENBERG BAY¹: ARCHAEOLOGICAL IMPACT ASSESSMENT – COMMENTS ON AMENDED APPLICATION DATED 27/08/2025

The Environmental Authorisation (16/3/3/1/D1/14/0028/22) was issued on 31 July 2024 which authorises the Holder to undertake the following activities that includes the listed activities as it relates to the development of structures and infrastructure within 100 metres of the high-water mark of the sea and the littoral active zone, the clearance of indigenous vegetation of more than 300m², development of roads wider than 4 metres and the excavation of more than 5m³ of sand within 100 metres of the high-water mark of the sea and littoral active zone for the development of a small beachfront estate (9 residential stands). A Part 1 Amendment was approved on 14 June 2024 for amendments to the SDP (16/3/3/5/D1/14/0007/24).

REASON FOR THE AMENDMENT

The email request from Eco Route Environmental Consultancy to comment on the amended application with respect to archaeological resources was received on 23/09/2025 and read as follows:

Please can you assist with the following regarding the Amendment of the Environmental Authorisation for Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay–

The proposed amendments are as follows –

- *The amendment of the Site Development Plan (“SDP”) to reflect a boardwalk instead of a footpath;*
- *A revised layout proposed for the amendment of building plates that will have an overall increase in the development footprint of the building plates by 165m² for P06 and P07, allowing for the consolidation of the stands;*
- *The inclusion of an additional development footprint area on building plate PO8 of 54m², and removal of development footprint area from PO9 of 71m² that will have an overall decreased of 17m²;*
- *Amendment of Condition 21 as contained in the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025.*

In terms of Section 32 of the EIA Regulations, the specialist is required to provide input on the following:

- (i) an assessment of all impacts related to the proposed changes;*
- (ii) advantages and disadvantages associated with the proposed changes; and*
- (iii) measures to ensure avoidance, management and mitigation of impacts associated with such proposed change; and*
- (iv) any changes to the EMP.*

¹ Erf 16830 before sub-division (SG Diag 416/2024)

Please can you provide your input on your letterhead and indicate if there will be any further impacts or mitigations beyond what was already assessed/recommended in your Archaeological Impact Assessment. I have also included the Final comments from HWC."

SPECIALIST COMMENTS

I have examined the proposed amendments as described in bullet points 1 to 4 above and further described in the Amendment Report (Marshall 2025) and confirm that:

The impact on archaeological heritage resources of the proposed changes in my opinion remains LOW and there are no perceived advantages/disadvantages to archaeological resources arising from the amendments.

The findings of the archaeological impact assessment (Halkett 2022) suggested that impacts on archaeological heritage resources would be LOW without mitigation although it is acknowledged that we cannot entirely exclude the possibility of finds given that material could be deeply buried. The low heritage significance of the resources however does not warrant implementation of formal mitigation although it should be noted that the discovery of buried archaeological material during construction must nevertheless be reported to the Heritage authority (Heritage Western Cape).

EMPr

The following should be included in the EMPr: If any archaeological resources (e.g. shell layers/middens, human remains) are identified during construction, these must be immediately reported to the Archaeologist and Heritage Western Cape who will indicate a way forward appropriate to the finds. In the case of human remains, as soon as they are recognised during construction, the immediate surrounding area must be cordoned off and the area not disturbed further. Work may carry on elsewhere on site until the finds have been examined/removed.

CONCLUSION

Overall we find that the proposed amended residential development and associated infrastructure will not result in the loss of significant archaeological heritage resources. The proposed amended development is supported with the addition of a paragraph(see above) in the EMPr.

Yours sincerely,



David Halkett: Director
For ACO Associates cc

References:

Halkett, D. 2022. Archaeological impact assessment of a proposed residential estate on Portions 66 & 67 of Farm 443, Plettenburg Bay. Prepared for KAPP Environmental Consultants on behalf of The Keep Property (Pty) Ltd. ACO Associates cc.

Marshall, J 2025. Final application for a part two amendment of an environmental authorisation for the development of a beachfront security estate on Portion 66 & 67 of Farm 443, Plettenburg Bay, Western Cape. Ref: 16/3/3/5/D1/14/0011/25. Prepared for: Athina Development (Pty) Ltd. Eco Route Environmental Consultancy: Knysna.