



Comments and Response Report

Part 2 Amendment for the Development of a Small Beachfront Security Estate on Portions 66 and 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape.

DEA&DP Ref. No: 16/3/3/5/D1/14/0011/25

APPROACH

The public participation process for the Project was undertaken with due reference to Section 39 of the EIA Regulations, 2014 (as amended). Specifically, this comprised the following activities:

- The Notice of Intent to Submit an application was submitted to the Department of Environmental Affairs and Development Planning (DEA&DP) in 02 December 2024, and acknowledged on 20 February 2025.
- A 30-Day Pre-Application Public Participation Process was undertaken which ran from 05 June 2025 to 07 July 2025.
- All Registered Interested and Affected Parties identified in the BAR process were notified of the Amendment via email. Registered I&AP's that do not have email addressed were notified via registered mail.
- Advertisement of the Amendment Application was done via the local newspaper, the Knysna-Plett Herald.
- Two site signs were placed at the site in areas that can be easily viewed by the public.
- All documents were made available on the Eco Route website.
- A second 30-Day Public Participation Process was undertaken following the submission of the Amendment application to DEA&DP, which ran from 24 July to 25 August 2025.
- A stakeholder and Interested and Affected Parties (I&AP) database was prepared for the project (Annexure 3).
- The preparation of an Issues Trail, listing the comments received throughout the public participation process to date (Annexure 4).
- BOCMA consultation regarding WULA is incorporated into Annexure 5
- Evidence of comments received have been included in Annexure 6.
- Evidence of notifications sent to I&APs have been included in Annexure 7. Emails sent to private individuals have been excluded from annexure 2 due to the POPI Act.

Thursday 5 June 2025

KNYSNA-PLETT HERALD

7

SWD CRICKET

Badgers squad: Fresh faces and new ambitions



Mondli Khumalo
Photos: Supplied
by SWD Cricket

South Western Districts Cricket has unveiled its professional squad for the upcoming 2025/26 season, and big changes are on the cards for the Garden Route Badgers.

After a disappointing 2024/25 campaign, the team is turning a new page with the appointment of Letlotli Sesele as head coach. Sesele is bringing fresh energy and a renewed sense of purpose to the squad, aiming to lift performances across the board.

One of the biggest shake-ups can be seen in the bowling department, where several exciting new recruits have joined the ranks. However, the Badgers also suffered a major loss with the departure of star wrist-spinner Thomas Kaber, who has signed with the division 1 outfit, the Warriors.

To fill that gap, the Badgers have snapped up talented former SA U19 and Warriors spinner Liam Alder, a promising young player with great potential. Adding further depth to the bowling attack

are Banele Cele of the Dolphins, Mondli Khumalo, a former SA U19 player of the Tuskers, and Zack Momborg, who joins from the Lions. Like Alder, Momborg matriculated from King Edward VII School in Johannesburg.

One of the most talked-about signings is Benni Hansen, the 2024 SA Schools and SA U19 captain and wicketkeeper-batsman. Hansen joins from Western Province and is expected to make a big impact on and off the field.

Despite the changes, the Badgers have held onto several key players.

Middle-order batsman George van Heerden, their top scorer across all formats last season, remains with the squad. Van Heerden is currently touring Bangladesh as captain of the SA Emerging team.

Also staying on are explosive wicketkeeper-batsman Luke Beaufort and all-rounder Pheko Moletsane, who enjoyed an excellent 2024/25 season.

Top-order batsmen Yaseen Valli,

Ruan Terblanche and Kyle Jacobs will serve the second year of their two-year contracts.

Sesele expressed his optimism about the season ahead, saying: "I'm excited about this squad. We want to improve, compete hard and make our presence felt in every competition."

SWD CEO Albertus Kennedy echoed his sentiments. "We believe this group has what it takes. We've focused on strengthening key areas, and we're confident it will show in our results."

The SWD Badgers contracted squad for 2025/26:

Liam Alder, Luke Beaufort, Banele Cde, Benni Hansen, Kyle Jacobs, Mondli Khumalo, Pheko Moletsane, Zack Momborg, Ruan Terblanche, Yaseen Valli and George van Heerden.

High-performance contracts: Tyrece Karebe, Sintu Majiza, Liyabona Malife and Heath Richards



Liam Alder

OAKHILL
THE JOY OF LEARNING

OAKHILL SCHOOL

Oakhill School, a co-educational day school situated in the beautiful town of Knysna, on the Garden Route, seeks to appoint an **IT/AV Technician** with proven skills and experience. The successful candidate will work in cooperation with the IT Coordinator to provide ICT support to the school's staff and students and work on development projects. The job will include ensuring that all hardware and software work properly, assembling hardware and installing or deleting software, and set up and operation of audiovisual equipment for school events and functions. Applicants must be self-motivated and enthusiastic with good communication skills; able to deal with people at all levels of the school by phone, email and at their desk. A methodical but flexible approach is needed in the school's busy team environment. This is a full-time, permanent position, reporting to the IT Coordinator.

IT/AV Technician

Experience and qualifications for the role:

- Relevant certifications (CompTIA A+, Network+, Security+, Microsoft, AVIXA CTS).
- Minimum of 1-year proven experience in similar role.
- Previous experience working in the educational sector would be advantageous.
- Must have proficient knowledge in computer hardware and software systems and programs, computer troubleshooting, computer viruses and security, email and internet programs, Windows and macOS operating systems.
- Must be familiar with Chromebooks, basic hardware repairs, Google Workspace for Education and Microsoft 365.
- Must have a basic understanding of networking, including Wi-Fi and LAN.
- Must be familiar with AV equipment such as projectors, mixers, microphones, and cameras.
- Must be familiar with the POPI Act, and discretion and trustworthiness are a must.
- Excellent organisational and multitasking skills, with the ability to prioritise and manage multiple projects simultaneously.
- Must demonstrate analytical and problem-solving skills.
- Excellent communication and interpersonal skills, with the ability to interact effectively with staff, students and contractors at all levels.
- Must be physically fit with ability to lift and move heavy equipment (possibly up to 25kg) and be comfortable with heights as ladder work may be required when working on cables in ceilings and on roofs.
- Valid South African ID and South African Drivers licence with own vehicle and ability to transport equipment to functions if needed.
- Contactable references
- Bilingual (English / Afrikaans / isiXhosa)
- Resides in or willing to relocate to Knysna, Western Cape

Please submit a CV with a covering letter to experiencethejoy@oakhill.co.za
The closing date for applications is Friday, 13 June 2025. The starting date for this position is 1 August 2025. Only short-listed candidates will be contacted. If you have not heard from the school by Friday, 20 June 2025 your application can be considered unsuccessful.

Oakhill School is an Equal Opportunity Employer

Prospective employees are obliged to confirm prior to employment that they have not been convicted of a sexual and/or criminal offence by providing the following current certificates: Criminal Clearance, Sexual Offenders Clearance and Child Protection Clearance.

Oakhill School, in line with POPIA (Protection of Personal Information Act) will attempt to ensure the confidentiality of all applicants for this role. All reasonable measures will be in place to protect personal information but will be used in the recruitment, selection, and reporting process. By submitting your application for this position, you are recognising and accepting this disclaimer.

Tel: +27 (0)44 382 6506 • www.oakhill.co.za

AMENDMENT APPLICATION

Notification of Public Participation:

Part 2 Amendment Application for the Athina Estate on Portion 66 and 67 of the Farm Brakdoof 443, Plettenberg Bay, Western Cape.

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended) of the Amendment of a valid Environmental Authorisation. A 30-day Public Participation Process will be undertaken under the authority of the Department of Environmental Affairs and Development Planning (DEA&DP).

The Public Participation Process will run from **05/06/2025 – 07/07/2025**.
DEADP Ref for EA: **16/3/3/1/D1/14/0028/22**
DEADP Ref for Amendment: **16/3/3/5/D1/14/0007/24**

Location and Activity:
The Part 2 Amendment is for the Athina Estate development on Portion 66 and 67 of the Farm Brakdoof 443 in the Bitou Municipality, Plettenberg Bay, Western Cape. The Environmental Authorisation was issued on 31 July 2024 which approved the development of 9 residential stands with associated infrastructure and communal open space. A Part 1 Amendment was approved on 14 June 2024 for amendments to the SDP which included the realignment of the internal road and minor realignment of the five beachfront erven. The new proposed changes to the SDP 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 reduction in the development footprint of the building plates for P06 and P07.

The following Listed Activities in terms of the FIA Regulation 2014 as per the EA (16/3/3/1/D1/14/0028/22), are relevant:

- Government Notice No. R327 (Listing Notice 1): Activity 17(v)(e) & 19A(ii)
- Government Notice No. R324 (Listing Notice 3): 12(i)(iii)

A Part 2 Amendment Application and relevant appendices will be made available to all registered Interested and Affected Parties (I&AP's) for public review and comment. All relevant documents may be accessed via our website (www.ecoroute.co.za) during the public participation period.

Should you wish to gain further information regarding the project or wish to register as an Interested and Affected Party please contact the Environmental Assessment Practitioner (details below). Please provide written comments with your name, contact details and an indication of any direct business, financial, personal, or other interest which you may have in the development.

Environmental Assessment Practitioner
Joclyn Marshall (EAPASA Reg 2022/5006)
P.O. Box 1252, Sedgfield, 6573
Email: admin@ecoroute.co.za
Cell: 072 126 6393

ECO-ROUTE ENVIRONMENTAL CONSULTANCY
REGISTRATION NO. 2014/0017/12

Figure 1: Advert placed in the Knysna-Plett Herald on 05 June 2025.



Figure 2: Site sign placed on portion 66 and 67 of 443 Brakkakloof, coordinates 34° 5'23.63"S, 23°22'8.90"E.



Figure 3: Site sign placed on portion 66 and 67 of 443 Brakkakloof, coordinates 34° 5'26.87"S , 23°22'10.37"E.

Annexure 2: Notification to Stakeholders and I&AP's



Outlook

NOTIFICATION OF PUBLIC PARTICIPATION: Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

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

Date Thu 05 Jun 2025 13:19

To 'Danie Swanepoel' <Danie.Swanepoel@westerncape.gov.za>; 'Francois Naude' <Francois.Naude@westerncape.gov.za>; Dorien.Werth@westerncape.gov.za <Dorien.Werth@westerncape.gov.za>; Nathan Jacobs <Nathan.Jacobs@westerncape.gov.za>; BCAdmin@environment.gov.za <BCAdmin@environment.gov.za>; RMolale@dffe.gov.za <RMolale@dffe.gov.za>; OCEIA <OCEIA@dffe.gov.za>; OCEia@environment.gov.za <OCEIA@environment.gov.za>; BNcube@dffe.gov.za <BNcube@dffe.gov.za>; Lydia Kutu <LKutu@dffe.gov.za>; Thivhulawi Nethononda <Tnethononda@dffe.gov.za>; Noluvo.Toto@westerncape.gov.za <Noluvo.Toto@westerncape.gov.za>; Stephanie Barnardt <Stephanie.barnardt@westerncape.gov.za>; Azni.November@westerncape.gov.za <Azni.November@westerncape.gov.za>; Dirk.Prinsloo@westerncape.gov.za <Dirk.Prinsloo@westerncape.gov.za>; Robertsj@dws.gov.za <robertsj@dws.gov.za>; 'Cor Van der Walt' <Cor.VanderWalt@westerncape.gov.za>; 'Brandon Layman' <Brandon.Layman@westerncape.gov.za>; Vanessa Stoffels <vanessa.stoffels@westerncape.gov.za>; Melanie Koen <mkoen@dffe.gov.za>

Cc joclyn@ecoroute.co.za <joclyn@ecoroute.co.za>; 'Janet' <janet@ecoroute.co.za>

Good day,

Kindly find below link to the Part 2 Amendment and relevant appendices.

<https://we.tl/t-5UuHutYBev>

Amendment Application For the ATHINA ESTATE-05.06.2025.pdf

12 files sent via WeTransfer, the simplest way to send your files around the world

we.tl

A 30-day public participation will be held from **05/06/2025 – 07/07/2025**. Please submit your comments to the EAP undersigned in this time.

Should you have an issue accessing the link above, please visit our website to view all documents:

[Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape | Eco Route](#)

NOTIFICATION OF PUBLIC PARTICIPATION: Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

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

Date Thu 05 Jun 2025 13:21

To Andiswa Sam <asam@bocma.co.za>; rmphahlele@bocma.co.za <rmphahlele@bocma.co.za>; Sbonelo Ndlovu <sndlovu@bocma.co.za>; Megan Simons <msimons@capenature.co.za>; abrahamsN@nra.co.za <abrahamsn@nra.co.za>; managerfpa@gmail.com <managerfpa@gmail.com>; 'Vanessa Weyer' <vanessa.weyer@sanparks.org>; environment@caa.co.za <environment@caa.co.za>

Cc joclyn@ecoroute.co.za <joclyn@ecoroute.co.za>; 'Janet' <janet@ecoroute.co.za>

Good day,

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

Date Thu 05 Jun 2025 13:27

To cschliemann@plett.gov.za <cschliemann@plett.gov.za>; mrhode@plett.gov.za <mrhode@plett.gov.za>; 'Anjé Minne' <aminne@plett.gov.za>; info@gardenroute.gov.za <info@gardenroute.gov.za>; Nina Viljoen (Dr) <nina@gardenroute.gov.za>

Cc joclyn@ecoroute.co.za <joclyn@ecoroute.co.za>; 'Janet' <janet@ecoroute.co.za>

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Environmental Assessment Practitioner
Joclyn Marshall (EAPASA Reg 2022/5006)
P.O. Box 1252, Sedgefield, 6573
Email: admin@ecoroute.co.za
Cell: 072 126 6393

ECO-ROUTE
ENVIRONMENTAL
CONSULTANCY



REGISTRATION NO. 1998/031976/23

Re: NOTIFICATION OF PUBLIC PARTICIPATION: DEA&DP Ref: 16/3/3/5/D1/14/0011/25 - Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

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

Date Thu 24 Jul 2025 14:09

To 'Danie Swanepoel' <danie.swanepoel@westerncape.gov.za>; 'Francois Naude' <francois.naude@westerncape.gov.za>; Dorien Werth <dorien.werth@westerncape.gov.za>; Nathan Jacobs <Nathan.Jacobs@westerncape.gov.za>; BCAdmin@environment.gov.za <BCAdmin@environment.gov.za>; RMolale@dffe.gov.za <Rmolale@dffe.gov.za>; 'OCEIA' <oceia@dffe.gov.za>; BNcube@dffe.gov.za <BNcube@dffe.gov.za>; Lydia Kutu <LKutu@dffe.gov.za>; Thivhulawi Nethononda <Tnethononda@dffe.gov.za>; 'Noluvo Toto' <noluvo.toto@westerncape.gov.za>; Stephanie Barnardt <Stephanie.barnardt@westerncape.gov.za>; Azni K November <Azni.November@westerncape.gov.za>; Dirk.Prinsloo@westerncape.gov.za <Dirk.Prinsloo@westerncape.gov.za>; Roberts John (BVL) <robertsj@dws.gov.za>; 'Cor Van der Walt' <Cor.VanderWalt@westerncape.gov.za>; 'Brandon Layman' <Brandon.Layman@westerncape.gov.za>; 'Vanessa Stoffels' <vanessa.stoffels@westerncape.gov.za>; Melanie Koen <mkoen@dffe.gov.za>; leptieshaam.Bekko@westerncape.gov.za <leptieshaam.Bekko@westerncape.gov.za>

Cc Joclyn Marshall <joclyn@ecoroute.co.za>; 'Janet ' <janet@ecoroute.co.za>

Good day,

Please see correct notice below.

Kindly find below link to the Part 2 Amendment and relevant appendices.

<https://we.tl/t-WgITH3m7Fc>

Should you have an issue accessing the link above, please visit our website to view all documents:

[Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape - DEA&DP Ref: 16/3/3/5/D1/14/0011/25 | Eco Route](#)

Re: NOTIFICATION OF PUBLIC PARTICIPATION: DEA&DP Ref: 16/3/3/5/D1/14/0011/25 - Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakklloof 443, Plettenberg Bay, Western Cape

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

Date Thu 24 Jul 2025 14:14

To 'Andiswa Sam' <asam@bocma.co.za>; Rabokale Mphahlele <rmphahlele@bocma.co.za>; Sbonelo Ndlovu <sndlovu@bocma.co.za>; 'Megan Simons' <msimons@capenature.co.za>; abrahamsn@nra.co.za <abrahamsn@nra.co.za>; managerfpa@gmail.com <managerfpa@gmail.com>; Vanessa Weyer <vanessa.weyer@sanparks.org>; environment@caa.co.za <environment@caa.co.za>

Cc Joclyn Marshall <joclyn@ecoroute.co.za>; 'Janet ' <janet@ecoroute.co.za>

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

Date Thu 24 Jul 2025 14:11

To OCEIA@environment.co.za <OCEIA@environment.co.za>; Melvin.Schwartz@dalrrd.gov.za <Melvin.Schwartz@dalrrd.gov.za>

Cc Joclyn Marshall <joclyn@ecoroute.co.za>; 'Janet ' <janet@ecoroute.co.za>

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

Date Thu 24 Jul 2025 14:14

To Chris Schliemann <cschliemann@plett.gov.za>; mrhode@plett.gov.za <mrhode@plett.gov.za>; Anjé Minne <aminne@plett.gov.za>; info@gardenroute.gov.za <info@gardenroute.gov.za>; Nina Viljoen (Dr) <nina@gardenroute.gov.za>

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DEADP Ref No: **16/3/3/5/D1/14/0011/25**

DEADP Ref for EA: **16/3/3/1/D1/14/0028/22**

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- 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.
- 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.

The following Listed Activities in terms of the EIA Regulation 2014 as per the EA (16/3/3/1/D1/14/0028/22), are relevant:

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Joclyn Marshall (EAPASA Reg 2022/5006)
P.O. Box 1252, Sedgfield, 6573
Email: admin@ecoroute.co.za
Cell: 072 126 6393



Annexure 3: Interested and Affected Parties Database

STATE DEPARTMENTS			
Name	Contact Person	Contact Details	Email
Department of Environmental Affairs and Development Planning (DEA & DP)	Francois Naude Dorien Werth	Private Bag x 6509, George, 6530 044 814 2013 (T)	Francois.Naude@westerncape.gov.za Dorien.Werth@westerncape.gov.za
Department of Health	Nathan Jacobs	Private Bag x6592, George, 6530 044-803 2727 (T) 044-873 5929 (F)	Nathan.Jacobs@westerncape.gov.za
Department of Environmental Affairs and Development Planning (DEA & DP)	Danie Swanepoel		Danie.Swanepoel@westerncape.gov.za
DFFE Directorate: Biodiversity & Conservation	Mr Seoka Lekota	Environmental House 473 Steve Biko, Arcadia Pretoria 0083	BCAdmin@environment.gov.za
DFFE: Oceans and Coast	Rueben Molale		RMolale@dfre.gov.za OCeia@environment.gov.za OCEIA@dfre.gov.za

Department of Forestry, Fisheries and the Environment (DFFE): Integrated Environmental Authorisations	Ms Bathandwa Ncube Ms Lydia Kutu	012 399 9368 (T)	BNcube@dfre.gov.za LKutu@dfre.gov.za
DFFE Protected Areas, Planning and Management Effectiveness	Mr Thivhulawi Nethononda	Environmental House 473 Steve Biko, Arcadia Pretoria 0083	Tnethononda@dfre.gov.za
Heritage Western Cape	Noluvo Toto Stephanie Barnardt	Private Bag x9067, Cape Town, 8000 021-483 9729 (T) 021-483 9845 (F)	Noluvo.Toto@westerncape.gov.za Stephanie.barnardt@westerncape.gov.za
Provincial Roads Dept	Azni November Dirk Prinsloo	Private Bag x617, Oudtshoorn, 6620 044 272 6071 (T) 044 272 7243 (F)	Azni.November@westerncape.gov.za Dirk.Prinsloo@westerncape.gov.za
Department of Water & Sanitation	John Roberts	Private Bag x16, Sanlamhof, 7532 021 941 6179 (T) 021 941 6082 (F)	RobertsJ@dwa.gov.za
Dept of Agriculture Land Use Management	Cor van der Walt Brandon Layman	Private Bag x1, Elsenburg, 7601 021 808 5099 (T)	Cor.VanderWalt@westerncape.gov.za Brandon.Layman@westerncape.gov.za
Transport & Public Works / Department of Infrastructure	Vanessa Stoffels	24 th Floor, 9 Lower Burg Street, Cape Town 021 483 4669 (T)	Vanessa.Stoffels@westerncape.gov.za

DAFF: Forestry Management	Melanie Koen	Private Bag x12, Knysna, 6570 044 302 6902 (T) 044 382 5461 (F)	MKoen@dffe.gov.za
Coastal Management Unit, DEA&DP	leptieshaam Bekko Mercia J Liddle Hilda Hayward Ryan Apolles	Private Bag x9086, Cape Town, 8000 021 483 3370 (T) 078 744 9205 (Cell) leptieshaam Bekko)	leptieshaam.Bekko@westerncape.gov.za Mercia.Liddle@westerncape.gov.za Hilda.Hayward@westerncape.gov.za Ryan.Apolles@westerncape.gov.za
Department of Rural Develop. & Land Reform	Melvin Schwartz	P.O. Box 872 George 6530	Melvin.schwartz@dalrrd.gov.za
ORGANS OF STATE			
Name	Contact Person	Contact Details	Email
Breede-Olifants Catchment Management Agency	Andiswa Sam R Mphahlele SI Ndlovu	PO Box 1205, George, 6530 023 346 8000 (T) 023 347 2012 (F)	asam@bocma.co.za rmphahlele@bocma.co.za sndlovu@bocma.co.za
Cape Nature Land Use Advice	Megan Simons	Private Bag x6546, George, 6530 044 802 5328 (T)	msimons@capenature.co.za
SANRAL	Nicole Abrahams	Private Bag x19, Bellville, 7530 021 957 4602 (T)	AbrahamsN@nra.co.za
Southern Cape Fire Protection Agency	Dirk Smit	Private Bag x12, Knysna, 6570 044 302 6912 (T) 086 616 1682 (F)	managerfpa@gmail.com

SANPARKS	Dr. Vanessa Weyer	PO Box 3542, Knysna, 6570 044 302 5600 (T)	Vanessa.Weyer@sanparks.org
South African Civil Aviation Authority	Canny Mosebjadi Mothapo	083 461 6292	environment@caa.co.za
MUNICIPALITIES			
Name	Contact Person	Contact Details	Email
Bitou Municipality	Chris Schliemann	PO Box 255, Plettenberg Bay, 6600 044 501 3324 (T) 086 659 7954 (F) 083 628 4001	cschliemann@plett.gov.za
Bitou Municipality	Michael Rhode	PO Box 255, Plettenberg Bay, 6600 044 501 3264 (T) 044 533 3485 (F)	mrhode@plett.gov.za
Bitou Municipality	Anje Minne	PO Box 255, Plettenberg Bay, 6600 044 501 3318 (T) 044 533 6885 (F)	aminne@plett.gov.za
Garden Route District Municipality	Mr. Lusanda Menze	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	info@gardenroute.gov.za
Garden Route District Municipality	Dr. Nina Viljoen	P.O. Box 12, George, 6530 044-8031300 (T) 0865556303 (F)	nina@gardenroute.gov.za
PUBLIC			
Portion No.	Contact Person	Contact Details	Email
The Ivor Karan Trust (Portion 88 of the farm Brakkloof 443)	Ivor Karan		

Portion 89A and 112	Albert van der Merwe obo Almerwe Trust		
Erf 65 / 443	Bruce Anderson obo Jacobs Anderson Share Block		
Erf 65 / 443	Trevor Charles Frost Family Trust obo Jacobs/Anderson Share Block		
• Plett Erven 3959 / 3960 / 3961 (Celsum 1069 (Pty) Ltd • Plett Erf 3958 (Philippus Greeff Joubert) • Plett Erf 12906 (BF Solar (Pty) Ltd • Plett Erf 13006 (Ursula Walter Kruse & Carlos Maria Criado Perez Trefault) • Plett Er 13011 (Schnitzel Von Krumm Investments (Pty) Ltd) • Plett Erf 13012 (H Pretorius) • Plett Erf 13013 (Iyakhula II Trust) • Plett Erf 13015 (IS Projects CC) • Plett Erf 13016 (V Hulme) • Plett Erf 13018 (A Mulckhuysen)	Marika Vreken obo Duin & See Homeowners Association		
Erf 87 / 443	Delarey Viljoen obo Mr PK Gain		
Erf 87 / 443	Hilland and Associates obo Peter Gain / Cathy Avierinos		
	EcoVive on behalf of Plett Environmental Forum		

	S Comline Plettenberg Bay Ratepayers and Residents Association		
	K. Otto		

Annexure 4: Issues and Response Register

COMMENTS	RESPONSE
COMMENTS RECEIVED IN RESPONSE TO NOTICE OF INTENT (NOI) DATED 05 JUNE 2025	
Department of Environmental Affairs and Development Planning (DEA&DP) – 20/02/2025	
ACKNOWLEDGEMENT OF AND COMMENT ON THE NOTICE OF INTENT TO SUBMIT AN APPLICATION IN TERMS OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 FOR THE AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (DEA&DP REF. 16/3/3/1/D1/14/0028/22 ISSUED ON 31 JULY 2022) FOR THE DEVELOPMENT OF A BEACHFRONT SECURITY ESTATE ON PORTION 66 & 67 OF FARM 443, PLETTENBERG BAY, WESTERN CAPE 1. The abovementioned document compiled by the appointed Environmental Assessment Practitioner, Ms. Joclyn Marshall (EAPASA No: 2022/5006), of Eco Route (Pty) Ltd., received by this Directorate via electronic mail on 02 December 2024, refers. 2. This letter serves as an acknowledgment of receipt of the aforementioned document by this Directorate. 3. This Directorate considered the previous Notice of Intent which was submitted on 03 October 2024 with the ref 16/3/3/6/7/5/D1/14/0311/24. 4. This Directorate has reviewed the documents and provides the following comment and guidance:	
4.1. It is noted that the proposal entails the amendment of the Site Development Plan ("SDP") to reflect a boardwalk instead of a footpath. The boardwalk extends beyond the approved development footprint. 4.2. Furthermore, there is a revised layout proposed for the amendment of building plates that will have an overall reduction in the development footprint of the building plates for P06 and P07; however, the proposed building footprints will extend beyond those previously assessed. 4.3. According to the proposed changes to the SDP, it is noted that PO8 with the additional building plate will transverses the existing erven boundary.	The Application submitted on 7 July 2025 to DEA&DP is that of a Part 2 Amendment. A further proposed amendment has been included in the Draft Amendment Application for the amendment of Condition 21 as contained in the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025. This is highlighted as red in the document. Condition 21 – <i>The Holder must ensure the development provides the public unrestricted access to the coastal public property. A coastal access point should be established and maintained on the site.</i>

Therefor there will be additional impacts that was not assessed in the previous Environmental Authorisation. 4.4. Considering the impacts during the construction phase and the operational phase, there will be a change in the visual and landscaping impacts. These further highlight that there will be additional impacts which were not assessed when the initial application for Environmental Authorisation was considered. 4.5. The latest proposal to amend the Environmental Authorisation (i.e., changes to the approved SDP) will result in a change to the scope of a valid environmental authorisation where such change will result in an increased level or change in the nature of impact where such level of or change in the nature of the impact was not - assessed and included in the initial application for environmental authorisation; or - taken into consideration in the initial application Environment authorisation. This view is supported by the changes to the building plates / footprints and the development of a boardwalk, which were not previously assessed nor taken into account in the initial application for environmental authorisation. The application to amend the Environmental Authorisation (Ref. 16/3/3/1/D1/14/0028/22 issued on 31 July 2022) must therefore follow the process described in Part 2 of Chapter 5 of the Environmental Impact Assessment Regulations, 2014, and not Part 1 as suggested in the NOI Form.	It is proposed to amend this condition to the following – <i>The Holder must ensure that access to the coastal public property over the servitude right of way is not restricted in accordance with the title deed condition.</i> Specialist inputs were obtained for the part 2 amendment application please refer to Appendix E1: As per the Archaeological Impact Assessment: 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: <i>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).</i> As per the Animal & Terrestrial Biodiversity Assessment by Conservation Management Services: <i>The natural habitats available on the study site are all anthropogenically impacted, to a variable degree, but the current situation is set to deteriorate swiftly due to the devastating impact of invasive alien Acacia cyclops, which in the last few years has already spread over half of the site and which will continue to spread and mature to the further detriment of all indigenous plant and animal species in the area.</i>
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	<i>It can thus be summarized with a high degree of confidence that the study site is of no importance to the fauna predicted by the screening tool to occur on it and that the other fauna on the site is already in an advanced state of decline due to habitat transformation.</i> <i>It is concluded that the proposed changes to the Environmental Authorization will not have a negative impact on the biodiversity of the site and that the installation of the boardwalk will in fact have a long-term positive impact.</i> As per the Freshwater Assessment: <i>I can confirm that the amendments as described above are all confined to the development footprint to the east of Robberg Road (Figure 2) and will have no additional or alternative impact on the wetland. The impacts described and assessed in the original freshwater assessment report are therefore also applicable to the updated SDP.</i> As per the Terrestrial Plant Species Compliance Statement: 1. A boardwalk is preferable to reduce impacts on the primary dune system. 2. The minor increase in the number of units will not alter the botanical impacts of the proposed development. As per the Visual Impact Assessment: <i>I therefore recommend that the proposed amendments be endorsed by the powers that be, as the proposed development (inclusive of the amendments described above), would have little to no visual impact on the cultural landscape.</i>
4.6. Please be advised that in accordance with Regulation 12(1) you are required to appoint a registered environmental assessment practitioner (EAP) to manage the application which must be submitted in terms of Part 2 of Chapter 5 of the Environmental Impact Assessment Regulations, 2014. Such an EAP must comply with the prescripts set out in Regulation 13 of the Environmental Impact Assessment Regulations, 2014, amongst others being "independent". Whereas, "independent", in relation to an EAP, a specialist or the person responsible for the preparation of an environmental audit report, means—	It has been confirmed by the Applicant that Eco Route Environmental Consultancy is no longer the Environmental Control Officer for Athina Estate. The ECO contract for the Construction and Rehabilitation phase has been completed. An external audit report was submitted to DEA&DP by an independent EAP in May 2025 on closure of the initial construction works. Confirmation letter from the Applicant is included below. Please also see Appendix A. The EAP's CV is also attached as Appendix A.

(a) that such EAP, specialist or person has no business, financial, personal or other interest in the activity or application in respect of which that EAP, specialist or person is appointed in terms of these Regulations; or
(b) that there are no circumstances that may compromise the objectivity of that EAP, specialist or person in performing such work;
excluding—

(i) normal remuneration for a specialist permanently employed by the EAP;
or
(ii) fair remuneration for work performed in connection with that activity, application or environmental audit.

Furthermore, in accordance with Regulation 12(3) you must take all reasonable steps to verify whether the EAP complies with Regulation 13(1)(a) and 13(1)(b), meaning that you must verify that the EAP is independent and that they have expertise in conducting environmental impact assessments or undertaking specialist work as required, including knowledge of the National Environmental Management Act, 1998 (Act No. 107 of 1998, as amended) ("NEMA"), these Environmental Impact Assessment Regulations, 2014 and any guidelines that have relevance to the proposed activity.

It is understood that **Eco Route Environmental Consultancy** is currently appointed to undertake the ongoing environmental control officer (ECO) responsibilities as stipulated in the Environmental Authorisation (Ref. 16/3/3/1/D1/14/0028/22 issued on 31 July 2022) until the activities are concluded. In light of the current business and/or financial interest, it appears that neither *Eco Route Environmental Consultancy's* or an EAP in its employ, will conform to the definition of 'independent' should they be appointed to manage the intended application for the amendment of the Environmental Authorisation (Ref. 16/3/3/1/D1/14/0028/22 issued on 31 July 2022) in terms of Part 2 of Chapter 5 of the Environmental Impact Assessment Regulations, 2014.

You are advised to verify the requirements of Regulation 13(1)(a) and (b) prior to the appointment of such a registered person to manage your intended application, or to ensure that you can demonstrate that the requirements of Regulations 13(2) and 13(3) of the Environmental Impact Assessment Regulations, 2014 have been complied with.

4.7. Please note that it is the responsibility of the applicant / proponent / EAP to ascertain whether subsequent versions of the NOI have been published or produced by the competent authority. In this regard please



ATHINA
ESTATE

ATHINA DEVELOPMENT PTY (LTD)
Reg no: 2018/081918/07

DEA&DP Attention: Danie Swanepoel

We have appointed Eco Route Environmental Consultancy as our ECO on site. As the management agent our responsibility was to develop all the infrastructure for roads and services. This process has now been completed as is evident in the last ECO reports. We have now handed over the development to the homeowners association who will be responsible from hereon with regards to complying with the Environmental Authorisation Ref16/3/3/1/D1/14/0028/22.

It is only envisioned that the first houses will be constructed in 2026, therefor the need for an Eco on site will only be required in 2026. Rehabilitation of the site can only continue post construction of each single residential house, however the rehabilitation of the site where areas were disturbed during the implementation of the services is now complete.

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

Kyle Powter
082 505 1770

kpowter

Noted.

note that the form submitted to this Department is not the latest version of the Notice of Intent. The current version of the form is dated April 2024 is available on request from the Department or can be downloaded from URL: https://d7.westerncape.gov.za/eadp/resource-library/forms. Future submissions must be done on the aforementioned form until such time that a newer version has been produced and published by this Department.	
5. Kindly quote the abovementioned reference number in any future correspondence in respect of the proposed application.	
6. This Department reserves the right to revise initial comments and request further information from you based on any new or revised information received.	
COMMENTS RECEIVED IN RESPONSE TO PRE-APPLICATION PUBLIC PARTICIPATION PROCESS 05 JUNE 2025 – 07 JULY	
STATE DEPARTMENTS	
Department of Forestry, Fisheries and the Environment (DFFE): Branch Oceans & Coasts (O&C) – 25/06/2025	
The Department of Forestry, Fisheries, and the Environment (DFFE), Branch Oceans & Coasts (O&C) appreciates the second opportunity granted to comment on the Proposed Amendment of the environmental Authorization (EA) for the Development of a Beachfront Security Estate on Portion 66 & 67 of Farm 443, Plettenberg Bay, Western Cape. This Branch has provided recommendations in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICM Act"). The Branch O&C has the mandate to ensure the holistic management of the coast and estuarine areas as an integrated system and promote coordinated coastal management. It ensures that the ecological integrity, natural character, and economic, social, and aesthetic value of coastal zones are maintained to ensure that people, properties, and economic activities are protected against the impacts of dynamic coastal processes. Guided by the principles of integrated coastal management, this Branch promotes developments that promote socially justified sharing of benefits derived from a resource-rich coastal area and strives to ensure that the principles of sustainable development are upheld.	Noted.

Based on the submitted section post-application BAR, the Branch O&C presents the comments stipulated below for consideration. Please note the recommendations for your consideration:	
1. This amendment application refers to the Environmental Authorisation (EA) issued on 31 July 2024; however, the EA in Appendix G is dated 31 July 2023.	Correct.
2. The proposed amendments to the EA are the amendment of the Site Development Plan (SDP) to reflect a boardwalk instead of 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 165m ² for P06 and P07 and the inclusion of an additional development footprint area on building plate PO8 of 54m ² , and removal of development footprint area from PO9 of 71m ² that will have an overall decreased of 17m ² . The proposed boardwalk should be constructed within the property boundaries, and the service area should not obstruct the right-of-way for the public and its establishment purpose.	A further proposed amendment has been included in the Draft Amendment Application for the amendment of Condition 21 as contained in the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025. This is highlighted as red in the document. Condition 21 – <i>The Holder must ensure the development provides the public unrestricted access to the coastal public property. A coastal access point should be established and maintained on the site.</i> It is proposed to amend this condition to the following – <i>The Holder must ensure that access to the coastal public property over the servitude right of way is not restricted in accordance with the title deed condition.</i>
3. This Branch notes that the proposed elevated boardwalk will minimize direct contact with sensitive ecosystems, thereby reducing habitat disturbance. Indeed, studies indicate that properly designed boardwalks can facilitate the recovery of native vegetation, reduce soil compaction and erosion by limiting human trampling. From the application, it is not clear why this option was not included in the initial EA application.	Noted and agreed.
4. Using durable, non-toxic materials is recommended to ensure that the materials resist rot and withstand the impacts of coastal conditions and climate-related factors.	Durable and non-toxic materials will be used for the boardwalk. This will also reduce maintenance requirements.
5. The Branch O&C would like to remind the applicant of Section 15 NEM: ICM Act 2008 (Act No. 24 of 2008)" <i>No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or intentional act or omission of that organ of state or other people.</i> "	This is noted and will be done should this be a requirement in future.

Therefore, should any protection measures be required in the future, the applicant will be required to conduct a maintenance management plan.	
6. The applicant is reminded of the Duty of Care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: "...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorized by law or cannot reasonably be avoided or stopped, to minimize and rectify such pollution or degradation of the environment..." together with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.	Noted. The Applicant is aware of their Duty of Care to the environment. This is also stipulated in the EMPr.
7. The ICM Act advocates for reasonable coastal access to the coastal and estuarine resources. Therefore, the applicant must take note of the provisions of Section 13 of the ICM Act which states that "(1) Subject to this Act and any other applicable legislation, any natural person in the Republic – (a) has a right of reasonable access to the coastal public property; and (b) is entitled to use and enjoy coastal public property, provided such use – (i) does not adversely affect the rights of members of the public to use and enjoy the coastal public property; (ii) does not hinder the State in the performance of its duty to protect the environment; and (iii) does not cause adverse effect. (1A) Subject to subsections (2) and (3), no person may prevent access to coastal public property." During the construction and operational phase, the applicant, together with any occupiers of the property, should only use the designated access points to the beach and ensure that the public can safely use and enjoy the coastal zone.	As per Condition 20.3. of the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025, <i>the ecological servitude must not be fenced on the eastern and western boundaries</i> . This servitude will remain unfenced in perpetuity.
8. While on the subject of public coastal access, the EA amendment, states that "The property will be fenced and gated, however access to the frontal/coastal beach walking trail will not be denied. The Homeowners Association will control the development..." The branch wishes to express concerns regarding private players such as a HOA burdening itself with the responsibility of managing and controlling the public exercising the right of access to the coast. Even though this is a good gesture that could be appreciated, the concern is that this should be a municipal function or a function of a public body. In this regard, it is recommended that such an undertaking be recorded in a manner that guarantees that the coastal access right-of-way will remain in perpetuity.	Noted and agreed. Public access will not be provided through the gated estate. The access right of way will remain in perpetuity as per the condition of the Title Deed and Notarial Deed of Servitude K750/1996 (Appendix O).

9. Section 63 of the ICM Act states that when environmental authorization for coastal activities is applied for in terms of Chapter 5 of the National Environmental Management Act, the competent authority must take into account all relevant factors, including whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and protecting those areas, the socio-economic impact of the proposed activities and the likely effects of coastal processes on the developmental proposal.	The proposed amendments will not affect coastal public property, the coastal protection zone or coastal access land. The amendment will not change existing rights as per the Title Deed as the servitude will give access right of way to Portion 60. Please see Appendix B
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joclyn@ecoroute.co.za

From: OCEIA <OCEIA@dfre.gov.za>
Sent: Tuesday, 30 September 2025 11:54
To: joclyn@ecoroute.co.za; OCEIA; Tabisile Mhlana
Cc: admin@ecoroute.co.za; janet@ecoroute.co.za
Subject: RE: Comments on Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

Dear Joclyn,

I trust this email finds you well.

This comment aims to ensure that the right of public access to the coast is secured permanently, not just for as long as the HOA or developer chooses to allow it, hence the recommendation that this undertaking be formally secured and recorded in a manner to ensure that the coastal access right-of-way is preserved in perpetuity.

Kind Regards
Tabisile

From: joclyn@ecoroute.co.za <joclyn@ecoroute.co.za>
Sent: Monday, 29 September 2025 11:40
To: OCEIA <OCEIA@dfre.gov.za>; Tabisile Mhlana <tmhlana@dfre.gov.za>
Cc: admin@ecoroute.co.za; janet@ecoroute.co.za
Subject: RE: Comments on Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

Dear Tabisile

I trust you are well.

The Department of Environmental Affairs and Development Planning (DEA&DP) requested that we get clarity from your department on the following with regards to the comments you submitted -

In addition to the above it is noted from the comments from DFFE: Oceans and Coasts dated 25 June 2025 DFFE: Oceans and Coasts does not support controlled access through the estate. It is required that more information be provided in this regard as the statements made are unclear.

Please can you assist in providing clarity.

Much appreciated.

Kind Regards,

Joclyn Marshall
MSc Environmental Science
EAPASA 2022/5006
072 126 6393



10. You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no other additional activities outside the scope of this application may commence before an Environmental Authorization is granted by the Department.	Noted.
Kindly note that the Branch Oceans & Coasts reserves the right to revise its comments and request further information based on any additional information received. All correspondence, documentation, and/or requests (hard copy and an electronic copy) should be submitted to our office via email to OCEIA@dffe.gov.za / Physical Address: Department of Forestry, Fisheries & the Environment (DFFE), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.	Noted.
Department of Environmental Affairs and Development Planning (DEA&DP): Coastal Management – 03/07/2025	
Good Day, Your request for comment from the Sub-directorate: Coastal Management on the abovementioned part 2 amendment application received on 05 June 2025, refers. 1. CONTEXT 1.1. The Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("NEM: ICMA") is a Specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"). The NEM: ICMA sets out to manage the nation's coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment. In terms of Section 38 of the NEM: ICMA, the Department of Environmental Affairs and Development Planning ('the Department') is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the "Management of public launch sites in the coastal zone (GN No. 497, 27 June 2014) 'Public Launch Site Regulations'". 1.2. The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme ("PCMP"). The PCMP is a five (5) year strategic document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the Province. The Department has developed the next generation PCMP that includes priority objectives for the next 5 years. This PCMP was adopted on 19 May 2023 and available upon request.	Noted.

1.3. A key priority of the PCMP is the Estuary Management Programme, which is implemented in accordance with the NEM: ICMA and the National Estuarine Management Protocol ("NEMA"). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The Department is in the process of approving a series of Estuarine Management Plans. 1.4. The facilitation of public access to the coast is an objective of the NEM: ICMA as well as a Priority in the WC PCMP. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 ("PCASP") and commissioned coastal access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NEM: ICMA. The PCASP as well as the coastal access audits are available upon request.	
2. COMMENT 2.1 The sub-directorate: Coastal Management ("SD:CM") has reviewed the information as specified above and have the following commentary:	
2.1.1. An environmental authorisation was issued on 31 July 2024 for the development of 9 residential stands with associated infrastructure and communal open space on Farm 66/443 and Farm 67/443. A part 1 amendment was approved on 14 June 2024 for amendments to the SDP which included the realignment of the internal road and minor realignment of the five beachfront erven. The new proposed changes to the SDP are as follows: 2.1.1.1. The amendment of the Site Development Plan to reflect a boardwalk instead of a footpath 2.1.1.2. A revised layout proposed for the amendment of building plates that will have a slight increase in the development footprint of the building plates P06 and P07 2.1.1.3. The inclusion of an additional development footprint area on building plate P08 and removal of development footprint area from P09 that will have a slight decrease in the development footprint for the two stands.	A further proposed amendment has been included in the Draft Amendment Application for the amendment of Condition 21 as contained in the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025. This is highlighted as red in the document. Condition 21 – <i>The Holder must ensure the development provides the public unrestricted access to the coastal public property. A coastal access point should be established and maintained on the site.</i> It is proposed to amend this condition to the following – <i>The Holder must ensure that access to the coastal public property over the servitude right of way is not restricted in accordance with the title deed condition.</i>
2.1.2. The SD: CM is satisfied that all the proposed amendments and SDP will occur landward of the Garden Route District's coastal management	Noted and agreed.

line ("CML"). The increased effects of climate change, sea level rise and increased storm surges in coastal environments obliges the Department to take a more cautious approach when considering developments along the coast and estuaries. The technical delineation of the CML project was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone.	
2.1.3. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk to flooding, wave-run-up modelling, inter alia, and was delineated in conjunction with and supported by other organs of state including the Local and District Municipalities, CapeNature and all other organs of state represented on the steering committee for the Garden Route District CML project. The principal purpose of the CML is to protect coastal public property ("CPP"), private property and public safety; to protect the CPZ; and to preserve the aesthetic value of the coastal zone. The use of CMLs is of particular importance in response to the effects of climate change, as it involves both a quantification of risks and pro-active planning for future development. The SD: CM can confirm the proposed development would not be affected by coastal processes as per the Department's coastal risk modelling and due to the property's elevation.	Noted and agreed.
2.1.4. It should be noted that the seaward boundary of the subject properties' forms part of the littoral active zone ('LAZ') and as such the SD: CM advises the proposed boardwalk in item 2.1.1.1. may not occur outside the applicant's property boundary nor may the applicant create any further footpaths through the LAZ to the coast. Any development within the LAZ will impede the ecological processes relating to beach replenishment, the cycle of erosion and accretion that occur naturally along sandy shores and will negatively impact the ability of coastal dunes to mitigate the impact of sea level rise as well as the increase in the magnitude and frequency of storm surges currently being experienced along the coast.	The boardwalk will remain within the property boundary. No further footpaths will be created. The existing footpath will be designated access.
2.1.5. Due to the subject properties' proximity to the coast, be advised that the proposed development and associated activities may in no way hinder public's ability to access coastal public property.	As per Condition 20.3. of the Environmental Authorisation (16/3/3/1/D1/14/0028/22) dated 31 July 2025, <i>the ecological servitude must not be fenced on the eastern and western boundaries</i> . This servitude will remain unfenced in perpetuity.
2.1.6. Based on the abovementioned items, the SD: CM does not object to the proposed amendment application for Farm 66/443 and Farm 67/443, provided that all the abovementioned items are considered, effectively applied and that the EMPr is strictly adhered to.	Noted, the EMPr will be strictly adhered to. All items have been addressed above.
2.2. The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: "...Every person who causes, has caused or	Noted.

may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment ..." together with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.	
3. The SD: CM reserves the right to revise or withdraw its comments and request further information from you based on any information that may be received.	
Department of Forestry, Fisheries and the Environment (DFFE): Directorate Biodiversity Conservation – 07/07/2025	
The Directorate: Biodiversity Conservation has reviewed and evaluated the amendment report Based on the information provided in the amended report, changes to the approved SDP will result in a change to the scope of a valid environmental authorisation where such change will result in an increased level or change in impact where such a change in the nature of the impact was not - assessed and included initially. Each potential environmental impact and risk identified was assessed according to specific criteria as part of the part 2 EA amendment. No significant impact to the biodiversity themes and areas will be affected. The proposed amendment is still within the ESA1 according to the screening tool. The Directorate Biodiversity Conservation does not have any objection to the proposed amendment, provided mitigation measures as outlined are adhered to and implemented. In conclusion, the Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@dffe.gov.za for the attention of Mr. Seoka Lekota. Yours faithfully	Mitigation measures will be adhered to and implemented as per the approved EMPr. Mr. Seoka Lekota of the Directorate: Biodiversity Conservation has been included in the PPP, and is registered as an I&AP.
ORGANS OF STATE	
Breeder-Gouritz Catchment Management Agency (BGCMA): Rabokale Mphahlele – 10/06/2025	
Good day, Thank you for the opportunity to comment on the above-referenced amendment application for the Athina	Thank you for the confirmation of the valid water use license.

Estate, located on Portions 66 and 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape. The application involves proposed changes to the Site Development Plan (SDP), which include: • Amendment of the footpath to reflect a boardwalk; • Slight increase in the development footprint of building plates P06 and P07; • Inclusion of an additional development footprint area on building plate P08; and • Removal of a development footprint area from P09, resulting in a slight overall decrease in development footprint across the two stands. This office confirms that a water use licence is already in place for this development, under Licence No: 02/K60G/CI/134, dated 24 August 2021. Please note that the licence remains valid provided that the proposed SDP amendments do not result in any new or additional impacts, or an increase in the significance of impacts already assessed and approved under the existing licence. In this regard, confirmation by a suitably qualified aquatic specialist must be submitted to this office for review prior to approval and implementation of the amended SDP. Kindly note that this office reserves the right to revise its comments should it be deemed necessary.	Please see confirmation from the aquatic specialist, attached to the Amendment application as Appendix Q. The aquatic specialist confirms that the amendments as described are minor and will not result in an increase in the significance of impacts to the wetland system. As per the Freshwater Assessment (appendix E1): I can confirm that the amendments as described above are all confined to the development footprint to the east of Robberg Road (Figure 2) and will have no additional or alternative impact on the wetland. The impacts described and assessed in the original freshwater assessment report are therefore also applicable to the updated SDP.
PUBLIC	
No comments received.	
COMMENTS RECEIVED IN RESPONSE TO PRE-APPLICATION PUBLIC PARTICIPATION PROCESS	
STATE DEPARTMENTS	
Department of Forestry, Fisheries and the Environment (DFFE): Directorate Biodiversity Conservation – 22/08/2025	
Good morning, Ms Marshall, Kindly find attachment of comments from the Directorate: Biodiversity and Conservation, the comments still stand from the previous submission.	Noted. The comments attached from the previous submission have been addressed above.

Department of Forestry, Fisheries and the Environment (DFFE): Directorate Biodiversity Conservation – 07/07/2025	
COMMENTS ON THE DRAFT PART 2 EA AMENDMENT FOR PROPOSED DEVELOPMENT FOR THE ATHINA ESTATE ON PORTION 66 & 67 OF THE FARM BRAKKLOOF 443, PLETTENBERG BAY, WESTERN CAPE PROVINCE The Directorate: Biodiversity Conservation has reviewed and evaluated the amendment report Based on the information provided in the amended report, changes to the approved SDP will result in a change to the scope of a valid environmental authorisation where such change will result in an increased level or change in impact where such a change in the nature of the impact was not - assessed and included initially. Each potential environmental impact and risk identified was assessed according to specific criteria as part of the part 2 EA amendment. No significant impact to the biodiversity themes and areas will be affected. The proposed amendment is still within the ESA1 according to the screening tool. The Directorate Biodiversity Conservation does not have any objection to the proposed amendment, provided mitigation measures as outlined are adhered to and implemented. In conclusion, the Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@dffe.gov.za for the attention of Mr. Seoka Lekota.	No objection is noted thank you for your input.
Department of Environmental Affairs and Development Planning (DEA&DP): Coastal Management – 22/08/2025	
Good day, Please note there no further comments from the sub-Directorate: Coastal Management on the subject matter.	Noted. The comments attached from the previous submission have been addressed above.
Department of Infrastructure 14/08/2025	
1. Your email to Ms V Stoffels of this Branch dated 5 June 2025 refer. 2. This Branch offers no objection to the amendment of the environmental authorisation.	Thank you for comments received.

3. There is an existing application to upgrade OP 7209 (Robberg Road) with this Branch. The Chief Directorate Road Design still awaits Bitou Municipality's response regarding the transfer of road authority	
Department of Environmental Affairs and Development Planning (DEA&DP) – 17/07/2025/2025	
Dear Sir, ACKNOWLEDGEMENT OF RECEIPT OF THE APPLICATION FOR AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION (REF: 16/3/3/1/D1/14/0028/22 ISSUED ON 31 JULY 2024) IN TERMS OF PART 2 OF CHAPTER 5 OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED DEVELOPMENT OF A BEACHFRONT SECURITY ESTATE ON PORTION 66 & 67 OF FARM 443, PLETTENBERG, WESTERN CAPE PROVINCE 1. The abovementioned document dated 5 June 2025 and submitted to the Directorate: Development Management (Region 3) (hereinafter referred to as "this Directorate" by your registered Environmental Assessment Practitioner (EAP), Joclyn Marshall (EAPASA: 2022/5006) on 7 July 2025, refers 2. This letter serves as acknowledgment of receipt of the aforementioned document by this Directorate 7 July 2025. 3. After reviewing the information submitted to this Department, the following is noted: 3.1. The proposed amendment to the Environmental Authorisation (REF: 16/3/3/1/D1/14/0028/22) issued on 21/07/2024 ("EA") will result in a change of Scope of the EA. 3.2. The proposed amendment will result in an increased level or change in the nature of impact where such level or change in nature of impact was not assessed and included in the initial application for Environmental Authorisation. 3.3. The proposed change will not on its own constitute a listed activity 4. The application must follow the process contemplated in Part 2 Amendment of Chapter 5 of the Environmental Impact Assessment Regulations, 2014 (Government Notice No. R. 982 of 4 December 2014, as amended), namely Regulation 32. You are therefore required to: 4.1 Make an Amendment Environmental Impact Report (EIR) available to all potential and registered Interested and Affected Parties ("I&AP") and all the relevant State Departments/Organs of State, including this Directorate, for a minimum 30-day commenting period.	Please Note that Janet Ebrsohn (EAPASA2019/1286) has taken over as EAP as Ms Marshall has resigned. The EAP agrees and has obtained comments from all required specialists please refer to Appendix E1. The boardwalk was re-assed to ensure no further listed activities were triggered within 100 meters of the High-water Mark and the boardwalk that was proposed outside of the property boundaries have been removed ensuring no additional listed activities are triggered. Noted and agree new PPP dates are 13/10/2025 to 13/11/2025.

4.2 The EIR must contain the information as prescribed by Regulation 32 of the EIA Regulations, 2014 4.3 Screening Tool Report ("STR") and Site Sensitivity Verification Report ("SSVR") The content of your STR and SSVR, along with the identified specialist input in the amendment process is noted. Kindly ensure that all specialist input complies with the Protocols. Nonetheless, the Amendment EIR must reflect all the minimum information requirements detailed in Regulation 32(1)(a). 4.4 Public participation process: Having considered the public participation plan, the competent authority hereby agrees to the proposed steps in the plan, and it must be implemented. 4.5. The EAP must record and respond to all comments received. The comments and responses must be captured in a Comments and Responses Report and must also include a description of the public participation process followed. This report must also be included in the public participation information attached to the Amendment Application Report to be submitted for decision. 5. In accordance with Regulation 32 of the EIA Regulations, 2014, the Department hereby stipulates that the report must be submitted to this Department for decision within 90 days from the date of receipt of the application by the Department. If however, significant changes have been made or significant new information has been added to the report, the applicant/Environmental Assessment Practitioner must notify the Department that an additional 50 days (i.e. 140 days from the date of receipt of the application) will be required for submission of the report. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information. 6. If the report is not submitted within 90-days, or 140 days where an extension is applicable, the application shall lapse in terms of Regulation 45 of Government Notice Regulation No. 982 of 4 December 2014 and your file will be closed. Should you wish to continue, a new Application Form must be submitted.	Please refer to amended EIR A new Public Participation is proposed for 13/10/2025 to 13/11/2025, it was noted with a telephonic conversation with DEA&DP, that we ask for extension of time, and that it is not required to re-advertise in a newspaper. Noted please refer to the C&R report As specialist inputs were asked on the Part 2 amendment it is seen as significant new information and a 50-day extension notice was sent to DEA&DP. Please refer to appendix I. Noted
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7. Kindly quote the above-mentioned reference number in any future correspondence in respect of this matter. 8. Please note that the conditions stipulated in the EA (REF: 16/3/3/1/D1/14/0028/22 issued on 31 July 2024) remain applicable until a decision on this amendment application is taken by this Department. The changes may not be commenced with until such time as an amendment to the EA is granted. It is an offence in terms of Section 49A of the National Environmental Management Act, 1998 (Act No. 107 of 1998, as amended) ("NEMA") if a person fails to comply with or contravenes a condition of an environmental authorisation granted for a listed activity or an approved environmental management programme. Failure to comply with the requirements of 49A of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department for prosecution. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment. The Department reserves the right to revise initial comments and request further information based on any new or revised information received.	Noted Noted and agree
Department of Environmental Affairs and Development Planning (DEA&DP) – 26/09/2025	
Dear Sir, CORRECTION NOTICE: REPLACEMENT OF THE LETTER OF "ACKNOWLEDGEMENT OF RECEIPT OF THE FINAL ENVIRONMENTAL IMPACT REPORT" ISSUED ON 5 SEPTEMBER 2025 FOR THE PROPOSED DEVELOPMENT OF A BEACHFRONT SECURITY ESTATE ON PORTION 66 & 67 OF FARM 443, PLETTENBERG, WESTERN CAPE PROVINCE	
1. The following has reference:	
1.1. The Application Form (dated 20 May 2025), compiled by the appointed Environmental Assessment Practitioner ("EAP"), Ms. Joclyn Marshall (EAPASA No: 2022/5006), of Eco Route Environmental Consultancy, and received by the Directorate: Development Management (Region 3) (hereinafter referred to as "this Directorate") on 5 June 2025.	Please note that an amended application form will be submitted to include a Part 4 amendment. Please note the new EAP on the Project is Janet Ebersohn EAPASA: 2019/1286

1.2. This Directorate's correspondence issued on 7 July 2025, informing you that the aforementioned Application Form was not in order. 1.3. The Application Form (as corrected) resubmitted to this Department on 7 July 2025 by the EAP. 1.4. This Directorate's correspondence issued on 17 July 2025, acknowledging receipt of the corrected Application Form on 7 July 2025. 1.5. The notice received from the Eco Route Environmental Consultancy on 24 July 2025 of the availability of a document and supporting information for comment during a 30-day public participation process, which document is titled: "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, Plettenberg Bay, Western Cape." 1.6. The document received on 27 August 2025 which the EAP submitted as the "<i>Final Amendment Application for Athina Estate Portion 66 & 67 of 443 Plettenberg Bay</i>". 1.7. The additional information received from the EAP per electronic mail on 28 August 2025; and \ 1.8. The Directorate's letter of 5 September 2025, wherein receipt of the document received on 27 August 2025 was acknowledged as a <i>Final Environmental Impact</i>.	Please refer to amended application form Noted
2 In accordance with Section 47(1)(b) of National Environmental Management Act, 1998 (Act No. 107 of 1998, as amended) ("NEMA"), the letter issued by this Department on 5 September 2025 wherein receipt of the document submitted to the Department on 27 August 2025, is withdrawn and replaced by this letter. This letter serves as an acknowledgment of receipt of the aforementioned document received on 27 August 2025.	Noted and agreed
3 Reasons for the decision to replace the letter issued on 5 September 2025:	

3.1	The purpose is to correct an error in the acknowledgement letter. After a review the document received on 27 August 2025, it has been determined that the document is indeed an Application Form and not a <i>Final Environmental Impact</i> report. The document was acknowledged incorrectly.	Noted
3.2	The document received on 24 July 2025 was not perceived to be a Draft EIR as it was submitted on the ' <i>Application Form (April 2024)</i> ' template.	Please refer to amended EIR
3.3	In accordance with Regulation 8(b), a competent authority must advise the proponent or applicant of any matter that may prejudice the success of an application. Through this corrective measure, an opportunity becomes available to inform the Applicant of any matter which will prejudice the success of the application. As such, the 90-day legislated period referenced in Regulation 19(1) has not lapsed.	Thank you
3.4	The view is held that the correction does not change the rights and duties of the Applicant materially. In fact, it will allow the Applicant to potentially address the matters which will prejudice the success of the application.	Thank you
4	Further to the above (specifically point 3.3), the following are relevant considerations forthcoming from a review of the documents submitted to the Department, namely:	
4.1	It is noted that the documents submitted to this Directorate on 24 July 2025 (i.e., Amended Application Form) and on 27 August 2025 (i.e., Final Amended Application Form) were in fact submitted on the Department's formal Amendment Application Form (April 2024) and not a separate Environmental Impact Report (EIR), as prescribed in terms of Regulation 32(1)(a) of the Environmental Impact Assessment Regulations, 2014 (Government Notice 982 of 4 December, 2014 as amended) ("<i>the EIA Regulations</i>"). Please be advised that the competent authority has determined the format of Department's Amendment Application Form (April 2024) in accordance with Regulation 9 of the EIA Regulations, and its sole purpose is to serve as the application form, not to provide a format for an Environmental	Please refer to amended EIR

Impact Report which information is prescribed in terms of Regulation 32(1)(a) of the EIA Regulations. Due to this error, this Directorate mistook the document to be an 'application form' which it had already commented on and not a Draft Environmental Impact Report as required in terms of Regulation 32(1)(a). Therefore, this Directorate did not issue further comment on the "Amended Application Form" received on 24 July 2025.	
4.2 It is acknowledged that the EAP has inserted information in the Application Form template which may address certain aspects of the proposed changes which are being applied for; however, the respective 'Application Forms' received on 24 July 2025 and 27 August 2025 do not address all the minimum information requirements set out in Regulation 32(1)(b), namely that a report is submitted, reflecting— (i) an assessment of all impacts related to the proposed change; (ii) advantages and disadvantages associated with the proposed change; and (iii) measures to ensure avoidance, management and mitigation of impacts associated with such proposed change; and (iv) (iv) any changes to the EMPr.	Noted
4.3 This Directorate notes the undated letter from Heritage Western Cape ("HWC") requires that a Heritage Impact Assessment ("HIA") is required for this amendment proposal. Furthermore, it is noted that only page 1 of 2 pages was provided to this Directorate. Please ensure that all documentation is uploaded when submitted.	ACO Associates cc Archaeology and Heritage Specialist report on the part 2 amendment is included as appendix E1 their findings are as follow: 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.

4.4 In addition to the above it is noted from the comments from DFFE: Oceans and Coasts dated 25 June 2025 DFFE: Oceans and Coasts does not support controlled access through the estate. It is required that more information be provided in this regard as the statements made are unclear.

Please refer to the servitude title deeds appendix B

joclyn@ecoroute.co.za

From: OCEIA <OCEIA@dffe.gov.za>
Sent: Tuesday, 30 September 2025 11:54
To: joclyn@ecoroute.co.za; OCEIA; Tabisile Mhlana
Cc: admin@ecoroute.co.za; janet@ecoroute.co.za
Subject: RE: Comments on Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

Dear Joclyn,

I trust this email finds you well.

This comment aims to ensure that the right of public access to the coast is secured permanently, not just for as long as the HOA or developer chooses to allow it, hence the recommendation that this undertaking be formally secured and recorded in a manner to ensure that the coastal access right-of-way is preserved in perpetuity.

Kind Regards
Tabisile

From: joclyn@ecoroute.co.za <joclyn@ecoroute.co.za>
Sent: Monday, 29 September 2025 11:40
To: OCEIA <OCEIA@dffe.gov.za>; Tabisile Mhlana <tmhlana@dffe.gov.za>
Cc: admin@ecoroute.co.za; janet@ecoroute.co.za
Subject: RE: Comments on Part 2 Amendment Application for the Athina Estate on Portion 66 & 67 of the Farm Brakkloof 443, Plettenberg Bay, Western Cape

Dear Tabisile

I trust you are well.

The Department of Environmental Affairs and Development Planning (DEA&DP) requested that we get clarity from your department on the following with regards to the comments you submitted -

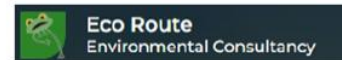
In addition to the above it is noted from the comments from DFFE: Oceans and Coasts dated 25 June 2025 DFFE: Oceans and Coasts does not support controlled access through the estate. It is required that more information be provided in this regard as the statements made are unclear.

Please can you assist in providing clarity.

Much appreciated.

Kind Regards,

Joclyn Marshall
MSc Environmental Science
EAPASA 2022/5006
072 126 6393



	Please refer to Appendix B title deeds, where the right to public access will be according to the title deed, no public access through the estate will be allowed the Eastern boundary (on the Road) and Western Boundary (at the sea) will not be fenced in.
4.5 Furthermore, the approved environmental authorisation condition 20.3. "No structures or infrastructure may be constructed in this servitude without authorisation. This ecological servitude must not be fenced on the eastern and western boundaries". Prohibits any fencing on the eastern and western boundaries. This also relates to an "Impact Management Outcome" which may need to be changed in the EMPr. Please refer to the requirements of Regulation 36(2) pertaining to the amendment of the EMPr. Should Regulation 36(2) be applicable, the EMPr may only be amended on application. To address this, the current Application Form may be revised and resubmitted to the Department to include such changes.	A new application form will be submitted to DEA&DP
4.6 Input from specialists and specialist reports: It is noted that various specialist reports were undertaken during the initial Basic Assessment process. However, only input from the Aquatic Specialist has been submitted with the Final Amendment Application document. Please note that all the requirements stipulated in Regulation 32(1)(a) must be addressed for the respective specialist reports which were originally undertaken. It is advised that the Specialists who undertook those original studies assess all the proposed changes and provide such input.	Please refer to appendix E1 where the specialist has commented on the proposed amendments. No significant impact to the receiving environment was observed by the specialist for the proposed amendments.
4.7 This Directorate does note that the EAP makes reference to a Visual Impact Assessment which was compiled by <i>André Vercueil Professional Architects</i> , dated 15 May 2022, but this report has not been submitted. The Directorate requires an updated assessment/confirmation letter from the specialist that the proposed changes is assessed and mitigated. Please be sure that all the proposed changes are assessed and reported on.	Please refer to Appendix E
5 In accordance with Regulation 32 of GN No. R. 982 of 4 December 2014, the Department hereby reminds you that the report must be submitted to this Department for decision within 90 days from the date of receipt of the application by the Department. However, if significant changes have been made or significant new information has been added to the report, the applicant/Environmental Assessment Practitioner must notify the	Please refer to Appendix I where extension of time letter was submitted to DEA&DP

Department that an additional 50 days (i.e. 140 days from the date of receipt of the application) will be required for submission of the report. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information.	
6 Please note that the conditions stipulated in the Environmental Authorisation (REF:16/3/3/1/D1/14/0028/22 issued on 31 July 2024, as amended) remain applicable until a decision on this amendment application is taken by this Department. The proposed changes may not be commenced with until such time as an amendment to the EA is granted. It is an offence in terms of Section 49A of the NEMA if a person fails to comply with or contravenes a condition of an environmental authorisation granted for a listed activity or an approved environmental management programme. Failure to comply with the requirements of 49A of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department for prosecution. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.	Noted and Agree
7 The Department reserves the right to revise initial comments and request further information based on any new or revised information received.	
ORGANS OF STATE	
Breeder-Gouritz Catchment Management Agency (BGCMA): Rabokale Mphahlele – 29/07/2025	
Dear Jocyn Please note that this office has no further comments on the subject matter, and our previous comments stand. We reserve the right to review this position should the need arise.	Noted. The comments attached from the previous submission have been addressed above.
MUNICIPALITY	
Garden Route District Municipality, Chief Municipal Health-Plettenberg Bay/Bitou: GJ Vos - 29/07/2025	
Ms RE: PROPOSED CONSTRUCTION OF BOARDWALK FOR ATHINA ESTATE ON PORTION 66 AND 67 OF THE FARM BRAKKLOOF 443, BITOU MUNICIPALITY, PLETTENBERG BAY.	These comments are noted.

Your letter under reference DEADP Ref: 16/3/3/5/D1/14/0011/25 with attachment dated 28 May 2025 concerning the above mentioned refers: This office has no objection of the construction of the approximately 104m wooden structure boardwalk to Robberg Beach.	
PUBLIC	
No comments received.	



Eco Route

ENVIRONMENTAL CONSULTANCY

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

PhD Univ. Pretoria

Cell: 072 222 6013

e-mail: ebersohn@cyberperk.co.za

MS. JANET EBERSOHN

Bsc. Hons. Environmental Management

Cell: 082 557 7122

e-mail: janet@ecoroute.co.za

Annexure 5: Consultation with BOCMA

Empty box for consultation details.

Empty box for consultation details.

