46 President Steyn, The Island, Sedgefield Western Cape, South Africa

Mobile: 082 557 7122 Email: admin@ecoroute.co.za Website: www.ecoroute.co.za

FEEDBACK ON THE HIGH-WATER MARK, ATHINA ESTATE, PLETTENBERG BAY

10 October 2025

To whom it may concern,

It was initially observed that the high-water mark depicted on the Site Development Plan (SDP) (Annexure 1) appeared to be located much closer to the eastern boundary of the proposed development. In light of the proposed amendment to the environmental documentation to include a boardwalk at Athina Estate, the exact position of the high-water mark may significantly influence the regulatory process that must be followed.

If the high-water mark is accepted as currently shown on the SDP, the addition of the boardwalk would trigger a separate Basic Assessment in terms of the National Environmental Management Act (NEMA), Act 107 of 1998. However, if the high-water mark is accepted as described in the revised proposal below, the boardwalk may instead be authorised through an amendment process.

According to the SG diagram for property C03900080001683600000 (Annexure 2), the high-water mark is positioned further from the property boundary than indicated on the SDP. Updated data, obtained via aerial imagery dated 07 October 2025, confirms that the actual high-water mark aligns with the position shown on the SG diagram. This is further supported by the most recent Google Earth aerial imagery from February 2025 (Annexure 3).

Based on this information, it has been determined that the portion of the proposed boardwalk located within the 100-metre high-water mark setback is less than 49.00 square metres (Annexure 4). However, this is only accurate if the boardwalk terminates at the property boundary, as the current layout includes a section extending beyond the boundary (Annexure 5).

Provided the boardwalk remains within the property limits, its inclusion does not trigger any listed activities within the 100-metre high-water mark setback.

Justin Brittion

EAPASA: Candidate EAP (2023/6648)

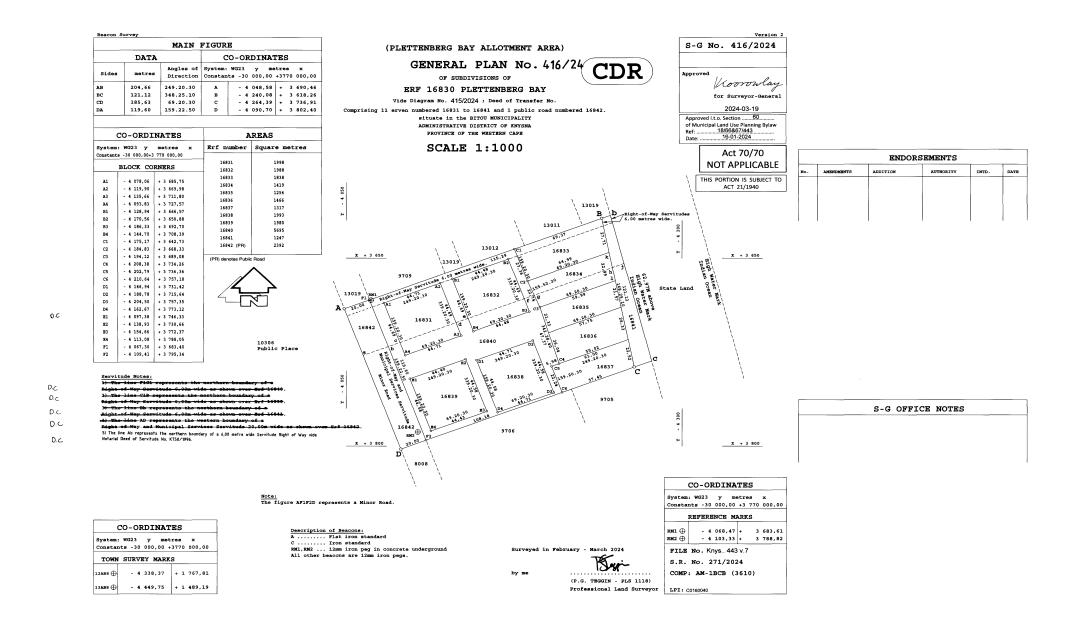
081 208 2170



Annexure 1 – Athina Site Development Plan Revised (Project number – 2020-01; Sheet Number 10-03)



Annexure 2 – SG diagram 416/2024



Annexure 3 – Updated high-water mark (By: Justin Brittion, 2025/10/07)





High-water map – Athina Estate (Erf 66/443) Created by: Justin Brittion 2025/10/10

Annexure 4 – Measurement of boardwalk inside the 100-meter high-water mark (By: Justin Brittion, 2025/10/07)





Measurement of boardwalk
Created by: Justin Brittion 2025/10/10

Annexure 5 – Portion of boardwalk outside the property boundary (Yellow block)

