



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA · 0001 · Environment House · 473 Steve Biko Road, Arcadia, PRETORIA

Reference: EDMS - 270202

Inquiries: Mr. Xolani Myanga

E-mail: OCEIA@dfpe.gov.za

Telephone: (021) 493 7064

Ms Samantha Teeluckdhari
Eco Route Environmental Consultancy
P.O Box 1252,
Sedgefield,
6573

Email: Samantha@ecoroute.co.za

Cell: 082 557 7122

Dear Ms Teeluckdhari

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT - FOR THE PROPOSED DEVELOPMENT OF OUTSIDE DECK WITHIN 100 METERS OF THE HIGH-WATER MARK AND BEACH ACCESS BOARDWALK & VIEWING DECK ON ERF 9706, PORTION 57 OF FARM 443 BRAKKLOOF, PLETTENBERG BAY, BITOU MUNICIPALITY, WESTERN CAPE.

The Department of Forestry, Fisheries, and the Environment (DFPE), Branch Oceans & Coasts (O&C) appreciates the opportunity granted to provide comments and recommendations on the Draft Basic Assessment Report (DBAR) in the subject of this letter. This Branch will provide comments based on the provisions of the National Environmental Management Act 107 of 1998 ("NEMA") and the National Environmental Management: Integrated Coastal Management Act 24 of 2008 ("ICM Act").

The Branch O&C has the mandate to ensure the holistic management of the coast, estuarine areas and maintenance of the coastal landscapes to realise that the development and use of natural resources are sustainable. The Branch further ensures that the ecological integrity, natural character, and economic, social,

and aesthetic value of the coastal zone are maintained to protect people, properties, and economic activities against the impacts of dynamic coastal processes.

Based on the submitted DBAR, the Branch O&C would like to submit the following comments for your consideration:

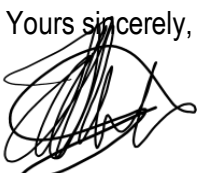
1. Whilst the Branch notes the support of the proposed effort to minimize vegetation clearance by replanting and rehabilitating disturbed edges with locally indigenous vegetation; and using raised and permeable structures to avoid interference with dune dynamics and hydrological processes. It should also be noted that if deemed necessary by the project proponent to protect the property from the risks of sea level rise/ or general coastal dynamic processes, Section 15 of the ICM Act should be considered.
2. The usage of abbreviations requires defining the term upon first use to ensure that all Interested & Affected Parties (I&APs) from various backgrounds understand them for example the use of the abbreviation “**ESA**” on **Page 3** of the Site Sensitivity Report.
3. Clarity should be provided on the exact location of the proposed beach access boardwalk in relation to the property boundaries – Does it fall within the private property or within the coastal public property?
4. Furthermore, more clarification should be provided on whether the proposed boardwalk and deck are for public or private use, and in terms of land ownership, on which the footprint of the access boardwalk is. To aid this concern, the application should include title deeds and/or SG diagrams. The concern stems from the evaluation of the ICM Act insofar as it is explicit to coastal access, for example, Sections 13, 18, 19 and 20 can be summarised to emphasise that “beach access” or coastal access along the coast of South Africa to mean “public” access and the local municipality as the mandated authority to implement in terms of the ICM Act. The reference to “**A BEACH ACCESS BOARDWALK**” in the application/project title should be amended accordingly if the purpose is for public access.
5. In addition, “Beaches” in terms of Schedule 5 of the Constitution of the Republic of South Africa, 1996 are primarily managed at the local government level i.e. local municipality. To what extent does this proposal comply with municipal by-laws?

Based on the information provided, DFFE O&C objects to the granting of environmental authorisation for the proposed development of the beach access boardwalk and viewing deck on the coastal public property (CPP)

or that impedes the rights of the public to access and use the CPP, unless such development is in the public interest or for public use.

The Oceans and Coasts Branch requests to be registered as a Commenting Authority. Kindly note that the Branch reserves the right to revise its comments based on new or 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@dfpe.gov.za / or **Physical Address: Department of Forestry, Fisheries & the Environment (DFPE), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001**

Yours sincerely,



Mr Ryan Peter

Director: Coastal Development & Coordination

Department of Forestry, Fisheries, and the Environment

Date: 5/3/2026