

Jacqui Sauer and Prof Warwick HH Sauer
Dept of Ichthyology & Fisheries Science Rhodes University

Thalassa
Portion 22 of the Farm Ongegunde vryheid
Rebelsrus
St Francis Bay

1 May 2025

ATT: Claire De Jongh
Eco Route Environmental Consultancy
0846074743

Email: claire@ecoroute.co.za

Dear Clair

Ref: **SBROB#2021-05-21**

Applicant: Soundprops 1246 cc

Environmental authorisation application process in terms of Section 24G of the National Environmental Management Act, 1998 (Act 107 of 1998) Activities carried out on Portion 12 of the Farm Ongegunde Vryheid No 746, Cape st Francis Kouga Local Municipality, Sarah Baartman District Municipality Eastern Cape DEDEAT reference:

Date of Notice: 27 March 2025
Closing Date: 2 May 2025 17:00

Comments from: WHH Sauer & J Sauer

**REGISTERED OWNER: ERF 746/22 SEA VISTA
PHYSICAL ADDRESS: THALASSA, PORTION 22 OF THE FARM ONGEGUNDE VRYHEID, REBELS,
ST FRANCIS BAY**

We have been furnished with a copy of the Background Information Document for the regularization of unlawful commencement or continuation of listed activities in terms of Section 24G of the NEMA. Contravention is noted for the following activities:

LN 1 (GNR 327): Activity 19A

LN 1 (GNR 327): Activity 54

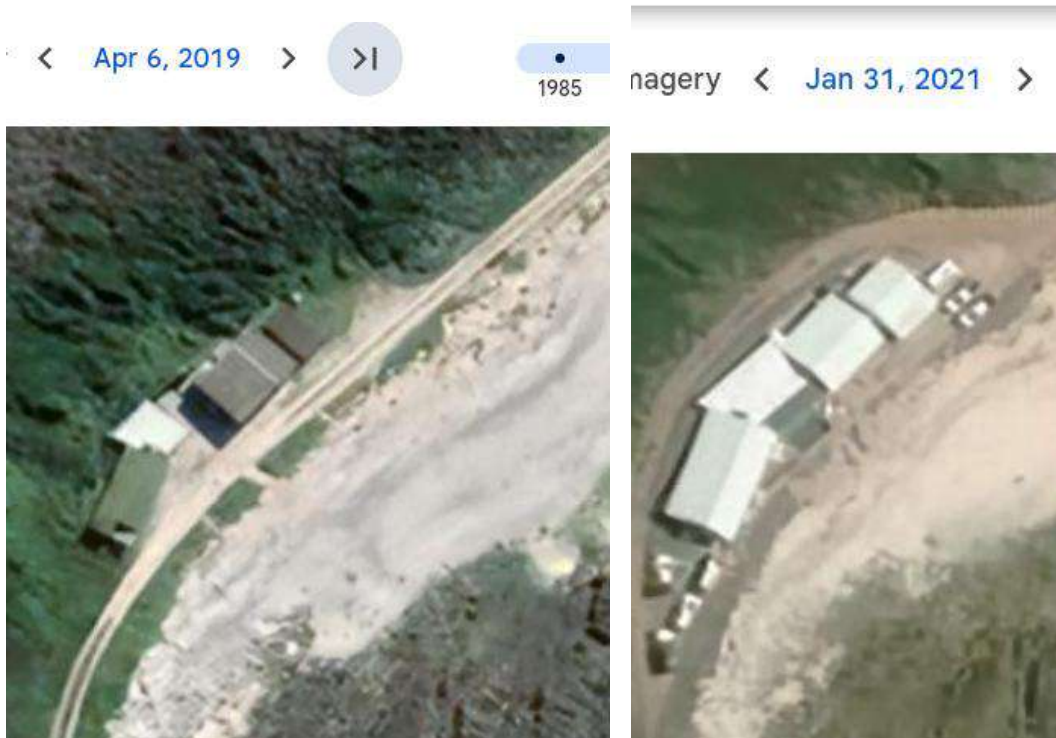
LN 1 (GNR 327): Activity 54

LN 3 (GNR 324): Activity 5

We noted the following in your BID document:

1. Background:

- a. Date of refurbishing the northeast building and rerouting of the road appears to be earlier than 2021 as stated in your document.
- b. Rerouting of road: This would have required quite substantial bush clearing and stabilization of the dune behind the northeast building



- c. Your BID states that “Renovation of southwestern dwelling in the same development footprint”. This is inaccurate. The footprint size was substantially increased.





1 New foundations outside the perimeter of the old structure (south western building)

2. Screening:

- a. No reports were attached to the BID documents. Please provide the screening report.

- b. Could you provide details on how the level of each of the identified sensitivities was decided. Further, is there any mitigation for those sensitivities that are deemed high. There are a number of items that have been identified (see items listed below) as medium to high sensitivity. Why are only two specialist reports identified as being required. Surely specialist reports are required for all high and very high sensitivities.
- Agricultural theme - Medium Sensitivity
 - Animal Species - High Sensitivity
 - Archaeological and Cultural Heritage - Very High Sensitivity
 - Paleontological - Very High sensitivity
 - Plant Species Assessment - Medium sensitivity
 - Terrestrial Biodiversity - Very High Sensitivity
 - Civil Aviation Assessment - High sensitivity
- c. Aquatic biodiversity is deemed low sensitivity. Increased effort owing to increased fishers in the area will impact the aquatic biodiversity. There are many resident and non-resident species along this coast-line that should not be removed/ caught.
- d. Both building that were renovated were old beach shacks, originally owned by John and De Villiers Melville. John Melville in his book, "A century of Business in Humansdorp", notes the north eastern building (which used to be called *The Den*) being in use in October 1955 (p.89).

3. Other Comments

- a. Use of the communal road: The current access road from the R330 to Mostertshoek is maintained by the residents of Mostertshoek, Rebelsrus, Tula Moya and Rocky Cost Farm, through a levy. If there is to be a tourist business introduced, then there is a need for mitigation for the significant increase on the use of the road. This value should be negotiated, and a further levy introduced into the current road fund.
- b. Impact on Marine Resources: In the past, the situation was limited dwellings, not used for tourism, which resulted in only medium pressure on the coastal flora and fauna for families and friends. Many of the fish species found along this section of coastline are highly resident. Apart from removing fish to eat, catch and release

fishing results in the same fish being caught repeatedly and the post capture mortality increases to a high level. Self-catering tourists remove shellfish to consume and increase the pressure, ultimately removing most shellfish along this section of coast. At present several nature reserves are being proclaimed along this section of coast and the use of the marine environment is an important consideration, above obeying the current Government regulations on the removal of marine species. The best solution would be a no-take rule introduced for any paying tourists visiting the area. Generally, a Fishing Policy would also be a good idea, where the highly resident species are afforded a measure of protection, in addition to the current regulations as per the Living Marine Resources Act. This will ensure a healthy fish population in the area, while still allowing fishing activity and the removal of selected species for consumption. It is important that the marine resources are not exploited by tourists.

- c. Waste Management: The waste structures of most of the buildings in Mostert's Hoek are conservancy tanks. These tanks would have been designed for use periodically for family and friends not as for use in a 10 to 15 sleeper guest house. The proximity to the water and increased flow into the conservancy tanks may be an issue in terms of marine pollution.
- d. Sense of Place: This section of the coast has traditionally been privately owned and utilized as a retreat and holiday space for owners and friends. A tourist destination within the space alters the sense of space and the way the environment is utilised. It also places increased pressure on all the resources within the area. The presence of more people with no ties or affiliation to the area could impact those existing land owners in Mostert's Hoek and neighbouring reserves. Tourists could abuse the natural resources and may not take other residents and their privacy into consideration.

Yours faithfully

A handwritten signature in black ink, appearing to be 'W. H. Sauer', written in a cursive style.

Prof Warwick HH Sauer
Dept of Ichthyology & Fisheries Science
Rhodes University

A handwritten signature in black ink, appearing to be 'Jacqui Sauer', written in a cursive style.

Jacqui Sauer



claire@ecoroute.co.za

From:
Sent:
To:
Cc:
Subject:



Attachments: BID - Ptn 12 Farm Ongegunde Vryheid No 746_27 March 2025.pdf

Good day Jacqui

Thank you for the phone call this morning. I have registered you as an interested / affected party for this process.

The background information document is attached.

Kindly submit your comments and concerns which you may have so they can be addressed in the process.

Thank you

Kind regards
Claire



Claire De Jongh
Eco Route Environmental Consultancy
0846074743
EAPASA registration: **2021/3519**

claire@ecoroute.co.za

From:
Sent:
To:
Cc:
Subject:

Kouga Local Municipality

Thanks Claire

From: claire@ecoroute.co.za <claire@ecoroute.co.za>

Sent: 08 April 2025 16:33

To: jacqui@itsnet.co.za

Cc: 'Janet Ebersohn' <janet@ecoroute.co.za>; 'Admin' <admin@ecoroute.co.za>

Subject: DEDEAT Ref: SBROB#2021-05-21 - Activities carried out on Portion 12 of the Farm Ongegunde Vryheid No 746, Cape St Francis Bay, Kouga Local Municipality

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Attachments: Comments SAuer Pnt 12 of 746.pdf

Afternoon Claire

Herewith our comments on your Bid document for 12/746

Please confirm receipt of the document

Kind regards

Jacqui



uga Local Municipality

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Cc: [REDACTED]
Subject: RE: DEDEAT Ref: SBROB#2021-05-21 - Activities carried out on Portion 12 of the Farm Ongegunde Vryheid No 746, Cape St Francis Bay, Kouga Local Municipality

Hi Jacqui

Thank you, the comments have been received.

Kind Regards
Claire

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Kouga Local

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