

Ecoroute 007

23 April 2026

Directorate: Biodiversity and Coastal Management
Department of Environmental Affairs and Development Planning – Mercia Liddle

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

Please be advised that the Final Basic Assessment Report (BAR), together with the Environmental Management Programme (EMPr), specialist studies, Comments and Responses Report, and supporting appendices for the proposed development on Portion 79 of Farm Ruygte Valley No. 205, was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) on **23 April 2026** for consideration and decision-making in terms of the National Environmental Management Act, 1998 and the Environmental Impact Assessment Regulations, 2014 (as amended).

The Final BAR incorporates comments received during the public participation process, specialist inputs, and amendments made to the proposed layout and mitigation measures. The application will now be reviewed by the Competent Authority, which may request additional information or clarification during its decision-making process.

Once a decision has been issued, all registered I&APs will be formally notified of the outcome and advised of their right to appeal in terms of the applicable regulations.

We sincerely thank all Interested and Affected Parties for their participation, time, and valuable input throughout the environmental assessment process.

Yours sincerely,

Bianca Gilfillan
Environmental Assessment Practitioner
Eco Route Environmental Consultancy

Ecoroute 004

23 April 2026

Breede-Olifants Catchment Management Agency (BOCMA)

Attention: Mr SI Ndlovu

sndlovu@bocma.co.za

Reference: 4/10/2/K40D/RUYGTE VALLEY 205/79, SEDGEFIELD

Dear Mr Ndlovu,

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

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We sincerely thank all Interested and Affected Parties for their participation, time, and valuable input throughout the environmental assessment process.

Please see below the responses to your comments as submitted with the Final BAR.

Kind regards,

Bianca Gilfillan

Environmental Assessment Practitioner

Eco Route Environmental Consultancy

BREDE-OLIFANTS CATCHMENT MANAGEMENT AGENCY: GEORGE: Sbonelo Ndlovu – 31 March 2026

RE: AMENDED DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A PRIMARY DWELLING AND ACCESS ROAD ON PORTION 79 OF FARM 205, RUYGTE VALLEY, SEDGEFIELD, WESTERN CAPE

Reference is made to the above-mentioned amended Draft Basic Assessment Report made available to Breede-Olifants Catchment Management Agency (BOCMA) for comments.

The following are BOCMA comments relating to amended Draft Basic Assessment Report for proposed development of a primary dwelling and access road on Portion 179 of Farm Ruygte Valley 205, which should be adhered to:

1. The Breede-Olifants Catchment Management Agency has reviewed amended Draft Basic Assessment Report and has no objections to the amended proposed development as there are no new major changes in terms of the activities likely to trigger the National Water Act.

2. Please note that the comments issued by BOCMA on the 20 June 2025 and 15 December 2025 respectively for the Pre-Application and Draft Basic Assessment Reports are still valid and must be adhered to.

3. As required by section 22 of the National Water Act, 1998 (Act No. 36 of 1998), a Water Use Authorisation is required prior to commencement with any water use activity contemplated in section 21 of National Water Act. Moreover, commencement with any water use activity without an authorisation as required by section 22 of National Water Act constitutes an offence in terms of section 151(1) (a) of the National Water Act. In terms of section 151(2) of the National Water Act, any person who contravenes is guilty of an offence and liable, on first conviction to a fine or an imprisonment of a period not exceeding five years or both such a fine and imprisonment.

4. In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of National Water Act that is associated with the proposed development.

Noted.

Noted.

Noted.

Noted.

Noted.

Noted.

5. Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.
6. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.
7. Should you wish to apply for a water use authorisation for unregistered water uses triggered by the proposed activities, you may apply electronically by logging onto the Department of Water and Sanitation (DWS) website at <http://www.dws.gov.za/e-WULAAS>
8. Should you have further enquiries, the office can be contacted or alternatively contact Mr. SI Ndlovu at the above-mentioned contact number or on sndlovu@bocma.co.za

Ecoroute 007

23 April 2026

The Directorate: Protected Areas Planning and Management Effectiveness

For attention: Awelani Viola Matamela

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

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We sincerely thank all Interested and Affected Parties for their participation, time, and valuable input throughout the environmental assessment process.

Yours sincerely,

Bianca Gilfillan
Environmental Assessment Practitioner
Eco Route Environmental Consultancy

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT LOCATED ON PORTION 79 OF FARM 205, RUYGTE VALLEY WITHIN THE KNYSNA LOCAL MUNICIPALITY, WESTERN CAPE

Background and Discussion

The Directorate Protected Areas Planning and Management Effectiveness would like to thank you for the opportunity to review the Amended Draft Basic Assessment Report for the proposed development located on Portion 79 of Farm 205, Ruygte Valley, within the Wilderness Protected Environment Knysna Local Municipality in the Western Cape.

The project entails the development of a low-density residential node, including a main dwelling, additional accommodation units, associated access infrastructure, parking areas, and raised boardwalks. The total development footprint has been reduced to approximately 1 375 m², with the building footprint comprising approximately 525 m². Most of the site (approximately 97%) will remain in a natural or rehabilitated state. The development is proposed within a Wilderness National Lake Area, with portions of the site falling within the 100 m High-Water Mark (HWM) trigger area.

The site is characterised by sensitive environmental features, including mapped Critical Biodiversity Areas (CBA1 and CBA2), indigenous forest patches, and protected milkwood trees. The amended BAR proposes a constraints-led layout, avoiding CBA1 areas and forest vegetation, and confining development to degraded CBA2 areas. The application further includes a proposal to rezone the property to Open Space III to support long-term conservation.

After the review of the report, the Directorate has the following comments:

1. The revised layout demonstrates a constraints-led approach, avoiding mapped CBA1 areas, indigenous forest, and high-risk coastal erosion and flood zones, and limiting development to a reduced and defined disturbance footprint. The commitment to retain most of the site as natural/open space and the proposal to rezone the property to Open Space III are noted and supported.

The comments received are noted and appreciated. The Directorate's acknowledgement of the constraints-led approach, reduced footprint, and conservation-oriented rezoning proposal is welcomed.

Noted.

Noted.

Noted.

Noted.

2. However, the EAP has not adequately addressed the issue of the Wilderness Protected Environment in relation to the proposed development. The following matters must be addressed before any development can be approved:

- According to section 51 of the National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003), development in a Protected Environment, including Wilderness Protected Environments, is regulated and requires approvals. South African National Parks (SANParks) is the management authority for the Wilderness Protected Environment under NEMPAA. All development activities must be coordinated with SANParks and relevant landowners and follow strict compliance requirements.
- The development must strictly comply with:
 - The provisions of NEMPAA;
 - The approved management plan for the Protected Environment;
 - Applicable environmental legislation, including the National Environmental Management Act, 1998 (NEMA), particularly with regard to Environmental Impact Assessment (EIA) requirements; and
 - Any conditions or restrictions imposed by the Minister or MEC.

The comment is noted.

The proposed development falls within the Wilderness Protected Environment, and the requirements of the National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003) (NEMPAA) are acknowledged.

The following is confirmed:

- The Applicant recognises that SANParks is the Management Authority for the Wilderness Protected Environment.
- The development will be aligned with the applicable Management Plan for the Protected Environment.
- All relevant approvals required in terms of NEMPAA and any applicable management frameworks will be obtained prior to commencement of any activities.
- The development will comply with:
 - NEMPAA requirements
 - NEMA and the EIA Regulations
 - Any conditions imposed by the Competent Authority and/or SANParks

It is further confirmed that:

- No development will commence prior to obtaining all required authorisations, including Environmental Authorisation and any approvals required in terms of Protected Area legislation.
- The development proposal has been designed to support long-term conservation objectives, including the proposed rezoning to Open Space III and retention of approximately 97% of the site in a natural or rehabilitated state.

The Final BAR will include an explicit statement confirming compliance with NEMPAA and coordination with SANParks, to ensure clarity for decision-making.

Noted.

- No development may proceed without the necessary authorisations and approvals, and all activities must be aligned with the conservation objectives of the Protected Environment.
- The Comments and Responses Report on page 18 indicates that the updated Basic Assessment Report (BAR) would include a clear commitment that the final layout will be informed by specialist verification of species of conservation concern (SCC), and that any confirmed threatened or protected species would be avoided and managed in accordance with applicable permitting requirements. However, upon review of the Amended BAR, no such commitment or detailed discussion relating to species of conservation concern could be identified. Furthermore, there is no evidence of specialist verification, mapping, or assessment of SCC within the proposed development footprint, nor are any avoidance or management measures clearly outlined.
- A site-specific coastal erosion specialist study has not been undertaken. The reliance on constraints mapping and preliminary geotechnical information is insufficient to assess long-term shoreline dynamics, dune stability, and storm surge risk. This remains a critical information gap.

The comment is noted.

The omission of an explicit statement regarding Species of Conservation Concern (SCC) in the Amended Draft BAR is acknowledged and will be addressed in the Final BAR.

The following will be incorporated:

- Confirmation that site-specific specialist inputs (botanical and ecological) have informed the identification of sensitive habitats and potential SCC presence.
- A clear commitment that:
 - Pre-construction walk-downs by a qualified specialist will be undertaken where required;
 - Any confirmed SCC within or adjacent to the development footprint will be avoided where feasible;
 - Where avoidance is not feasible, appropriate permits will be obtained and mitigation implemented in accordance with applicable legislation;

The Environmental Management Programme (EMPr) will be updated to include:

- SCC protection measures
- Search-and-rescue protocols (where applicable)
- Permit compliance requirements

The development footprint has already been positioned to avoid CBA1 areas, indigenous forest, and sensitive vegetation, thereby reducing the likelihood of direct impacts on SCC.

The comment is noted.

The assessment of coastal processes and dune stability has been informed by:

- Constraints mapping (including coastal risk zones)
- The Preliminary Geotechnical and Geomatic Investigation
- Site verification and terrain assessment

It is acknowledged that a dedicated coastal erosion specialist study has not been undertaken as a standalone assessment.

However:

It is recommended that the EAP address the concerns raised, provide clarity on certain matters raised to the Directorate: Protected Areas Planning and Management Effectiveness, and consider the comments from all other Stakeholders, Interested, and Affected Parties.

- The development footprint is set back from the most dynamic coastal interface areas, including high-risk erosion zones identified in the constraints mapping.
- The proposed development is of limited scale, with no hard coastal protection structures or shoreline modification proposed.
- The layout avoids steep and unstable dune faces to the extent feasible.

The geotechnical input considered:

- Dune stability
- Founding conditions
- Long-term risk considerations

Given the scale of development, setback from high-risk zones, and absence of direct coastal engineering works, the current level of assessment is considered appropriate for Basic Assessment purposes.

Nonetheless, the Final BAR will:

- Strengthen the discussion on coastal processes and long-term risk considerations
- Include a precautionary approach to design and siting
- Confirm that any future design refinements will remain within the assessed and approved footprint and constraints framework

The concerns raised by the Directorate are acknowledged and have been carefully considered.

The Final BAR will:

- Explicitly address NEMPAA compliance and SANParks coordination
- Include a strengthened section on Species of Conservation Concern
- Expand on coastal risk considerations and mitigation approach

The proposed development remains:

- Low in intensity and footprint
- Constraints-led in design
- Aligned with conservation objectives of the Wilderness Protected Environment

The assessment is therefore considered adequate and sufficient to support informed decision-making by the Competent Authority, subject to the implementation of mitigation measures and compliance requirements.

Ecoroute 007

23 April 2026

DWS: Directorate: Biodiversity Conservation

Sub-Directorate: Policy Development, Mainstreaming EIA: Ms Khuliso Khomari

BCAdmin@dffe.gov.za

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Yours sincerely,

Bianca Gilfillan

Environmental Assessment Practitioner

Eco Route Environmental Consultancy

DWS: Directorate: Biodiversity Conservation
Sub-Directorate: Policy Development, Mainstreaming EIA: Ms Khuliso Khomari -16 March 2026

Dear Sir/Madam

RE: Department of Forestry Fisheries and the Environment Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation on the 18th of February 2026 for review and comment on the project mentioned in the subject line.

Kindly note that the project has been allocated to Ms M Rabothata and Ms Khuliso Khomari (Copied in this email).

Note, all Public Participation Process documents related to Biodiversity EIA review and Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation by email: BCAdmin@dff.gov.za for attention of Mr Seoka Lekota.

Good morning,

Please see the link for the documentation for the project: <https://we.tl/t-3fv3K7wyhB>

Please note that the 30-day public participation will be held from **18/02/2026 to 20/03/2026**. The notification was sent to BCAdmin@dff.gov.za when the PPP commenced.

Thank you for your attention to this matter.



Eco Route

ENVIRONMENTAL CONSULTANCY

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

PhD Univ. Pretoria

Cell: 072 222 6013

e-mail: egersohn@cyberperk.co.za

MS. JANET EBERSOHN

Bsc. Hons. Environmental Manag

Cell: 082 557 7122

e-mail: janet@ecoroute.co.za

Ecoroute 005

23 April 2026

Kate

Dear Kate,

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

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Environmental Assessment Practitioner

Eco Route Environmental Consultancy



Eco Route

ENVIRONMENTAL CONSULTANCY

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

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Cell: 072 222 6013

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MS. JANET EBERSOHN

Bsc. Hons. Environmental Management

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e-mail: janet@ecoroute.co.za

Ecoroute 001

23 April 2026

Dr Vanessa Weyer

E-mail: vanessa.weyer@sanparks.org

Dear Dr Weyer,

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Please find attached the VRMA Visual report.

Yours faithfully

Ms. Bianca Gilfillan

Reg. EAP (EAPASA): 2023/7929

EcoRoute

SANParks - Dr Vanessa Weyer: 19 March 2026

Dear Madam,
SANPARKS COMMENTS, AMENDED DRAFT BASIC ASSESSMENT, RUYGTE VALLEY
205, PORTION 79, SEDGEFIELD, WESTERN CAPE
DFFE Ref No. 14/12/16/3/3/1/3235

SANParks has provided the following comments on this application:

1. Pre-application, Draft Basic Assessment Report (DBAR), Eco Route Environmental Consultancy (Eco Route), March 2025. DFFE Ref. No. (not provided). SANParks comment dated 23 June 2025.
2. DBAR, Eco Route, November 2025. DFFE Ref. No. (not provided). SANParks comment dated 15 December 2025.

Please refer to these comments, which describe the landscape context of Ruygte Valley 205 Portion 79, development proposals proposed at that time, points raised by SANParks, as well as summaries and the way forward.

An amended DBAR, by Eco Route, dated January 2026, has subsequently been circulated for further comment.

Key aspects of the development proposal as extracted from the application include:

The proposed development comprises a main dwelling ($\pm 200 \text{ m}^2$), three small self-contained units ($\pm 65 \text{ m}^2$ each), staff accommodation ($\pm 50 \text{ m}^2$), an equipment shed ($\pm 80 \text{ m}^2$), and associated parking and access infrastructure. The landowners currently plan to utilise the additional units for private family and guest accommodation. From a planning perspective, the proposed rezoning provides a tourism-compatible land-use framework required for multiple accommodation units on agriculturally zoned land and is aligned with long-term conservation and land-management objectives.

Noted.

The DFFE reference number was provided on the cover of the draft report.

Noted.

Noted.

Vehicular access will lead to a parking area of approximately 660 m², from which pedestrian access to the main dwelling and accommodation units will be provided via elevated timber boardwalks, reducing soil compaction and disturbance to underlying vegetation. The development concept is to establish a low-impact private retreat within a natural coastal landscape. The architectural design will utilise lightweight, environmentally sensitive materials, including timber, steel, glass, and natural stone, enabling the structures to blend visually with the surrounding environment and minimising excavation. The total development footprint is approximately 1 375 m², representing less than 2.7% of the property. Approximately 97.3% of the site remains protected under conservation-compatible land use.

Vehicular access will be provided via a gravel access road approximately 220 metres in length and 3 metres wide, routed through existing disturbed vegetation along the eastern boundary of the site. The road terminates in a parking area accommodating four parking bays with a total area of approximately 765 m².

Sewer Reticulation

Municipal bulk sewer services are not available in the area. Wastewater will therefore be managed through sealed conservancy tanks designed and installed in accordance with applicable standards and municipal requirements. Effluent will be removed by a licensed service provider and disposed of at an approved treatment facility.

Water Reticulation

The development will be fully off-grid in terms of water supply. All domestic water requirements will be met through rainwater harvesting systems installed at each building. Water will be collected from roof catchments and stored in on-site tanks for domestic use. This approach avoids reliance on municipal water services and supports water conservation objectives.

Electricity

There is currently no electrical infrastructure present on the property or in the adjacent road reserve. It is advisable to consider the installation of a solar power facility in this location.

Current application

The current application seeks to exercise the primary land-use right under the existing Agriculture Zone I zoning through the construction of a single private dwelling, including access, services, and rehabilitation measures. In addition, and in order to regularise the full development proposal, the Applicant intends to apply for:

- Rezoning of the property to Open Space III (Nature Conservation Area); and
- Consent use approval to allow for three low-intensity accommodation units, described as tourist accommodation for land-use planning purposes.

Accordingly, it is proposed that the property be rezoned to Open Space III (Nature Conservation Area). This rezoning will formalise the long-term conservation intent of the property, ensure protection of its ecological and scenic

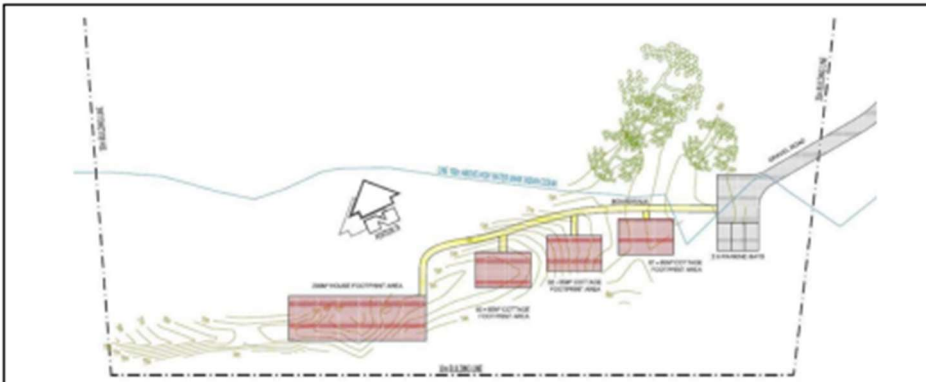


Fig. 1. Preferred Alternative SDP, as extracted from pg. 22 & 60 of the DBAR, Eco Route, November 2025.



Fig. 2. SDP as extracted from pg. 4 of the Visual Compliance Statement, Outline Landscape Architects cc, Kathrin Hammel, March 2025. **Note:** Main dwelling and cottages, and parking areas are shown seaward of the 100m HWM (depicted blue), and on steep slopes.

Noted and agreed.

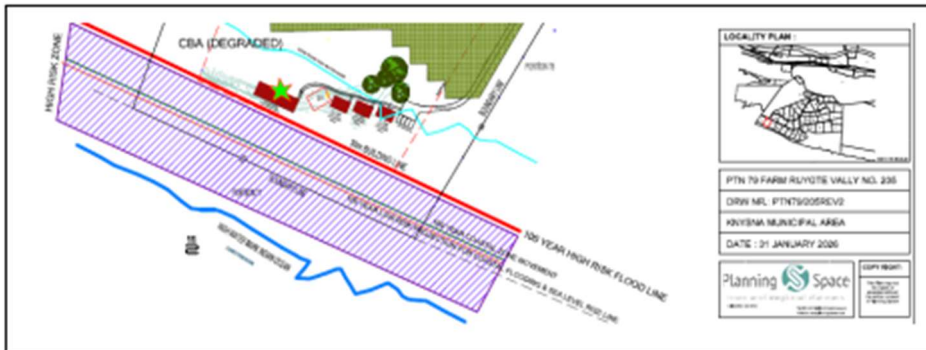


Fig. 3. Site Constraints Map, showing SDP, Planning Space, 31 January 2026, amended DBAR

The total development footprint area of the preferred alternative has increased from that stated in the DBAR of November 2025 of approx. 1175m², to approx. 1375m² in the amended DBAR of January 2026.

The vehicle access road through the property and the access road that will be required through the adjoining road servitude/ and neighbouring property for main access appears to not have been included in area calculations.

No road currently exists and the property, and road servitude/ neighbouring property are densely vegetated with indigenous trees, which requires clearing (Figs. 4 & 5). Solar and water tank areas further do not appear to have been included in disturbance footprint area calculations.

No revised Preferred Alternative SDP could be found in the amended DBAR of January 2026, nor its appendices.

An updated Constraints Map (Appendix B1) (**Fig. 3**), however shows a slight change to the SDP contained in the DBAR of November 2025 (**Fig. 1**). The three cottages appear to have been shifted slightly eastwards, however not northwards.

SANParks conducted a site visit on 5 March 2026, attended by Dr. V. Weyer (SANParks), Mr. T. Kgaphola (SANParks), Ms. C. Pluim (SANParks), Ms. M. Mudau (DFFE), Ms. P. Makitla (DFFE), Ms. A. Matamela, (DFFE), Ms. N. Lekalakala (DFFE), and Ms. J. Christie (Eco Route) (**Figs. 4 & 5**).

An updated Constraints Map was included.

Noted.

The comment is noted.

The Basic Assessment Report (BAR) includes specialist inputs that are appropriate to the level of assessment required for a Basic Assessment process, and sufficient to inform decision-making.

Visual

The inclusion of the document by Mr P. Buchholz is acknowledged as supporting input and not relied upon as a formal specialist study.

The Visual Compliance Statement (Outline Landscape Architects, March 2025) constitutes the primary, site-specific visual assessment informing the BAR. While the methodology is not presented as a formal VIA framework, the assessment is based on:

- Site inspection



Fig. 4. Meeting attendees viewing the site. The site is densely vegetated with access difficult.

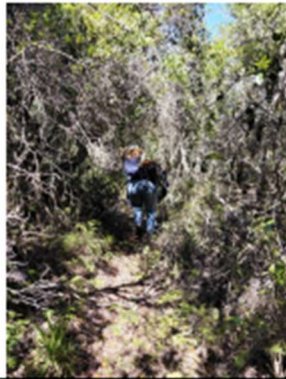


Fig. 5. Meeting attendees walking the site, along the proposed road access which is densely vegetated with indigenous trees.

Point 1: Specialist Studies

Comments on specialist studies as provided by SANParks to the DBAR of November 2025 stand, no new information appears to have been added in the amended DBAR of January 2026.

Visual

A visual specialist report by Mr. P.Buchholz (registered Professional Geographical Information Science Practitioner (PGP 1323)) was included, however closer perusal revealed the document appended to be a quotation and not a specialist study/ statement. Therefore, its inclusion is confusing/ not relevant.

- Landscape character analysis
- Visual absorption capacity
- Development layout

The VRM Africa report was reviewed, however it is noted that it was not aligned to the final verified development footprint and layout, and is therefore not relied upon as determinative input.

The BAR does not rely on an assumption of no visibility, but rather assesses visual impact significance, concluding that impacts are localised and of low significance. A peer review or higher-order VIA is not a regulatory requirement for a Basic Assessment, and the level of assessment undertaken is considered appropriate.

8. Cost estimate

The total cost is anticipated to be ZAR 20,260.00 (no VAT applicable – not VAT registered). The cost breakdown is as follows:

Table 3: Cost breakdown

Task	Total (no VAT applicable)
Visual impact statement for portion 79 of 205, Sedgfield	ZAR 20,260.00

10. Closing remarks

Thank you very much for the opportunity to submit this proposal.

Should you require any further information or have any queries, please contact me.

Yours faithfully



Paul Buchholz

C +27 79 881 4447
E p.buchholz@outlook.com

A second Visual Compliance Statement is included, by Outline Landscape Architects cc, Ms. K. Hammel (Registered Professional Landscape Architect, South African Council of Landscape Architects (SACLAP), registration No. 20162), March 2025. The methodology applied is not specified.

A third Visual Impact Assessment (VIA): Site Sensitivity Report was included by VRM Africa, Mr. S. Stead (registered with the Association of Professional Heritage Practitioners), 24 October 2024, however it is stated that the incorrect site was assessed, therefore the report was excluded from findings. The methodology followed by VRM Africa is based on the United States Bureau of Land Management's (BLM) Visual Resource Management method (USDI., 2004). The VRM Africa report raises significant visual impact concerns that warrant a deeper investigation.

Geotechnical

A Preliminary Geotechnical and Geomatic Investigation has been undertaken and forms part of the BAR. This assessment identifies:

- Slope conditions
- Stability constraints
- No-go areas

The development footprint has been positioned outside identified geotechnical risk areas, and no additional slope analysis is required at this stage for Basic Assessment purposes.

Civil and Engineering

The engineering input by Sham Consultants has informed the development layout and infrastructure feasibility.

The BAR includes sufficient information to assess impacts associated with access, services, and infrastructure. Detailed design drawings are not a requirement at Basic Assessment stage and are typically refined at detailed design phase

The comment is noted.

The BAR includes an assessment of reasonable and feasible alternatives, including layout alternatives informed by:

- Geotechnical constraints
- Biodiversity sensitivity
- Coastal risk considerations
- Site accessibility

The preferred alternative represents the most suitable balance between environmental constraints and development feasibility.

Reference is made in the Comments and Responses report of the amended DBAR of January 2026 to a follow-up revised report by VRM Africa. However, this report has not been provided for perusal, in public participation documentation. SANParks wishes to have sight of this report.

A peer review of the three VIAs/ Statements is suggested. Specialist Protocols for VIAs and registration requirements for VIA specialists are not clearly defined/ undeveloped as part of the EIA process, and requirements differ between national and from province to province. Guidance on requirements from DFFE, the Competent Authority should be sought.

As the property borders the GRNP in the south, and the Goukamma Nature Reserve and its Marine Protected Area, is 1km to the east, visual impacts and changes in landscape character are a significant concern. No detailed architectural plans are provided to show building heights and exact positioning relative to contours. No 3D visualisations have been undertaken.

Geology/ Geotechnical

A Preliminary report by Dr. E. Spicer, 21 May 2024 was undertaken. No detailed slope analysis has been undertaken. Extracts likely from CapeFarmMapper showing slopes and contours are provided.

Civil and Engineering

The report by Sham Consultants, Mr. M. van Coller, Pr.Eng, Registration No. 20060275, 22 October 2025 is provided, however no maps/ SDPs are included in the report, in reference to text comments. It is difficult to understand which areas are referred to. The report is unsigned.

Point 2: Alternatives

Comments on alternatives as provided by SANParks in the DBAR of November 2025 stand, minimal effort has been made in the amended DBAR of January 2026 to provide a further layout alternative, i.e. locating dwellings elsewhere on the property, other than the southern sector within the sensitive 100m line from the HWM, on the sensitive coastal foredune.

The suggested alternative location in the north-eastern portion of the site was considered during the design process; however, the selected footprint was determined to be more appropriate based on integrated specialist input and site conditions.

The BAR therefore satisfies the requirement to assess reasonable and feasible alternatives, and no further alternative assessment is considered necessary

The comment is noted.

The BAR acknowledges that the property falls within the Coastal Protection Zone, and coastal processes have been considered as part of the geotechnical and environmental assessment.

Importantly:

- The development footprint has been positioned outside identified erosion risk areas and unstable dune systems, based on specialist input
- The development does not propose any coastal protection structures or interference with coastal processes
- The BAR does not rely on any future requirement for coastal stabilisation measures

Section 62(2) of NEM: ICMA has been considered, and the assessment concludes that the proposed development, as designed and mitigated, will not result in unacceptable adverse impacts on the coastal environment.

A separate coastal erosion specialist study is not considered necessary for this level of assessment, given the findings of the geotechnical investigation and constraints-based design.

The Preferred Alternative includes one primary dwelling, three cottages, a vehicle parking area, all situated in the south of Portion 79, a garage/storeroom in the north, and a 220m long x 3m wide new access road leading to the dwellings (>1375m2 disturbance area).

The application has not included a further alternative of clustering buildings further to the northeast in the property, adjacent to the entrance to the property off the main access road. This option would provide a more desirable clustered approach which would minimise landscape fragmentation. This siting is situated away from the sensitive foredune. The landowner could offer hiking trails through the property leading to a small viewing deck/ look-out point on the foredune. It is recommended that no permanent invasive structures be constructed in this sensitive area.

Point 3: Coastal Erosion and Setbacks

SANParks comments to the November 2025 DBAR on coastal erosion and setbacks stand.

In 2017 erosion coinciding with a spring tide occurred in the nearby Myoli Beach area, which removed a significant portion of the dune placing houses behind at risk1 – refer to extract on pg.12 of this document.

The comment is noted.



Figure 10.7. Emergency sand bags placed at Sedgfield (Myoli Beach) after a period of dune cliff storm erosion

Portion 79 is located approx. 1km east of Myoli Beach, it is likely that the active foredune on Portion 79 may too be at risk to coastal erosion, exacerbated by climate change impacts, and unpredictable storm events/ surges.

SANParks has concerns with supporting development on the foredune. Coastal erosion and dune slumping are possible, which are expected to increase with climate change. The foredune is regarded as critical ecological infrastructure, as a buffer, which will become crucial as a climate change mitigation strategy.

In terms of Section 62(2) of NEM: ICMA, an organ of state may not authorise any activity that may have an adverse effect on the coastal environment. SANParks is concerned that Section 62(2) has not been adequately addressed in the DBAR of November 2025 and the amended DBAR of January 2026, no specialist coastal erosion study has been undertaken.

The Preferred Alternatives show buildings seaward of the 100m line from the HWM, and on steep slopes. This positioning is not supported by SANParks.

The Applicants attention is drawn to Section 15 of NEM: ICMA which states:

The BAR includes an assessment of cumulative impacts, and recognises broader coastal development pressures and climate-related risks.

However:

- Each application must be assessed on its own merits
- The proposed development is limited in scale (~1,375 m² footprint)
- The majority of the site remains undeveloped and conserved

The BAR concludes that the development will not result in unacceptable cumulative impacts, and does not establish a precedent for inappropriate development.

The risks associated with historical coastal development are acknowledged, but the current application reflects a modern, constraints-based design approach, informed by current environmental understanding.

The comment is noted.

The proposal to rezone the property to Open Space III (Nature Conservation Area) supports long-term conservation objectives.

The establishment of a formal stewardship agreement, nature reserve declaration, or conservation servitude is supported in principle; however:

- Such processes fall outside the scope of the Basic Assessment process
- They are subject to separate agreements with CapeNature and relevant authorities

The BAR ensures that the development is compatible with conservation objectives, and that the majority of the property remains in a natural state.

Any stewardship mechanisms may be pursued independently by the landowner and relevant authorities.

(1) 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 such other coastal public property, or of land adjacent to coastal public property, unless the erosion is caused by an intentional act or omission of that organ of state or other person.

(2) No person may construct, maintain, or extend any structure, or take other measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided for in this Act, the National Environmental Management Act, or any other specific environmental management Act.

Should dune slumping/ coastal erosion occur, protection structures would be required within Portion 79, protection structures would not be permitted on the adjoining GRNP state land (Portion 71), i.e., seaward of Portion 79.

Point 4: Precedent Setting and Cumulative Impacts

Comments regarding precedents and cumulative impacts as provided by SANParks in the DBAR of November 2025 stand,

Prior to the 1997 EIA Regulations, when climate change risks were unknown, land use rights were granted for development in areas such as the Myoli and Wilderness Beach foredunes. Risks associated with developing in marginal areas are now known.

The Wilderness Beach coastline has experienced significant coastal erosion, recently in September 2023, after a storm surge, which placed many foredune dwellings at risk. In response, property owners constructed protective retaining structures on state land (George Municipality and GRNP SANParks land). Several landowners were issued DFFE notices and requested to remove structures and to rehabilitate the dune. Encroachment into state land, via building structures, gardens, decking, pools and walkways is a further issue. Rectification of this situation is challenging. It is anticipated that coastal erosion risks to poorly sited foredune dwellings will likely intensify. Placing property and in worst cases, lives at risk. There is limited space for a 'retreat' climate change adaption strategy.

SANParks is concerned that authorisation of structures on the Ruygte Valley foredune will set a similar dangerous precedent for this area, resulting in cumulative impacts. Risks are known and remediation may prove difficult and costly.

Point 5: Stewardship

The comment is noted.

The Final Basic Assessment Report includes sufficient information to support informed decision-making, including:

- Specialist assessments
- Constraints mapping
- Public participation outcomes
- Impact assessment

The BAR concludes that the proposed development:

- Is low-density and limited in extent
- Avoids high-risk and sensitive areas where feasible
- Results in impacts of low to moderate significance with mitigation

The request for additional specialist studies (visual, coastal, geotechnical) is acknowledged; however, the level of assessment undertaken is appropriate to a Basic Assessment process, and no regulatory requirement exists for further studies prior to decision-making.

The BAR represents a final and complete assessment, and no further amendments are proposed.

As noted previously, SANParks supports a NEM: PAA biodiversity stewardship agreement via CapeNature, preferably where the property is declared a Nature Reserve, i.e., as a CapeNature Level 3 Nature Reserve. Dependent on discussions with and approvals from CapeNature.

It is not a guarantee that the MEC or the Minister will declare a property, and it is therefore recommended that the landowner is required as a condition to register a conservation servitude over the property in favour of CapeNature should the property not be declared as a nature reserve. It is further recommended that a voluntary title deed restriction is registered against the property (i.e., via a Notarial Deed).

It is suggested that the stewardship process be concluded through the signing of required documents, prior to construction commencement.

Points 6: Summary and Way Forward

SANParks does not support the Preferred Alternative as detailed in the amended DBAR of January 2026.

SANParks will support an Alternative of clustering buildings further to the north-east of the property, adjacent to the entrance to the property off the main access road. This option would provide a more desirable clustered approach which would minimise landscape fragmentation, and disturbance to the sensitive foredune.

Information and specialist studies provided in the amended DBAR of January 2026 are considered inadequate, particularly pertaining to visual and coastal erosion impacts, and development on a sensitive foredune.

Reference is made in the Comments and Responses report of the amended DBAR of January 2026 to a follow-up revised report by VRM Africa that was produced. SANParks wishes to have sight of this report.

A peer review of the three VIAs/ Statements is suggested. As the site borders the GRNP in the south and the Goukamma Nature Reserve and its Marine Protected Area are situated 1km to the east, visual impacts and changes in landscape character are a significant concern. Detailed architectural plans, and a detailed SDP should be provided to show building heights, positioning relative to contours, and disturbance areas. 3D visualisations should be presented.

More detailed geotechnical, slope analysis, visual impact, and coastal erosion specialist studies should be undertaken.

This information should be provided prior to decision-making, to inform layouts, alternatives, etc., and should not be undertaken after an Environmental

The comment is noted.

The recommended conditions are acknowledged. Where applicable:

- Environmental Authorisation conditions will be determined by the competent authority (DFFE)
- The EMPr includes measures relating to biodiversity management, alien vegetation control, construction management, and rehabilitation
- Compliance with relevant legislation, including NEM:BA, National Forests Act, and Fire Protection requirements, is acknowledged

Specific measures such as fencing, plant rescue, topsoil management, and ECO monitoring are addressed within the EMPr.

Matters relating to stewardship agreements, rezoning, and land use restrictions fall outside the scope of the Basic Assessment and will be addressed through separate processes where applicable.

Authorisation (EA) is granted. The information is pertinent to decision-making, SDP development, and would form a record in the EA.

Notwithstanding this, SANParks does not support development on the foredune. SANParks is concerned that authorisation of dwellings/ structures on the Ruygte Valley foredune will set a dangerous precedent, resulting in cumulative impacts, with risks known, and remediation difficult.

Gains in sea views in the short-term do not warrant risks that will be borne by future generations in the long-term.

It is possible to honour the landowner's rights, by permitting dwellings in an alternative location in the north-east corner of Portion 79.

SANParks supports a NEM: PAA biodiversity stewardship agreement via CapeNature, preferably where the property is declared a Nature Reserve.

It is recommended that the following conditions are considered, in conjunction with the main dwelling, and other proposed structures/ infrastructure being positioned in the far north-east corner of Portion 79, next to the main access road (an alternative that should be considered):

1. The landowner should commit the remaining portion of the property to a biodiversity conservation stewardship mechanism, which should comprise of:
 - 1.1 CapeNature NEM: PAA Level 3 Nature Reserve.
 - 1.2 It is recommended that a conservation servitude and a voluntary title deed restriction are registered against the property (i.e., via a Notarial Deed). This will ensure that the conservation status of the property is transferred to any new owner on the sale of the property.
 - 1.3 The stewardship process should be concluded through the signing of the required documents, prior to construction commencement.
- 2 The property should be rezoned to Open Space III or IV.
- 3 Fencing must not inhibit wildlife movement.
- 4 An Environmental Management Programme (EMPr) must be implemented and monitored by an Environmental Control Officer (ECO). The EMPr must be finalised based on any Environmental Authorisation (EA) outcomes/ conditions.

The comment is noted.

The SANParks comment letter forms part of the Comments and Responses Report included in the Final BAR, which constitutes the formal public participation record.

<p>5 The landowner's attention is drawn to the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEM:BA) Alien and Invasive Species Regulations, 25 September 2020, where a landowner is legally responsible for the removal of alien vegetation on their property. The owner should formalise an Invasive Alien Vegetation Control Plan as required by the NEM:BA.</p> <p>6 Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. The owner should join the local Fire Protection Association, if not already a member. The owner should consider using non-flammable building materials, including external fittings such as aluminum gutters, and should consider an irrigation system to mitigate fire risk. A comment from the Southern Cape Fire Protection Association (SCFPA) should be included.</p> <p>7 A permit from the Department of Forestry, Fisheries & the Environment (DFFE) must be attained should any protected tree species be disturbed on the property, as per the National Forests Act (Act 84 of 1998), as amended. It was observed during the site visit that the property contains many Milkwood trees (<i>Sideroxylon inerme</i>), including where the road and driveway access is proposed.</p> <p>8 Should any resources of suspected heritage value be uncovered during clearing, Heritage Western Cape (HWC) must be contacted immediately for instructions.</p> <p>9 The disturbance footprint/ no-go areas should be fenced off during the construction phase with a barrier material, such as shade cloth to prevent workers from encroaching into adjacent vegetation, and to ensure that animals are not injured on the building site.</p> <p>10 An indigenous plant rescue operation should be conducted prior to site clearance.</p> <p>11 Topsoil should be set-aside for reuse.</p> <p>12 Confirmation is required from the relevant Competent Authority (BOCMA) of the need for a Water Use License.</p>	<p>The Final BAR will be submitted to the competent authority, and SANParks will be notified as a registered Interested and Affected Party.</p>
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13 The property falls within the Coastal Protection Zone; therefore, careful, environmentally sensitive decision-making must be made for any proposed development on this property.

The NEM: ICMA requires that activities that are potentially harmful to the coastal zone are considered as part of the National Environmental Management Act, Act No. 107 of 1998 (NEMA): Environmental Impact Assessment process.

SANParks' comment letter should be included in the body of the FBAR, and not only in a Comments and Responses report/ table. SANParks wishes to be copied in and have sight of the FBAR, as submitted to DFFE, the Competent Authority.

SANParks reserves the right to revise comments if additional information becomes available.



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Ecoroute 007

23 April 2026

Mr De Waal

Dear Mr De Waal,

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

Please be advised that the Final Basic Assessment Report (BAR), together with the Environmental Management Programme (EMPr), specialist studies, Comments and Responses Report, and supporting appendices for the proposed development on Portion 79 of Farm Ruygte Valley No. 205, was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) on **23 April 2026** for consideration and decision-making in terms of the National Environmental Management Act, 1998 and the Environmental Impact Assessment Regulations, 2014 (as amended).

The Final BAR incorporates comments received during the public participation process, specialist inputs, and amendments made to the proposed layout and mitigation measures. The application will now be reviewed by the Competent Authority, which may request additional information or clarification during its decision-making process.

Once a decision has been issued, all registered I&APs will be formally notified of the outcome and advised of their right to appeal in terms of the applicable regulations.

We sincerely thank all Interested and Affected Parties for their participation, time, and valuable input throughout the environmental assessment process.

Yours sincerely,

Bianca Gilfillan

Environmental Assessment Practitioner

Eco Route Environmental Consultancy

Ecoroute 006

23 April 2026

Ms Brigitte Beck

Dear Ms Beck,

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

Please be advised that the Final Basic Assessment Report (BAR), together with the Environmental Management Programme (EMPr), specialist studies, Comments and Responses Report, and supporting appendices for the proposed development on Portion 79 of Farm Ruygte Valley No. 205, was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) on **23 April 2026** for consideration and decision-making in terms of the National Environmental Management Act, 1998 and the Environmental Impact Assessment Regulations, 2014 (as amended).

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Once a decision has been issued, all registered I&APs will be formally notified of the outcome and advised of their right to appeal in terms of the applicable regulations.

We sincerely thank all Interested and Affected Parties for their participation, time, and valuable input throughout the environmental assessment process.

Please see below the responses to your comments as submitted with the Final BAR.

Yours sincerely,

Bianca Gilfillan
Environmental Assessment Practitioner
Eco Route Environmental Consultancy

Comment	Response
<p>Comments on Amended Draft Basic Assessment Report – Portion 79 of Farm 205 Ruygte Valley, Sedgefield Date 17 March 2026 Amended Draft Basic Assessment Report - The Proposed Development of a Primary Dwelling and Access Road on Portion 79 of Farm 205 Ruygte Valley, Sedgefield, Western Cape. DFFE REF: 14/12/16/3/3/1/3235 Eco Route consists of 2 pages Submitted by B. G. BECK Paul Kruger Street. I am an interested and affected party.</p> <p>A. There is no official appointment for environmental officer at the Knysna Municipality, who is checking up on the legitimacy of the procedures of the proposed development? Many of the environmental officers mentioned in your draft proposal are no longer in their positions.</p> <p>B. Does rezoning to Open Space 111 now super cede the number of dwellings from 1 to 5?</p> <p>Agricultural 1 state that owners have the right to build one dwelling, as it now appears 5 dwellings are now planned for.</p> <p>See below</p> <ul style="list-style-type: none"> • Construction of a residential home of 200m2 in footprint area. • Construction of 3 free-standing cottages of 65m2 in footprint area. • Construction of a shed of 80m2 in footprint area. • Construction of a staff quarter building of 50m2 in footprint area 	<p>Noted.</p> <p>The comment is noted. The Basic Assessment process is undertaken in terms of the Environmental Impact Assessment Regulations, 2014 (as amended), and is administered by the competent authority, namely the Department of Forestry, Fisheries and the Environment (DFFE). Oversight of the environmental assessment process, including compliance with legislative requirements, rests with the competent authority and not the local municipality. Environmental practitioners and specialists referenced in the BAR are identified in accordance with their professional roles at the time of assessment. The validity of the process is not dependent on municipal staffing but on compliance with national environmental legislation and procedural requirements, which has been adhered to in this application.</p> <p>The comment is noted. The proposed rezoning to Open Space III (Nature Conservation Area) does not automatically confer unrestricted development rights. The number and nature of structures proposed form part of the specific application under assessment, and any development is subject to:</p> <ul style="list-style-type: none"> • Environmental Authorisation (if granted) • Municipal land use approvals • Applicable zoning scheme provisions <p>The BAR assesses a low-density development footprint, consisting of a primary dwelling and ancillary structures, which remain limited in scale relative to the overall property. The environmental assessment evaluates the physical footprint and associated impacts, and the conclusions are based on this defined proposal.</p>

C. The Environmental Consultants, botanists and ecological experts who contributed to the document concerning this proposal i.e. Draft Basic Assessment Report and Amended Draft report – Portion 79 of Farm 205 Ruygte Valley, have drawn attention to the fact that the ecosystem on farm 205 is unique and sensitive to disturbance. The proposed activities will have a detrimental effect on the fauna and flora of the area. Importunely the area already contains some invader plants, this is the reason why this farm needs to be placed under the custodianship, of CAPE NATURE (Goukamma Nature reserve) SANPARKS and other effective environmental bodies. How can it be guaranteed that these bodies will to be checking up on the private Stewardship on an ongoing basis?

D. REZONING FROM AGRICULTURE 1 TO OPEN SPACE 111. This should be carefully monitored, as, if the prosed developments are approved it will set a **precedent** for others to follow, resulting in a negative impact on sensitive vegetation. **the proposed development will form part of a cumulative trend that will lead to possible disruption of ecological processes on farm 205 as a whole. A very important point.**

The comment is noted.

The sensitivity of the site and the presence of important biodiversity features have been comprehensively assessed in the Terrestrial Biodiversity Assessment, which forms part of the BAR.

The assessment recognises that:

- The site contains areas of high biodiversity value
- Portions fall within CBA1 and CBA2 categories
- Protected species, including Sideroxylon inerme (Milkwood), occur on site

For this reason, the development footprint has been significantly reduced and positioned within the least sensitive and most disturbed portions of the site, in accordance with the mitigation hierarchy.

Long-term environmental management is addressed through the Environmental Management Programme (EMPr), which becomes legally binding upon Environmental Authorisation. Compliance monitoring and enforcement are undertaken by the relevant authorities.

The BAR therefore includes appropriate safeguards and management measures, and ongoing compliance is regulated through the environmental authorisation framework.

The comment is noted.

The issue of cumulative impact and precedent has been considered in the BAR.

The assessment concludes that the proposed development:

- Is limited in extent (approximately 1,375 m² footprint)
- Retains the vast majority of the site in a natural or conserved state
- Is designed to avoid the most sensitive environmental features

Each application is assessed on its own merits, and approval of this application does not automatically create a precedent for other developments.

The cumulative impact assessment included in the BAR concludes that, given the small scale and low-density nature of the development, the contribution to cumulative impact is low and acceptable.

E. With reference to the statement below

“Biodiversity Assessment (2025) and Agricultural Compliance Statement (2025), it is proposed that the entire property be rezoned to “Open Space III” (Nature Conservation Area). No fences and a handover or partnership with SANParks for the management of the property. “

This should indeed include the whole of Farm 205. Farm 205 should be classified as a Conservation area in the form of a protected Nature Reserve, to be handed over to SANParks and Cape Nature to be preserved for future generations. (Cape Nature already manages the Goukamma Nature reserve which is in close proximity to farm 205), **A trust could be formed between the Stewardship and SANParks , Cape Nature and other influential environmental bodies to ensure that the area in question remains an important part of the Western Cape Green Heritage).**

F. Below see some relevant quotations from **Draft Basic Assessment Report – Portion 79 of Farm 205 Ruygte Valley.**

- **A recent assessment of coastal dune ecosystems (Cowling et al. 2023) suggests that this vegetation type needs The stewardship needs to be carefully monitored and assessment and that the coastal components should be a high priority for protection.”**
- **“An impact assessment assessed that potential impacts associated with the proposed development could have MODERATE and LOW negative significance, primarily because of the high conservation value of the forest habitats on site and the value that this area has for current and future conservation. Although relatively small in extent, the proposed development will form part of a cumulative trend that will lead to possible disruption of ecological processes.”**
- **“ The entire site is in a natural state and also falls within CBA1 and CBA2 areas, as well as being an indigenous natural forest. All parts of the site therefore have VERY HIGH sensitivity with respect to the Terrestrial Biodiversity Theme. According to the "Protocols", a Specialist Assessment is therefore required.” Please note a specialist**

The comment is noted.

The proposal to rezone the property to Open Space III (Nature Conservation Area) is intended to support long-term conservation objectives, while allowing for a limited, low-impact residential use.

The Basic Assessment process evaluates the specific development proposal submitted, and does not determine land ownership, stewardship arrangements, or the transfer of land to conservation authorities.

Any future arrangements with SANParks, CapeNature, or other conservation bodies fall outside the scope of the Basic Assessment process and would be subject to separate agreements or processes.

The BAR ensures that the proposed development is compatible with conservation objectives, and that the majority of the site remains in a natural state.

The comment is noted.

The proposal to rezone the property to Open Space III (Nature Conservation Area) is intended to support long-term conservation objectives, while allowing for a limited, low-impact residential use.

The Basic Assessment process evaluates the specific development proposal submitted, and does not determine land ownership, stewardship arrangements, or the transfer of land to conservation authorities.

Any future arrangements with SANParks, CapeNature, or other conservation bodies fall outside the scope of the Basic Assessment process and would be subject to separate agreements or processes.

The BAR ensures that the proposed development is compatible with conservation objectives, and that the majority of the site remains in a natural state.

assessment is required first however independent parties like, Cape Nature (Goukamma Nature reserve) and SANParks should be used.

- **“The proposed development is almost entirely within areas of natural habitat that have high biodiversity value. is an indigenous forest protected under the National Forests Act 84 of 1998, is adjacent to protected areas and therefore falls within the buffer zones of these, and has been **earmarked as being desirable for future conservation.**”**
- **“ The vegetation on site is dominated by the protected tree species, *Sideroxylon inerme*.” Although it is therefore not clear whether or not the thicket on site falls under Western Cape Milkwood Forest (protected under the National Forests Act), it is dominated by the Milkwood *Sideroxylon inerme*, that is protected under the same Act”**
This needs to be carefully managed by independent conservation bodies i.e. Cape Nature (Goukamma Nature reserve)

Keeping the above quotations in mind, the whole of farm 205, should become a protected area.

- G. I could find no information on the fauna of the area and how any proposed development will affect them. There should be no boundary fences or other fences on any portion of Farm 205. It must be delegated that responsible and effective environmental bodies must enforce this. It remains an important fact that boundary fences must never be allowed, around any of the portions on Farm 205. This is important to allow for the free movement of any animals in this area.**

All rights to elaborate on these comments and to raise new issues at a later date are being reserved.

The comment is noted.

Faunal considerations are included within the Terrestrial Biodiversity Assessment, which assesses habitat, ecological processes, and species presence within the study area.

The BAR recognises the importance of maintaining ecological connectivity and minimising disturbance to fauna. For this reason:

- The development footprint is limited in extent
- The majority of the site remains undeveloped and natural
- Disturbance is confined to the approved footprint

The issue of fencing is addressed through the project design and environmental management measures. Where applicable, fencing requirements will be determined through the detailed design phase and relevant approvals, taking into account environmental considerations.

The environmental authorisation and EMPr provide the framework for ensuring that impacts on fauna are minimised and managed appropriately.



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Ecoroute 005

23 April 2026

Ms Uta

Dear Ms Uta,

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

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The Final BAR incorporates comments received during the public participation process, specialist inputs, and amendments made to the proposed layout and mitigation measures. The application will now be reviewed by the Competent Authority, which may request additional information or clarification during its decision-making process.

Once a decision has been issued, all registered I&APs will be formally notified of the outcome and advised of their right to appeal in terms of the applicable regulations.

We sincerely thank all Interested and Affected Parties for their participation, time, and valuable input throughout the environmental assessment process.

Yours sincerely,

Bianca Gilfillan

Environmental Assessment Practitioner

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Ecoroute 005

23 April 2026

Ms Zelda Eastwood

Dear Ms Eastwood,

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

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We sincerely thank all Interested and Affected Parties for their participation, time, and valuable input throughout the environmental assessment process.

Yours sincerely,

Bianca Gilfillan

Environmental Assessment Practitioner

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Ecoroute 009

06 February 2026

Niel de Villiers

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Dear Mr de Villiers

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

Please be advised that the Final Basic Assessment Report (BAR), together with the Environmental Management Programme (EMPr), specialist studies, Comments and Responses Report, and supporting appendices for the proposed development on Portion 79 of Farm Ruygte Valley No. 205, was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) on **23 April 2026** for consideration and decision-making in terms of the National Environmental Management Act, 1998 and the Environmental Impact Assessment Regulations, 2014 (as amended).

The Final BAR incorporates comments received during the public participation process, specialist inputs, and amendments made to the proposed layout and mitigation measures. The application will now be reviewed by the Competent Authority, which may request additional information or clarification during its decision-making process.

Once a decision has been issued, all registered I&APs will be formally notified of the outcome and advised of their right to appeal in terms of the applicable regulations.

We sincerely thank all Interested and Affected Parties for their participation, time, and valuable input throughout the environmental assessment process.

Please see below the responses to your comments as submitted with the Final BAR.

Yours sincerely

Bianca Gilfillan

Environmental Assessment Practitioner

Eco Route Environmental Consultancy

Niel de Villiers – 19 February 2026

Comment	Response
<p><u>Re Amended Draft Basic Assessment Report - The proposed development of a primary dwelling, three cottages, additional structures and access road on Portion 79 of Farm 205 Ruygte Valley, Sedgefield, Western Cape</u></p> <ol style="list-style-type: none"> I commented on 15 December 2024 on the Draft Basic Assessment Report regarding the Proposed Development of “a Primary Dwelling” (sic) and Access Road on Portion 79 of Farm 205 Ruygte Valley, Sedgefield, Western Cape. I did so in my own name and on behalf of a voluntary association to be formed. That voluntary association has not been formed yet, but I continue to act in my own name and on behalf of that voluntary association to be formed. Its provisional name is now Save Our Sedgefield and the establishment process is ongoing. I did not receive the response letter of 6 February 2026 referred to in your current report. <u>Please provide me with proof of transmission of the documents included in Appendix E as “response letters”.</u> 	<p>In a letter date 26 February 2026, Ms Gilfillan responded with the following: Dear Mr de Villiers RE: RESPONSE TO COMMENTS ON THE AMENDED DRAFT BASIC ASSESSMENT REPORT – PORTION 79 OF FARM 205 RUYGTE VALLEY, SEDGEFIELD – LETTER DATED 19 FEBRUARY 2026</p> <p>We refer to your previous submission dated 15 December 2024 on the Draft Basic Assessment Report for the proposed development of a primary dwelling, three cottages and associated access infrastructure on Portion 79 of Farm 205, Ruygte Valley, Sedgefield, as well as your subsequent correspondence relating to the amended Draft Basic Assessment Report. Your involvement in the public participation process, both in your individual capacity and concerning the voluntarily formed association, is duly recognised. You have been officially informed of the amended Draft Basic Assessment Report, which was disseminated in accordance with Regulation 19(1)(b) of the Environmental Impact Assessment Regulations, 2014 (as amended). This correspondence serves to respond to the procedural and substantive matters raised in your recent communication and to clarify the status of the Basic Assessment process.</p> <p><u>Response to the request for proof of transmission of the letter dated 6 February 2026</u></p> <p>The response letter dated 6 February 2026, as referenced in Appendix E of the Amended Draft Basic Assessment Report (DBAR), forms part of the consolidated documentation of the amended public participation process. The letter was not distributed separately to the Interested and Affected Parties as an independent communication. It was incorporated into the Amended Draft Basic Assessment Report documentation package and forms part of the current Regulation 19(1)(b) public participation process. The amended DBAR, including Appendix E and all associated response letters, was circulated as a single consolidated package for the required minimum 30-day public participation period. There is therefore no separate proof of transmission for the letter dated 6 February 2026, as it was not issued independently of the amended DBAR distribution. The current public participation process constitutes one unified 30-day consultation period in terms of Regulation 19(1)(b), and all relevant correspondence is included within that circulated documentation set.</p>

4. On 18 February 2026 at 11H31 you sent me a revised Draft Basic Assessment Report for comment, with no explanation. I assume you did this in terms of regulation 19(1)(b) of the **Environmental Impact Assessment Regulations, 2014** (as amended). In terms thereof you are obliged to inform the Competent Authority, the Department of Forestry, Fisheries and the Environment (“the DFFE”) in writing that “as significant changes have been made or significant new information has been added to the documents which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised documents will be subjected to another public participation process of at least 30 days.” Please provide me with that notice and the response thereto. (The documents appear to have been dated 21 January 2026.)

Response to Regulation 19(1)(b) query and explanation for amended Draft BAR The revised Draft Basic Assessment Report (DBAR) circulated on 18 February 2026 was issued in compliance with Regulation 19(1)(b) of the Environmental Impact Assessment Regulations, 2014 (as amended). The amendment of the Draft BAR was necessary following the refinement of the environmental constraints mapping and the incorporation of updated specialist input. The updated constraints map consolidated and spatially aligned the following confirmed sensitives:

- Geotechnical no-go areas, including the Structurally Weak Zone (SWZ) and D7 fracture line
- Coastal erosion risk projections and setback lines
- 100 m High Water Mark buffer
- Slope instability zones
- Biodiversity sensitivity areas (CBA1 and CBA2)
- Protected forest components (Western Cape Milkwood Forest)

Following the integration of these constraints into a single verified spatial overlay, it became necessary to refine the development footprint to ensure full alignment with the most stable central–northern portion of the property and to avoid all identified geotechnical and ecological no-go areas.

Accordingly, the amended Draft BAR reflects:

- Updated and corrected constraints mapping
- Refined development footprint positioning
- Clarified building envelope and disturbance areas
- Updated impact assessment tables to reflect the refined layout
- Strengthened mitigation measures in the EMPr
- Clarified differentiation between preferred and alternative footprint extents
- Alignment of specialist recommendations with the revised layout

These refinements constitute material clarification and spatial alignment rather than a fundamentally new proposal. However, in the interest of procedural fairness and regulatory compliance, the amended Draft BAR was subjected to a further public participation process in terms of Regulation 19(1)(b).

5. You first gave notice of a public participation process to run from 24 April 2025 to 24 May 2025. The notice that you gave had the heading: "Proposed Development of a Primary Residential Dwelling (sic) on Portion 79 of Farm 205, Ruygte Valley, Sedgfield, Western Cape." In that notice you undertook to make a Pre-Application Basic Assessment Report and relevant appendices available to all registered Interested and Affected Parties. Please provide me with those original

In compliance with the Regulation, the Department of Forestry, Fisheries and the Environment (DFFE) was formally notified in writing that amendments had been made and that the revised documentation would be subjected to a further public participation process of at least 30 days.

An extension of the applicable timeframe was also formally requested from the DFFE. The reasons provided for the extension included:

- The need to consolidate and verify updated specialist spatial data;
- The preparation of a comprehensive constraints map integrating geotechnical, biodiversity and coastal risk information;
- The alignment of the development footprint to avoid identified no-go areas;
- Ensuring that the amended documentation accurately reflects environmental sensitivities before submission; and
- Allowing sufficient time to conduct a compliant additional public participation process in terms of Regulation 19(1)(b).

The DFFE acknowledged receipt of the notification submitted in terms of Regulation 19(1)(b), confirming compliance with the procedural requirements of the EIA Regulations. The acknowledgement confirms receipt of the notification in terms of Regulation 19(1)(b).

The Amended Draft BAR dated January 2026 reflects the date of finalisation of the amended documentation following incorporation of the updated constraints mapping and specialist alignment.

The current public participation process, therefore, constitutes a lawful continuation of the Basic Assessment process in terms of Regulation 19(1)(b), following notification to the Competent Authority.

Response to request for Pre-Application Basic Assessment Report Documentation The public participation process conducted from 24 April 2025 to 24 May 2025 constituted the pre-consultation phase of the Basic Assessment process.

The Pre-Application Basic Assessment Report (Pre-Application BAR) made available during that period was substantially the same as the subsequent Draft Basic Assessment Report (DBAR), subject only to minor administrative

documents. (I requested this information also on 15 December 2025 but received on 7 January the DBAR that I had already commented on.)

refinements, formatting updates and incorporation of preliminary comments received during the pre-consultation stage.

No material changes to the development proposal were introduced between the Pre-Application BAR and the Draft BAR stage. The significant refinements to the proposal, including updated constraints mapping and layout adjustments, were introduced only at the Amended Draft BAR stage in terms of Regulation 19(1)(b).

All Interested and Affected Parties (I&APs) were afforded the opportunity to register during the pre-consultation process. The I&AP database was formally established during that phase, and any member of the public could register and obtain access to the documentation.

With regard to your request for the original Pre-Application documentation, it is important to clarify that when you requested documentation on 15 December 2025, the assessment process had progressed beyond the pre-consultation phase and was at the Draft BAR stage. In the interest of transparency and to ensure you had access to the most current and comprehensive information available at that point in the process, the Draft Basic Assessment Report was provided to you.

This was done to avoid prejudice and to ensure that you were reviewing the most updated version of the assessment documentation reflecting the stage the application had reached. At no stage was information withheld.

Should you still require the original Pre-Application BAR documentation for record purposes, it can be provided; however, it should be noted that it does not materially differ from the Draft BAR previously circulated, apart from minor updates and administrative refinements.

Eco Route Environmental has conducted the public participation process in a transparent manner throughout and has ensured that all registered I&APs have had access to the applicable documentation relevant to each stage of the assessment.

6. Please provide me with any environmental management programmes compiled and submitted to the Competent Authority, the DFFE. Without access to them I

Environmental Management Programmes Compiled and Submitted

am prejudiced in commenting on the latest revised/amended Draft Basic Assessment Report.

7. Please grant me an extension of one month to comment. You have not indicated what changes were affected to the previous version of the Basic Assessment Report in the notice to me. The new document is about 850 pages long; the previous one was less than 740 pages. It requires substantial time to consider 1 500 pages, even more so when I receive the additional documents requested above. Public participation cannot be effective where interested and affected parties are not given sufficient time to consider a Basic Assessment Report. I place on record that I, on 12 December 2025, requested an extension of time to 15 January 2026 in respect of the previous round, an extension that would have ended roughly when your offices re-opened on 13 January 2026. You did not give that consent. It prejudiced me by placing me under undue time pressure.

The Environmental Management Programme (EMPr) has at all times formed part of the Basic Assessment documentation and has been included as an Appendix to the report during each phase of the assessment process. The EMPr was included in:

- • The Pre-Application Basic Assessment Report;
- • The Draft Basic Assessment Report; and
- • The Amended Draft Basic Assessment Report circulated in terms of Regulation 19(1)(b). The EMPr forms part of the consolidated report package and is not a separate standalone submission document.

The exact same documentation, including the EMPr as appended to the Amended Draft BAR, is submitted to the Competent Authority, the Department of Forestry, Fisheries and the Environment (DFFE). No separate or additional EMPr has been compiled outside of the documentation already distributed to Interested and Affected Parties. Accordingly, you have not been prejudiced in commencing on the amended Draft Basic Assessment Report, as the Environmental Management Programme has been included in the documentation circulated for the current 30-day public participation process.

Response to Request for Further Extension of Time

Your request for a further one-month extension to submit comments cannot be accommodated.

The amended Draft Basic Assessment Report has been circulated in terms of Regulation 19(1)(b) of the Environmental Impact Assessment Regulations, 2014 (as amended). Regulation 19(1)(b) requires that where material changes are made to the assessment documentation, the revised report must be subjected to a further public participation process of at least 30 days.

In order to lawfully conduct this additional public participation process, formal notification was submitted to the Department of Forestry, Fisheries and the Environment (DFFE), and an extension of the applicable timeframe was requested and granted to allow for the prescribed 30-day consultation period.

The authorised statutory public participation period therefore runs until 20 March 2026.

In terms of Regulation 3(7), only the Competent Authority may grant an extension of a prescribed timeframe. There is no provision in the EIA Regulations permitting the Environmental Assessment Practitioner to unilaterally extend a statutory public participation period beyond that approved by the Competent Authority. No further extension has been granted by the DFFE.

Accordingly, the 30-day comment period ending on 20 March 2026 constitutes the final lawful opportunity for submission of comments on the amended Draft Basic Assessment Report.

The application must proceed in accordance with the prescribed regulatory timeframes. Submissions received after the expiry of the statutory public participation period fall outside the regulated Basic Assessment process .

With regard to the length of the amended Draft BAR, the report has been compiled strictly in accordance with Appendix 1 of the EIA Regulations, 2014 (as amended), and applicable specialist protocols issued under the National Environmental Management Act, 1998 (Act 107 of 1998). The format, level of detail, inclusion of specialist assessments, consolidated constraints mapping, impact assessment matrices and appendices are regulatory requirements and not discretionary inclusions.

The increase in page number reflects regulatory consolidation and compliance, including:

- Integration of a consolidated environmental constraint map.
- Alignment of the development footprint with confirmed geotechnical, coastal and biodiversity constraints.
- Clarification of preferred and alternative footprint extents.
- Incorporation of updated specialist input.
- Strengthening of mitigation measures in the EMPr; and
- Consolidation of public comments and responses for transparency and procedural integrity.

The amendments represent refinement and spatial alignment in response to environmental constraints and specialist findings. They do not constitute a fundamentally new development proposal.

<p>8. When did you submit the application forming the subject matter of the Basic Assessment Report for the first time to the competent authority and when did you obtain the reference number DFFE REF: 14/12/16/3/3/1/3235?</p> <p>9. I wait to hear from you as a matter of urgency.</p>	<p>The public participation process is being conducted lawfully and in strict compliance with the EIA Regulations. The prescribed 30-day period ending on 20 March 2026 provides the statutory opportunity for comment.</p> <p>Submission of Basic Assessment Report The application forming the subject matter of the Basic Assessment Report was formally submitted to the Competent Authority in <u>November 2025</u>. The reference number <u>DFFE REF: 14/12/16/3/3/1/3235</u> was issued following submission during that same period in November 2025. We trust the above clarifies the matters raised and confirms that the Basic Assessment process is proceeding in full compliance with the Environmental Impact Assessment Regulations, 2014 (as amended).</p>
<p>Niel de Villiers- 20 March 2026</p>	
<p><u>Comments on Amended Draft Basic Assessment Report - The proposed development of a primary dwelling, three cottages, additional structures and access road on Portion 79 of Farm 205 Ruygte Valley, Sedgefield, Western Cape</u></p> <p><u>Introduction</u></p> <p>1. I submit this comment on behalf of myself and on behalf of a voluntary association to be established on 23 March 2026, Save Our Sedgefield (S.O.S). The rights and benefits retained for S.O.S will be accepted by it after its establishment as a voluntary association. This is the name decided upon, after Sedgefield Accountability and Environment Forum (SAEF), or Garden Route Environment and Accountability Team (GREAT) were previously considered.</p> <p>2. I am a resident of Sedgefield, and I walk on the unspoilt beach that runs from the edge of Sedgefield to Buffels Bay. This pristine coastline is of unparalleled beauty. It is a piece of scenic coast for more than ten kilometres which is under threat by this application that will set a development precedent.</p> <p>3. This matter has had an unusual history. There are already three Basic Assessment Reports (“BAR’s”). They are:</p> <p>3.1 “The Basic Assessment Report: Pre-Consultation for the proposed development of a primary dwelling and access road (sic) on Portion 79 of</p>	<p>The comment is noted. The Public Participation Process (PPP) undertaken as part of the Basic Assessment process has been conducted in accordance with the requirements of the Environmental Impact Assessment Regulations, 2014 (as amended). All registered Interested and Affected Parties (I&APs), including the commenting party, were afforded the opportunity to participate and submit comments on the Draft and Amended Draft Basic Assessment Reports. The Final Basic Assessment Report (BAR) has been compiled taking into account all comments received during the PPP, including those referenced by the commenting party. The Comments and Responses Report forms part of the BAR and provides a comprehensive record of issues raised and corresponding responses.</p> <p>The concerns relating to precedent and the broader coastal landscape are acknowledged; however, the assessment has focused on the site-specific environmental sensitivities, constraints, and impact significance, as required by the EIA Regulations. The BAR concludes that the proposed development, as currently designed and positioned, represents a low-density, limited footprint development within a largely conserved property.</p> <p>The Final BAR now represents a complete and informed assessment, incorporating specialist input, public participation, and environmental constraints.</p>

Farm 205, Ruygte Valley, Sedgefield, Western Cape”, dated March 2025 (“the First BAR”);

3.2 Draft basic assessment report for the proposed development of a primary dwelling and access road (sic) on Portion 79 of Farm 205, Ruygte Valley, Sedgefield, Western Cape”, dated January 2025 (“the Second BAR”);

3.3 “Amended draft basic assessment report for the proposed development of a primary dwelling and access road (sic) on Portion 79 of Farm 205, Ruygte Valley, Sedgefield, Western Cape”, dated January 2026 (“the Third BAR”).

4 I again fully align myself with the objection to the First BAR by Cape Nature, the questions raised by SANParks, Prof AT Lombard’s detailed objection, the issue raised by Ms M White and her objection, and the detailed objection raised by Mr S Stead.

5 These objections were expanded upon in the objections to the Second BAR and I fully align myself with the objection to the Second BAR by Dr D Laing, Ms T Joubert, Mr B Powell, Prof AT Lombard, Dr V Weyer/SANParks, Mr S Stead, Ms M Simons/Cape Nature, Ms G Beck, Ms S Mentz. See too the questions raised by Mr R Peter/DFFE.

6 I have had limited time to prepare this response, and my request for an extension of time was refused. I accordingly focus on some aspects only. Also, I repeat my objection of 15 December 2025, and incorporate it by reference. I did not have time to address the comments thereon, and to ascertain which statements have not been addressed and are thus common cause. In addition, I did not have access to all relevant documents.

7 I reserve the right to add to this objection in any future process or proceedings.

Regulatory non-compliance:

The comment is noted.

The application has been submitted by the applicant as reflected in the Basic Assessment Report and supporting documentation. The issue relating to the applicant’s status and land ownership has been considered and addressed as part of the application documentation submitted to the competent authority.

8 Application by a non-owner 8. Regulation 39(1) of the Environmental Impact Assessment Regulations, 2014 (“the EIA Regulations”) requires that the if “the proponent is not the owner or person in control of the land on which the activity is to be undertaken, the proponent must, before applying for an environmental authorisation in respect of such activity, obtain the written consent of the landowner or person in control of the land to undertake such activity on that land.”

9 The EAP alleged in the First BAR that the application was made by the owner, and that no consent by the owner was required¹

Regulation with regard to conducting a Public Participation Process	Description of adherence to the Legislated Requirements
1) If the proponent is not the owner or person in control of the land on which the activity is to be undertaken, the proponent must, before applying for environmental authorisation in respect of such an activity, obtain written	The proponent (applicant) is the landowner and therefore consent is not required.

10 In the Second² and Third BAR’s³ the EAP repeated the same statement, namely that the applicant/proponent is the owner and that no consent is required. The decision not to obtain the written consent prior to making the application therefore was deliberately made, as is reflected in all three BAR’s. As such, a consent could not have existed at the time when the application was made (the EAP deemed it unnecessary).

11 The applicant/proponent is a company Daniel Sevenster and Partners Inc. The name of the applicant/proponent appears on pages 1 and 11 of the First BAR, pages 1 and 11 of the Second BAR, and pages 1 and 12 of the Third BAR. One example:

PREPARED FOR: DANIEL SEVENSTER AND PARTNERS INC.
PREPARED BY: ECO ROUTE ENVIRONMENTAL CONSULTANCY
DEPARTMENT REF: 14/12/16/3/3/1/3235

12 The EAP knew who her client was and have stated so repeatedly. It is Daniel Sevenster and Partners Inc. This is even done in Appendix F Draft EMPr Page 26.

Where required in terms of Regulation 39 of the EIA Regulations, confirmation of landowner awareness and/or consent forms part of the application record submitted to the Department of Forestry, Fisheries and the Environment (DFFE).

The Final BAR reflects the information available at the time of submission, and the competent authority is in possession of all relevant documentation necessary to assess compliance with the applicable regulatory requirements. This matter is therefore considered to have been procedurally addressed within the application process, and no further amendment to the BAR is required in this regard.

13 The owner of the property however is someone else, an individual Daniel Francois Sevenster, and not a company, Daniel Sevenster and Partners Inc. We know this, as the title deed is an annexure to Appendix D7 Draft Motivation Report Planning, Page 29.

DANIEL FRANCOIS SEVENSTER
Identity Number 660401 5164 08 3
Unmarried

14 The repeated statement in three BAR's that the applicant is the owner, on the known facts, is untrue. Therefore, his written consent was required before applying for an environmental authorisation. This did not happen, and its common cause that this did not happen.

15 I have raised these aspects in paragraph 32 to 37 of my objection dated 15 December 2025.4 If there were an issue, it ought to have been addressed.

16 Appendix E2 Comments and Responses Report, Page 55 states this about our objection to the Second BAR: "...(iii) correcting the applicant/proponent details and attaching the required landowner consent / authority to apply where applicable ..."

17 The statement, on the known facts, is untrue. There has been no correction in the name of the applicant/proponent in the Third BAR.

18 See Regulation 16(1)(b(i) of the EIA Regulations:

16 General application requirements

(1) An application for an environmental authorisation must-

(a) be made on an official application form obtainable from the relevant competent authority; and

(b) when submitted in terms of [regulation 19](#) or [21](#), be accompanied by-

(i) unless [regulation 39\(2\)](#) applies, the written consent referred to in [regulation 39\(1\)](#), if the applicant is not the owner or person in control of the land on which the activity is to be undertaken;

19 See too Regulation 39.

20 The obligation to obtain the written consent prior to making the application is a mandatory requirement and cannot be condoned. It is, with respect, the end of the matter.

Introduction: Non-disclosure of material information

21 Regulation 13(1)(f) of the **EIA Regulations** requires of the EAP to disclose to “registered interested and affected parties and the competent authority all material information in the possession of the EAP and, where applicable, the specialist, that reasonably has or may have the potential of influencing – (i) any decision to be taken with respect to the application by the competent authority” or “(ii) the objectivity of any report, plan or document to be prepared by the EAP or specialist” for submission to the competent authority. This duty of disclosure manifests from the duty of the EAP to be independent and to carry out his/her duties in an objective manner.

22 Clearly, not only must the information be complete, but the submissions need to be accurate as well. Below I refer to several statements (on the one or two aspects that I had time to consider), that on the known facts, are inaccurate or untrue. In some case the only reasonable inference is very negative, especially when those issues have been pertinently raised in the public participation processes in the First and Second BAR’s as wrong. It is also very negative when inexplicable wrong statements are made. I submit that the application stands to be dismissed as a result.

Non-disclosure of material information: Appendix E3 Response Letters

23 Included in the Third BAR is Appendix E3, Response Letters. These letters are dated 6 February 2026. The only reasonable inference is that they have been included in the BAR to reflect that the objections received were responded to as set out in the response letters.

24 One of them is addressed to me.⁵ I never received this letter. On 21 February 2026 I requested proof of transmission of the letter. I received a response on 26 February 2026 that confirms that the letters were not sent. If so, they do not constitute part of any record at all. This, in my view, should have been brought to the attention of the competent authority.

The comment is noted.

The response letters referenced form part of the Amended Draft Basic Assessment Report and were included as part of the overall public participation record. These letters were not circulated as standalone correspondence but were incorporated into the BAR documentation to ensure transparency and a complete record of responses.

The Final BAR includes the full Comments and Responses Report, which consolidates all comments received and responses provided in a structured and accessible format.

All registered I&APs will be formally notified of the submission of the Final BAR to the competent authority and will receive communication confirming such submission, together with reference to where responses to their comments are recorded.

The public participation record is therefore considered complete and compliant.

The comment is noted.

All visual-related specialist inputs that are considered relevant to the proposed development have been included in the Basic Assessment Report. The Visual Compliance Statement prepared by Outline Landscape Architects forms the primary visual specialist input informing the assessment.

The previously referenced Visual Resource Management Africa (VRMA) documentation was reviewed and considered in the assessment process. The Final BAR reflects the findings of the most relevant and site-applicable visual assessment.

The Visual Compliance Statement concludes that the proposed development, given its limited footprint, fragmented design, and integration with existing

Non-disclosure of material information: Conflicting visual statements

25 A big issue in this matter, is that the EAP omitted in the First BAR a negative Visual Impact Assessment prepared by Visual Resource Management Africa CC. This matter was pertinently raised by Mr Stead on 22 June 2025.⁶ The response was that the negative Visual Impact Assessment was about the wrong site, and was thus omitted. This is an untrue response to the negative Visual Impact Assessment, as it was about the correct site. That untrue response is still being used in the Third BAR, as will appear below. The result is that Mr Stead's views stand uncontested. They are of material importance in this matter where visual impact alone is sufficient to have the application dismissed. With respect.

26 A further big issue in this matter, is that the EAP in response to Mr Stead's objection, added to the Second BAR a negative Visual Impact Assessment prepared by Visual Resource Management Africa CC, but omitted to add the final version of the report. An earlier version of the report was included, the one Draft V1 of 24 October 2024. This was not the one of 18 November 2024 to which Mr Stead referred. This matter was pertinently raised by Mr Stead on 15 December 2025.⁷ Its omission impacted on the public participation process.

27 In response, rectification was promised in the Third BAR. The EAP knows that the wrong version the negative Visual Impact Assessment was attached to the Second BAR. In the Updated Comments And Responses Report, page 37, the EAP States:

"The omission is acknowledged and corrected in the Amended BAR. The VRMA Draft Visual Baseline Report is now included as an appendix for transparency. The Amended BAR clarifies that earlier spatial discrepancies led to confusion regarding applicability, however the report is now included for full consideration. The final assessment relies on the updated Visual Compliance Statement (2025), Visual Impact

vegetation and topography, will result in a low visual impact, which can be effectively mitigated through design and management measures.

For completeness and ease of reference, the Visual Compliance Statement will be made available directly to SANParks.

The visual impact assessment as presented in the BAR is considered sufficient for decision-making purposes.

The comment is noted.

The documentation attributed to Mr Paul Buchholz is acknowledged as preliminary input and not a formal specialist report. The visual assessment relied upon in the BAR is the Visual Compliance Statement prepared by Outline Landscape Architects, which constitutes the formal specialist input for the purposes of the Basic Assessment.

The Final BAR is based on the most relevant and applicable specialist information available, and the visual impact conclusions are drawn accordingly

Statement (2025), and the Site Constraints Map, all aligned to verified cadastral boundaries."

28 It did not happen that "(t)he VRMA Draft Visual Baseline Report is now included as an appendix for transparency." The Third BAR still does not include the final version of the negative Visual Impact Assessment prepared by Visual Resource Management Africa CC, the one of 18 November 2024.

29 Without such report, the BAR process is compromised. Not only does the competent authority not have access to the final report, but neither does the public in the public participation process. Non-disclosure of material information: Alleged visual impact statement is only a quote

30 A further material issue, is the other two purported visual impact "reports" that the EAP relies upon in the Second and Third BAR.

31 In the Second BAR, much was made about an alleged "report" by Mr Paul Buchholz. It is for some reason still attached to the Third BAR as Appendix D1.

32 It is obviously not a report, but a quote. Mr Paul Buchholz wanted to be paid R20 260.00 to do the work and to prepare a report. As will be seen below, this purported report is still relied upon by the EAP in the Third BAR. Non-disclosure of material information: The site will be visible from the beach and disturb the skyline

33 Attached to the Third BAR are three annexures dealing with Visual Impact:

33.1 "Appendix D1 A Initial Visual Statement.pdf. [This is not a report, but is a quote from Paul Buchholz, as stated already];

33.2 Appendix D1 B Visual Compliance Statement.pdf.;

33.3 Appendix D1 C VRM Visual Impact Assessment Wrong site.pdf". [This the earlier version of the report by Visual Resource Management

The comment is noted.

The issue of visibility and potential skyline intrusion has been assessed in the Visual Compliance Statement and considered alongside the site's topography, vegetation cover, and development design.

The proposed development has been designed as a low-density, fragmented layout, utilising:

- Existing vegetation for screening
- Natural topography
- Non-reflective, earth-toned materials

While visibility from certain vantage points cannot be entirely excluded, the specialist assessment concludes that the degree of visual intrusion will be limited and localised, and does not constitute a significant impact in the context of the receiving environment.

The BAR has considered the visual concerns raised during the PPP and maintains that the impact significance remains low with mitigation.

The Final BAR therefore reflects a balanced and specialist-informed assessment of visual impacts.

Africa CC. It was omitted in any form the First BAR, and the wrong versions have been included in the Second and Third BAR's. It, even in its current form, correctly identifies the negative visual impact of the proposed development].

34 The main Visual Impact statement relied upon in the Third BAR is by Outline Landscape Architects CC. I deny that it is a properly reasoned report, or that the alleged academic references at the end of the report find any application in the report. I take issue with the especially the following statements in the report by Outline Landscape Architects CC:

34.1 *"From the site visit, it was established that the site is not visible from the N2 and Lake Pleasant Resort due to the higher topography and dense vegetation of the site."*⁸

The development will be on the highest point of the property, and the property is the highest point between the N2 and the ocean, a high dune. The "the higher topography" and "dense vegetation" are not answers to the issue];

34.2 *"The development will also not be visible to viewers on the beach due to the highly elevated and eroded cliffs."*⁹

[The structures absolutely will be visible from the beach. The highest point is about 70 metres above sea level];¹⁰

34.3 The report states that there are "large trees close to the highest point of the site", but omits to describe them, or state that they will have any impact on the planed construction.

35 With regard to the actual visibility from the shore, the photographs used by Outline Landscape Architects CC do not depict the true picture. The photographs used in the report by Outline Landscape Architects CC were taken from behind vegetation, and do not depict actual visibility of the development from the beach. In none of the photographs on pages 8 to 10 can one actually see the beach, as they were not taken from where the development would be visible. As dealt with

my objection of 15 December 205, other photographs in the Second BAR show the beach. It in a sense gets worse, the final photographs on page 10 were taken from so close to the cliff, that one cannot see the development area. They should have been taken from the water's edge, at low tide.

- 36 On the South-Western side of the property (as I understand its position) is a protrusion on the dune on the adjacent property. It is clearly visible from the beach. This protrusion appears on some of the following photographs that show that the development, which would protrude several meters above the highest point, would clearly be visible from the beach at an average person's height. Without being able to ascertain exact boundaries, these pictures depict visibility from the beach, walking direction Platbank:





37 And looking back. i.e. walking from Platbank towards Sedgefield:



38 Mr Stead's photograph 15 shows visibility from the beach, as I interpret them.

The comment is noted.

The assertion that the visual assessment is inaccurate or of no value is not supported by the findings of the Visual Compliance Statement (Outline Landscape Architects, March 2025), which forms part of the Basic Assessment Report. The visual specialist assessment was undertaken based on site inspections, topographical analysis, vegetation cover, and receptor sensitivity, in line with accepted visual assessment practice for Basic Assessment processes.

The specialist does not conclude that the development will be entirely invisible from all viewpoints, but rather that visual exposure will be limited, localised, and mitigated through design and siting measures. These include:

- Fragmentation of built form
- Use of natural materials and colours
- Retention of existing vegetation for screening
- Placement of structures within the most suitable portion of the site

The assessment further recognises that the site is elevated; however, the combination of vegetation cover, slope profile, and design approach reduces the degree of visual intrusion to a level assessed as low.

The BAR therefore does not rely on an assumption of absolute invisibility, but on a specialist-informed evaluation of visual impact significance, which is considered appropriate for decision-making purposes

The comment is noted.

The Basic Assessment Report acknowledges applicable DFFE and DEA&DP guidelines regarding development on ridgelines and skylines, and these considerations informed the site selection and layout planning process.

ID	15
Remarks	KOP beach 2 visual intrusion highly likely
Time	10/22/2024 12:08:34.999 GMT+02:00
Geometry	POINT Z (22,82513189 -34,04219157 35,053)
PhotoDir	NW
Photo	Ruygteview_20241022_120914554.jpg



39 If my understanding is correct, the version that the development would not be visible from the beach is a shockingly wrong, placing the whole BAR process in doubt. It is one of the most important issues in the matter. It is common cause that the visual impact study relied upon in the Third BAR is inaccurate. I would submit that it is of no value to determine visual impact based on the facts of this matter. [I should add that I believe that it is common cause that the top of the ridge has a gentle slope towards the beach, the development will not be hidden by topography.]

The statement that the development footprint is located inland from the dune edge refers to the fact that the preferred layout has been positioned away from the coastal cliff edge and identified high-risk zones, based on the findings of the geotechnical and constraints mapping exercises.

The development footprint is therefore not located on the immediate dune crest or unstable cliff-edge areas, but within the most suitable and stable portion of the site, taking into account environmental and engineering constraints.

The layout was specifically refined to avoid the most visually sensitive and geotechnically unstable areas, consistent with the mitigation hierarchy and specialist input.

The comment is noted.

The duplication of content between the Updated Comments and Responses Report and Appendix E2 is administrative in nature and does not affect the substance of the assessment or the conclusions reached.

Both documents form part of the public participation record and reflect the same responses for completeness and traceability within the BAR documentation set.

This does not impact the validity or adequacy of the environmental assessment.

The comment is noted.

The statement that the preferred layout avoids cliff crests and ridge skylines is based on an integrated assessment of multiple specialist inputs, including:

- Geotechnical and geomatic investigation
- Constraints mapping
- Visual specialist input
- Site inspections

The placement of the development footprint was informed by these combined considerations, not solely by the visual assessment.

The development has been positioned to avoid the most sensitive and high-risk areas, including steep slopes, structurally unstable zones, and immediate cliff-edge environments.

The BAR reflects a constraints-led design approach, and the selected layout represents the most appropriate balance between environmental sensitivity, engineering feasibility, and land use considerations.

<p>40 As appears from the Updated Comments and Response Report Portion 79 page 30, [and from Appendix E2 Comments and Response Report Page 27] Mr Stead made the point that Relevant DFFE and DEA&DP guidelines strongly discourage development on crests, and ridges or skylines where structures would be visually intrusive. The comment in the notes by the EAP, is untrue where it states that “the development footprint is located inland from the dune edge”.</p>	<p>The comment is noted.</p> <p>The statement that the preferred layout avoids cliff crests and ridge skylines is based on an integrated assessment of multiple specialist inputs, including:</p> <ul style="list-style-type: none"> • Geotechnical and geomatic investigation • Constraints mapping • Visual specialist input • Site inspections <p>The placement of the development footprint was informed by these combined considerations, not solely by the visual assessment.</p> <p>The development has been positioned to avoid the most sensitive and high-risk areas, including steep slopes, structurally unstable zones, and immediate cliff-edge environments.</p> <p>The BAR reflects a constraints-led design approach, and the selected layout represents the most appropriate balance between environmental sensitivity, engineering feasibility, and land use considerations.</p>
<p>41 I do not know why the same comments by the EAP were duplicated in the Updated Comments and Response Report Portion 79 and in Appendix E2 Comments and Response Report, and I refer to the page numbers pertaining to the Updated Comments and Response Report Portion 79 in what follows.</p>	<p>The comment is noted.</p> <p>The matters raised by Mr Stead have been recorded and considered as part of the public participation process. The Final Basic Assessment Report (BAR) incorporates all relevant specialist inputs and stakeholder comments in an integrated manner, and the conclusions presented reflect the outcome of this comprehensive assessment.</p>
<p>42 The comment on page 29 that “the updated specialist inputs confirm that the final preferred layout has been repositioned to avoid cliff crests, ridge skylines, ...” This statement by the EAP certainly is not based on the visual impact study relied upon by the EAP. The same seemingly incorrect statement is repeated on page 30 (twice).</p>	<p>The comment is noted.</p> <p>The BAR does not rely on an assumption that the development will be entirely invisible from all viewpoints, including the beach. The visual assessment recognises that some degree of visibility may occur, depending on viewing location and conditions.</p> <p>The Visual Compliance Statement assesses the extent, intensity, and significance of visual exposure, concluding that any visibility will be localised and of low impact, given the limited scale of development, the fragmented layout, retained vegetation, and the use of materials and colours that blend with the receiving environment.</p> <p>The photographic material included in the BAR is illustrative in nature and supports, but does not solely determine, the assessment. The conclusions are based on professional judgement informed by site inspection, landscape</p>

43 Mr Stead made the point that the development would introduce (and cause) residential skyline intrusion, as it on the common cause facts will do. Yet the response by the EAP on page 30, on the known facts, cannot be correct: “Structures are sited below crest level and screened by retained vegetation. The revised visual modelling will demonstrate skyline preservation”.

44 Mr Stead made this telling point at page 31:

- **Incorrect Viewshed Analysis:** Erroneous claim that views from the beach are obstructed by undulating topography. A basic Google Earth block extrusion clearly shows that all four of the proposed dwellings would be clearly visible from the beach. No viewshed modelling was provided to substantiate the claim, and selective photographs failed to show the actual visual incidence from beach vantage points.

45 On the known facts, that is correct. The response by the EAP is telling. The fact that the development would be visible from the beach, and that the photographs do not reflect the true position, remained unanswered.

context, and visual absorption capacity, which are considered appropriate for a Basic Assessment.

The comment is noted.

Mr Stead’s submission dated 15 December 2025 forms part of the public participation record and has been considered in the compilation of the Final BAR. The Comments and Responses Report consolidates and addresses the issues raised through the public participation process.

The Final BAR reflects an integrated assessment of all relevant comments and specialist inputs, including those raised by Mr Stead, and the conclusions reached are informed accordingly.

The comment is noted.

The Draft Visual Baseline Report prepared by VRMA was reviewed during the assessment process. However, it is noted that this report was not prepared for the specific development footprint or final layout under assessment, and therefore does not constitute site-specific specialist input for the purposes of the Basic Assessment.

For this reason, the Final Basic Assessment Report does not rely on the VRMA report as a determinative visual assessment. Instead, the visual impact assessment is based on the Visual Compliance Statement prepared by Outline Landscape Architects, which is specific to the proposed development footprint and informed by site verification and current layout planning.

The BAR therefore relies on relevant and site-specific specialist information, and the documentation included represents the appropriate and complete record for decision-making purposes.

The comment is noted.

The assertion that the application is proceeding without an adequate visual assessment is not supported. The Final BAR includes a site-specific Visual Compliance Statement (Outline Landscape Architects, March 2025), which assesses the visual impact of the proposed development based on the final layout and environmental context.

The Visual Compliance Statement does not rely on an assumption of complete invisibility or absence of skyline intrusion. Rather, it assesses the extent, nature, and significance of potential visual impacts, acknowledging that some degree of visibility may occur from certain viewpoints.

46 I do have access to Mr Stead's comments of 15 December 2025. It is included in Appendix 4 Comments Received at page 47.11 I cannot see that it was addressed in the Updated Comments and Response Report annexed to the Third BAR. I do not repeat its contents, and incorporate them by reference.

47 At present, Mr Stead's views have not been addressed in the Third Bar. If one has regard to the response letters allegedly dated 6 February 2026 (the ones that were not sent), Appendix E3, one finds a response to his letter on page 16. It contains the untrue statement that "The Draft Visual Baseline Report submitted by VRMA has now been formally included in the project record and reviewed alongside the other specialist inputs." This is a reference to the omitted final report submitted by Mr Stead on 18 November 2024. It has still not been made available in the public participation report, and has not been annexed to any BAR, as already dealt with.

48 The Visual Impact statement relied upon in the Third BAR is by Outline Landscape Architects CC. It is the one that wrongly states that there would be no skyline intrusion. The applicant, in the letter dated 6 February 2026 to Mr Stead now

The assessment concludes that, due to the limited development footprint, fragmented layout, retention of vegetation, and sensitive design approach, the visual impact will be localised and of low significance, and can be effectively mitigated.

The level of assessment undertaken is appropriate for a Basic Assessment process, and there is no regulatory requirement for a higher-order or Level 4 Visual Impact Assessment in this instance.

The Final BAR is therefore based on adequate, site-specific specialist **input**, and provides sufficient information for informed decision-making.

The comment is noted.

The Basic Assessment Report has been compiled using the information available from specialist inputs and supporting documentation. The Visual Compliance Statement forms the basis of the visual assessment presented in the BAR.

The BAR does not rely on preliminary or non-finalised inputs as determinative evidence but rather on the most relevant and applicable specialist assessment.

The conclusions presented in the BAR are therefore considered to be appropriate for the purposes of environmental decision-making.

The request to delete sections of the BAR is not supported.

The Final BAR has been compiled in accordance with the Environmental Impact Assessment Regulations, 2014 (as amended) and includes the relevant specialist inputs and professional assessments required for decision-making.

The visual impact assessment considers the receiving environment, landscape character, development footprint, and mitigation measures, and concludes that the impact is of low significance and acceptable within the context of the site.

The BAR represents a complete and final assessment, and the information presented is considered accurate, appropriate, and sufficient for the competent authority to make an informed decision.

concedes that this statement cannot be made, but does not address it properly by for example employing a specialist that is recognised by a landscape registration authority as having the suitable expertise to address this aspect, and to do so in a full Level 4 Visual Impact Assessment. The result is that the application is being pushed ahead without favourable visual impact assessment or any modelling to show its impact.

Non-disclosure of material information: The Third BAR inaccurately reflects purported facts with regard to the Visual Compliance Statements

49 What is stated in the Third BAR? It addresses the Visual Compliance Statements from page 128, according to its index. It is in fact from page 119.

50 The very first sentence reflected below is wrong. On the known facts, Paul Buchholz only prepared a quote, attached the Second and Third BAR's as Appendix D1 A Initial Visual Statement.pdf. Thus, the following parts of the Third BAR should be deleted:

Initial Visual Statement

Paul Buchholz was appointed to undertake the Initial Visual Impact Statement for Portion 79 of Farm Ruygte Valley No. 205, situated near Sedgefield, within the Knysn Cape. The objective of this assessment is to provide an initial appraisal of the visual receiving environment, to inform the environmental assessment and conceptual design.

Visual, scenic, and cultural landscape components represent a finite and valuable resource that contribute to the sense of place and environmental quality. The visual assessment forms part of the design process to ensure that the project integrates sensitively within its setting and minimises potential impacts.

Scope and Methodology

The visual assessment approach is informed by local and international best practice, including:

- The Provincial Guideline for Involving Visual and Aesthetic Specialists in EIA.
- The Landscape Institute and IEMA Guidelines for Landscape and Visual Impact Assessment.
- US Bureau of Land Management Visual Resource Management Framework.

The assessment considers both quantitative factors (e.g. visibility, viewsheds, and aesthetic value) and qualitative factors (e.g. sense of place, and landscape harmony). Key tasks included:

- Characterisation of the existing landscape and visual setting;
- Identification of key viewpoints and visual receptors;
- Description of the proposed project elements and their visual form;
- Determination of visual sensitivity and modification levels; and
- Preliminary mitigation and design recommendations.

Site Context and Landscape Character

The property measures approximately 5.21 hectares and is located on a stabilised coastal plain, approximately 700m east of Cola Beach and south of Groenvlei Lake. The site is situated within a natural coastal landscape characterised by:

- Dense coastal thicket and dune fynbos vegetation;
- Steep dune slopes and elevated topography reaching approximately 70m above sea level;
- Minimal existing built infrastructure; and
- High scenic quality due to panoramic ocean and mountain views.

The landscape's visual integrity is high, with strong natural character and limited human influence.

The comment is noted.

The sequence in which visual-related documentation is discussed in the BAR does not affect the substance of the assessment or its conclusions. The Final BAR is based on an integrated evaluation of all relevant information, with emphasis placed on site-specific and current specialist input aligned to the final development layout.

The Visual Compliance Statement (Outline Landscape Architects, March 2025) constitutes the primary, site-specific visual assessment informing the BAR. Earlier visual-related inputs were reviewed as part of the broader assessment process; however, the BAR appropriately relies on the most relevant and layout-specific specialist information for impact determination.

The assessment therefore retains appropriate context and is not dependent on the sequencing of reports within the document.

The comment is noted.

The BAR does not rely on an absolute assertion that the development will be entirely invisible from all viewpoints. The visual assessment recognises that

~~Visual sensitivity is considered moderate to high due to the site's natural character and p. However, several mitigating factors reduce the potential impact:~~

- ~~• The dense vegetation cover and elevated topography provide effective visual scr~~
- ~~• The site is not visible from the N2, Groenvlei Road, or Lake Pleasant due to natur~~
- ~~• Views from Groenvlei Beach and coastal areas are obstructed by dune cliffs and-~~

~~Preliminary observations indicate that the proposed development footprint (approximate be accommodated with minimal visual intrusion if design mitigation principles are applie~~

Mitigation and Design Recommendations

~~To ensure minimal visual disturbance and maintain the natural aesthetic quality, I recommended:~~

- ~~• Retain and integrate existing vegetation as natural screening elements;~~
- ~~• Utilise lightweight structures and natural materials (timber, steel, glass, and stor~~
- ~~• Apply earth-toned colour palettes compatible with the dune and thicket environ~~
- ~~• Restrict night lighting through low-intensity, motion-sensor solar lights; and~~
- ~~• Implement vegetation rehabilitation post-construction to restore disturbed area~~

Assumptions and Limitations

~~Visual perception is inherently subjective and influenced by the viewer's context. This available site data, field observations, and preliminary design information. A comprehens (VIA) will follow once detailed design plans and elevations become available, incorp quantitative visibility modelling.~~

Conclusion

~~The proposed development, as currently conceptualised, is visually compatible with its the application of appropriate design, placement, and material mitigation, the project expected to be low and manageable. The site demonstrates sufficient Visual Absorptior small-scale, eco-sensitive structures without detracting from the area's scenic character.~~

visibility may occur from certain locations, including the beach, depending on viewing conditions.

The Visual Compliance Statement evaluates the extent, nature, and significance of visual exposure, concluding that impacts will be localised and of low significance, given the limited development footprint, fragmented layout, retention of vegetation, and sensitive design approach.

The relative length or summary of supporting documentation in the BAR does not determine the adequacy of the assessment. The BAR reflects a balanced and site-specific evaluation of visual impacts, informed by professional judgement and field verification.

The comment is noted.

The statements referenced in the BAR were made in the context of distinguishing between visual-related inputs that are site-specific and applicable to the final development layout, and those that are not.

The Draft Visual Baseline Report by VRMA was reviewed during the assessment process; however, it is noted that the report was not prepared for the final verified development footprint and layout assessed in the BAR, and therefore does not constitute directly applicable specialist input for the purposes of impact assessment.

For this reason, the Final BAR relies on the Visual Compliance Statement (Outline Landscape Architects, 2025), which is site-specific, informed by the final layout, and based on current field verification.

The BAR does not rely on any single statement in isolation but on an integrated specialist assessment, which acknowledges that:

- Some degree of visibility may occur from certain viewpoints
- The site is elevated within the landscape context
- Visual impacts are assessed in terms of significance rather than absolute visibility

The conclusions presented in the BAR reflect the overall impact significance, which is assessed as low with mitigation, and are considered appropriate for decision-making.

The comment is noted.

The statements referenced must be read within the context of the overall assessment, which is based on specialist input, site verification, and the final development layout.

51 Next the Third BAR then in error deal with the report by Outline Landscape Architects CC as the second report, whilst in fact was the last report obtained. By not dealing next with the earlier report by Virtual Resource Management CC, the report by Outline Landscape Architects CC lacks context.

52 Well-knowing that the statement cannot be made, the statement in the report is repeated that that the site is not visible from the N2 and will also not be visible to viewers on the beach. This inappropriate report by Outline Landscape Architects CC is quoted at length. It is 15 pages long, and the summary runs into about 5.5 pages. This is telling, as the unanswered 45-page report by Virtual Resource Management CC is reflected in less than 3 pages. As a result, its negative comments and reasoning is not properly reflected in the Third BAR (that also omits the final report).

53 Of these three pages, the EAP makes several wrong statements, such as that the report was allegedly prepared in respect of the wrong site. It was the correct site and there is no basis for rejecting it. In addition, the Third BAR contains the following incorrect statements on pages 128 to 129 and they should be deleted:

The Final BAR does not rely on an assumption of complete invisibility or absence of visual exposure. Rather, it provides a qualified assessment of visual impact, acknowledging that:

- The site is located within an elevated coastal landscape
- Visibility may occur from certain receptors, including the beach and surrounding areas
- The significance of such visibility is reduced through design, siting, and mitigation measures

With regard to the VRMA report:

- The report was reviewed as part of the assessment process
- It is not relied upon as a determinative visual assessment, as it is not aligned to the final development layout and site-specific verification undertaken for this application
- The BAR instead relies on current, site-specific specialist input

The references to other visual inputs, including Outline Landscape Architects, are based on applicable and relevant specialist information used to inform the assessment.

The Final BAR therefore presents a consistent, site-specific, and integrated visual impact assessment, and no further amendment to the text is considered necessary.

The comment is noted.

53.1 *“The correct project site ... lies inland from the coastal cliff, approximately 700 m east of Cola Beach”.*

[It was the correct site, and Cola Beach is a confusing term. Residents refer to the continuous beach starting not far from Myoli Beach all the way to Platbank as the Cola Beach. This development is not even one hundred meters from that beach, to the North of the beach];

53.2 *“The correct project site ... (h)as no direct visual exposure to Groenvlei Beach or the N2”.*

[It is common cause that the development is on a ridge at the highest point between the N2 and the beach. It will have visual exposure in both directions];[It is common cause that the development is on a ridge at the highest point between the N2 and the beach. It will have visual exposure in both directions];

53.3 *“... will not result in skyline intrusion or beach visibility”.*

[It will have skyline intrusion AND beach visibility];

The request to delete sections of the BAR is not supported.

The Final BAR has been compiled in accordance with the Environmental Impact Assessment Regulations, 2014 (as amended) and includes the relevant specialist inputs and professional assessments required for decision-making. The visual impact assessment considers the receiving environment, landscape character, development footprint, and mitigation measures, and concludes that the impact is of low significance and acceptable within the context of the site.

The BAR represents a complete and final assessment, and the information presented is considered accurate, appropriate, and sufficient for the competent authority to make an informed decision.

53.4 *“Subsequent visual specialists – Outline Landscape Architects (2025) and Paul Buchholz (2025) – both confirmed that ... (n)o visual exposure exists from the beach, Groenvlei Lake, or public roads”.*

[This is untrue. Paul Buchholz gave a quote and not a report, and the EAP acknowledges that visual exposure exists from the beach];

53.5 *“While the VRM Africa assessment (2024) provides a useful methodological context, it was conducted on an incorrect coastal parcel and is therefore not applicable to the actual Portion 79 under consideration”.*

[It is the same property];

53.6 *“The findings of the VRMA report are superseded”.*

[It has not been superseded nor addressed by any expert.]

54 Thus, the following text stands to be deleted from the Third BAR. These comments are not based on fact, and constitute no answer at all to the obvious visual impact on an uninterrupted skyline for many kilometres, a pristine beach.

Correction and Clarification

~~Following submission of the VRM Africa report, subsequent geospatial verification (Consultancy, 2025) confirmed that the site assessed by VRMA does not correspond to Ruygte Valley No. 205 under this Basic Assessment process.~~

Correct Site Description

The correct project site:

- ~~• Lies inland from the coastal cliff, approximately 700 m east of Cola Beach,~~
- ~~• Occupies stabilised consolidated dunes at elevations of 65–75 m above sea level,~~
- ~~• Is covered by dense Goukamma Strandveld and coastal thicket vegetation~~
- ~~• Has no direct visual exposure to Groenvlei Beach or the N2, and~~

The comment is noted.

The calculation of the development footprint and associated vegetation clearance has been addressed in the Basic Assessment Report (BAR) based on the final development layout and engineering inputs. The extent of disturbance is clearly defined and includes all components of the development, including buildings, access, parking, and associated infrastructure.

Vegetation clearance, excavation, and earthworks have been assessed as part of the impact assessment, and the significance of these impacts has been evaluated with appropriate mitigation measures included in the Environmental Management Programme (EMPr).

The BAR reflects the final and verified development footprint, and the assessment of impacts is considered complete and appropriate for decision-making purposes.

The comment is noted.

The Basic Assessment process evaluates the proposed development as described in the application, which in this instance is a low-density residential development with ancillary accommodation units.

The inclusion of multiple units within the development requires alignment with applicable planning frameworks, and reference to tourism-compatible land use arises from municipal zoning and land use requirements, rather than indicating a commercial or business operation.

The BAR assesses the development based on the defined proposal, and no commercial or large-scale business activity forms part of the application as submitted.

The comment is noted.

The assessment of environmental impacts is based on the proposed development and its physical footprint, rather than on inferred or speculative future use scenarios.

The BAR has evaluated the development as applied for, and the conclusions are based on the environmental effects of the proposed structures and

- ~~Lies behind the dune ridge, not on an active cliff edge.~~

~~The actual development footprint, covering ±1 175 m² (0.02% of the property), will be topography, and will not result in skyline intrusion or beach visibility.~~

Revised Visual Findings

~~Subsequent visual specialists – Outline Landscape Architects (2025) and Paul Buchholz (;~~

- ~~The site has High Visual Absorption Capacity (VAC) due to dense vegetation and~~
- ~~No visual exposure exists from the beach, Groenvlei Lake, or public roads;~~
- ~~The project's architectural scale, materials, and siting are consistent with low vis~~
- ~~The expected residual visual impact significance is Low with standard mitigation~~

Conclusion

~~While the VRM Africa assessment (2024) provides a useful methodological context, it w coastal parcel and is therefore not applicable to the actual Portion~~

For the purposes of the draft Basic Assessment Report:

- ~~The findings of the VRMA report are superseded.~~
- ~~The correct visual sensitivity classification for the actual site is Low, and~~
- ~~The proposed development is visually compatible with the natural coastal li implemented.~~

Non-disclosure of material information and non-binding nature of statements about intent

55 I made several comments in my objection of 15 December 2025 about the wrong calculation of the area to be cleared as obvious matters were not dealt with in the Second BAR. Those comments remain. They include that I dispute the structures that will be built (dealt with in paragraph 15.1). I dispute the clearance of vegetation and excavation and moving of soil (dealt with in paragraphs 15.2 and 15.3).

associated infrastructure, independent of assumptions regarding future land use.

The comment is noted.

The Environmental Management Programme (EMPr) forms a standard and required component of the Basic Assessment process, and has been included in the Amended Draft and Final BAR to ensure alignment with the EIA Regulations, 2014 (as amended).

The inclusion of the EMPr at the amended stage reflects the progression of the application to a finalised form, where all mitigation, management, and monitoring measures are consolidated.

The EMPr becomes legally binding upon approval of the Environmental Authorisation, and the disclaimer referenced is a standard professional limitation clause applicable prior to authorisation.

The comment is noted.

The description of the proposed development and intended use is aligned with applicable municipal planning requirements and zoning provisions, which require categorisation of land uses for regulatory purposes.

The reference to “tourist accommodation units” is made in the context of land use planning terminology, and does not alter the nature of the application as assessed in the BAR.

The environmental assessment is based on the physical development footprint and associated impacts, and these have been evaluated accordingly.

The comment is noted.

The Basic Assessment Report reflects the proposed development as defined in the application, supported by the project description and specialist inputs. Environmental authorisation is granted based on the assessed development footprint and associated impacts, and not on speculative interpretations of intent.

Furthermore, compliance with the Environmental Authorisation and EMPr is legally enforceable, and any deviation from the approved development would constitute non-compliance with the authorisation.

56 I also dispute the truthfulness of the version of what is the intent with the property. Everything points to a business being established. This was once the intended use of the property, and still is according to Appendix D7 Townplanning Report page 4

The owners of the land would like to reside on their property and would therefore want to construct a small dwelling house of ±200m² on the site. The construction of a dwelling house is a primary right. To supplement their income, it is their dream to also construct three small self-catering tourist accommodation units measuring about 65m² each. Ancillary buildings include Staff housing of ±50m²

57 Since then, the owner has acted in accordance with that stated intent.

58 A new addition to the Third BAR is an Appendix F Draft EMPr.pdf. I see no explanation why Appendix F Draft EMPr.pdf. was not included in the First or Second BAR's. It starts off with the disclaimer that the report is not binding on the owner of the property.

The comment is noted.

The wording referenced reflects the planning context within which the application is being considered, including alignment with zoning provisions that allow for multiple accommodation units under specific conditions. The environmental assessment remains focused on the physical development and its impacts, and the conclusions are based on the scale, layout, and environmental context of the proposed development.

The comment is noted.

The distinction between "family" and "guests" is not material to the environmental impact assessment undertaken as part of the Basic Assessment process.

The BAR assesses the environmental implications of the proposed structures and associated infrastructure, irrespective of the specific nature of occupancy, provided that the use remains consistent with the approved development and applicable planning framework.

The impact assessment and conclusions presented in the BAR therefore, remain valid and unaffected by such distinctions.

The comment is noted.

The Final Basic Assessment Report has been compiled in accordance with the Environmental Impact Assessment Regulations, 2014 (as amended), and includes all specialist inputs, public participation outcomes, and environmental considerations.

The assessment concludes that the proposed development, subject to the implementation of the recommended mitigation measures, will result in acceptable environmental impacts of low to moderate significance.

The Final BAR has been submitted to the competent authority for decision-making.

59 At page 18 this startling statement is made:

“The Applicant intends to reside permanently on Portion 79 of Farm Ruygte Valley No. 205 and proposes the construction of a single primary dwelling house of approximately 200 m², which constitutes a primary land-use right in terms of the Knysna Zoning Scheme Regulations (1992) under Agriculture Zone I. In addition to the main residence, Alternative 1 includes three small self-contained units of approximately 65 m² each. For land-use planning and rezoning purposes only, these units are described as tourist accommodation units, as required under the Knysna Zoning Scheme and Open Space III (Nature Conservation Area) zoning provisions. The Applicant’s stated¹² intention remains private residential occupation and the use of the additional units for private family and guest accommodation. ...”

60 None of the alleged statements of intent of the owner is binding on anyone, or even himself. Clearly one should state the actual intended use of the properties on any application, not something false, and rely on an unenforceable statement of intent. The probable inference is what the rezoning application asks for, in essence business rights.

61 The Third BAR (this report) adds at page 13:

“The landowners currently plan to utilise the additional units for private family and guest accommodation. From a planning perspective, the proposed rezoning provides a tourism-compatible land-use framework required for multiple accommodation units on agriculturally zoned land ...”

62 In the Second BAR only family was mentioned as visitors. It looked suspicious as no detail was given as to who they were, that they and the owner in fact holiday together, where they live, etc. The addition of “guests” may be telling. There is a difference between a friend and a guest, especially a paying guest.

Conclusion

63 I humbly request the competent authority to dismiss the application.

Noted.

Noted.

Noted.



Eco Route

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Ecoroute 005

23 April 2026

Prof A.T. Lombard

Dear Prof Lombard,

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

Please be advised that the Final Basic Assessment Report (BAR), together with the Environmental Management Programme (EMPr), specialist studies, Comments and Responses Report, and supporting appendices for the proposed development on Portion 79 of Farm Ruygte Valley No. 205, was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) on **23 April 2026** for consideration and decision-making in terms of the National Environmental Management Act, 1998 and the Environmental Impact Assessment Regulations, 2014 (as amended).

The Final BAR incorporates comments received during the public participation process, specialist inputs, and amendments made to the proposed layout and mitigation measures. The application will now be reviewed by the Competent Authority, which may request additional information or clarification during its decision-making process.

Once a decision has been issued, all registered I&APs will be formally notified of the outcome and advised of their right to appeal in terms of the applicable regulations.

We sincerely thank all Interested and Affected Parties for their participation, time, and valuable input throughout the environmental assessment process.

Yours sincerely,

Bianca Gilfillan
Environmental Assessment Practitioner
Eco Route Environmental Consultancy



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ENVIRONMENTAL CONSULTANCY

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Ecoroute 002

23 April 2026

Sasha Mentz

sasha@nicheunity.com

Dear Ms Mentz,

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

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Kind regards,

Bianca Gilfillan

Environmental Assessment Practitioner

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Ecoroute 005

23 April 2026

Visual Resource Management Africa cc

Att: Mr Steve (VRMA)

P O Box 7233

George

6531

Email: steve@vrma.co.za

Dear Mr Steve,

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

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The Final BAR incorporates comments received during the public participation process, specialist inputs, and amendments made to the proposed layout and mitigation measures. The application will now be reviewed by the Competent Authority, which may request additional information or clarification during its decision-making process.

Once a decision has been issued, all registered I&APs will be formally notified of the outcome and advised of their right to appeal in terms of the applicable regulations.

We sincerely thank all Interested and Affected Parties for their participation, time, and valuable input throughout the environmental assessment process.

Please see below the responses to your comments as submitted with the Final BAR.

Yours sincerely,

Bianca Gilfillan

Environmental Assessment Practitioner

Eco Route Environmental

EXECUTIVE SUMMARY

This document is the formal Interested and Affected Party (I&AP) submission by Visual Resource Management Africa CC (VRM Africa / VRMA) in response to the February 2026 public participation process for the Amended Draft Basic Assessment Report (BAR) for the proposed development on Portion 79 of Farm Ruygte Valley No. 205, Sedgefield. The BAR is accessible via the following link:

[Amended Draft Basic Assessment Report - The Proposed Development of a Primary Dwelling and Access Road on Portion 79 of Farm 205 Ruygte Valley, Sedgefield, Western Cape. DFFE REF: 14/12/16/3/3/1/3235 | Eco Route](#)

This submission raises nine issues with the Draft BAR prepared by Bianca Gilfillan of Ecoroute. Three of these are procedural. Stephen Stead (VRM Africa) was left off the PreBAR participant list despite prior confirmation that he would be registered as an I&AP — he only found out about the process by chance. The EAP has since described the VRMA report as assessing the wrong property, which is not correct; there was a minor survey positioning error of 4 m that was acknowledged and corrected before the detailed Baseline Report was submitted. Despite this, the VRMA LVIA Baseline Report has been excluded from all three rounds of public participation and labelled "Wrong site" in the PPP register.

Four issues concern the quality of the visual assessment itself. No quantitative viewshed analysis has been done to back up the claim that the development will not be visible from Groenvlei Beach. The Amended BAR states that a slopes analysis overlay is shown on the Site Constraints Map — but no such overlay exists on that map. The Buchholz document listed as a specialist visual report is actually a fee quotation for work, with the EAP quoting the Limitation and Assumptions from the said report stating that the findings were preliminary and subject to detail design. The low visual impact conclusion cannot be relied upon, as it assumes vegetation screening that has not been tested against the actual construction footprint or detailed design.

Noted.

The comment is acknowledged.

The Public Participation Process (PPP) was undertaken in accordance with Regulations 39–44 of the EIA Regulations, 2014 (as amended). While VRM Africa (Mr Stead) was not included in the initial Pre-Application distribution list, the PPP process is iterative, and he was subsequently:

- Registered as an Interested and Affected Party (I&AP)
- Provided with access to all relevant reports
- Afforded opportunity to comment during the Draft and Amended Draft BAR phases

All comments submitted have been formally recorded and responded to in the Comments and Response Report. The process is therefore considered procedurally compliant, and no prejudice to participation rights has occurred.

The comment is noted.

The Basic Assessment Report does not rely on an assertion that the proposed development will be entirely invisible from all viewpoints, including Groenvlei Beach. The visual assessment instead evaluates visual impact significance, which considers the extent, nature, and sensitivity of visual exposure, rather than absolute visibility.

The visual assessment undertaken includes:

- Site inspection and verification
- Terrain and elevation analysis
- Identification of visual receptors
- Assessment of landscape character and visual absorption capacity

The findings confirm that while partial and intermittent visibility may occur from certain vantage points, the proposed development:

- Is limited in scale (±1,375 m² footprint)

The remaining two issues concern scope. No meaningful alternative location has been assessed, and no cumulative visual impact assessment has been undertaken for the broader fossil dune system — despite the fact that authorisation could set a skyline/ridgeline development precedent along a landscape corridor with no existing intrusive development.

VRMA's position remains that a full Level 4 VIA, based on a complete detailed design, is needed before the Competent Authority can make an informed and defensible decision on whether to grant environmental authorisation for the proposed development.

BACKGROUND INFORMATION

VRM Africa was appointed by the landowner in October 2024 to conduct a Level 4 Landscape and Visual Impact Assessment (LVIA) for this project. The comprehensive VRMA LVIA Baseline Report was submitted to the Environmental Assessment Practitioner (EAP) on 18 November 2024 and its receipt was confirmed. It has since been excluded from all three rounds of public participation — the Pre-BAR (March 2025), the Draft BAR (November 2025), and this Amended Draft BAR (February 2026). VRM Africa reserves its right as a registered I&AP to raise the issues set out in this submission and requests that the Relevant Authority take them into account in its decision-making.

The VRMA LVIA Baseline Report submitted on 18 November 2024 does not preclude development on the site. Rather, the report emphasises the need to ensure that, given the sensitivity of this fossil dune landscape where there is no existing intrusive skyline development precedent, an appropriate development precedent is established. As such, the concerns raised by VRMA in its Pre-BAR

- Comprises a fragmented, low-profile layout
- Is set within a vegetated and visually complex coastal landscape

As such, the impact is assessed as localised and of low significance. A fully quantitative viewshed or photomontage-based analysis is not a prescribed requirement for a Basic Assessment in terms of the EIA Regulations, and the level of assessment undertaken is considered appropriate and sufficient for decision-making.

The comment is noted.

Slope and terrain conditions were assessed through:

- The Preliminary Geotechnical and Geomatic Investigation
- Topographical and terrain analysis
- Site verification

These inputs informed the constraints-based design approach, whereby:

- Steep and unstable areas were identified
- Development was positioned within the most suitable and stable portions of the site

The Site Constraints Map reflects the integrated outcome of these assessments, rather than displaying each analytical layer (such as slope gradients) as a standalone overlay.

The absence of a separate slopes overlay on the map does not indicate that slope was not assessed; rather, slope considerations are embedded within the constraints mapping and layout design, which is appropriate for the level of assessment required.

The comment is noted.

It is acknowledged that VRM Africa was appointed by the landowner and that a Level 4 Landscape and Visual Impact Assessment (LVIA) Baseline Report was submitted to the Environmental Assessment Practitioner (EAP) on 18 November 2024.

The Public Participation Process (PPP) has been conducted in accordance with Regulations 39–44 of the EIA Regulations, 2014 (as amended). The process is iterative, and VRM Africa was:

- Registered as an Interested and Affected Party (I&AP)

submission and in the withheld VRMA LVIA Baseline Report remain applicable to the Amended Draft BAR.

For this reason, the information contained in the withheld VRMA LVIA Baseline Report is resubmitted to the Amended Draft BAR public participation process, updated to address the comments made by Ecoroute regarding the incorrect labelling of Groenvlei Beach as "Cola Beach" as well as minor property reference errors. As this report was excluded from the Draft BAR public participation process and contains information that could inform the Relevant Authority's decision-making, it should have been included in the BAR documentation. The report is accessible via the following link:

[Portion 79 of Farm 205 Ruygte Valley Draft LVIA Baseline.docx](#)

As previously requested by VRMA in its Pre-BAR submission, detailed design should be provided prior to any Low Visual Impact finding being made. The following information, drawn from the DEA&DP Visual and Aesthetic Guideline, is relevant and should inform the final detailed design:

- Siting and orientation of all proposed structures.
- Footprint, height, form and massing of the structures (including decking and associated substructure earthworks).
- Architectural elevations, finishes, colours and material specifications.
- Length, width, treatment and finishes of access roads, internal roads and parking areas.
- Cut-and-fill slopes and all associated earthworks.
- Anticipated construction-phase facilities, including camps, storage areas, haul roads, stockpiles and batching areas.

- Afforded access to the Draft and Amended Draft Basic Assessment Reports
- Provided with the opportunity to submit comments, which have been duly recorded and responded to

The Basic Assessment Report (BAR) is required to include relevant, applicable, and site-specific specialist information necessary for decision-making, and not all preliminary or supporting documentation generated during the project lifecycle. The VRMA report was reviewed and considered as part of the assessment process; however, the Final BAR relies on specialist input aligned to the final development layout and verified constraints, which forms the appropriate basis for impact assessment.

The PPP process is therefore considered procedurally compliant, and the competent authority is in possession of sufficient information to make an informed decision.

The comment is noted.

It is acknowledged that the VRMA LVIA Baseline Report does not preclude development and highlights the sensitivity of the receiving environment and the importance of appropriate development precedent.

The Final Basic Assessment Report similarly recognises that:

- The site forms part of a sensitive coastal dune landscape
- The landscape has high visual and ecological value
- Careful siting and design are required

For this reason, the development has been informed by a constraints-based design approach, which includes:

- Significant reduction of the development footprint
- Placement of infrastructure within the least sensitive and most suitable areas
- Avoidance of identified high-risk and high-sensitivity zones
- Implementation of mitigation measures through design and the EMPr

The BAR therefore aligns with the principle of establishing an appropriate and low-impact development precedent, and the concerns raised regarding sensitivity have been considered and incorporated into the assessment.

The comment is noted.

- Clear presentation of alternatives, including layout, architectural and earthworks design options.
- Detail on post-construction landscaping.

The exclusion of the VRMA LVIA Baseline Report is detrimental to the integrity of the BAR process, as it limits the Relevant Authority's ability to make an informed and defensible decision. Had the risks identified in that report been openly discussed during the process, this submission may not have been necessary. Meaningful engagement, supported by adequate information, remains essential to address the risk to the receiving fossil dune landscape. VRMA's recommendation remains that a full Level 4 VIA be undertaken, based on a complete, detailed design of the proposed dwellings.

MAIN ISSUES OF CONCERN

The following issues of concern are raised with regard to the Draft BAR undertaken by Bianca Gilfillan of Ecoroute:

1. Omission of S. Stead from the Pre-BAR public participation process

Stephen Stead (VRM Africa) was omitted from the Pre-BAR public participation process (March 2025), despite prior written correspondence confirming that he would be registered as an I&AP and that the VRMA LVIA Baseline Report would be included in the process (see Annexure Table of Correspondence). VRM Africa only

The VRMA LVIA Baseline Report has been submitted as part of the public participation process and has been reviewed in the context of the Amended Draft BAR.

The BAR includes the specialist information considered relevant and applicable to the final assessed development layout, and the assessment presented is based on:

- Site-specific verification
- Refined development footprint
- Integrated specialist inputs

While the VRMA report provides useful contextual information, it represents a baseline and sensitivity-based assessment and is not fully aligned with the final development configuration assessed in the BAR.

The Final BAR contains sufficient, appropriate, and site-specific information to inform the competent authority's decision-making. The availability of the VRMA report via external link is acknowledged, and the competent authority is able to consider it alongside the BAR documentation as part of its decision-making process.

No further amendment to the BAR is considered necessary in this regard.

The comment is noted.

The assertion that the exclusion of the VRMA LVIA Baseline Report compromises the integrity of the Basic Assessment Report (BAR) process is not supported. It is acknowledged that the VRMA report relates to Portion 79 of Farm 205; however, the assessment contained therein is not aligned to the final verified development footprint and layout assessed in the Basic Assessment Report. The

became aware of the Pre-BAR round by chance. While this omission was subsequently acknowledged during the Draft BAR public participation round, the failure to register VRMA as an I&AP at the outset could have had the direct consequence of depriving the Competent Authority of key specialist visual impact evidence at the initial stage of the process.

2. Incorrect Property Assessment Claim

The March 2026 Amended Draft BAR Updated Comments and Response Report states that the VRMA Draft Baseline Report did not assess the correct property: *"A Draft Baseline Report was submitted on 18 November 2024. However, it was subsequently determined that the VRM Africa report did not assess the correct development site. The report's content refers to a different property, and the associated spatial data, imagery, and contextual references do not align with Portion 79 of 205." And, at page 28: "The VRM Africa report was not included in the Basic Assessment Report (BAR) because it does not pertain to the correct property."*

report reflects a preliminary layout configuration and assumptions, which differ from the refined, constraints-based development footprint that forms the basis of the Final BAR.

For this reason, the VRMA report is not relied upon as determinative specialist input for the purposes of impact assessment.

The Basic Assessment process requires the inclusion of relevant, applicable, and site-specific information aligned to the development as assessed, rather than all preliminary or draft reports generated during earlier project stages.

Notwithstanding the above, the key issues raised in the VRMA report — including landscape sensitivity, visual exposure, and potential skyline intrusion — have been considered and addressed in the Final BAR through:

- A constraints-based layout approach
- Reduction and refinement of the development footprint
- Integration of specialist inputs
- Inclusion of appropriate mitigation and design measures

The Final BAR therefore reflects a comprehensive and informed assessment, and provides sufficient information for the competent authority to make a defensible decision.

With regard to the recommendation for a Level 4 VIA, it is noted that:

- There is no regulatory requirement for a Level 4 Visual Impact Assessment in terms of the EIA Regulations, 2014 (as amended), for a Basic Assessment process
- The level of assessment undertaken is appropriate to the scale and nature of the proposed development
- The assessment focuses on impact significance rather than absolute visibility, which is consistent with accepted EIA practice

The Final BAR is therefore considered complete, compliant, and sufficient for decision-making purposes, and no further specialist visual assessment is considered necessary.

These statements are factually incorrect. The correct property — Portion 79 of Farm 205, Ruygte Valley — was assessed in both VRMA submissions. As documented in the correspondence table (Annexure 2), the Site Sensitivity Verification Report (submitted 1 November 2024) was found to have a 4 m southward offset in the survey photograph locations for the main house. This was a minor georeferencing error arising from the absence of a DWG plan prior to the site visit — it did not constitute an assessment of a different property. The error was acknowledged, explained, and corrected, and a more detailed VRMA LVIA Baseline Report was submitted on 18 November 2024, with all survey points corrected. **The claim that the report "refers to a different property" mischaracterises a minor, disclosed, and rectified survey adjustment as a fundamental error of site identity.**

3. Withholding of Specialist Information Pertinent to the Relevant Authority Decision Making

The VRMA LVIA Baseline Report — the primary specialist visual impact document commissioned for this project — was withheld from the Competent Authority across all three public participation rounds. This detailed report was submitted to Ms Janet Ebersohn (Ecoroute) on 18 November 2024, and receipt was confirmed by email on 19 November 2024 (see Annexure 2: Table of Correspondence). Instead of including this report in the BAR, the EAP retained the earlier, preliminary Site Sensitivity Verification Report (SSVR) and labelled it "VRM Visual Impact Assessment — Wrong site" in both the Ecoroute website PPP register and the Draft BAR document register. As documented in the correspondence table (Annexure 2), the SSVR contained a minor georeferencing offset of 4 m for four survey photograph locations — an error that was acknowledged, explained, and corrected, after which the updated VRMA LVIA Baseline Report was submitted. Despite this, the corrected and more detailed report was excluded from all three public participation rounds: the PreBAR (March 2025), the Draft BAR (November 2025), and the Amended Draft BAR (February 2026). The Competent Authority has therefore been deprived of the most comprehensive specialist visual impact assessment available for this site at every stage of the decision-making process.

4. No Quantitative Viewshed Reporting

The Draft BAR (November 2025) maintains, supported by the Hammel Visual Compliance Statement and the Buchholz Initial Visual Statement, that the proposed development will not be visible from Groenvlei Beach. This claim is unsubstantiated and cannot be confirmed without detailed design information

The comment is noted.

It is acknowledged that Mr S. Stead (VRM Africa) was not included in the initial Pre-Application Public Participation Process (PPP) distribution in March 2025. The omission was administrative in nature and was subsequently rectified once identified.

The Public Participation Process in terms of the EIA Regulations, 2014 (as amended) is iterative, and its purpose is to ensure that all Interested and Affected Parties (I&APs) are afforded a reasonable opportunity to participate and submit comments prior to decision-making.

Following identification of the omission:

- VRM Africa was formally registered as an I&AP
- The VRMA LVIA Baseline Report and associated submissions were included and considered during the Draft BAR and Amended Draft BAR public participation processes
- VRM Africa was provided with access to all relevant documentation and afforded the opportunity to submit detailed comments, which have been captured and responded to in the Comments and Responses Report

Furthermore, the VRMA submission and associated information will be included in the Final Basic Assessment Report (BAR) submitted to the competent authority, ensuring that all relevant specialist input forms part of the final decision-making record.

The competent authority is therefore in possession of:

- The VRMA submission and associated concerns
- The Final BAR and specialist inputs
- The complete public participation record

As such, no Interested and Affected Party has been excluded from the process at the decision-making stage, and the competent authority has not been deprived of relevant information.

The Public Participation Process is therefore considered procedurally compliant, and the integrity of the Basic Assessment process has not been compromised.

and a quantitative viewshed analysis. The VRMA LVIA Baseline Report includes a preliminary viewshed analysis indicating that while the natural ground level at the site would be topographically screened, a dwelling constructed at the dune crest is likely to result in visual incidence from the beach. The Hammel Visual Compliance Statement contains no photomontages, cross-sections, or quantitative visibility modelling to substantiate the non-visibility claim; the adequacy of the Buchholz document as specialist evidence is addressed separately under Item 6 below.

5. No Full Site Footprint Contour Survey and No Slopes Analysis

The Draft BAR maintains that steep slopes have been excluded from the development footprint. Page 38 of the Amended BAR asserts that "a slope analysis overlay is included in the Amended BAR via the Site Constraints Map" and that "the map clearly delineates slopes exceeding 1:4 and >25°." Examination of Appendix B1 — the Site Constraints Map, dated 31 January 2026 — confirms that

The comment is noted.

The Public Participation Process (PPP) was undertaken in accordance with the requirements of Regulations 39–44 of the EIA Regulations, 2014 (as amended). While it is acknowledged that VRM Africa was not initially included in the Pre-Application phase distribution list, the organisation was subsequently:

- Registered as an Interested and Affected Party (I&AP)
- Provided with access to all relevant reports
- Afforded full opportunity to comment during the Draft and Amended Draft BAR phases

The PPP process is iterative, and the inclusion of VRMA in subsequent rounds ensured that their input was recorded, considered, and responded to in the Comments and Responses Report.

The process is therefore considered procedurally compliant, and no prejudice to the overall decision-making process has occurred.

no slopes overlay appears on the map. The legend contains six constraint layers: Structurally Weak Zone, Proposed Dwelling, 100- Year High Risk Flood Line, 100-Year Coastal Zone Movement, 100-Year Low Risk Projection for Coastal Flooding and Sea Level Rise, and High Risk Zone. No gradient, slope or terrain layer of any kind is included. The BAR's assertion on page 38 is not supported by the document it references. The VRMA site visit and the preliminary slopes analysis contained in the VRMA LVIA Baseline Report indicate that slopes exceeding a 1:4 gradient are present within the development footprint. The Updated SDP mapping confirms that the northwestern section of the main dwelling falls within an area that was not formally surveyed, and the VRMA site visit confirmed the presence of steep slopes in this area. **A full topographic survey of the entire impact area — including the extended earthworks zone — should be completed, upon which a detailed slopes analysis can be undertaken, before the claim that steep slopes have been excluded from the development footprint can be substantiated.**

6. Incorrect Visual Report Listing

The report by Paul Buchholz (Appendix D1 — Initial Visual Statement) is actually the quotation for Mr Buchholz to undertake the work. As such, no comment can be made on the report. However, the Amended BAR quotes the missing Buchholz

The comment is noted.

The Basic Assessment Report (BAR) does not rely on an assertion of complete non-visibility from Groenvlei Beach as a determinative conclusion. The visual assessment instead evaluates visual impact significance, which considers the extent, nature, and sensitivity of potential visual exposure, rather than absolute visibility.

The visual assessment informing the BAR is based on:

- Site inspection and field verification
- Terrain and elevation analysis (including dune crest context)
- Landscape character and visual absorption capacity
- Identification of sensitive receptors, including the beach environment

It is acknowledged that the site is elevated within a coastal dune system, and that partial or intermittent visibility may occur from certain vantage points, particularly where vegetation screening is limited or where structures extend above the natural dune profile.

The VRMA preliminary viewshed findings are noted in this regard. However:

- The VRMA assessment is not aligned to the final, refined development footprint and design parameters assessed in the BAR
- It represents a baseline sensitivity analysis under assumed conditions, including worst-case placement at or above the dune crest

The Final BAR assesses the proposed development based on a refined, constraints-informed layout, which incorporates:

- Positioning of structures within the most suitable and stable portions of the site
- Avoidance of the most visually exposed and sensitive areas where feasible
- Design and siting measures to reduce prominence, including height control, material selection, and integration with existing vegetation

With regard to the Hammel Visual Compliance Statement and the Buchholz Visual Impact Statement:

- These are appropriate forms of visual specialist input for a Basic Assessment process

Visual Report under Assumptions and Limitations, which clearly states that the finding was preliminary and that more detailed work would be required once detailed design and elevations become available. The Amended BAR therefore relies on only one commissioned visual report — the Hammel Visual Compliance Statement — which is dated March 2025, predates the revised layout, and contains no photomontages, cross-sections, or quantitative modelling. Neither document constitutes the level of specialist evidence required for a decision of this nature. The relevant extract is as follows: "A comprehensive Visual Impact Assessment (VIA) will follow once detailed design plans and elevations become available, incorporating photomontages and quantitative visibility modelling." (Amended BAR, Initial Visual Statement, Assumptions and Limitations, p. 120)

7. Insufficient Quantitative Evidence to Support Low Visual Impact Findings

The low visual impact conclusion made by the EAP is unsubstantiated, as there is insufficient quantitative evidence to support it. The finding is predicated on detailed design information that has not been provided, and visual screening that is un-confirmed. To substantiate this conclusion, the following would be required: detailed design of all proposed structures, a full topographic survey of the site, a slopes analysis, and a complete impact area footprint encompassing the earthworks compaction zones and expected construction access route along the dune crest for the proposed compaction machinery. The Hammel Visual Compliance Statement maintains that existing vegetation would visually screen the proposed dwelling. Since no detail has been provided on the final design or the full construction impact area — including foundation compaction areas, heights etc — the reliance on existing vegetation as visual screening remains an unverified assumption. A specific unresolved question is how the removal of vegetation for the proposed dwellings and associated construction access along the dune crest would affect the screening capacity. This remaining vegetation is situated on steep, windswept steep gradient slopes to the north and south of the proposed main dwellings — terrain characterised by limited growth potential. A full VIA would need to reconcile the detailed design with the resultant landscape to ascertain whether the remaining vegetation would actually be sufficient to provide visual screening.

- The use of photomontages, cross-sections, and fully quantitative modelling is typically associated with higher-order Visual Impact Assessments (e.g. Level 4 VIA), which are not a regulatory requirement in this instance

The absence of such modelling does not invalidate the assessment. The EIA Regulations require a reasonable, site-informed evaluation of impact significance, which has been undertaken.

The conclusion of low visual impact is based on:

- The limited scale of development ($\pm 1,375$ m² footprint)
- The fragmented and non-dominant layout
- The visual absorption capacity of the surrounding landscape
- The implementation of mitigation measures through design and the EMPr

The Final BAR therefore provides a balanced and sufficiently substantiated visual impact assessment, and is considered adequate for informed decision-making by the competent authority.

The comment is noted.

The Basic Assessment Report (BAR) does not rely solely on a standalone slopes overlay map to assess terrain suitability. Slope and terrain conditions were evaluated through an integrated set of specialist inputs, including:

- The Preliminary Geotechnical and Geomatic Investigation, which identifies slope conditions, stability constraints, and areas of potential risk
- Topographical interpretation and site verification undertaken during specialist fieldwork
- Constraints-based mapping, which reflects the outcome of these assessments in defining suitable and unsuitable development areas

It is acknowledged that the Site Constraints Map (Appendix B1) does not display a separate, explicit slope gradient layer. The statement in the BAR referring to a "slope analysis overlay" reflects the fact that slope considerations informed the delineation of constraint zones, rather than being presented as an independent mapped layer.

The constraints map therefore represents a synthesis of multiple risk and sensitivity inputs, including:

8. No Functional Alternative

There is no functional variation in the alternatives assessed that could make a difference to the visual impact. The updated SDP depicts only a minor eastward shift of the three proposed cottages due to unstable terrain — a concern previously raised by VRMA in its Draft BAR I&AP submission. In preliminary correspondence with the EAP, VRMA identified the area just south of the mapped tree cluster in the proposed SDP as the visually preferred location for the main dwelling. While still providing ocean views, this location is on flatter terrain, is not situated on the dune crest, would not break the skyline, and could be positioned largely outside the 100 m High-Water Mark. This alternative has not been assessed and should be included as an assessment alternative in the recommended Level 4 VIA.

9. No Visual Impact Assessment of Cumulative Risks

Any authorisation will establish a precedent for similar development along the 1.7 km fossil dune system, as there is currently no precedent for skyline-intrusive development along the fossil dune cliff section between Sedgfield and the Goukamma Nature Reserve — one of the last undeveloped stretches of fossil dune cliff in the Garden Route. The applicant's response that an authorisation is 'site-specific and not precedent-setting' fails to address the reality that any such approval will be cited in adjacent development applications along the same dune system. This cumulative visual risk has not been assessed. The DEA&DP Visual and Aesthetic Guideline requires assessment of cumulative impacts, and a full Level 4 VIA is needed to address this requirement.

COMMENTS TO AMENDED DRAFT BASIC ASSESSMENT REPORT 20FEB2026

The following comments are made regarding the March 2026 Amended Draft BAR Updated Comments and Response Report.

- Geotechnical stability
- Coastal processes
- Flood risk
- Structurally weak zones

These collectively capture the practical implications of slope and terrain conditions for development planning.

With regard to the presence of steep slopes:

- It is acknowledged that the broader site includes areas of varying slope, including steeper gradients typical of coastal dune systems
- The development layout has been refined to position structures within the most suitable and stable portions of the site, as informed by specialist input
- The BAR does not assert the absence of slope across the entire site, but rather that unsuitable and high-risk areas have been avoided to the extent feasible

The reference to portions of the footprint not being “formally surveyed” relates to the level of detail appropriate at Basic Assessment stage. A full engineering-grade topographic survey is typically undertaken during the detailed design phase, once environmental authorisation has been obtained.

The EIA Regulations require that the assessment be based on sufficient information to evaluate environmental impacts, not on final construction-level design detail. The current level of information — including geotechnical input and site verification — is considered adequate to assess slope-related risks and inform layout decisions.

The VRMA observations regarding slope are noted; however, these are based on a preliminary and non-aligned layout scenario and do not reflect the final, refined development footprint assessed in the BAR.

The Final BAR therefore provides a reasonable and defensible assessment of terrain suitability, and no further slope analysis is required at this stage for decision-making purposes

The comment is noted. The Buchholz Visual Report includes a probable view catchment and visual exposure assessment, and the assessment is based on:

- GIS-supported terrain analysis
- Site inspection

Page	Ecoroute Comment	VRMA Reply
Page 28	<p>As a result, the Environmental Assessment Practitioner (EAP) commissioned two site-specific and updated visual assessments, both undertaken in 2025:</p> <ol style="list-style-type: none"> 1. Visual Compliance Statement by <i>K. Hammel</i> (Outline Landscape Architects, March 2025); and 2. Visual Impact Statement by <i>Paul Buchholz</i> (January 2025). 	<p>The following was extract from the BAR regarding the Buchholz limitations. Once again, the Buchholz report is not listed, but the QUOTATION for the work.</p> <p><i>"This initial statement is based on available site data, field observations, and preliminary design information. A comprehensive Visual Impact Assessment (VIA) will follow once detailed design plans and elevations become available, incorporating photomontages and quantitative visibility modelling."</i> (Amended BAR, Appendix D1 A – Paul Buchholz, p. 119)</p> <p>This comment from the Draft BAR quoting the Buchholz Visual Report clearly states that the finding was preliminary with the assumption that more detailed work would be required once detailed design, elevations become available.</p>
Page 29	<p>The applicant notes the concern. The updated specialist inputs confirm that the final preferred layout has been repositioned to avoid cliff crests, ridge skylines, and steep slopes. The</p>	<p>This is incorrect. The proposed development footprint is still on the dune ridgeline, and the northwestern and southeastern sections of the main dwelling are still located on</p>

- Receptor identification

The BAR does not rely on a claim of absolute non-visibility. Instead, it assesses:

- extent of visibility
- visual absorption capacity
- impact significance

The conclusion that impacts are low is based on:

- Limited development scale
- Fragmented layout
- Retained vegetation
- Sensitive design approach

A quantitative photomontage-based VIA is not a regulatory requirement for a Basic Assessment.

The comment is noted.

The Buchholz report includes:

- terrain modelling and topographical assessment
- evaluation of slope and landscape form

In addition, the VRMA report itself confirms slope presence, but uses this as a constraint, not a prohibition.

The development layout has been informed by:

- Geotechnical investigation
- Terrain constraints
- Stability considerations

The Final BAR integrates these findings into a constraints-based layout, which is appropriate at Basic Assessment level.

This comment is incorrect.

The Buchholz document is a formal Visual Impact Statement (Final Report, Feb 2025), including:

- methodology
- site assessment
- visual exposure analysis
- mitigation measures

While it includes standard professional limitations, this does not invalidate the report.

	<p>development footprint is located inland from the dune edge and outside high-risk slope zones as confirmed by the geotechnical and biodiversity assessments. Visual mitigation measures and siting controls have been strengthened in the revised BAR.</p>	<p>slopes steeper than 1 in 4m. Due to the lack of accessibility, these areas were excluded from the contour survey and remain so on the map of both the preferred and alternative development SDP.</p> <p>A review of the Hammel finds that the report is still dated March 2025 and no additional information is provided. The Buchholz Visual Statement is still the quotation.</p> <p>The withheld VRMA Baseline Report cross section diagram and mapping clearly identified the site on a dune crest. Refer to Annexure 1 for topographic section mapping.</p>	<p>The BAR does not rely on preliminary statements alone, but on integrated visual assessment findings.</p> <p>Both visual reports confirm:</p> <ul style="list-style-type: none"> • Elevated site location • Presence of sensitive landscape • Need for mitigation <p>However, neither report concludes that development is not possible. The Buchholz report explicitly includes:</p> <ul style="list-style-type: none"> • mitigation measures • integration strategies • visual absorption considerations <p>The Visual Compliance Statement confirms that:</p> <ul style="list-style-type: none"> • scale and design are limited • structures can be integrated into landscape <p>The conclusion of low visual impact is therefore based on:</p> <ul style="list-style-type: none"> • impact significance (not visibility alone) • mitigation feasibility • development scale <p>The comment is noted.</p> <p>The BAR includes alternatives based on:</p> <ul style="list-style-type: none"> • geotechnical constraints • biodiversity sensitivity • coastal processes <p>The VRMA “preferred alternative” represents a design preference, not a required feasible alternative.</p> <p>The selected layout reflects the most balanced and practical option.</p> <p>The comment is noted.</p> <p>The BAR includes a cumulative impact assessment.</p> <p>The proposed development:</p> <ul style="list-style-type: none"> • is small-scale (~1,375 m²) • retains majority of site natural
Page 29	<p>In response and as corrective action:</p> <ul style="list-style-type: none"> • All three visual specialist reports—namely: • VRM Africa Baseline Landscape and Visual Assessment (Nov 2024), • Visual Compliance Statement (Hammel, March 2025), and • Visual Statement (Buchholz, January 2025) <p>will be included as appendices in the revised Draft Basic Assessment Report to ensure procedural transparency.</p>	<p>This is incorrect. The VRMA Baseline VIA is still not included in the Amended Draft BAR. The VRMA Visual SSVR (labelled as Wrong Site) is still listed.</p>	
Page 29	<p>Visual mitigation measures and siting controls have been strengthened in the revised BAR. These are (from the EMPr listed below from Page 35):</p> <p><i>Key design principles include:</i></p> <ul style="list-style-type: none"> o Low-profile building forms o Fragmented layout to reduce bulk 	<p>The Amended BAR’s visual mitigation strategy is predicated on low-profile construction aligned with vegetation height but excludes any detail.</p> <p>As no detail is provided, these generic mitigations for reducing visual intrusion do not bind the applicant in any</p>	

- does not introduce large-scale infrastructure

Precedent arguments are speculative and not a basis for rejecting an application.

The comment is noted.

With regard to the Buchholz Visual Impact Statement, it is confirmed that the document constitutes a site-specific visual impact statement prepared for the purposes of informing the Basic Assessment process, based on:

- Available site data
- Field observations
- Preliminary design parameters

The inclusion of standard limitations and reference to potential future refinement (e.g. photomontages or detailed modelling) is consistent with professional practice at Basic Assessment stage, where final architectural design and engineering details are not yet available.

The EIA Regulations do not require a full Level 4 Visual Impact Assessment at this stage. The purpose of the Basic Assessment is to evaluate impact significance based on available and reasonable information, which has been undertaken.

The visual assessment does not rely on an assertion of complete non-visibility. It is acknowledged that:

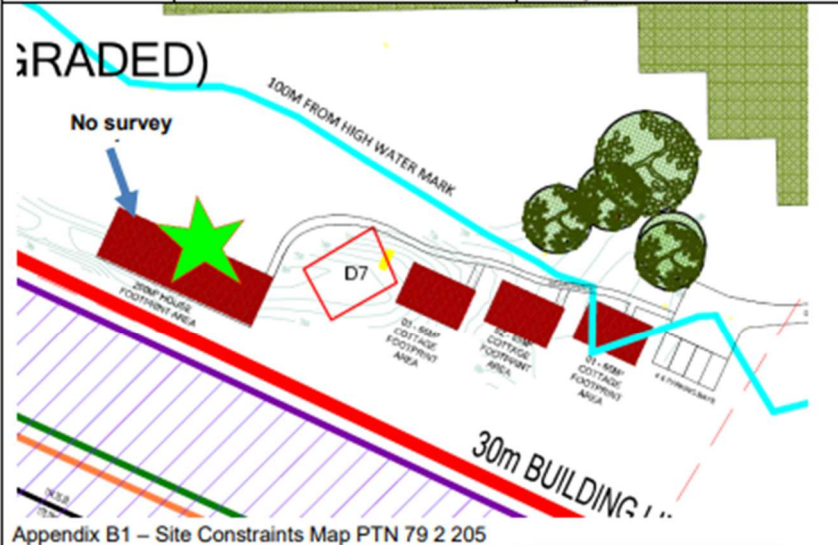
- The site is located within an elevated coastal dune landscape
- Partial visibility may occur from certain viewpoints, including the beach
- The potential for visual exposure is influenced by topography, vegetation, and design

However, the assessment concludes that:

- The development is limited in scale and footprint
- The layout is fragmented and non-dominant
- The landscape has moderate to high visual absorption capacity

With regard to the statement that the layout avoids ridge skylines and steep slopes, this refers to the avoidance of the most sensitive and high-risk areas

	<p><i>o Structures positioned below the skyline where feasible</i> <i>o Use of natural materials and muted colour palettes</i> <i>o Retention of indigenous vegetation</i> <i>o Minimal site clearing</i> <i>o Integration with natural contours</i> <i>This approach reduces visual dominance and supports landscape integration.</i></p> <p>And</p> <p><i>Sensitive Site Planning:</i> <i>o Buildings must follow natural contours</i> <i>o Structures must remain within the approved footprint</i> <i>o Skyline intrusion must be avoided</i> <i>o Low-profile architecture required</i></p>	<p>way, or provide civil society/ the relevant authority with any degree of confidence.</p>	<p>identified through integrated specialist input, including geotechnical and environmental constraints.</p> <p>It is not asserted that the site is devoid of slope or elevation, but rather that the development footprint has been positioned within the most suitable portions of the site to minimise visual and physical risk.</p> <p>The Final BAR therefore presents a balanced, site-specific, and appropriate level of visual assessment, and the conclusions remain valid for decision-making purposes.</p> <p><u>Slope & Footprint Positioning</u></p> <p>The comment is noted.</p> <p>The Basic Assessment Report does not rely on a standalone slope gradient map, but on an integrated assessment of terrain suitability, informed by:</p> <ul style="list-style-type: none"> • The Preliminary Geotechnical and Geomatic Investigation • Site verification and field observations • Identification of structurally weak and high-risk zones <p>It is acknowledged that the broader site includes areas of varying slope typical of coastal dune systems, including steeper gradients in certain locations.</p> <p>The development layout has therefore been informed by a constraints-based approach, whereby:</p> <ul style="list-style-type: none"> • Structures are positioned within the most suitable and stable portions of the site • Areas identified as geotechnically unsuitable or high-risk have been avoided to the extent feasible • Development is not proposed on unstable dune faces or high-risk erosion zones <p>The BAR does not assert that the site is devoid of slope, but rather that terrain constraints have been appropriately considered and incorporated into the layout design.</p> <p>The level of assessment is considered adequate for Basic Assessment purposes, with detailed engineering design to be confirmed at the next stage.</p> <p><u>Inclusion of Visual Reports</u></p> <p>The comment is noted.</p> <p>It is confirmed that:</p> <ul style="list-style-type: none"> • The VRM Africa Baseline Assessment • The Visual Compliance Statement (Hammel, 2025)
30	<p>The Amended BAR confirms that the updated development footprint is not located on the dune crest. The revised constraints map relocates the footprint inland into a stable central zone, avoiding cliff crest, skyline exposure, and structurally weak geotechnical zones. The layout responds directly to geotechnical and visual sensitivity constraints.</p>	<p>As above. Once again, there is no evidence to substantiate this claim. With the withholding of the Basic VIA submitted by VRMA 18Nov2024, this information is effectively withheld from the public and the relevant authority.</p>	
30	<p>The updated layout avoids skyline positioning. Structures are sited below crest level and screened by retained vegetation. The revised visual modelling will demonstrate skyline preservation.</p>	<p>This is factually incorrect. The structures are not sited below crest level as clearly depicted in the SDP mapping.</p> <p>Once the structures are developed on the narrow dune ridgeline, with construction road along the crest of the dune to access the main dwelling, how much of the vegetation will remain to screen the structures? The</p>	

		<p>area to the north and south of the main dwelling area steep slope areas. How will this vegetation, located well below the structure (with limited growth potential dune wind swept dune location), provide screening?</p> <p>No revised modelling is provided to prove that skyline intrusion will not take place.</p>	<ul style="list-style-type: none"> The Visual Impact Statement (Buchholz, 2025) <p>have all been reviewed and considered as part of the assessment process. For purposes of transparency and completeness, the VRMA submission and associated information will be included in the Final Basic Assessment Report submitted to the competent authority, ensuring that all relevant inputs form part of the decision-making record.</p> <p>The Final BAR therefore provides a complete and integrated record of visual considerations.</p>
30	<p>The Amended BAR includes comparative assessment of the southeastern alternative. The updated constraints map confirms both preferred and alternative footprints avoid sensitive slope zones.</p>	<p>The amended layout plan is still located in steep terrain which is not included in the contour survey depicted in the SDP mapping. A full contour survey and slopes analysis needs to be provided and included as an overlay.</p>	<p><u>Visual Mitigation Measures</u></p> <p>Visual mitigation measures are not limited to generic principles, but are supported through the Environmental Management Programme (EMPr) and design controls, which include:</p> <ul style="list-style-type: none"> Limitation of building height and profile to reduce skyline prominence Use of non-reflective, earth-toned materials to blend with the surrounding landscape Fragmented layout design to reduce visual bulk and massing Retention of existing vegetation where feasible, supplemented by rehabilitation measures Restriction of disturbance to the defined development footprint
 <p>Appendix B1 – Site Constraints Map PTN 79 2 205</p>			<p>These measures form part of the EMPr and will be legally binding upon Environmental Authorisation, ensuring that mitigation is enforceable. The level of detail provided is appropriate for the Basic Assessment stage, with further refinement to occur during detailed design.</p>
Page 30	<p>The access route follows an existing disturbed alignment. No new linear clearing occurs through intact thicket vegetation.</p>	<p>This is factually incorrect. The Preferred Alternative SDP (Draft EMPr Pg 22) depicted below clearly maps the new linear clearing through intact CBA thicket vegetation. This is not an existing disturbed alignment.</p>	<p><u>Buchholz and Hammel Reports</u></p> <p>The Buchholz document constitutes a formal Visual Impact Statement, prepared to inform the Basic Assessment process. The inclusion of standard limitations and reference to potential future refinement reflects accepted professional practice, given that detailed architectural and engineering designs are not yet finalised at this stage.</p> <p>Similarly, the Visual Compliance Statement (Hammel, 2025) is based on:</p> <ul style="list-style-type: none"> Site inspection Landscape assessment Professional visual evaluation <p>These reports are appropriate to the level of assessment required and provide sufficient information to evaluate visual impact significance.</p>

The BAR does not rely on a claim of complete non-visibility, but rather on a balanced assessment of visibility, sensitivity, and impact significance, which is considered appropriate for decision-making.

Page 30 – Location of Development Footprint

The comment is noted.

The Basic Assessment Report does not assert that the development site is devoid of elevation or that it falls entirely outside a dune ridge system. It is acknowledged that the property forms part of an elevated coastal dune landscape, with varying terrain conditions across the site.

The statement that the footprint has been relocated inland refers to the refinement of the layout to position development within the most suitable and stable central portion of the site, as informed by:

- Geotechnical assessment
- Environmental sensitivity mapping
- Constraints-based planning

The intent of the revised layout is to reduce exposure to the most sensitive and high-risk areas, including:

- Steep and unstable dune faces
- Areas of increased erosion risk
- Highly exposed skyline positions where feasible

The layout therefore represents an optimised position within the constraints of the site, rather than a complete avoidance of elevated terrain.

Page 30 – Skyline Positioning and Screening

The comment is noted.

The BAR does not rely on an assertion of complete absence of skyline exposure. It is acknowledged that:

- The site occurs within an elevated dune environment
- Some degree of visibility or partial skyline interaction may occur, depending on viewpoint and final design

The visual assessment instead considers impact significance, which is influenced by:

- Scale and form of development
- Landscape context
- Visual absorption capacity



Page 31	The EMPr now includes binding design controls: height limits, recessive finishes, crest setback protection.	<p>A review of the Amended Draft BAR and Draft EMPr found NO binding height limits or specific design controls.</p> <p>The mitigation sections for both the Preferred Development and Alternative 1 (BAR pp. 151 and 166) list the same conditions. The mitigations do specify no skyline or ridgeline development which contradict the report findings.</p> <ul style="list-style-type: none"> No skyline or ridgeline construction.
Page 31	The consolidated SDP now includes earthworks, slope overlays and vegetation buffers.	<p>This is factually incorrect.</p> <p>The SDP listed Appendix B1 – Site Constraints or Appendix B2 – Environmental Sensitivity mapping does not include earthworks, slope overlays or vegetation buffers. (Map extract from the Amended Draft BAR is inserted above)</p>
Page 35	The Amended BAR incorporates updated constraints mapping, revised layout, full footprint overlay, visual reassessment and geotechnical avoidance strategy to address the concerns raised.	As mapped above, the revised layout does not depict full footprint overlay. As previously raised, the drawing only show the proposed dwelling without decking, foundational earthworks, or the construction access road to the main dwelling which would have to

- Mitigation measures

The proposed development has been designed to reduce visual prominence, including:

- Limiting building height and bulk
- Using low-profile architectural forms
- Applying earth-toned, non-reflective materials
- Retaining existing vegetation where feasible
- Restricting disturbance to a defined footprint

Vegetation screening is considered a supporting mitigation measure, not the sole basis of impact reduction.

While detailed visual modelling has not been undertaken at this stage, the assessment concludes that potential visual impacts will be:

- Localised
- Reduced through design and mitigation
- Of low to moderate significance, depending on viewpoint

The level of assessment is considered appropriate for a Basic Assessment process, and sufficient for decision-making.

Slope Sensitivity and Alternative Layout

The comment is noted.

The Basic Assessment Report does not rely on a detailed contour survey or standalone slope overlay to define terrain suitability. Instead, slope and terrain conditions have been assessed through:

- The Preliminary Geotechnical and Geomatic Investigation
- Site verification and field observations
- Integration of terrain considerations into the constraints-based layout design

It is acknowledged that the site includes areas of varying slope, including steeper gradients typical of coastal dune systems.

The reference to avoidance of “sensitive slope zones” relates to the avoidance of the most unsuitable and high-risk areas identified through integrated specialist

input, rather than a claim that no slopes occur within or near the development footprint.

Both the preferred and alternative layouts have been positioned to minimise exposure to identified terrain constraints, within the practical limitations of the site.

The level of information provided is considered appropriate for Basic Assessment purposes, with detailed topographical survey and engineering refinement to occur at the detailed design stage.

Absence of Revised Modelling

The comment is noted.

The Basic Assessment Report does not rely on detailed visual modelling or photomontage analysis to support its conclusions. Such modelling is typically associated with higher-order visual assessments and is not a prescribed requirement for a Basic Assessment process.

The visual impact assessment is based on:

- Site inspection
- Terrain and landscape analysis
- Professional specialist input

The assessment focuses on impact significance, rather than absolute visibility or modelled outcomes, and is considered sufficient for decision-making purposes.

Access Route and Vegetation Clearing

The comment is noted.

The access route has been aligned, as far as reasonably practicable, along an existing or previously disturbed alignment, informed by site inspection and planning inputs.

It is acknowledged that:

- Portions of the route may traverse areas of secondary or partially vegetated thicket
- Some degree of localised vegetation disturbance may be required

However:

- The access route is narrow in width (± 3 m)
- Clearing is limited to the minimum required for access and safety
- Disturbance is confined to the defined development footprint
- No large-scale clearing of intact vegetation is proposed

All vegetation disturbance will be:

- Managed in accordance with the EMPr

		be routed along the dune crest. This should also be included if a full footprint overlay claim is to be achieved.		
Comments pertain to the three pages of comments submitted regarding the 15Dec2025 Draft BAR PPP				
Page 37	<p>Regarding the omission of the Draft Visual Baseline Report.</p> <p>The omission is acknowledged and corrected in the Amended BAR. The VRMA Draft Visual Baseline Report is now included as an appendix for transparency. The Amended BAR clarifies that earlier spatial discrepancies led to confusion regarding applicability, however the report is now included for full consideration. The final assessment relies on the updated Visual Compliance Statement (2025), Visual Impact Statement (2025), and the Site Constraints Map, all aligned to verified cadastral boundaries.</p>	<p>This is factually incorrect.</p> <p>The Visual Baseline is not included in the list of specialist studies in the March 2026 PPP.</p>		<ul style="list-style-type: none"> • Subject to rehabilitation and alien vegetation control measures <p>The impact associated with the access route is therefore considered localised and of low significance and has been appropriately assessed.</p> <p><u>Statement of “Factually Incorrect”</u></p> <p>The comment is noted.</p> <p>The Basic Assessment Report is based on:</p> <ul style="list-style-type: none"> • Available site information • Specialist input • Site verification and constraints mapping <p>Differences in interpretation between specialists are acknowledged and are not uncommon in environmental assessment processes.</p> <p>The BAR presents a balanced and integrated assessment, which considers multiple specialist inputs and applies a precautionary and mitigation-based approach.</p> <p>The conclusions presented are considered reasonable, defensible, and appropriate for the level of assessment required, and sufficient to inform the competent authority’s decision.</p> <p><u>Binding Design Controls (EMPr)</u></p> <p>The comment is noted.</p> <p>The Environmental Management Programme (EMPr) forms part of the application and, once approved, becomes legally binding in terms of the Environmental Authorisation.</p> <p>The EMPr includes clear and enforceable management and design controls, including:</p> <ul style="list-style-type: none"> • Restriction of development to the approved footprint • Limitation of building scale and profile to reduce visual prominence • Implementation of appropriate material and colour specifications • Control of vegetation clearing and requirement for rehabilitation • Environmental Control Officer (ECO) oversight during construction <p>It is acknowledged that certain design elements will be refined during the detailed design phase; however, the EMPr establishes the binding framework within which such design must occur.</p> <p>The mitigation measures are therefore not discretionary, but enforceable through the Environmental Authorisation and compliance monitoring.</p> <p><u>Slope Overlays, Earthworks and Vegetation Buffers</u></p> <p>The comment is noted.</p>
Page 37	<p>The Amended BAR incorporates the updated constraints mapping and confirms that the development footprint has been relocated away from the dune crest and skyline exposure zones. The Site Constraints Map overlays slope gradients, HWM buffer, and geotechnical zones, demonstrating that structures are positioned within visually recessive terrain. Architectural controls in the EMPr now include height limits, non-reflective materials, and vegetation retention buffers specifically to prevent skyline intrusion.</p>	<p>As indicted in the topographic profile mapping in the withheld Visual Baseline Report, the site is not located on visually recessive terrain.</p> <p>No specific height limits were provided other than a generic reference to ‘low-profile’ architecture. However, there is no reference to how a low-profile architecture on a raised pole-foundation (proposed) would influence the visual intrusion.</p>		

Page 38

A slope analysis overlay is included in the Amended BAR via the Site Constraints Map. The map clearly delineates slopes exceeding 1:4 and >25°. The selected footprint lies outside these zones. The northwestern encroachment previously noted has been removed. No infrastructure is located on unstable or steep slopes in the amended layout.

This is factually incorrect.

As depicted below from the screen clip of the Appendix B1 – Site Constraints Map, there is no slopes analysis. The northwest encroachment into steep slope areas is still clearly apparent.



Appendix B1 – Site Constraints Map Extract

Page 38

RE the VRMA Draft BAR comment - the report by Paul Buchholz... is actually the quotation... no comment can thus be made...

The Amended BAR includes the final signed Visual Impact Statement report (not the quotation). The documentation error has been corrected.

The listing still depicts the quotation

The Basic Assessment Report does not rely on a single composite map displaying all analytical layers simultaneously. Instead, the assessment is based on an integrated interpretation of multiple specialist inputs, including:

- Geotechnical assessment
- Environmental sensitivity mapping
- Site verification

The Site Constraints Map reflects the synthesised outcome of these inputs, identifying areas suitable and unsuitable for development.

It is acknowledged that individual layers such as slope gradients, earthworks extents, or vegetation buffers are not displayed as separate overlays on a single map. However, these considerations have been incorporated into the layout design and impact assessment.

The level of mapping provided is considered appropriate for Basic Assessment purposes, with detailed engineering drawings and earthworks design to be finalised at the detailed design stage.

Development Footprint and Earthworks

The comment is noted.

The Basic Assessment Report assesses the development based on a defined and assessed disturbance footprint, which includes:

- Building footprints
- Access infrastructure
- Associated disturbance areas required for construction

It is acknowledged that detailed elements such as:

- Foundation design
- Final earthworks profiles
- Construction sequencing

are not presented at engineering design level, as this is not required at Basic Assessment stage.

The purpose of the BAR is to assess environmental impacts at an appropriate level of detail, which has been achieved through:

- Site-specific specialist input
- Constraints-based layout design
- Assessment of construction and operational impacts

All construction-related disturbance will be restricted to the approved footprint and managed through the EMPr.

PROFESSIONAL DISAGREEMENT ON LOW VISUAL IMPACT FINDING

This section presents VRMA's professional disagreement with the low visual impact conclusion contained in the Amended Draft BAR. It reproduces the relevant BAR extract and demonstrates, by reference to VRMA's withheld LVIA Baseline Report (November 2024), that the assumptions underpinning that conclusion are not supported by the available evidence. The following statement is made in the Amended Draft BAR with regard to the findings of the other two visual reports:

Subsequent visual specialists – Outline Landscape Architects (2025) and Paul Buchholz (2025) – both confirmed that:

- The site has High Visual Absorption Capacity (VAC) due to dense vegetation and complex terrain;
- No visual exposure exists from the beach, Groenvlei Lake, or public roads;
- The project's architectural scale, materials, and siting are consistent with low visual sensitivity; and
- The expected residual visual impact significance is Low with standard mitigation.

The Final BAR therefore provides a reasonable and sufficient representation of the development footprint for impact assessment purposes.

Inclusion of VRMA Visual Baseline Report

The comment is noted.

It is acknowledged that the VRMA Visual Baseline Report was not included in the initial Pre-Application phase documentation. This omission was subsequently identified and addressed during the ongoing Public Participation Process.

VRM Africa was:

- Registered as an Interested and Affected Party
- Provided with the opportunity to submit detailed comments
- Included in both the Draft BAR and Amended Draft BAR public participation processes

The VRMA submission and associated information will be included in the Final Basic Assessment Report submitted to the competent authority, ensuring full transparency and that all relevant specialist input forms part of the decision-making record.

The BAR does not rely solely on the VRMA report, but it has been reviewed and considered alongside other specialist inputs.

The Public Participation Process is therefore considered procedurally compliant, and no information has been withheld from the competent authority at the decision-making stage

Recessive Terrain and Layout Positioning

The comment is noted.

The Basic Assessment Report does not assert that the site is uniformly visually recessive, nor that it is devoid of elevation. It is acknowledged that the property forms part of an elevated coastal dune landscape, with varying terrain conditions.

The reference to “recessive terrain” relates to the relative positioning of structures within the broader site context, where the layout has been refined to:

- Avoid the most visually exposed and sensitive areas where feasible
- Reduce prominence relative to surrounding landform
- Respond to geotechnical and environmental constraints

The low visual impact conclusion reached by the EAP is unsubstantiated, since it depends entirely on future design choices stated as EMPr commitments that are not supported by binding architectural specifications incorporated into conditions of authorisation. The VRMA Draft Baseline VIA identified that further detail on earthworks and architecture would be required before low levels of visual intrusion could be assured. This is based on the following findings:

- The site is located on a narrow fore-dune crest with steep slopes on either side. The Engineering Report (p. 111) recommends "piled footings anchored in semiconsolidated sand with a compacted 1.5 m perimeter zone" as the construction method. Once heavy machinery accesses the site to establish the compaction platform, the vegetation within 1.5 m of each dwelling will be cleared — yet there is no indication of the construction road required to access the sites, nor any assessment of how that road, combined with the compaction platforms, would affect the existing vegetation relied upon as visual screening in the Hammel and Buchholz reports. This once again emphasises the need for detailed design covering both the architecture and earthworks before any Low Visual Impact rating can be substantiated.

The development is therefore positioned to minimise visual exposure, rather than eliminate it entirely.

Slope Gradients and Constraints Mapping

The comment is noted.

The Site Constraints Map reflects an integrated synthesis of multiple specialist inputs, including geotechnical, environmental, and coastal considerations.

It is acknowledged that a standalone slope gradient overlay is not presented as a discrete map layer. The reference in the BAR to slope considerations relates to their integration into the constraints-based layout design, rather than depiction as an independent overlay.

Slope and terrain conditions were assessed through:

- Geotechnical investigation
- Site verification
- Terrain interpretation

The level of mapping provided is considered appropriate for Basic Assessment purposes, with detailed topographical design to follow at a later stage.

Architectural Controls and Skyline Intrusion

The comment is noted.

The Environmental Management Programme (EMPr) includes design and mitigation controls intended to reduce visual impact, including:

- Limitation of building scale and profile
- Use of low-reflective, natural materials
- Retention of vegetation where feasible
- Restriction of development to the defined footprint

It is acknowledged that detailed architectural design, including precise height dimensions and structural specifications, will be finalised during the detailed design phase.

The BAR does not rely on an absolute claim that skyline intrusion will not occur. Instead, it assesses:

- The likelihood and extent of potential visual exposure
- The ability to reduce impact through design and mitigation

The conclusion that visual impacts are acceptable is based on:

- Development scale
- Layout configuration
- Landscape context
- Mitigation measures

<ul style="list-style-type: none"> NEMA Section 24(4)(a)(vii) requires assessment of cumulative impacts, taking into account approved and proposed developments in the area. A specific example of landscape risk embedded in the current layout is the proposed straight-line clearance through indigenous thicket vegetation for the main access road, which poses a risk to the predominantly private nature reserve character of the surrounding area. The access road should be redesigned as a curving alignment that follows the natural terrain, avoiding a wide, straight clear-cut visual corridor. Given that most surrounding land uses are Private Nature Reserve-related, a geometric/grid-based road layout would set a negative precedent in an area of notable landscape significance. Without this issue being addressed and assessed in a full VIA, the Low Visual Impact finding cannot be verified. 	<p>These measures will form part of the Environmental Authorisation conditions and EMPr and will be enforceable through compliance monitoring.</p> <p><u>Slope Analysis Overlay (Page 38)</u></p> <p>The comment is noted.</p> <p>It is acknowledged that the Site Constraints Map does not include a standalone slope gradient overlay depicting specific slope classes (e.g. >1:4 or >25°) as a discrete mapped layer.</p> <p>The reference in the BAR to a “slope analysis overlay” reflects the fact that slope and terrain considerations were assessed and integrated into the constraints-based layout design, informed by:</p> <ul style="list-style-type: none"> The Preliminary Geotechnical and Geomatic Investigation Site verification and terrain interpretation Identification of structurally weak and high-risk zones <p>The Site Constraints Map therefore represents a synthesised outcome of these inputs, rather than displaying each analytical layer independently.</p> <p>It is acknowledged that the broader site includes areas of varying slope, including steeper gradients typical of coastal dune systems. The development layout has been refined to position infrastructure within the most suitable and stable portions of the site, avoiding areas identified as geotechnically unsuitable to the extent feasible.</p> <p>The BAR does not rely on a claim that no slopes occur within or adjacent to the footprint, but rather that terrain-related risks have been appropriately considered and mitigated through layout refinement.</p> <p>The level of information provided is considered appropriate for Basic Assessment purposes, with detailed topographical survey and engineering design to be confirmed at the detailed design stage.</p> <p><u>Encroachment into Steep Areas</u></p> <p>The comment is noted.</p> <p>The amended layout reflects a refinement of the development footprint based on integrated specialist input. It is acknowledged that the site includes localised areas of steeper terrain, and that the footprint occurs within a variable dune landscape.</p> <p>The layout has been positioned to:</p> <ul style="list-style-type: none"> Reduce exposure to steep and unstable slopes where feasible Avoid identified high-risk geotechnical zones Limit disturbance to a defined and controlled footprint
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- A further cumulative risk pertains to the precedent being set for development along the 1.7 km fossil dune system. The applicant's response that approval is "site-specific, not precedent-setting" does not address the reality that an authorisation will be cited as precedent in adjacent development applications along the same dune system. This section of coastline — between Sedgfield and the Goukamma Nature Reserve — has no existing precedent for skyline-intrusive development and represents one of the last stretches in the Garden Route where a natural, undeveloped coastal landscape still prevails. **No assessment of cumulative visual impact across the Groenvlei Fossil Dunes landscape corridor has been undertaken; without this issue being addressed and assessed in a full VIA, the Low Visual Impact finding cannot be verified.**

As previously requested by VRMA in the Ecoroute Pre-BAR submission, detailed design must be provided before any Low Visual Impact finding can be made with confidence. The following information, drawn from the DEA&DP Visual and Aesthetic Guideline, is relevant and should inform the final detailed design:

- Siting and orientation of all proposed structures.
- Footprint, height, form and massing of the structures (including decking and associated substructure earthworks).
- Architectural elevations, finishes, colours and material specifications.
- Length, width, treatment and finishes of access roads, internal roads and parking areas.
- Cut-and-fill slopes and all associated earthworks.
- Anticipated construction-phase facilities, including camps, storage areas, haul roads, stockpiles and batching areas.

The assessment considers that any remaining interaction with sloped terrain is limited and manageable, and has been addressed through:

- Design measures
- Construction controls
- Environmental management requirements

Buchholz Report / "Quotation" Issue (Page 38)

The comment is noted.

It is confirmed that the final signed Visual Impact Statement prepared by Mr P. Buchholz (2025) forms part of the Basic Assessment Report.

Any previous reference to preliminary documentation or quotations has been corrected in the Amended BAR, and the assessment relies on the final submitted specialist report.

The inclusion of standard professional limitations within the report reflects accepted practice at this stage of assessment, where detailed design information is still to be finalised.

The documentation contained in the BAR is therefore considered accurate and appropriate for the purposes of the assessment.

The comment is noted.

The Basic Assessment Report does not rely on an assertion of absolute non-visibility of the proposed development from all surrounding receptors, including Groenvlei Beach, Groenvlei Lake, or public roads.

It is acknowledged that the site is located within an elevated coastal dune landscape, and that partial or intermittent visibility may occur from certain viewpoints, depending on topography, vegetation cover, and final building design.

The visual specialist inputs (Outline Landscape Architects, 2025 and Buchholz, 2025) were undertaken to assess visual impact significance, rather than absolute visibility. These assessments considered:

- Landscape character and visual sensitivity
- Visual absorption capacity of the receiving environment
- Scale, form, and layout of the proposed development
- Potential for mitigation through design and siting

The conclusion of low visual impact is based on:

- The limited scale and footprint of the development ($\pm 1,375 \text{ m}^2$)
- The fragmented and non-dominant layout

- Clear presentation of alternatives, including layout, architectural and earthworks design options.
- Detail on post-construction landscaping.

The withholding of the VRMA Draft Visual Baseline report does not add to the BAR process as this limits the Relevant Authority ability to make an informed, defensible decision. Had the risks identified in the visual reports been openly discussed during the process, this situation could have been avoided. Meaningful engagement, supported by adequate information, remains essential to address the risk to the receiving fossil dune landscape. The VRMA recommendation, still remains, is that a full Level 4 VIA is undertaken based on full detail design of the proposed dwellings.

- The presence of vegetation and terrain complexity, which contribute to visual absorption
- The ability to reduce visual prominence through design and mitigation measures

While VRMA's LVIA Baseline Report highlights the sensitivity of the landscape and potential for visual exposure under certain conditions, it is noted that:

- The assessment is based on baseline and preliminary assumptions
- It does not reflect the final refined development layout assessed in the BAR
- It represents a worst-case interpretation of visibility, rather than an assessment of mitigated impact significance

Differences in professional opinion between specialists are acknowledged. The BAR presents a balanced and integrated assessment, informed by multiple specialist inputs and based on the development as proposed.

The Final BAR therefore concludes that, although visibility may occur, the significance of visual impact is low and acceptable, subject to the implementation of mitigation measures.

The comment is noted.

The Basic Assessment Report (BAR) does not rely "entirely" on future design choices to support the low visual impact conclusion. The assessment is based on current, site-verified information and an integrated evaluation of impact significance, considering:

- Scale and extent of development ($\pm 1,375$ m² disturbance footprint)
- Layout configuration (fragmented, low-density siting)
- Landscape context and visual absorption capacity
- Constraints-based positioning informed by geotechnical and environmental inputs

The Environmental Management Programme (EMPr) establishes a binding framework (upon Environmental Authorisation) within which detailed design must occur. While architectural and engineering details are refined at the detailed design stage, the BAR has assessed worst-credible construction and operational scenarios at an appropriate level for Basic Assessment.

The VRMA observation that further detail could refine the assessment is acknowledged; however, the EIA Regulations require sufficient information to

ANNEXURE 1: TOPOGRAPHIC CROSS-SECTION MAPPING FROM THE VRMA DRAFT BASELINE VIA

On Page 110, in reply to the VRMA I&AP comment, the following mapping from the Draft Baseline VIA submitted by VRMA. The map depicts a Terrain Model generated from Survey General 5m contours. The site visit also confirmed the site as an elevated dune ridgeline along a fossil dune sea cliffs. The location of the proposed main dwelling is marked in Red on the map below.

determine impact significance, not final engineering design. The information presented is considered adequate and proportionate for decision-making.

Dune Crest Location, Footings, Clearing and Access

The comment is noted.

It is acknowledged that the site occurs within an elevated coastal dune system and that construction will require appropriate foundation solutions (e.g., piled or anchored systems) and localised working areas.

The BAR assesses construction impacts, including:

- Localised vegetation disturbance associated with foundations and working platforms
- Temporary construction access within the defined footprint
- Short-term visibility of construction activity

Mitigation and controls include:

- Restriction of disturbance to the approved footprint and minimum working widths
- Phased clearing and immediate rehabilitation of disturbed areas
- Demarcation of no-go areas and vegetation retention zones
- ECO oversight during all clearing and construction activities
- Final siting and micro-alignment of access and platforms to avoid the most sensitive/unstable areas

Vegetation screening is treated as a supporting mitigation measure, not the sole basis of impact reduction. The visual assessment therefore does not depend on intact vegetation alone to achieve a low impact rating.

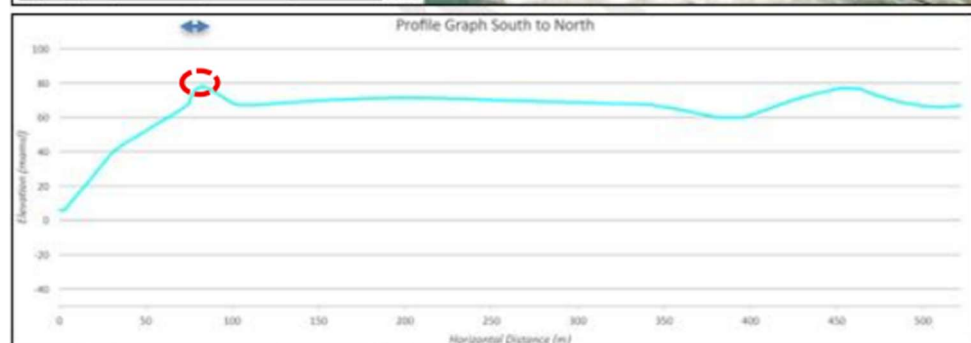
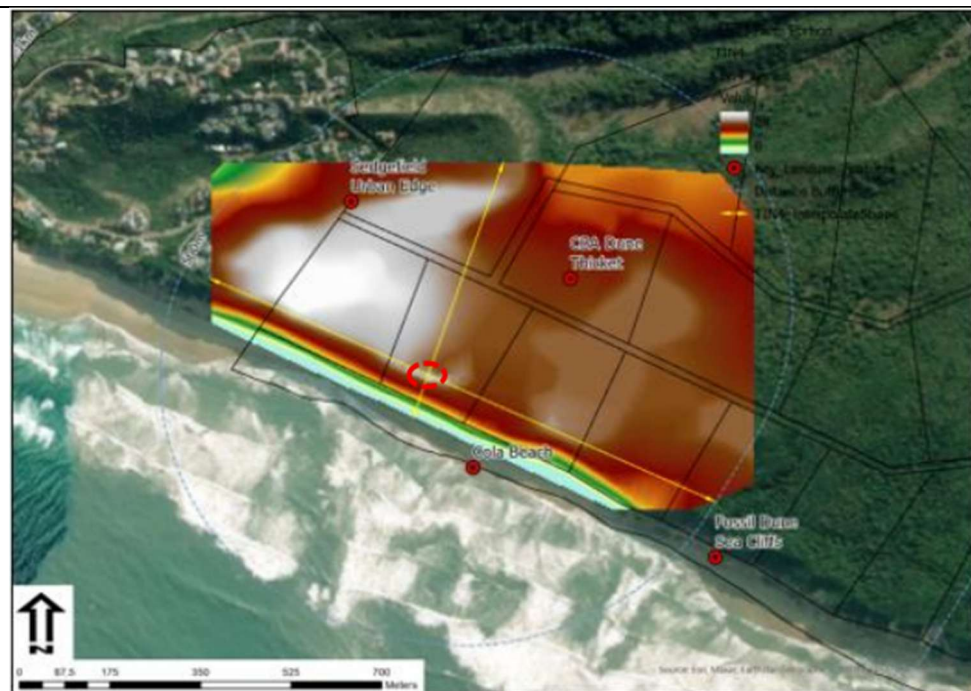
The absence of a finalised construction road alignment at this stage is consistent with Basic Assessment practice; however, the principle of minimising disturbance and avoiding unnecessary linear clearing is embedded in the EMPr and will govern detailed design.

Accordingly, construction-related impacts are assessed as temporary and localised, and manageable to low significance with mitigation.

Access Road Alignment and Cumulative Landscape Risk

The comment is noted.

The access route has been planned to minimise disturbance and, as far as reasonably practicable, to follow existing or previously disturbed alignments and natural terrain. It is acknowledged that:



In the Baseline Assessment that was withheld from the Pre BAR and the DBAR public participation processes. This mapping supports the statement that the site is located on the dune ridgeline. ***It also clearly identifies that the statement in the DBAR 'lies behind the dune ridge' is incorrect.***

ANNEXURE 2: UPDATED TABLE OF CORRESPONDENCE

The following table reflects the correspondence undertaken with the EAP for this project.

- Some localised clearing may be required
- Alignment refinement will occur at detailed design stage

The BAR assesses the access road as part of the overall disturbance footprint, with impacts considered under vegetation clearing, visual impact, and habitat disturbance.

Mitigation measures include:

- Limiting road width to the minimum required
- Avoiding straight, visually intrusive corridors where feasible
- Aligning the route to follow natural contours during detailed design
- Rehabilitation and re-vegetation of disturbed verges
- ECO supervision and compliance monitoring

The suggestion of a curvilinear alignment is acknowledged as good practice and is consistent with the EMPr principles; however, detailed geometric design is not fixed at this stage.

The cumulative landscape impact of the access road, in combination with the development, is assessed as low and localised, given the small scale of intervention and retention of the broader landscape in a natural state.

Precedent and Cumulative Visual Impact (Fossil Dune System)

The comment is noted.

The BAR includes a cumulative impact assessment, which considers the broader environmental and landscape context. It is acknowledged that the Groenvlei fossil dune system is a sensitive and largely undeveloped landscape corridor.

However:

- The proposed development is limited in scale and extent
- The majority of the property remains undeveloped
- The layout has been refined to minimise visual prominence and disturbance

In terms of EIA practice, each application is assessed on its own merits, based on its specific location, scale, and impact profile. While it is recognised that decisions may be referenced in future applications, this does not in itself determine cumulative impact.

The BAR concludes that the proposed development:

- Does not introduce large-scale or visually dominant infrastructure
- Does not materially alter the broader landscape character
- Results in low cumulative visual impact when considered in context

01Oct 2024	Visual Resource Management Africa CC (VRMA) was appointed by the property owner (Daniel Sevenster) on to undertake a Level 4 Visual Impact Assessment.
01Nov20 24	<p>VRMA submits the SSVR for the site.</p> <p>I have concluded the landscape and visual site sensitivity verification report. Please note that concerns are raised. While the current sites proposed for development present significant landscape and visual impact concerns, there exists a less visually intrusive opportunity located in the southeastern section of the property near the proposed vehicle parking area. This site is set back further from the geotechnical risks areas and there is a local precedent for residential development on the adjacent property. It is strongly recommended that if the current layout is pursued, then the three cottages should be excluded. Subject to geotechnical review, the main building would need to be set into the dune so as not to create a negative precedent for skyline intrusive development along the dune cliffs.</p> <p>I am happy to discuss the findings and suggest that we set up a teams meeting to discuss the issues raised and how to proceed further.</p>
3Nov202 4	Diana Cezar email indicating that the incorrect site was surveyed.
18Nov24	<p>VRMA reply to Ecoroute VRMA acknowledging that there was a 4m shift in the survey footprint.</p> <p>Hi Janet, Further to the comments made regarding the errors in the Site Sensitivity Report, the following refers.</p> <p>As the DWG plan had not been received prior to the site visit, I georeferenced a digital copy of the site development plan. This resulted in the image being stretched 10m to the south. As a result of this shift, 4 of the survey points relating to the proposed additional units were out by an average of 6m to the east, and 4m to the south. While the photograph locations have now been corrected for these 4 points, the issues raised in the SSVR are still relevant.</p> <p>The nature of the SSVR is to provide a general risk appraisal of the site, to inform the client of potential risks that could jeopardise the development. As verified by the more detailed Baseline Assessment that has now been concluded, the general risks identified within the SSVR were correct. The more detailed review of planning and guidelines related to fossil dunes, ridgelines, skyline intrusion and steep slope development, Critical Biodiversity Area of dune thicket related areas, as well as coastal recreational landscapes found that the proposed plan is unlikely to meet the National (Garden Route Environmental Management Framework) and Provincial</p>

A corridor-scale VIA is not a prescribed requirement for this Basic Assessment. The level of cumulative assessment undertaken is considered appropriate and sufficient for decision-making.

Requirement for Detailed Design Prior to Low Visual Impact Finding

The comment is noted.

The information listed (siting, elevations, materials, road details, earthworks, construction laydown, alternatives and landscaping) is acknowledged as best-practice detail typically associated with advanced design stages or higher-order Visual Impact Assessments (e.g. Level 4 VIA).

The Basic Assessment Report (BAR) has been compiled in accordance with the EIA Regulations, 2014 (as amended) and the applicable protocols, which require that impacts be assessed based on sufficient, reasonable, and site-specific information at the time of application, rather than final construction-level design.

The BAR includes, at an appropriate level of detail for this stage:

- Defined development footprint and layout
- Indicative building scale and use
- Access arrangements and disturbance areas
- Constraints-based siting informed by specialist inputs
- Assessment of construction and operational impacts
- Design and mitigation principles incorporated into the EMPr

The purpose of the Basic Assessment is to determine impact significance, not to finalise architectural or engineering design. Detailed design elements listed above are typically refined post-authorisation, within the framework of:

- The Environmental Authorisation conditions, and
- The legally binding EMPr

The BAR does not rely on speculative future design, but rather on conservative assumptions and mitigation-based assessment appropriate to the level of detail available

Adequacy of Information for Decision-Making

The comment is noted.

The Basic Assessment Report provides sufficient information to enable the competent authority to make an informed and defensible decision, including:

- Specialist inputs (visual, geotechnical, biodiversity)

	<p>(DEA&DP Visual and Aesthetic/ Mountain, Hills and Ridgelines) guidelines. I will send the DrfatV1 Baseline LVIA shortly in another email.</p> <p>I have attached below a screen capture of the map showing the previous survey points with an overlay to the DWG provided. Should you have any further queries with regards to the SSVR and the minor errors in the initial site survey photographs, please let me know.</p>	<ul style="list-style-type: none"> • Site verification and constraints mapping • Impact assessment and mitigation measures • Public participation record and responses to all comments
<p>18Nov20 24</p>	<p>VRMA submits the Draft Baseline Assessment.</p> <p>Hi Janet, Please find the Erf 205/79 DraftV1 Baseline LVIA for your review. Ruygtevei Farm 205_79 LVIA Baseline_DraftV1.docx (<i>Error in Farm reference is noted – Amened Farm 79/205 Ruygte Valley</i>)</p> <p>To delineate the steep slopes, ridgeline and dune crest related skyline intrusion, I have used the survey contours for the site, supplemented with 5m SG contours to generate a detailed digital elevation model. I have also concluded the literature review for landscape planning. As the fossil dune/ridgeline and coastal landscape does trigger as a significant landscape in the Garden Route EMF, the WC Mountains, Hills and Ridgelines Guideline, and the DEA&DP Visual & Aesthetic Guideline, detailed information of the nature of the proposed landscape change is a requirement. The following information is specified in the DEA&DP Visual & Aesthetic Guideline as necessary.</p> <p>Essential information:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The precise location and elevation of the project, and the boundaries of the project site, or the proposed route in the case of roads, pipelines, powerlines, etc.; <input type="checkbox"/> The siting and orientation of the structures within the project site; <input type="checkbox"/> The footprint, massing and height of the various structures; <input type="checkbox"/> Elevations of the structures, including finishes and colours; <input type="checkbox"/> Length, area and finishes of access roads to the site, internal roads and parking areas; <input type="checkbox"/> Type and height of all ancillary structures, such as masts, antennas, security fencing, gatehouses, substations, electrical kiosks, reservoirs, overhead power-lines and other cables (both on and off the site); <input type="checkbox"/> Cut and fill slopes and other major earthworks or excavations associated with the project; <input type="checkbox"/> Traffic within the site, or to and from the site, which may constitute a visual impact; <input type="checkbox"/> Construction phase facilities, such as construction camps, labourers' housing, haul roads, material storage, stockpiles, batch mixing areas, etc. where applicable; 	<p>The VRMA submission and associated concerns have been considered and responded to, and will form part of the Final BAR submitted to the competent authority.</p> <p>The BAR therefore reflects a transparent and comprehensive assessment process, and no material information has been withheld from the competent authority at the decision-making stage.</p> <p><u>Meaningful Engagement and Visual Risk</u></p> <p>The comment is noted.</p> <p>The sensitivity of the fossil dune landscape and associated visual risk has been recognised and incorporated into the assessment, including:</p> <ul style="list-style-type: none"> • Application of a constraints-based layout approach • Reduction and refinement of the development footprint • Identification of visually sensitive receptors • Inclusion of design and mitigation principles to reduce visual prominence <p>Public participation has been conducted in accordance with the EIA Regulations, and all registered Interested and Affected Parties, including VRMA, have been afforded opportunity to comment, with responses recorded.</p> <p>Meaningful engagement has therefore occurred within the regulatory framework of the Basic Assessment process.</p> <p><u>Recommendation for Level 4 VIA</u></p> <p>The comment is noted.</p> <p>A Level 4 Visual Impact Assessment, including detailed architectural design, photomontages, and quantitative modelling, is not a prescribed requirement in terms of the EIA Regulations for a Basic Assessment process of this scale and nature.</p> <p>The level of visual assessment undertaken:</p> <ul style="list-style-type: none"> • Is appropriate to the development footprint and intensity • Is based on site-specific specialist input • Evaluates impact significance rather than absolute visibility <p>While additional detail may refine the assessment, it is not required to determine whether the anticipated impacts are acceptable within the environmental context.</p> <p>The Final BAR therefore concludes that:</p>

	<p><input type="checkbox"/> Alternative scenarios, layouts or designs for the project that have been proposed.</p> <p>I am more than happy to discuss the findings of the baseline assessment should you have any queries.</p>
19Nov20 24	<p>Reply from Janet Ebersohn indicated that the report was received.</p> <p>RE: Erf 205/79 DraftV1 Baseline LVIA</p> <p>janet@ecoroute.co.za To: "Steve Stead" Cc: "Thema Stead (7 Jan)" <denal.sevender_mick@elvisarchitects.co.za> You replied to this message on 2025/11/23 12:31.</p> <p>Thank you working through it now and will revert back shortly</p> <p>Should you require any information please do not hesitate to contact me.</p> <p>Kind regards Janet Ebersohn Eco-High Environmental Management KAMMA Registration Number: 2014/1288 082 5577122</p>
03Mar20 25	<p>Janet indicates that a second visual impact assessor has been appointed.</p>
25Mar25	<p>Ecoroute commence with a Basic Assessment Report: Pre-consultation without notifying VRM Africa that the PPP has commenced. By chance, VRM Africa checks the Ecoroute website and finds that the PPP has commenced.. The following comments were made to the process as an I&AP.</p> <p>An alternative site near the proposed parking area in the southeast portion of the property was proposed as an alternative development for alternative assessment. This area has moderate slopes and is partially screened by dune thicket vegetation, limiting skyline intrusion. The following requirements were requested in the baseline assessment submitted 18Nov2025 to Janet Ebersohn to confirm this suitability/ risk:</p> <ul style="list-style-type: none"> • Conceptual architectural design and the need for 3D visualisations, in line with DEA&DP Visual & Aesthetic Guidelines. • A consolidated Site Development Plan (SDP) including: <ul style="list-style-type: none"> ○ All access routes and cut/fill areas (especially the access route along the dune ridgeline to construct the proposed main dwelling). ○ Earthworks/ Vegetation clearance buffers. ○ Deck specifications. ○ Adequate spacing between units to allow for vegetation screening. ○ Review of the main access driveway linear design. <p>As VRMA was excluded from the DBAR, we reserve the right to make comments as an I&AP.</p>
30mar25	<p>Based on the concern raised by VRMA regarding the second VIA, JE agrees that both reports are submitted, and that VRM Africa is added as an I&AP.</p>

- Visual impacts may occur, particularly given the elevated dune setting
- However, such impacts are localised and can be reduced through design and mitigation measures
- The overall impact significance is low and acceptable, within the context of the receiving environment

No further specialist visual assessment is considered necessary at this stage.

Annexure 1 – Topographic Cross-Section Mapping and Ridgeline Position

The comment is noted.

The topographic cross-section and terrain model presented by VRMA are acknowledged as reflecting the broader geomorphological context of the site, namely that the property forms part of an elevated fossil dune system associated with coastal dune ridgelines.

It is therefore accepted that:

- The site occurs within a raised dune landscape, and
- The general landform exhibits ridgeline characteristics when viewed at a macro scale

However, the Basic Assessment Report (BAR) does not rely on the assertion that the development is located “behind” a dune ridge in a strictly geomorphological sense. Rather, the intent of the statement was to describe the relative siting of the development within the property, based on:



- Localised terrain variation
- Micro-siting within the broader dune system
- Refinement of the development footprint to avoid the most exposed positions where feasible

The development layout has been informed by:

- Geotechnical input
- Environmental constraints mapping
- Site-specific observations

and represents a position within the site that reduces visual exposure relative to more prominent or sensitive areas, rather than implying complete separation from the ridgeline system.

It is further noted that:

	<p>RE: Erf 205/79 DraftV1 Baseline LVIA</p> <p> janet@ecocreate.co.za To: Steve Stead; steve@ecocreate.co.za Cc: admin@ecocreate.co.za</p> <p>Hi Steve</p> <p>Yes I agree,</p> <p>janet@ecocreate.co.za please add Steve as a ILAP</p> <p>Should you require any information please do not hesitate to contact me.</p> <p></p> <p>Kind Regards Janet Iberscha Ecovision Environmental Management EASA/EA Registration Number: 2015/7208 082 5977322</p> <hr/> <p>From: Steve Stead <steve@vrma.co.za> Sent: Monday, 03 March 2025 12:33 To: janet@ecocreate.co.za Cc: janet@ecocreate.co.za Subject: RE: Erf 205/79 DraftV1 Baseline LVIA</p> <p>Hi Janet,</p> <p>This is a problem. To ensure that 'cherry picking' of reports does not take place, please note that both assessment reports need to be included in the EIA process.</p> <p>Please let me know who the DEAMD representative is. I will also need to be included as an ILAP.</p> <p>Please confirm receipt of this email, and that I have been added as an ILAP.</p> <p>Kind regards, Steve</p> <p> Stephen Stead Visual Resource Management Africa Pty. Ltd.</p>
13Nov25	VRMA is notified of a Draft BAR public participation process.
18Feb26	VRMA is notified of an Amended DRAFT Basic Assessment Report public participation process.

- The VRMA mapping represents a broad terrain model derived from 5 m contour data, which is appropriate for baseline characterisation
- The Basic Assessment evaluates impact significance at a site-specific scale, incorporating layout refinement and mitigation

The BAR therefore acknowledges that:

- The site is located within an elevated dune environment
- Visibility from certain viewpoints, including the beach, may occur

However, the assessment concludes that:

- The proposed development is limited in scale and extent
- The layout is non-dominant within the broader landscape
- Visual impacts can be reduced through design and mitigation measures

Accordingly, while the VRMA mapping confirms the elevated nature of the site, it does not invalidate the conclusion that the anticipated visual impact is low to moderate and acceptable within context, based on the scale of development and mitigation applied.

Annexure 2 – Table of Correspondence

The comment and annexed correspondence are noted. The correspondence reflects the evolution of the project and engagement between the applicant, Environmental Assessment Practitioner (EAP), and Visual Resource Management Africa (VRMA) during the early stages of site investigation and assessment.

It is acknowledged that:

- VRMA was initially appointed by the landowner in 2024 to undertake a baseline visual assessment
- Preliminary findings raised concerns regarding ridgeline development, skyline intrusion, and slope sensitivity

- A minor spatial discrepancy (± 4 m) in early survey alignment was identified and corrected

These inputs were considered as part of the iterative refinement of the development proposal, which included:

- Appointment of additional visual input to verify and expand the assessment
- Refinement of the development footprint and layout
- Integration of geotechnical, environmental, and visual constraints into planning

Public Participation Process (PPP)

It is acknowledged that VRMA was not included in the initial Pre-Application Public Participation Process.

However, the process is iterative by design, and this was subsequently addressed:

- VRMA was formally registered as an Interested and Affected Party (I&AP)
- VRMA was notified of the Draft BAR and Amended Draft BAR
- VRMA was provided with opportunity to submit detailed comments, which have been incorporated into the Comments and Responses Report

Furthermore:

- All relevant submissions by VRMA, including the Baseline LVIA inputs, have been considered in the assessment process
- The information forms part of the Final BAR submission to the competent authority

The competent authority is therefore in possession of all relevant information required for decision-making, and no Interested and Affected Party has been excluded at the decision stage.

The Public Participation Process is therefore considered procedurally compliant with the EIA Regulations, 2014 (as amended).

Allegation of “Withholding” of the VRMA Baseline Report

The comment is noted.

The VRMA Baseline Assessment represents an independent baseline study commissioned by the landowner prior to the formal EIA process.

The Basic Assessment Report:

- Does not rely exclusively on this report
- Has considered its findings alongside other specialist inputs

- Reflects an integrated assessment based on the final proposed layout

The Final BAR submission will include:

- The VRMA submission and associated correspondence
- The visual specialist inputs relied upon in the assessment

No material information has been withheld from the competent authority. The process reflects a transparent and inclusive assessment, where all inputs have been considered.

Alternative Site and Layout Considerations

The comment is noted.

The suggestion of an alternative development location in the southeastern portion of the property was considered during the assessment process.

The final layout was informed by a multi-disciplinary constraints analysis, including:

- Geotechnical suitability
- Environmental sensitivity (including biodiversity and dune stability)
- Access feasibility
- Overall development practicality

The preferred layout represents a balanced outcome, taking into account these constraints.

The BAR includes an assessment of alternatives, as required in terms of the EIA Regulations.

Requirement for Detailed Design and Level 4 VIA

The comment is noted.

The correspondence reflects an early recommendation by VRMA for a Level 4 Visual Impact Assessment based on detailed design information.

However:

- A Level 4 VIA is not a regulatory requirement for a Basic Assessment process of this scale
- The EIA Regulations require that impacts be assessed based on reasonable and sufficient information at the time of application

The visual assessment undertaken:

- Is appropriate to the scale and nature of the development
- Is based on site-specific specialist input
- Evaluates impact significance rather than absolute visibility

While additional detail may refine the assessment, it is not required to determine impact acceptability.

Evolution of the Project and Assessment Approach

The correspondence clearly demonstrates that:

- The project has undergone iterative refinement
- Specialist inputs (including those from VRMA) have informed the process
- The development layout and assessment have been adapted in response to identified risks and constraints

Differences in professional opinion between specialists are acknowledged and are not uncommon in environmental assessment processes.

The Final BAR presents a balanced, integrated, and defensible assessment, which:

- Considers all available information
- Responds to stakeholder input
- Provides a sufficient basis for decision-making by the competent authority



Eco Route

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Ecoroute 003

23 April 2026

Tessa Joubert, MSc

Ecological Restoration Practitioner

Sedgefield Resident

Dear Ms Joubert,

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

Please be advised that the Final Basic Assessment Report (BAR), together with the Environmental Management Programme (EMPr), specialist studies, Comments and Responses Report, and supporting appendices for the proposed development on Portion 79 of Farm Ruygte Valley No. 205, was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) on **23 April 2026** for consideration and decision-making in terms of the National Environmental Management Act, 1998 and the Environmental Impact Assessment Regulations, 2014 (as amended).

The Final BAR incorporates comments received during the public participation process, specialist inputs, and amendments made to the proposed layout and mitigation measures. The application will now be reviewed by the Competent Authority, which may request additional information or clarification during its decision-making process.

Once a decision has been issued, all registered I&APs will be formally notified of the outcome and advised of their right to appeal in terms of the applicable regulations.

We sincerely thank all Interested and Affected Parties for their participation, time, and valuable input throughout the environmental assessment process.

Kind regards,

Bianca Gilfillan

Environmental Assessment Practitioner

Eco Route Environmental Consultancy



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Ecoroute 005

23 April 2026

Western Cape Roads Infrastructure

Dear Sir / Madam,

RE: RESPONSE TO COMMENT – BASIC ASSESSMENT PROCESS: PROPOSED PRIMARY DWELLING ON PORTION 79 OF FARM 205, RUYGTE VALLEY: SUBMISSION OF FINAL BASIC ASSESSMENT REPORT TO THE DFFE

Please be advised that the Final Basic Assessment Report (BAR), together with the Environmental Management Programme (EMPr), specialist studies, Comments and Responses Report, and supporting appendices for the proposed development on Portion 79 of Farm Ruygte Valley No. 205, was submitted to the Department of Forestry, Fisheries and the Environment (DFFE) on **23 April 2026** for consideration and decision-making in terms of the National Environmental Management Act, 1998 and the Environmental Impact Assessment Regulations, 2014 (as amended).

The Final BAR incorporates comments received during the public participation process, specialist inputs, and amendments made to the proposed layout and mitigation measures. The application will now be reviewed by the Competent Authority, which may request additional information or clarification during its decision-making process.

Once a decision has been issued, all registered I&APs will be formally notified of the outcome and advised of their right to appeal in terms of the applicable regulations.

We sincerely thank all Interested and Affected Parties for their participation, time, and valuable input throughout the environmental assessment process.

Yours faithfully,

Bianca Gilfillan

Environmental Assessment Practitioner

Eco Route Environmental Consultancy

