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DRAFT - BASIC ASSESSMENT REPORT

For

PROPOSED DEVELOPMENT OF LOW-IMPACT, SELF-CATERING CAMPING NODES WITH SHARED AMENITIES FACILITIES FOR THE LOVEMORE FAMILY - PORTION 104 OF FARM 216, UITZICHT, KNYSNA, WESTERN CAPE

PREPARE FOR:	Lovemore Children's Secondary Trust
PREPARE BY:	Eco Route Environmental Practitioners Janet Ebersohn (2019/1286); assisted by Justin Brittion (Can. EAPASA 2023/6648)
DOCUMENT REFERENCE:	2025.09.13 - Draft BASIC ASSESSMENT REPORT - Portion 104 of 216 - Lovemore's
DFFE EA REFERENCE:	TBC
DATE:	March 2026

"On 08 December 2014 the Minister of Environmental Affairs promulgated regulations in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), viz, the NEMA Environmental Impact Assessment (EIA) Regulations 2014, (GN R982, R983, R984 and R985 of 04 December 2014) as amended. The NEMA EIA Regulations, 2014 and listing notices, were subsequently amended on 07 April 2017 (refer to GN R324, R325, R327 of 07 April 2017) and is being referred to as NEMA EIA Regulations, 2014, as amended. The same referencing would apply to the listing notice containing the listed activities that would require Environmental Authorisation.

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STATEMENT OF INDEPENDENCE

I, **Janet Ebersohn**, of Eco Route Environmental Consultancy, in terms of Regulation 13 of the Environmental Impact Assessment Regulations, 2014 (as amended), hereby declare that I provide services as an independent Environmental Assessment Practitioner (**EAPASA Reg: 2019/1286)** and receive remuneration for services rendered for undertaking tasks required in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), and the Environmental Impact Assessment Regulations, 2014 (as amended). I have no financial or other vested interest in the project.

EAP SIGNATURE: _____

This section provides a brief overview of specific assumptions and limitations having an impact on this environmental application process:

- It is assumed that the information on which this report is based (specialist studies and project information, as well as existing information) is correct, factual and truthful.
- The proposed development is in line with the statutory planning vision for the area (namely the local Spatial Development Plan), and thus it is assumed that issues such as the cumulative impact of development in terms of character of the area and its resources, have been taken into account during the strategic planning for the area.
- It is assumed that all the relevant mitigation and management measures and agreements specified in this report will be implemented in order to ensure minimal negative impacts and maximum environmental benefits.
- It is assumed that Stakeholders and Interested and Affected Parties notified of the availability of draft reports during the PPP have submitted all relevant comments within the designated 30-days review and comment period, for inclusion in the Final BAR.

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Table 1: Applicable Basic Assessment Report Attachments

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Appendix B	Preferred layout plan
Appendix C	Environmental Consideration maps
Appendix D1	Terrestrial Biodiversity / Plant Species specialist assessment
Appendix D2	Faunal Species specialist assessment
Appendix D3	Aquatic Biodiversity specialist assessment
Appendix D4	Visual specialist assessment
Appendix E	2025.09.08 – Pre-Application Site sensitivity verification report 104-216.
Appendix F	2025.09.11 - Pre application EMPr - Lovemore - Ptn 104 of Farm 216
Appendix G1	Screening tool - 09 - 104-216 (Lovemore)-Rob Lovemore-2024-08-21 11-44 signed
Appendix G2	Screening Tool - 09 - 104-216 (Lovemore)-Rob Lovemore-2024-08-21 09-51 signed
Appendix H	JJ Marshall CV 2024
Appendix H1	CV Justin Brittion April 2025

SCOPE OF ASSESSMENT AND CONTENT OF BASIC ASSESSMENT REPORT

Appendix 1 of Regulation 982 of the 2014 EIA Regulations describes the contents required to complete a basic assessment report. The below table indicates how Appendix 1 requirements were incorporated into the basic assessment report:

Scope of assessment and content of basic assessment reports	Index
(1) A basic assessment report must contain the information that is necessary for the competent authority to consider and come to a decision on the application, and must include -	
(a) Details of – (i) The EAP who prepared the report; and (ii) The expertise of the EAP, including curriculum vitae.	**Annexure A**.
(b) The location of the activity, including – (i) The 21 digit surveyor General Code of each cadastral land parcel. (ii) Where available the physical address and farm name. (iii) Where the required information items (i) and (ii) is not available, the co-ordinates of the boundary of the property.	(i) **Section B** (ii) **Section B** (iii) **Section B**
(c) a plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale, or, if it is (i) A linear Activity, a description and coordinates of the corridor in which the	**Section B** (i) N/A

proposed activity or activities is to be undertaken; or (ii) On land where the property has not been defined, the coordinates within which the activity is to be undertaken.	(ii) N/A
(d) a description of the scope of the proposed activity, including – (i) All listed and specified activities triggered and being applied for; and (ii) A description of the activities to be undertaken including associated structures and infrastructure	**Section C** (i) **Section C** (ii) **Section C**
(e) A description of the policy and legislative context within which the development is proposed, including – (i) An identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and have been considered in preparation of the report; and (ii) How the proposed activity complies with and responds to the legislation and policy context, plans, guidelines, tools frameworks and instruments.	**Section D** (i) **Section D** (ii) **Section D**
(f) A motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred location.	**Section E**
(g) A motivation for the preferred site, activity and technology alternative	**Section F**
(h) A full description of the process followed to reach the proposed preferred alternative within the site including: (i) Details of all alternatives considered. (ii) Details of the public participation process undertaken in terms of regulation 41 of the regulations, including copies and supporting documents and inputs. (iii) A Summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them. (iv) The environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects. (v) The impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration	**Section F** **Section G** to be completed in Draft and Final BAR. **Section G** to be completed in Draft and Final BAR. **Section H** **Section H**

and probability of the impacts, including the degree to which these impacts – (aa) can be reversed (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated. (vi) The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives. (vii) Positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects. (viii) The possible mitigation measures that could be applied and level residual risk (ix) The outcome of the site selection matrix (x) If no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and (xi) A concluding statement indicating the preferred alternatives, including the preferred location of the activity.	**Section H** **Section H** **Section H** to be included in Draft and Final BAR. **Section H** to be included in Draft and Final BAR. **Section I** to be included in Draft and Final BAR.
(i) A full description of the process undertaken to identify, assess and rank the impacts the activity will impose on the preferred location through the life of the activity, including - A description of all environmental issues and risks that were identified during the basic assessment process; and An assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures	**Section H (7)**
(j) An assessment of each identified potentially significant impact and risk, including - Cumulative impacts; The nature, significance and consequences of the impact and risk; The extent and duration of the impact and risk; The probability of the impact and risk occurring; The degree to which the impact and risk can be reversed; The degree to which the impact and risk may cause irreplaceable loss of resources; and The degree to which the impact and risk can be mitigated	**Section H (7)**
(k) Where applicable, a summary of the findings and impact management measures identified in any specialist report complying with Appendix 6 to these Regulations and an indication as to how	**Section H (7)**

these findings and recommendations have been included in the final assessment report.	
(l) An environmental impact statement which contains: • A summary of the key findings of the environmental impact assessment; • A map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and • A summary of the positive and negative impacts and risks of the proposed activity and identified alternatives	**Section H and I, Appendix B** **Appendix D** **Section F and H**
(m) Based on the assessment, and where applicable, impact management measures from specialist reports, the recording of proposed impact management objectives, and the impact management outcomes for the development for inclusion in the EMPr.	To be completed in Draft and Final BAR
(n) Any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation.	To be completed in Draft and Final BAR
(o) A description of assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed	**Section B**
(p) A reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation.	To be completed in Draft and Final BAR
(q) Where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required, the date on which the activity will be concluded and the post construction monitoring requirements finalised.	To be completed in Draft and Final BAR
(r) An undertaking under oath or affirmation by the EAP in relation to: The correctness of the information provided in the reports; The inclusion of comments and inputs from stakeholders and I&APs; The inclusion of inputs and recommendations from the specialist reports where relevant; and Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties	To be included on submission of Draft BAR
(s) Where applicable, details of any financial provisions for the rehabilitation, closure and ongoing post decommissioning management of negative environmental impacts	This environmental assessment does not include application for decommissioning and closure of activities.

(t) Any specific information that may be required by the competent authority.	To be completed in Draft and Final BAR
(u) Any other matters required in terms of section 24(4)(a) and (b) of the Act.	Refer to report below in entirety.

SECTION A – ADMINISTRATIVE DETAILS

Applicant details:

Title	Mr
Name of the Applicant	Rob
Surname of the Applicant	Lovemore
Name of contact person for applicant (name and surname) (if other)	-
Company/ Trading name (if any)	Lovemore Children Secondary Trust
Company Registration Number	-
Physical address	Benmore Farm, Heatherbank Road, Theescombe
Postal address	-
Postal code	6065
Telephone	-
Cell phone	0824584475
E-mail	rob@lovemore.co.za

Landowner details:

Name of the Landowner	Lovemore Children Secondary Trust
Surname of the Landowner	-
Postal address	-
Postal code	-
Telephone	-
Cell phone	-
E-mail	-

Provincial Authority details:

Provincial Environmental Authority:	Western Cape Department of Environmental Affairs and Development Planning
Name of contact person in Environmental Section (name and surname)	Danie Swanepoel
Postal address	4th Floor, York Park Building, 93 York Street,
Postal code	6529
Telephone	0448142002
Cell phone	-
E-mail	Danie.Swanepoel@westerncape.gov.za

Local Municipal details:

Municipality	Knysna Municipality
Name of contact person in Environmental Section (name and surname)	Mulalo Musekene
Postal address	5 Clyde Street, Knysna
Postal code	6570
Telephone	044 302 6300
Cell phone	044 302 6375
E-mail:	mmusekene@knysna.gov.za

Environmental Assessment Practitioner details:

Company of Environmental Assessment Practitioner (EAP)	Eco Route Environmental Consultancy cc
EAP name and surname	• Janet Ebersohn (registered EAP - 2019/1286) • assisted by Justin Brittion (candidate EAP – 2023/6648)
EAP Qualifications and Professional affiliations	• Janet Ebersohn (B.Sc. Hons. Environmental Management) • Justin Brittion – MSc Environmental Science
Physical address	6 Parakiet Road, Sedgefield, Western Cape
Postal address	PO BOX 1252 Sedgefield
Postal code	6573
Telephone	-
Cell phone	081 208 2170 (Justin)
E-mail	janet@ecoroute / justin@ecoroute.co.za / admin@ecoroute.co.za

For clarity, it should be noted that Rob Lovemore, as a trustee of the Lovemore Family Trust, will be designated as the applicant. The proposed development, as well as the use of the property, is intended for the benefit of the trust and the Lovemore family. However, for the purposes of environmental authorisation and designated responsibilities, Rob Lovemore will act as the representative. This ensures that there is a clearly identified individual who can be held accountable, rather than the trust as a collective entity.

SECTION B – DESCRIPTIVE DETAILS

1. LOCATION DESCRIPTION

Portion 104 of Farm 216, Knysna (hereafter referred to as "the property") the Knysna Estuary on the northern boundary, and Featherbed Private Nature reserve on the western boundary. The property extends **9.96 Ha**(as per the title dead).

SG Region:	KNYSNA
Farm Nr:	104/216
Area (Ha):	9.96
SG Code:	C03900000000021600104

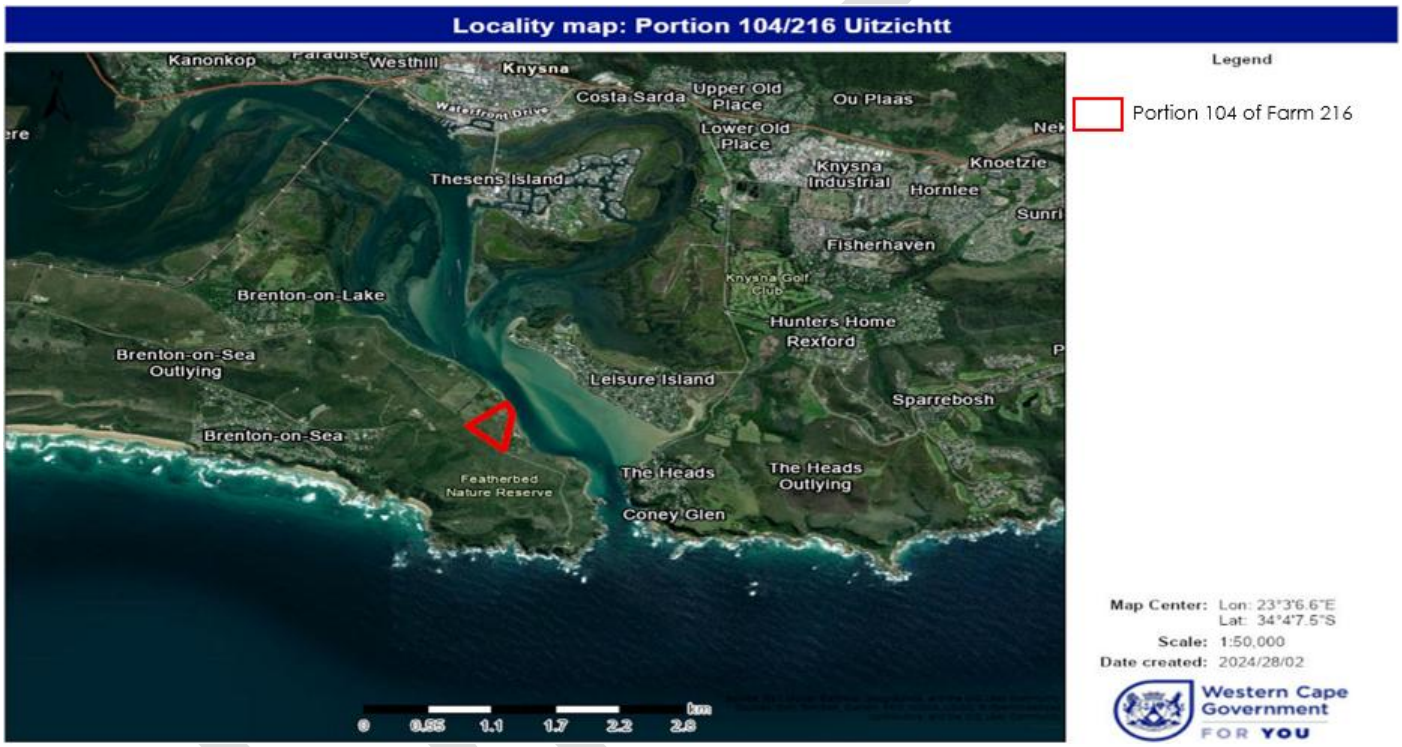


Figure 1: Locality Map of Portion 104 of Farm 216

Access to the site will be via Dolley Raats Street (a tarred road) that transitions into a gravel road, Dominee J.F. du Toit Avenue, which eventually becomes C.J. Langenhoven, leading towards the property. The following coordinates indicate the boundaries of the property (Google Earth, 2024).

FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Northern Boundary	34°	04'	11.13"	23°	02'	54.85"
Eastern Boundary	34°	04'	16.84"	23°	02'	58.28"
Southern Boundary	34°	04'	26.60"	23°	02'	55.97
Western Boundary	34°	04'	17.99	23°	02'	44.04

2. PROPERTY BACKGROUND INFORMATION

Based on Google Earth imagery from 2016, the property featured an existing dirt road with two structures near its northern boundary. These structures have been recently identified on the site plan as a "building" and a "garage" (TMBA, 2023). There has also historically been a disturbed patch of grass on the property at the end of the existing dirt road. During the 2017 Knysna veld fires the property vegetation was heavily affected. During regrowth the grass patch has been retained in the same originally disturbed area.

Figure 2: Brief overview of the property between 2016 and 2024 (Google Earth Pro)

The property has historically been used by the Lovemore family for private recreational purposes over many years. Family members have regularly made use of the property for outdoor activities and informal camping, making use of the existing disturbed areas and the dirt road for access. These activities have generally been temporary in nature, with family members making use of tents and basic camping arrangements during visits to the property.

The intention of the current application is therefore not to introduce a new form of land use, but rather to formalise and better manage the family's longstanding use of the property. The proposed development will provide structured and environmentally sensitive sleeping platforms and shared amenities that replace temporary camping arrangements currently used by the family. The overall nature and intensity of use of the property will remain consistent with its historic use by the Lovemore family.

Importantly, the proposed development is intended solely for use by members of the Lovemore family and their immediate guests and will not operate as a commercial tourism facility or public accommodation establishment.

SECTION C – RECEIVING ENVRIONMENTAL CONCIDERATIONS

This section presents the available environmental information alongside specialist confirmations to assess the current state of the receiving environment. It considers historical classifications and identifications, integrating ground-truthing information to provide context for the present conditions. This approach is necessary because desktop data may not always align with the actual findings on-site.

1. VEGETATION

According to the National Vegetation Map of South Africa (SANBI, 2018) (Figure 3) the expected vegetation type on the property would be Knysna Sand Fynbos (Critically Endangered).

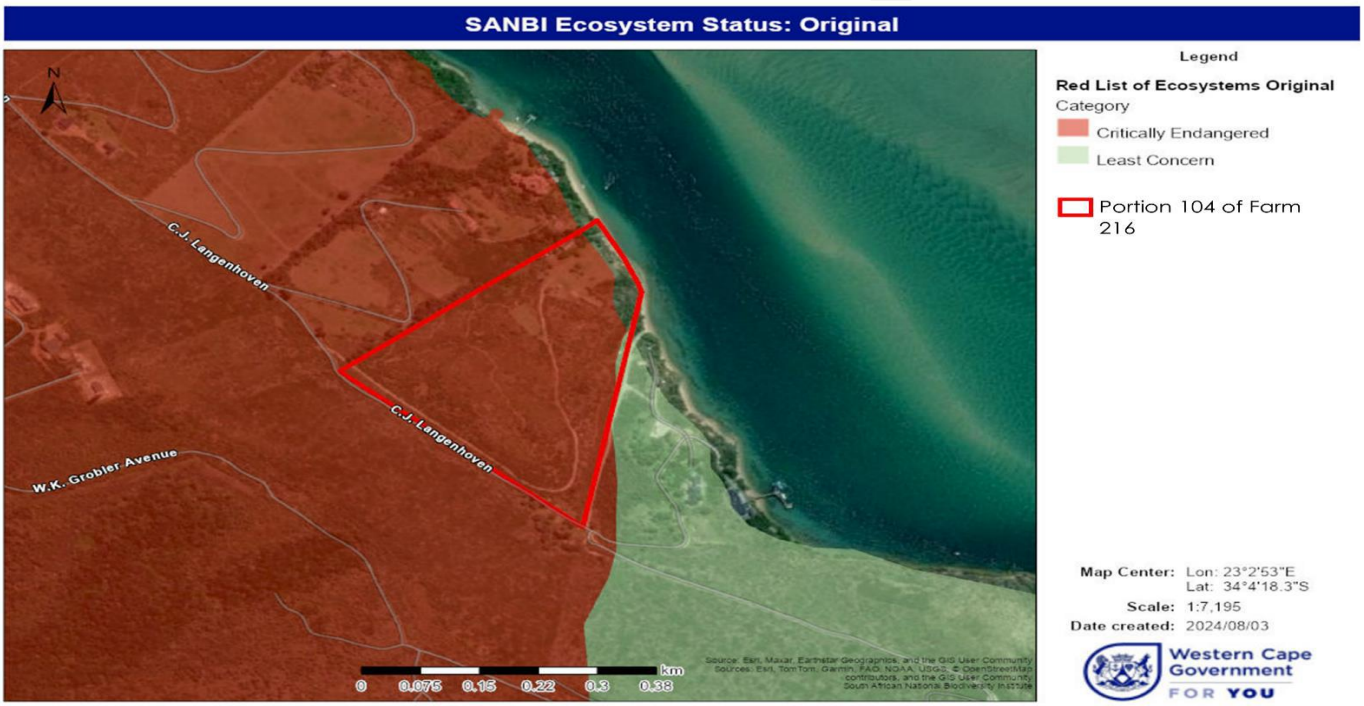


Figure 3: SANBI Original Ecosystem Status including Knysna Sand Fynbos

Some important features of this vegetation type are included in Table 2.

Table 2: Important Information Regarding Knysna Sand Fynbos (SANBI, 2018)

FFh 10 Knysna Sand Fynbos	VT 4 Knysna Forest (85%) (Acocks 1953). LR 2 Afromontane Forest (72%), LR 4 Dune Thicket (24%) (Low & Rebelo 1996). BHU 100 Knysna Afromontane Forest (72%) (Cowling et al. 1999b, Cowling & Heijnis 2001).
Distribution	Western Cape Province: Garden Route coastal flats from Wilderness, generally to the north of the system of lakes, several patches around the Knysna Lagoon, with more isolated patches eastwards to the Robberg peninsula near Plettenberg Bay. Altitude 40–300 m.
Vegetation & Landscape Features	Undulating hills and moderately undulating plains covered with a dense, moderately tall, microphyllous shrubland, dominated by species more typical of sandstone fynbos.
Geology & Soils	Deep, acid Tertiary sand inland of coastal dunes forming regic sands and soils of Lamotte form. Land types mainly Hb and Ga.
Climate	MAP 670–1 090 mm (mean: 850 mm), with a slight peak in autumn and spring. Mean daily maximum and minimum temperatures 27.3°C and 7.3°C for February and July, respectively. Frost incidence 2 or 3

	days per year. See also climate diagram for FFd 10 Knysna Sand Fynbos (Figure 4.57).
Important Taxa	Small Tree: Widdringtonia nodiflora. Tall Shrubs: Cliffortia linearifolia, Leucadendron eucalyptifolium, Metalasia densa, Passerina corymbosa. Low Shrubs: Anthospermum aethiopicum, Berzelia intermedia, Cliffortia drepanoides, Clutia rubricaulis, Erica diaphana, E. glandulosa subsp. fourcadei, E. glumiflora, E. sessiliflora, Helichrysum asperum var. asperum, Lachnaea diosmoides, Leucadendron salignum, Leucospermum cuneiforme, Lobelia coronopifolia, Morella quercifolia, Muraltia squarrosa, Oedera imbricata, Protea cynaroides, Stoebe plumosa, Tephrosia capensis. Herbs: Geranium incanum, Helichrysum felinum. Graminoids: Aristida junciformis subsp. galpinii, Brachiaria serrata, Cynodon dactylon, Eragrostis capensis, Ficinia bulbosa, Heteropogon contortus, Ischyrolepis eleocharis, Tetraria cuspidata, Thamnochortus cinereus, Themeda triandra, Tristachya leucothrix.
Conservation	Endangered. Target 23%. Patches are statutorily conserved in the proposed Garden Route National Park (about 3%) as well as 2% in several private nature reserves. Almost 70% already transformed (pine and gum plantations, cultivation, Knysna urban sprawl, building of roads). Alien Acacia melanoxylon, A. mearnsii and A. longifolia occur locally at low densities. Erosion very low and moderate.

* Reference - Taylor (1970b), Drews (1980a).

The vegetation within the study area was mapped at a fine scale in the C.A.P.E. Fine-scale Mapping Project by Vlok, Euston-Brown, & Wolf (2008). According to this mapping, two distinct vegetation units are identified within the study area: Groenvlei Coastal Forest (Endangered) and Sedgefield Thicket-Fynbos (Least Threatened). Taking this into consideration, together with ground truthing information (e.g. disturbance caused by alien invasive plant species and the 2017 Knysna veld fires), the proposed vegetation on the property consist of a fynbos thicket mosaic of varying degrees of degradation. This vegetation is closer in structure to Sedgefield Thicket-Fynbos and Goukamma Dune Thicket found on the property directly adjacent to the eastern side (Featherbed Nature Reserve) (Capensis, 2024). The habitat map (Figure 4) distinguishes between dune thicket and thicket-fynbos vegetation, and their corresponding condition. The habitats mapped at the site include (1) Degraded Dune Thicket, (2) Degraded Thicket-Fynbos, and (3) Transformed vegetation.

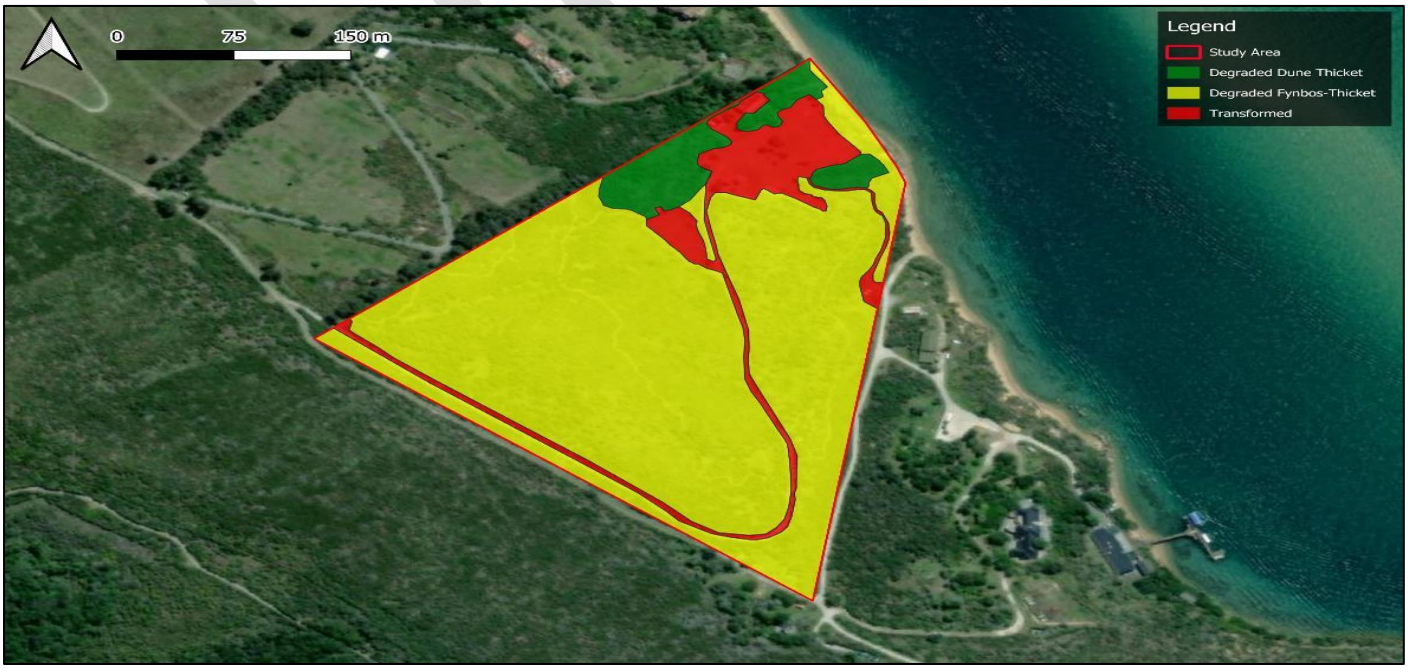


Figure 4: The habitats identified at the study area, superimposed on an ESRI TM satellite image (Capensis, 2024)

1.1. Degraded Dune Thicket

Several portions of the study area can be classified as degraded dune thicket. This habitat is found primarily on the north-western boundary of the site, with smaller areas to the north-east. The vegetation consists primarily of moderately sized thicket shrubs and small trees (2 -2.5m). The dominant species, much like the rest of the site is Osteospermum moniliferum however this vegetation type is distinguished from the thicket-fynbos vegetation by its increased diversity of thicket species and its denser structure (Capensis, 2024).

1.2. Degraded Fynbos Thicket

The majority of the site is covered in thicket-fynbos vegetation. The composition and structure of the habitat conforms more closely to the Sedgefield Fynbos-Thicket habitat described by Vlok, Euston-Brown, & Wolf (2008) than to Knysna Sand Fynbos (VEGMAP, 2018). The vegetation is dominated by Osteospermum monileferum, with other sclerophyllous shrub species forming a dense mid-canopy layer. These include Passerina corymbosa and Metalasia muricata. Thicket species such as Pterocelastrus tricuspidatus and Searsia lucida are fairly common and are likely to increase in density should fire continue to be excluded from the site. Two species of conservation concern were found in this habitat. These include Lebeckia gracilis (EN), and Selago villicaulis (VU). Within the dense fynbos-thicket vegetation there are open gaps, supporting low growing vegetation such as Helichrysum cymosum, Helichrysum foetidum, Helichrysum petiolare, Selago corymbosa, and Ficinia acuminata (Capensis, 2024).

1.3. Transformed Habitat

Transformed habitat contains very little indigenous or naturally occurring vegetation and describes areas of the study area that have been converted to open grassy areas or replaced by roads and other hard infrastructure (buildings, concrete pads etc.). The vegetation is dominated by grasses such as Cynodon dactylon, Stenotaphrum secundatum, and Pennisetum clandestinum, interspersed with common ruderal species (Capensis, 2024).

1.4. Sensitivities related to the identified habitats

In the case of the study area, a **Medium sensitivity** applies to the Degraded Fynbos-thicket habitat for the following reasons (Capensis, 2024):

1. The site classified as a CBA 1 and CBA 2 in the WCBSP. The CBA 1 area would be more accurately classified as CBA 2 due to the poor condition of the vegetation.
2. Two SCC were found in this habitat (*Lebeckia gracillis* & *Selago villicaulis*).
3. The ecological functioning of this habitat is moderately modified. The historic medium to high density of IAPs and high intensity fires have depleted the species richness of the vegetation.
4. This habitat occurs on moderate to steep slopes which would be prone to erosion if developed.
5. The restoration potential of this area is moderate with appropriate active management inputs.

A **Low sensitivity** applies to the Degraded Dune Thicket habitat for the following reasons (Capensis, 2024):

1. The vegetation type present is Least Concern, however the vegetation that remains in this habitat is only marginally representative of the original ecosystem in its current condition. However, it does contain "indigenous vegetation" by definition.

2. The site classified as CBA 1 and CBA 2 in the WCBSP. The CBA 1 area would be more accurately classified as CBA 2 due to the poor condition of the vegetation.
3. Two protected tree species were found in this habitat (White Milkwood *Sideroxylon inerme* and Outeniqua yellowwood *Afrocarpus falcatus*). The white milkwood is likely naturally occurring whereas the Outeniqua yellowwood appears to have been planted.
4. The ecological functioning of this habitat is modified in its current state due to the long history of high-density IAPs and significant fire events.
5. The restoration potential of this habitat is low to moderate without active management inputs, but restoration is possible, and recommended for the areas which are not developed.

A **Very Low sensitivity** applies to the Transformed habitat for the following reasons (Capensis, 2024):

1. The indigenous vegetation has been almost completely removed from this habitat, with the dominant vegetation consisting of lawn grasses.
2. One individual of one SCC (*Selago villicaulis*)was found in this habitat however this species is fairly abundant elsewhere on the property.

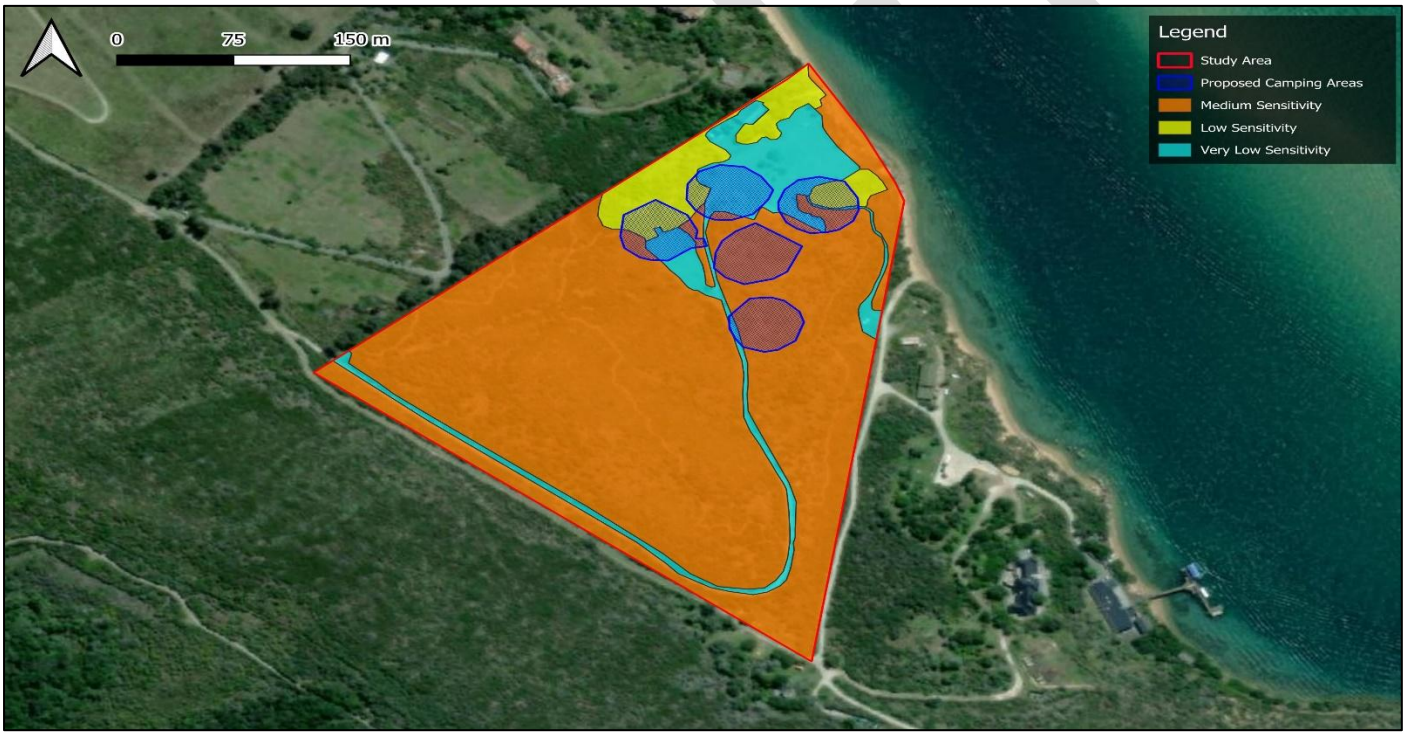


Figure 5: The sensitivities for habitats described in the study area overlaid on an ESRI ™ image.

Species of Conservation Concern was identified on the property, whereafter the architect (Tracey Mills Brink, 2025) designed the layout of the preferred alternative to avoid impacting the species. It will be recommended, as part of the mitigation measures and the Environmental Management Programme, that the location of this species be clearly demarcated and remain undisturbed throughout all phases of the development. Furthermore, if it becomes necessary to disturb protected trees identified (i.e. Sideroxylon inerme -White Milkwood), the applicable applications for permit in terms of the National Forests Act (Act 84 of 1998) must be considered.

2. SENSITIVE AREAS (CBA, ESA, and PA)

The Western Cape Biodiversity Spatial Plan (WCBSP, 2017) designated the property as situated within a Critical Biodiversity Area (CBA:1 – To maintain and CBA:2 – To restore), including terrestrial and aquatic features. An Ecological Support Area (ESA:2 – To restore) is also included on the property.

CBA1: Terrestrial – Terrestrial

Definition: Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.

Objective: Maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.

CBA1: Aquatic – Wetland

The definition and objective remain the same.

ESA 2: Restore from other land use

Definition: Areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of PAs or CBAs and are often vital for delivering ecosystem services.

Objective: Restore and/or manage to minimize impact on ecological processes and ecological infrastructure functioning, especially soil and water-related services, and to allow for faunal movement.

By the 2017 Western Cape Biodiversity Spatial Plan the eastern boundary of the site abuts the Featherbed Nature Reserve whereas the north-eastern boundary borders on the Garden Route National Park, both of which as designated protected areas (Figure 6).

Figure 6: Western Cape Biodiversity Spatial Plan (WCBSP 2017) Sensitive areas

However, the new 2023 Western Cape Biodiversity Spatial Plan designated the entire property as a protected area (Figure 7).

Figure 7: Western Cape Biodiversity Spatial Plan (WCBSP 2023) Sensitive areas

Definition: Areas proclaimed as protected areas in terms of national or provincial legislation.
Objective: Must be kept in a natural state, with a management plan focused on maintaining or improving the state of biodiversity. A benchmark for biodiversity.

It should be noted that that property is not proclaimed as a protected area, but as of the introduction of the 2023 WCBSP, the entire property will be dealt with according to the general guidelines for protected areas.

Table 3: Extract from Western Cape Biodiversity Spatial Plan (2023) regarding protected areas

WCBSP category	Desires management objective	General guidelines
Protected Areas	Must be kept in a natural state, with a management plan focused on maintaining or improving the state of biodiversity. A benchmark for biodiversity.	• All operational aspects of managing these areas must be subject to their main purpose, which is to protect and maintain biodiversity and ecological integrity and should be governed by a formally approved management plan including land-use activities that support the primary function of these areas as sites for biodiversity conservation. • The management plan must identify allowable activities, which should be consistent at least with the CBA 1 category; the location of these allowable activities should be captured in a zonation plan in the management plan. • Activities relating to the construction of roads, administrative or tourism

		infrastructure and services (such as water reticulation systems, power lines, etc.) that are required to support the primary function of the protected area and its allowable activities, are subject to NEMA authorisation and the protected area management plan. • In the case of Protected Environments, a variety of agricultural land-uses may be allowed, such as livestock grazing, plantation forestry and limited cultivation. The location of these land-use activities must be informed by the WC BSP Map and should be specified in the zonation plan in the management plan for the Protected Environment. All areas of natural habitat that are zoned for conservation use, should be subject to implementation of the land-use guidelines for protected areas, CBAs, and ESAs. • Mountain Catchment Areas are also included in this category, however unlike the other types of protected area, there is no requirement for a management plan which would guide allowable land-uses and activities. Therefore, the land-use guideline should be aligned with that of Protected Areas, with the primary intention to ensure the steady supply of good quality water to downstream areas.

3. FRESHWATER SENSITIVITIES

Although the 2017 Western Cape Biodiversity Spatial Plan identifies Critical Biodiversity Areas (CBAs) associated with wetlands on the property, Cape Farm Mapper does not indicate the presence of any wetlands or rivers (perennial or non-perennial) on the site (Figure 8). Furthermore, the aquatic specialist study conducted by Confluent (2024) confirmed that no freshwater features are present on the property.

Figure 8: Map of Freshwater Resources in proximity to Ptn 104 of farm 216

4. FAUNA

Faunal Specialist (Confluent, 2024) were consulted to provide feedback on the faunal sensitivities relevant to the proposed development property. The GPS tracking gives indication to the extent of a site visit done on 31 May 2024.

Figure 9: Habitats found on Portion104/216 Uitzigt Farm and GPS tracks of the site visits (Confluent, 2024)

4.1. Avifauna

No SCC was encountered during the site visit. Three bird counts were conducted across the property, in addition to opportunistic sightings noted throughout the meander and searching for nests/roosting sites in suspected habitat. A total of 16 bird species were identified during the site visit.

Table 4: Avifauna species observed during the site visit (Confluent, 2024)

Common name	Species Name
Speckled Mousebird	*Colius striatus*
Hadada Ibis	*Bostrychia hagedash*
Kelp Gull	*Larus dominicanus*
Pied Crow	*Corvus albus*
Cape White-eye	*Zosterops virens*
Fork-tailed Drongo	*Dicrurus adsimilis*
Bar-throated Apalis	*Apalis thoracica*
Egyptian Goose	*Alopochen aegyptiaca*
African Fish Eagle	*Icthyophaga vocifer*
Cape Bulbul	*Pycnonotus capensis*
Jackal Buzzard	*Buteo rufofuscus*
Southern Boubou	*Laniarius ferrugineus*
Sombre Greenbul	*Andropadus importunus*
Greater Double-collared Sunbird	*Cinnyris afer*
Karoo Prinia	*Prinia maculosa*
Green-backed Camaroptera	*Camaroptera brachyura*

4.2. Mammals

There was evidence of sub-surface tunnelling by golden moles found on site especially in the lawn area. A bushbuck was seen on the site and more individuals are suspected based on tracks and droppings found. Caracal scat was also found at the site. There was substantial evidence of mole rat activity, particularly on the lawn area. Rodent paths were also observed.

Table 5: Mammal species observed during the site visit (Confluent, 2024)

Common name	Species Name
Cape White-eye	Zosterops virens
Grey Heron	Ardea cinerea
Jackal Buzzard	Buteo rufofuscus
Karoo Prinia	Prinia maculosa
Kelp Gull	Larus dominicanus
Malachite Sunbird	Nectarinia famosa
Neddicky	Cisticola fulvicapilla
Olive Thrush	Turdus olivaceus
Red-eyed Dove	Streptopelia semitorquata
Sombre Greenbul	Andropadus importunus
Southern Boubou	Laniarius ferrugineus
Southern Fiscal	Lanius collaris
Western Cattle Egret	Bubulcus ibis

4.3. Terrestrial Invertebrates

No SCC were found during the site inspections. Cocktail ants (Crematogaster sp.) were found in nests. Spider webs (Araneae) were found on site as were zebra agate snails (Cochlitoma zebra). Pitfall traps did not attract

the dung beetle SCC (Circellium bacchus) but many blowflies (Calliphoridae) were attracted to the bait. A pea blue butterfly (Lampides boeticus) as well as an unidentified white lepidopteran (suspected Pieridae) were found during a sweep of the site. Butterfly host plants and ant species were not found at the site.

4.4. Amphibians

No amphibians were found, which is not surprising given the lack of any waterbodies/watercourses present on site. Consequently, there was no suitable habitat for the SCC Knysna Leaf-folding Frog (Afrixalus knysnae).

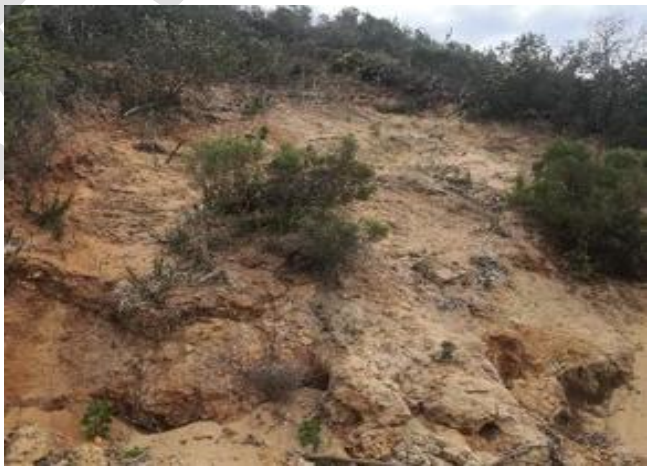
4.5. Reptiles

No reptile SCC were highlighted for this site by the DFFE Screening Tool or any of the public platforms. As such, no targeted sampling took place for this group. However, a puffadder was found on the property during the meander.

5. COASTAL ENVIRONMENT

The property slopes down to the northeast towards the Knysna Estuary (coastal environment) which is bordered by a very steep sandy cliff. The sandy cliff shows signs of erosion that is most likely associated with surface water that flows over a large, mowed lawn area immediately adjacent to the cliff. The lawn is located at the base of a relatively steep slope and acts a poor buffer to overland surface water flows which has most likely contributed to the erosion of the cliff face. The soil on the property is very sandy and no hydro-geomorphological landscape features (depressions, confined valleys, channels etc.) indicating the presence of a watercourse (i.e. stream, river or wetland) were observed within the proposed development footprint.

Table 6: Images that show the current state of the coastal environment (Confluent, 2024)



Take note that there are mitigation measures proposed by the aquatic specialist that will be fully considered and incorporated into both the Basic Assessment Report and the Environmental Management Programme (EMPr). Furthermore, it is confirmed that no development activities will be introduced that could negatively affect the coastal environment.

As the property boarders the Knysna Estuary, it should be noted that the Regulations for the Proper Administration of the Knysna Protected Environment is applicable. In these regulations there is reference to a "development control area" which is defined as –

"development control area" means the area comprising—

(a) the biodiversity control area; and

(b) land situated within fifty metres inland from the—

(i) water area; and

(ii) highest line to which any water occurring in the water area may rise at any time as a result of the action of the tides or otherwise, during ordinary storms occurring during the most stormy period of the year, excluding exceptional or abnormal floods;

Following consultation with South African National Parks (SANParks), it was agreed that a stewardship / settlement agreement will be pursued between SANParks and the Lovemore family in relation to the long-term management of Portion 104 of Farm 216. The intention of this agreement is to formalise conservation-oriented land management practices on the property and to ensure that the ecological integrity of the Knysna Protected Environment and surrounding conservation areas is maintained. The proposed development has therefore been considered in consultation with SANParks to ensure that it aligns with the broader conservation objectives applicable to the Knysna Estuary system and adjacent protected areas. The outcomes of this engagement will form part of the ongoing environmental management framework for the property and will be reflected.

6. HERITAGE

A Notice of Intent to Develop (NID) in terms of Section 38(1) and (8) of the National Heritage Resources Act (Act 25 of 1999) was submitted to Heritage Western Cape (HWC) for review of the proposed development. The submission was considered by the Heritage Officers Meeting (HOMS), and HWC issued a final comment confirming that no further heritage studies are required, as the proposed development is not expected to impact heritage resources. Heritage Western Cape further requested that the HWC Chance Finds Procedure and Accidental Finds Protocol be incorporated into the Environmental Management Programme (EMPr) and Environmental Authorisation conditions. These requirements will be included in the final Basic Assessment documentation and implemented during the construction phase should any heritage resources be encountered.

SECTION D – ENVRIONMENTAL SCREENINING TOOL INPUT

A Department of Forestry, Fisheries, and the Environment (DFFE) national web-based screening tool was generated (21 August 2024) to review the environmental sensitivities for *Transformation of land / Indigenous vegetation*. It was generated once more (21 August 2024) to review the environmental sensitivities for *Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property.*

The screening reports both list a variety of specialist studies to be undertaken based on the data informants of the tool at the study area.

The application classifications selected for the screening report was –

- *Transformation of land | Indigenous vegetation.*
- *Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property*

1. ENVIRONMENTAL MANAGEMENT FRAMEWORKS RELEVANT TO THE APPLICATION

The Garden Route Environmental Management Framework is applicable to the proposed development. (https://screening.environment.gov.za/ScreeningDownloads/EMF/gardenroute_finalreport.pdf)

The Basic Assessment process should consider impacts on biodiversity, water resources, soil stability, air quality, and noise. It must also address socio-economic factors, such as effects on the local community and cultural significance, while ensuring compliance with the National Environmental Management Act (Act 107 of 1998) and local zoning laws. Mitigation measures should include an Environmental Management Plan and continuous monitoring. Public participation is essential to involve and address concerns from stakeholders and the community.

2. RELEVANT DEVELOPMENT INCENTIVES, RESTRICTIONS, EXCLUSIONS OR PROHIBITIONS

The Screening Tool indicated that the proposed site is within both a South African Conservation Area (SACAD) and a South African Protected Area (SAPAD). Conservation Areas have recently become regulated through national and provincial legislation. Read in conjunction with NEMA (Act 107 of 1998), these areas have been considered in the Basic Assessment. The proposed development further takes into consideration governance of protected areas and the proposed development, the coastal area of the property is within the Garden Route National Park, which is declared a Protected Area under Section 9 of the National Environmental Management Protected Areas Act (Act 57 of 2003).
In Section 50(5) it further states that –

- No **development**, construction or farming may be permitted in a national park, nature reserve or world heritage site without the prior written approval of the management authority.

In which case South African National Parks (SANParks) is the management authority. Although no development is proposed within the boundaries of the Garden Route National Park, SANParks will be consulted.

3. PROPOSED DEVELOPMENT AREA ENVIRONMENTAL SENSITIVITY

The Screening Tool Report identifies the following summary of environmental sensitivities on the property, highlighting only the areas of highest sensitivity. These sensitivities, as reflected in the Screening Tool output, are indicative and have been verified on site. While this section presents the mapped sensitivities as generated by the Screening Tool, the verified sensitivities are detailed in the accompanying Site Sensitivity Verification Report (SSVR).

Table 7: Environmental Sensitivities according to the DFFE screening tool report

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture		X		
Animal Species		X		
Aquatic Biodiversity	X			
Archaeological & Cultural Heritage				X
Civil Aviation			X	
Defence				X
Palaeontology			X	
Plant Species		X		
Terrestrial Biodiversity	X			

4. IDENTIFIED SPECIALIST INPUT REQUIRED

Based on both the selected classifications (*Transformation of land | Indigenous vegetation*) as well as (*Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property*). Including considerations of the environmental sensitivities of the proposed development footprint. The following specialist assessments have been identified for inclusion in the Basic Assessment Report.

Table 8: Combined identified specialist assessments for (Transformation of land | Indigenous vegetation) as well as (Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property).

No:	Specialist Assessment	Assessment Protocol
1	Landscape/Visual Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
2	Archaeological and Cultural Heritage Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
3	Palaeontology Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
4	Terrestrial Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Terrestrial_Biodiversity_Assessment_Protocols.pdf
5	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Aquatic_Biodiversity_Assessment_Protocols.pdf
6	Marine Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
7	Avian Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Avifauna_Assessment_Protocols.pdf
8	Geotechnical Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
9	Socio-Economic Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
10	Plant Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Plant_Species_Assessment_Protocols.pdf

11	Animal Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Animal_Species_Assessment_Protocols.pdf

It must be taken into consideration that the current use of the land and the environmental sensitivity of the site, as identified by the national web-based environmental screening tool, was first reviewed and verified (or disputed) in the SSVR. During this verification, the reasons for not including certain specialist assessments were explained. This verification may change under additional input provided during the pre-application public participation.

SECTION E – PROJECT SCOPE

NOTE:

This section has been substantially revised for the Draft BAR following the Pre-Application PPP (29/05/2025 – 30/06/2025). Key revisions include: (1) explicit clarification of the private family-use mandate; (2) detailed EUA descriptions based on the updated SDP (TMBA Architects, 25/02/2026); (3) a complete disturbance footprint summary; (4) updated services information addressing BOCMA, SANParks, and I&AP concerns; and (5) a formal record of SANParks stewardship engagement. I&APs who raised concerns during the PPP regarding project ambiguity are directed to this revised section.

1. CLARIFICATION ON THE NATURE OF THE PROPOSED DEVELOPMENT

Before describing the physical development components, it is necessary to address directly the most persistent concern raised during the Pre-Application PPP: uncertainty about whether the proposed facility is intended for private family use or commercial tourism.

THE PROPOSED DEVELOPMENT IS EXCLUSIVELY FOR PRIVATE USE BY THE LOVEMORE FAMILY.

The facility will only ever be used by members of the Lovemore family and beneficiaries of the Lovemore Children's Secondary Trust. It is not a tourist lodge, camping resort, guesthouse, or short-term rental facility. No members of the public will be accommodated at the facility. No commercial revenue will be generated from the operation of the facility.

The proposed development formalises and upgrades informal camping arrangements that the Lovemore family has practised on the property for many years. As the family has grown across generations, the need to provide each sibling and their immediate family with a dedicated, structured camping node has arisen. This is the sole driver of the application.

The Applicant [Rob Lovemore, acting as Trustee of the Lovemore Children's Secondary Trust] confirms that:

- The Lovemore Children's Secondary Trust is both the registered landowner and the applicant for Environmental Authorisation.
- No subdivision of the property is proposed or intended.
- No commercial tourist accommodation operation is proposed.
- The number of people accessing the property will not increase beyond the historical baseline of family use.
- There will be no staff accommodation, public boat launch access beyond historical family use, reception facilities, or public-facing function venue component.

2. PROJECT PROPOSAL (UPDATED – FINAL ALTERNATIVE A)

The preferred alternative provides for the development of five (5) Exclusive Use Areas (EUAs), each comprising six (6) elevated deck platforms. The EUAs are positioned across the middle to upper portions of the property, within existing disturbed areas and away from the highest-sensitivity ecological zones, as informed by the terrestrial biodiversity, faunal, aquatic, and visual specialist assessments. All five EUAs are located outside the 30-metre building line from the Knysna River Estuary high-water mark and outside the aquatic specialist's recommended estuary-buffer zone.

All structures are elevated on stilts, there is no concrete slab or hard surface at ground level beneath the platforms. This design minimises disturbance to soil structure, natural drainage, and the movement of small

fauna. Lightweight timber and prefabricated modular components are used, reducing the need for heavy machinery and limiting the import of construction materials onto the site.

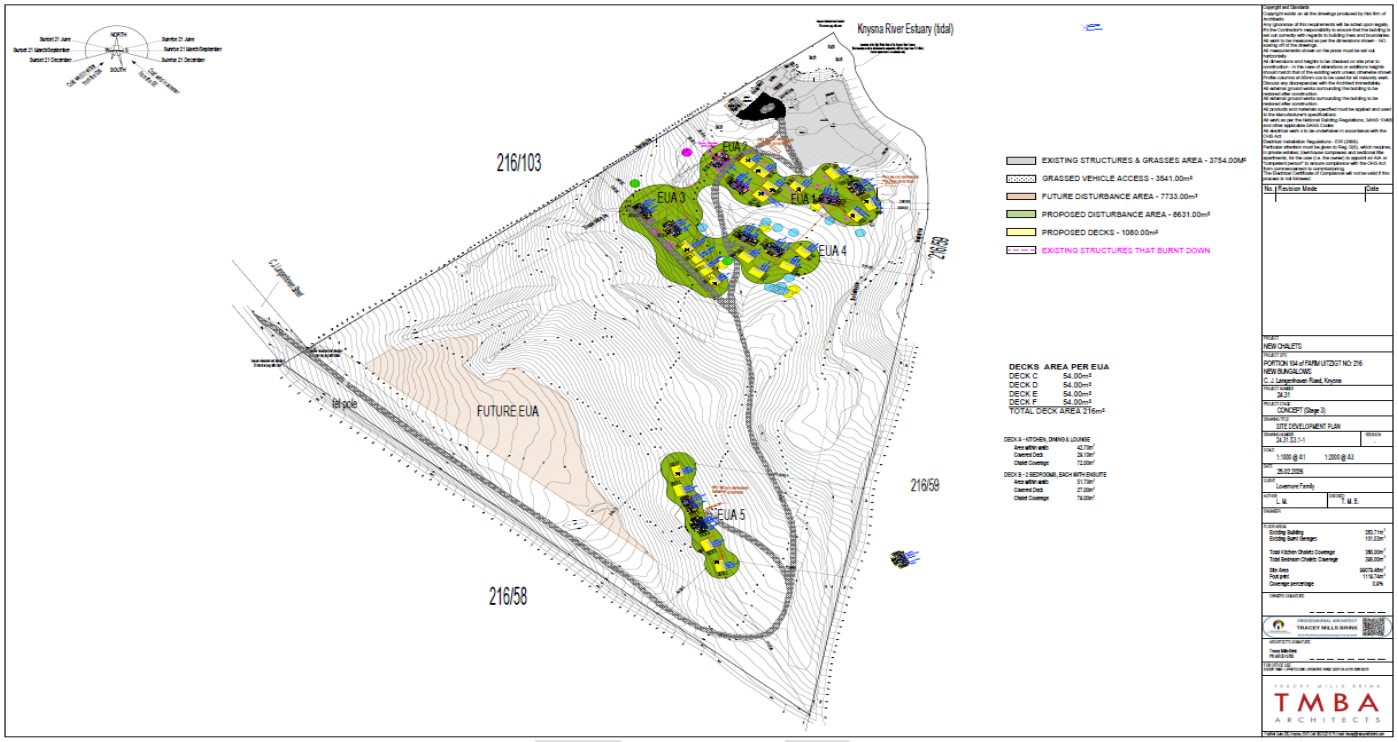


Figure 10: Alternative A (Preferred proposed development – Appendix B – TMBA, 104 of 216 2026-02-25)

2.1. Site Coverage and Disturbance Footprint

The following footprint areas are extracted from the TMBA Architects Site Development Plan (104 of 216 SDP 2026-03-05) and are provided in direct response to SANParks' and I&APs' requests for clarity on the total disturbance area:

Table 9: Site Coverage and Disturbance Footprint

Area Component	Area (m²)	Notes
Existing structures and grassed area	3,754.00	Pre-existing disturbed footprint — no change proposed
Grassed vehicle access road	3,541.00	*Existing access — no modification proposed*
Proposed disturbance area (new development)	8,631.00	*New disturbance for 5 EUAs and associated infrastructure*
Future disturbance area (indicative — NOT part of application)	7,733.00	*Shown on SDP for planning reference only. Separate application required.*
Proposed deck structures (all 5 EUAs)	1,080.00	*5 EUAs × 6 decks × approx. 36 m² per deck average*
Total new footprint (structures)	**1,119.74**	*Combined platform coverage — all 5 EUAs*
Site coverage percentage	0.9%	*Of total site area 99,079.46 m²*
Existing main dwelling	263.71	*Pre-existing — no change*
Existing burnt garages	101.03	*Pre-existing burnt structures — noted on SDP*

NOTE:

The 'Future Disturbance Area' of 7,733 m² shown on the SDP is for long-term planning reference only and is NOT part of the current Environmental Authorisation application. It will require a separate application process if the family wishes to activate it in future.

2.2. Description of Each Exclusive Use Area (EUA)

Each of the five EUAs follows the same structural layout and design standard as described below. The layout is based on the TMBA Architects Site Development Plan (104 of 216 SDP 2026-03-05), which is included as Appendix B to this Draft BAR.

Table 10: Deck Configuration per EUA (Decks A through F)

Deck	Function	Floor Areas	Key Features
A	Kitchen, Dining & Lounge Unit	Area within walls: 42.70 m² Covered deck: 29.10 m² Chalet coverage: 72.00 m²	Enclosed kitchen (induction, WC, hand basin, fridge, washing machine). Open and covered deck. 3× JoJo tanks (5,250 L) with induction pump and filter. RWDP rainwater harvest. Stilts construction.
B	Bedroom Chalet 1 (2 Bedrooms)	Area within walls: 51.70 m² Covered deck: 27.00 m² Chalet coverage: 79.00 m²	2 bedrooms each with ensuite (WC, hand basin, shower). BIC and shelving. Covered and open decks. 3× JoJo tanks below deck. Stilts construction.
C	Bedroom Chalet 2 (2 Bedrooms)	54.00 m² deck area	Identical layout to Deck B. 2 bedrooms with ensuites. 3× JoJo tanks. Covered and open deck. Stilts.
D	Tent Camping Platform	54.00 m² deck area	Open elevated platform for traditional tent camping. No enclosed structures. Stilts only.
E	Tent Camping Platform	54.00 m² deck area	Open elevated platform for traditional tent camping. No enclosed structures. Stilts only.
F	Tent Camping Platform	54.00 m² deck area	Open elevated platform for traditional tent camping. No enclosed structures. Stilts only.
Outdoor Facility	Open Shower, Toilet & Store	Ground-level, low-impact structure	Open outdoor shower, toilet and storage. Provided per EUA at EUAs 1–4 per SDP. No hard surfacing at ground level.

A summary of the total floor areas per EUA is provided as follows:

- Kitchen/Dining/Lounge unit (Deck A): Chalet coverage 72.00 m²
- Bedroom chalets (Decks B and C combined): Total coverage 158.00 m² (79.00 m² each)
- Tent camping platforms (Decks D, E and F): 54.00 m² each = 162.00 m² combined
- Total deck area per EUA: 216.00 m² (Decks C through F) + chalets A and B
- Total kitchen chalet coverage (all 5 EUAs): 360.00 m²
- Total bedroom chalet coverage (all 5 EUAs): 395.00 m²

2.3. Design Measures — Visual, Solar and Fencing

Visual impact is mitigated in line with the recommendations of the visual specialist assessment (Appendix D4) and the measures proposed by Mr P. Buchholtz (5 September 2024), including the use of recessive natural materials and finishes, retention of screening vegetation, and integration of the elevated decks and service infrastructure into the existing landscape. Any photovoltaic (solar) installations will be sited and oriented to avoid glare visible from sensitive receptor areas, and no solar array will be placed within a sensitive natural

environment; final solar siting will be confirmed with SANParks. Fencing will be kept to the minimum necessary; SANParks will be consulted on any fencing requirement, and fencing will be designed to remain permeable to wildlife movement so as not to fragment habitat. These measures are given effect through the corresponding rows of the EMPr.

2.4. Wastewater and Sewage Treatment

One Bio Bloo sewage water treatment system is provided per EUA (5 units in total across the property). These units receive all black water and grey water from the kitchen and bathroom facilities within each EUA. A 110 mmØ soil pipe connects each EUA's sanitation fixtures to the Bio Blo0 unit. The location of each Bio Bloo unit is indicated on the Site Development Plan (Appendix B), maintaining appropriate setback from the 30-metre building line and the aquatic specialist's recommended estuary buffer zone.

Conventional septic tanks with French drain soakaways are explicitly excluded from this design, consistent with the recommendation of the Breede-Olifants Catchment Management Agency (BOCMA), which confirmed that septic tanks and French drains are not appropriate given the proximity to groundwater resources and the Knysna River Estuary. The Bio Bloo system is a packaged, enclosed biological treatment system that does not rely on ground infiltration.

Figure 11: Evidence of BioBloo Project Proposal and Previous Installations

Each Bio Bloo unit is a packaged biological treatment plant (anaerobic/aerobic moving-bed bioreactor with secondary clarification and disinfection) certified through Agrément South Africa. Each unit is designed and warranted by the supplier to treat effluent to the South African Department of Water and Sanitation General Limits standard (including COD ≤ 75 mg/l, suspended solids ≤ 25 mg/l, ammonia ≤ 3.0 mg/l, nitrate ≤ 15 mg/l, faecal coliforms ≤ 1 000 per 100 ml, pH 5.5–9.5). Treated effluent will not be discharged to the Knysna Estuary, any wetland, or any watercourse. It will be beneficially reused on site by means of controlled sub-surface/drip irrigation within designated landscaped areas inside each developed EUA footprint, located outside the 30-metre building line and the 36-metre estuary buffer and clear of natural drainage lines, with irrigation areas sized to soil infiltration capacity so that no surface runoff, ponding or seepage toward the estuary occurs.

Each treatment unit will be installed below ground (the BIOBLOO buried configuration; a footprint of approximately 7.0 m × 2.0 m on a 150 mm reinforced concrete base), with only sealed, raised inspection and

access risers presented at the surface. Below-ground placement has been selected in preference to an above-ground installation because the property lies within a high-sensitivity coastal and estuarine landscape (the Knysna Protected Environment, bordering the Knysna Estuary and the Featherbed Private Nature Reserve) where above-ground treatment tanks would constitute conspicuous, industrial-scale structures within a sensitive viewshed visible from the estuary and surrounding conservation areas. An above-ground installation would directly undermine the visual-mitigation strategy adopted throughout this development (Appendix D4; and the measures proposed by Mr P. Buchholtz, 5 September 2024, which SANParks supports), as well as the low-visual-impact design rationale (elevated stilt platforms, recessive materials and no ground-level hard surfacing) on which the entire application rests. Burial, with the disturbed cover rehabilitated and re-vegetated, removes the visual element entirely and is therefore the environmentally preferable option in this setting.

To address the climate-change and flood risks that SANParks has identified in respect of below-ground infrastructure, each buried unit will be: sited landward of the 36-metre estuary buffer, above the 1:100-year flood line, and outside the zone of dynamic coastal processes associated with the Coastal Management Line (GNR 3668, 14 July 2023); constructed as a watertight, corrosion-resistant tank anchored against flotation (buoyancy) to its reinforced concrete base; and fitted with sealed access and inspection risers raised above the flood line to prevent stormwater or floodwater ingress and to keep all monitoring and maintenance points accessible at surface level. Because the system is fully sealed and packaged, and the treated effluent is reused by irrigation rather than infiltrated, below-ground placement creates no effluent pathway to groundwater or the estuary.

2.5. Water Supply

Each EUA is equipped with three JoJo water tanks (5,250 L × 1,820 mmØ each), providing a stored water capacity of 15,750 L per EUA and a total on-site storage capacity of 78,750 L across all five EUAs. Tanks are positioned below or adjacent to each deck structure and are fed by rainwater downpipe (RWDP) discharge from roof catchment areas on the enclosed structures. An induction pump and filter system is provided at each EUA.

The existing on-site borehole will supplement the rainwater harvest during periods when the family is in residence. During periods of non-use, the borehole will not be operated, allowing the aquifer to recharge naturally.

2.6. Access and Traffic

Access to the property is via C.J. Langenhoven Street using the existing grassed vehicle access track that has historically served the Lovemore family. No road widening, upgrading, or new access construction is proposed. The existing access has been adequate for historical family use and will remain so during the operational phase. No increase in vehicle movements is anticipated during the operational phase. The same family members who have historically accessed the property will continue to do so. The C.J. Langenhoven Street/Dolly Raats Road intersection will not experience any increase in traffic frequency as a result of operational use.

During the construction phase, a Traffic Management Method Statement will be prepared by the appointed contractor and submitted for review prior to commencement. This statement will address: scheduling of construction material deliveries; management of the Dolly Raats Road intersection (including the blind corner); and wildlife collision risk mitigation on the access road.

2.7. SANParks Stewardship Engagement

SANParks' first-round PPP comments noted that the property falls within SANParks' Land Inclusion Plan for the Garden Route National Park expansion and qualifies as a Contract National Park stewardship property. SANParks indicated it would support tourism accommodation within the currently disturbed footprint subject to a conservation stewardship commitment from the landowner.

In response, the Lovemore Children's Secondary Trust has engaged with SANParks regarding the formalisation of a stewardship arrangement for the property, exploring options including a Contract National Park arrangement with SANParks. This engagement is ongoing and demonstrates the family's genuine commitment to the long-term conservation of the property and to the restoration of the Knysna Sand Fynbos Coastal Corridor. The outcome of the stewardship engagement will be formally reported. SANParks' authorisation for any development within the 50-metre Development Control Area (DCA) of the Knysna Protected Environment will be sought as part of the overall authorisation process, in accordance with Section 8 of the KPE Regulations (GN 1175, 2009).

3. DETAILS OF DEVELOPMENT ALTERNATIVES

During the early design stages of the project, several layout alternatives were considered to identify a development configuration that responds appropriately to the environmental characteristics of the property, specialist input, and concerns raised during the public participation process.

The initial concept prepared by the project architect proposed a clustered layout of Environmental Use Areas (EUAs) located within the northern portion of the property near the Knysna Estuary (Figure 12). This layout provided the basis for the preliminary environmental assessment and specialist review.

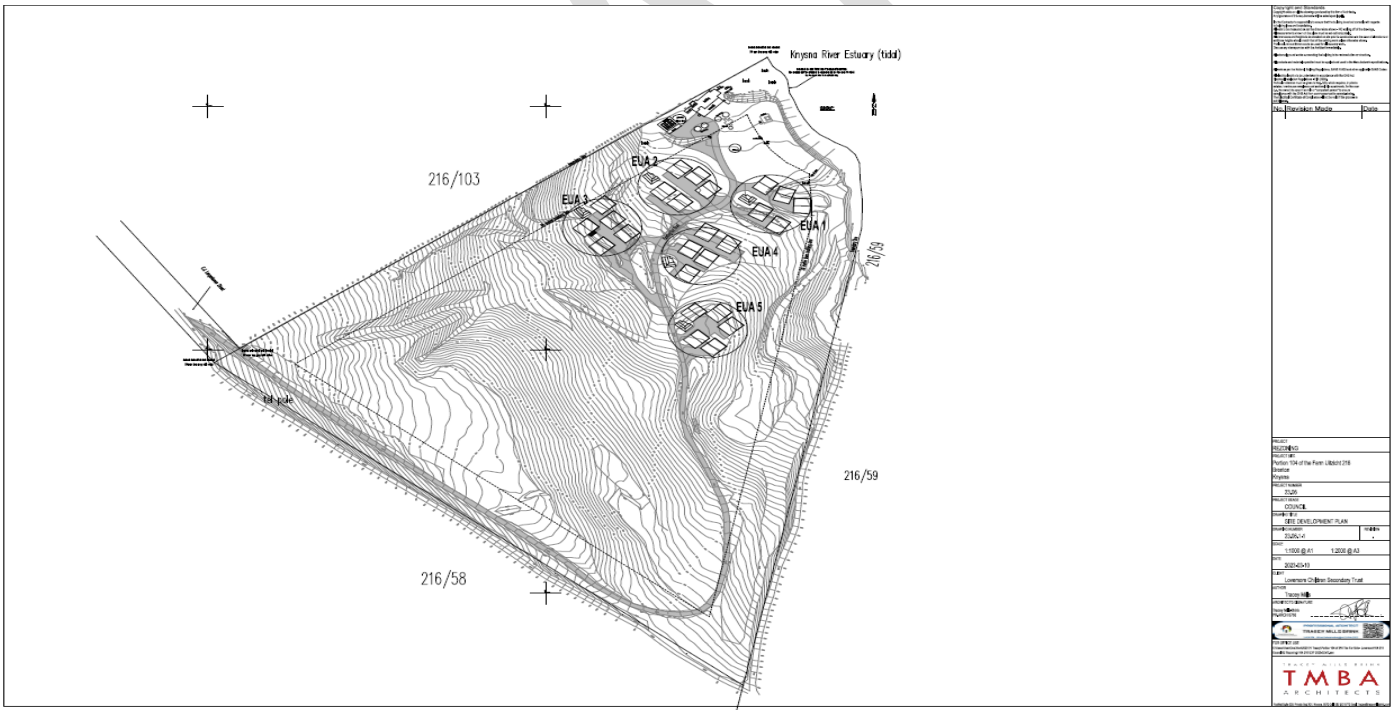


Figure 12: Alternative B - (TMBA architects, 2023)

Following ecological input identifying terrestrial Species of Conservation Concern (SCC), the layout was subsequently revised to shift certain development nodes to areas of lower ecological sensitivity. This adjustment ensured that the positioning of EUAs avoided identified sensitive habitat areas and reduced potential ecological disturbance. During later design discussions, a higher-density concept was briefly explored which considered increasing the number of potential accommodation units.

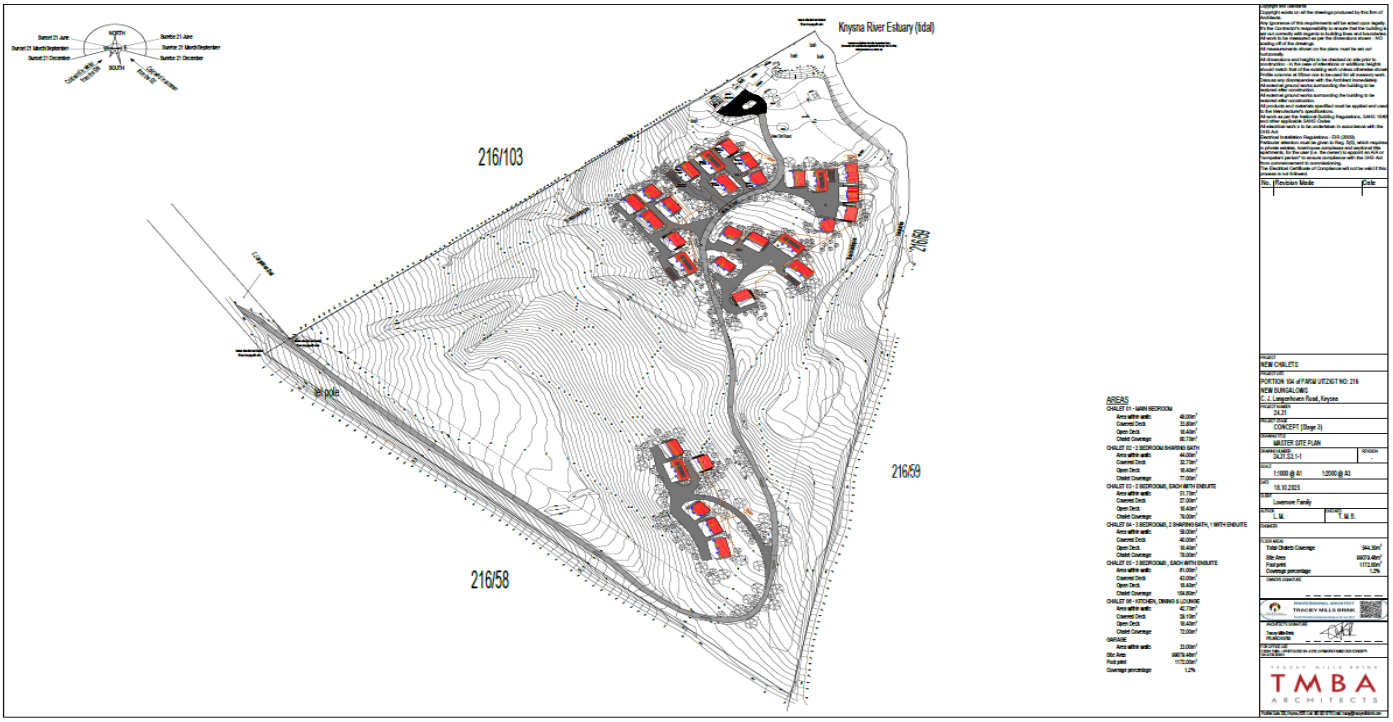


Figure 13: Alternative B 1 – (TMBA, 104 of 215 251014, 2025)

However, following further consultation with interested and affected parties, as well as internal discussions with environmental specialists and the project team, it was agreed that the density of development should remain limited in order to maintain the low-impact character of the property and to address concerns raised during the first round of public participation.

As a result of this iterative design process, a final preferred layout (Alternative A) was prepared by the project architect (Site Development Plan - 104 of 216 SDP 2026-03-05). This layout represents the environmentally and socially preferred development alternative and forms the basis of this Basic Assessment application.

4. COMPARATIVE ASSESSMENT OF ALTERNATIVES

The table below provides a structured comparison across the key criteria raised during the PPP and by specialist assessments:

Criterion	Preferred – Alternative A	Original – Alternative B
Layout / Concept	5 EUAs × 6 decks (Decks A–F). 2 bedroom chalets, 1 kitchen/lounge unit, 2 tent platforms, 1 open deck/shower unit per EUA. Specialist-informed refinement.	5 EUAs × 5 platforms (concrete base + timber deck). All tent-style camping with one ablution block per node. No enclosed sleeping structures.
EUA 4 Position	RELOCATED away from the highest SCC concentration (Lebeckia gracilis — Endangered). Specialist-confirmed reduced impact.	Original position conflicts with highest SCC density. Not ecologically endorsed.
Construction Method	All elevated on stilts — no concrete slab at ground level. Lightweight timber and prefabricated modular materials. Minimal ground disturbance.	Concrete base platforms. Partial ground contact. Less responsive to drainage and ecological connectivity.
Total New Footprint	1,119.74 m² (0.9% site coverage). Proposed disturbance: 8,631 m². Detailed on SDP.	Comparable disturbance footprint but no SCC refinement benefit.
Ecological Impact — SCC	LOWER: EUA 4 relocated. All SCC areas demarcated for protection. Specialist-endorsed.	HIGHER: EUA 4 placement risks SCC impact. Not specialist-endorsed.

Water Supply	3× JoJo tanks (5,250 L each) per EUA = 15,750 L per EUA. RWDP rainwater harvest + borehole supplement. Induction pump and filter per unit.	Rainwater collection proposed — detail not specified to this level.
Wastewater	Bio Bloo packaged treatment system — 1 per EUA. 110 mmØ soil pipe. No French drains or conventional septic tanks. BOCMA-compliant approach.	Septic tank/French drain proposed — NOT recommended by BOCMA for this location.
Family Use Clarity	PRIVATE FAMILY ONLY — explicitly stated throughout all documentation. Framing corrected from pre-application phase.	Same intent but previous documentation created ambiguity through references to tourist accommodation.

5. NEED AND DESIREABILITY

Based on the Integrated Environmental Management Guideline from the Department of Environmental Affairs (DEA), the proposed development on Portion 104 of Farm 216 in Knysna would need to align with the principles of sustainability and consider the need and desirability as outlined in the Guidelines.

Key points to consider:

Principle	Development Response
Ecological Sustainability	The site development planning has taken into consideration all specialist findings and recommendations. The preferred alternative (Alternative A) was specifically shaped by the terrestrial biodiversity specialist's identification of Species of Conservation Concern (SCC) on the property, resulting in the relocation of EUA 4 to reduce ecological disturbance. All SCC areas will be demarcated and protected during construction and operation. Rehabilitation commitments, including alien invasive species removal, cliff-edge stabilisation, and estuary-buffer restoration, are embedded in the EMPr. The development's low-impact design (elevated stilt platforms, no hard surfacing, lightweight materials) further limits disturbance to soil, drainage, and fauna movement.
Justifiable Economic and Social Development	The proposed development serves the private social need of the Lovemore family to formalise and structure their long-standing informal camping use of the property as the family has grown across generations. It is not motivated by commercial economic benefit, tourism revenue, or job creation. This distinction is important: the development responds to the internal needs of the family trust and its beneficiaries, not to an external market demand. The development will not generate any income, will not be advertised or marketed, and will not be accessible to the public.

Furthermore, the proposed development adheres to the strategic context set by various policies and plans, including the National Development Plan 2030 (NDP), and complies with statutory requirements. The development serves the private interests of the Lovemore Children's Secondary Trust, aligns with the applicable Spatial Development Frameworks and Environmental Management Frameworks, and reflects the conservation obligations applicable to the property as a Protected Environment.

Based on these key considerations, several assessment points will be addressed as part of this Basic Assessment Report (Table 11).

Table 11: Assessment of need and desirability

1.	Explain how the proposed development is in line with the existing land use rights of the property?

The property is currently zoned Agriculture Zone I under the Knysna Municipal Planning By-law. Under this zoning, consent use for a camping facility is permitted. The Lovemore family has historically used the property for informal camping, consistent with this consent use provision. The proposed development formalises and upgrades this existing, lawful land use, it does not introduce a new or foreign activity to the property. The structures proposed (elevated stilt platforms for family camping) are consistent in character with low-impact rural land use. The rezoning application being pursued in parallel (to Open Space III) is intended to create a stronger conservation outcome for the property and to enable engagement with SANParks on a formal stewardship arrangement. It is not sought for the purpose of enabling commercial tourism. The Town Planner appointed to the project will confirm the legal consistency of the proposed consent use with the private family-use mandate.	
2.	Explain how potential conflict with respect to existing approvals for the proposed site.
The EAP is not aware of any existing environmental authorisations or approved Site Development Plans that conflict with the proposed development. The property does not currently benefit from an approved SDP for the camping facilities, which is precisely why this EA process has been initiated, to formalise the use lawfully. The Lovemore family's historical informal camping use pre-dates the current application and has not been the subject of any formal compliance notices or enforcement action. Should any historical compliance matters be identified during the application process, these will be disclosed transparently and addressed as required. The property falls within the Knysna Protected Environment (KPE) and within the Development Control Area (DCA) as defined in the KPE Regulations (GN 1175, 2009). SANParks' authorisation will be sought for any development within the 50-metre DCA boundary, consistent with Section 8 of those Regulations.	
3.	Explain how the proposed development will be in line with the following?
3.1.	The Provincial Spatial Development Framework (Western Cape Provincial Spatial Development Framework; WCPSDF).
The WCPSDF promotes sustainable development that is sensitive to the ecological and spatial character of the Western Cape. It specifically supports the stewardship of biodiversity-sensitive areas and encourages landowners in high-value conservation areas to enter into formal stewardship arrangements. The proposed development aligns with this framework in the following ways: (i) the development footprint is kept to a minimum (0.9% site coverage); (ii) the preferred alternative was ecologically informed by specialist assessment; (iii) the property owner has engaged with SANParks regarding a formal stewardship arrangement (Biodiversity Stewardship Agreement or Contract National Park), which the WCPSDF actively promotes as a mechanism for achieving conservation outcomes on privately owned land; and (iv) the development does not constitute a large-scale commercial tourism facility. The WCPSDF's rural development guidelines, which caution against medium- to large-scale tourist facilities in rural and conservation areas, are not triggered by this proposal given its strictly private and non-commercial character.	
3.2.	The Integrated Development Plan of the local municipality.
The Knysna IDP promotes responsible land stewardship, protection of the natural environment, and sustainable development that respects the ecological sensitivity of the Knysna Estuary and its buffer areas. The proposed development contributes to the IDP's objectives by: (i) formalising an existing land use in a manner that is ecologically responsible; (ii) introducing structured wastewater treatment (Bio Bloq system) where none previously existed, thereby reducing any risk of informal waste disposal near the Knysna Estuary; (iii) committing to alien invasive species management on the property; and (iv) pursuing a stewardship agreement that aligns with the Municipality's interest in maintaining the ecological integrity of the Western Heads area. The development does not increase the demand on municipal water, sewage, or waste services, all services are managed privately on the property.	
3.3.	The Spatial Development Framework of the local municipality.
The Knysna SDF identifies the Western Heads area, including Portion 104 of Farm 216, as ecologically sensitive land outside the Urban Edge. The SDF does not support high-density or commercial development in this area. The proposed development is consistent with the SDF in the following respects: (i) it is located outside the Urban Edge, consistent with the property's existing zoning and character; (ii) it is a low-density, low-impact use with a total site coverage of 0.9%; (iii) it does not introduce any new permanent hard-surfaced infrastructure at ground level; (iv) it is not commercial in nature, there is no intensification of land use beyond what the family has historically practised. The Knysna Development Control Area (DCA) provisions, which apply to the lower portion of the property within 50 metres of the high-water mark, are acknowledged. No new development is proposed within the DCA without the prior authorisation of SANParks, as required by the KPE Regulations.	
3.4.	The Environmental Management Framework applicable to the area.
The property falls within the jurisdiction of the Garden Route District Municipality Environmental Management Framework (EMF) and is subject to the Coastal Management Programme applicable to the	

Knysna Protected Environment. The entire property has been reclassified as a Protected Area under the 2023 Western Cape Biodiversity Spatial Plan (WCBSP), promulgated on 13 December 2024 (Gazette Extraordinary 9017). The general guidelines for Protected Areas in the WCBSP state that activities relating to tourism infrastructure that support the primary function of the protected area are subject to NEMA authorisation and the protected area management plan. This application fulfils the NEMA authorisation requirement. The development is consistent with the EMF's objectives to the extent that: (i) it avoids the most sensitive ecological zones on the property; (ii) it introduces formal environmental management obligations (through the EMPr) where none previously existed; (iii) it enables the property to be brought under a formal stewardship agreement, enhancing the long-term conservation management of the Knysna Sand Fynbos Coastal Corridor; and (iv) the Bio Bloq wastewater treatment system eliminates the risk of informal effluent disposal in the Coastal Protection Zone.

6. MOTIVATION FOR PREFERED ALTERNATIVE

It is submitted that Alternative A, as described in Section E of this Draft Basic Assessment Report, represents a reasonable, responsible, and lawful development proposal that merits approval by the competent authority. The following motivation addresses the key considerations applicable to a decision of this nature.

6.1. The Proposed Activity is Lawful, and the Correct Process is Being Followed

The Lovemore Children's Secondary Trust is the registered owner of Portion 104 of Farm Uitzicht 216. As a private landowner, the Trust has the right to make reasonable use of its property, subject to compliance with applicable legislation. Rather than continuing the informal camping arrangements that have existed on the property for many years, the Trust has proactively chosen to engage with the formal Environmental Impact Assessment process in terms of Chapter 5 of the National Environmental Management Act (NEMA, Act 107 of 1998) and the EIA Regulations, 2014 (as amended).

This is precisely the behaviour that environmental legislation is designed to encourage. The Trust is not attempting to circumvent the system, it is using the system as intended, submitting itself to full scrutiny by the competent authority, engaging transparently with all registered I&APs, commissioning independent specialist studies, and committing to an Environmental Management Programme. Refusing authorisation in these circumstances would penalise responsible landowner conduct and would provide no environmental benefit, as the informal use of the property for family camping would continue regardless, without any of the structured management obligations that an EA imposes.

6.2. The Development is Exclusively for Private Family Use (There is No Commercial Dimension)

The most consistent concern raised during the public participation process was that the proposed development would function as a commercial tourist facility. This concern, while understandable given certain ambiguities in the pre-application documentation, is not borne out by the facts of the application.

The facility will be used exclusively by members of the Lovemore family and beneficiaries of the Lovemore Children's Secondary Trust. There will be no short-term rentals, no public booking system, no marketing, no revenue generation, and no members of the public admitted to the property. The number of people accessing the property will not increase beyond the historical baseline established during years of informal family camping.

This is a critical distinction. The objections from neighbouring landowners and conservation bodies are premised largely on the anticipated impacts of a high-density commercial tourism operation (increased traffic, noise, estuary congestion, waste generation, and precedent-setting for further commercial development).

None of these impacts are relevant to a private family facility of this nature. The competent authority is asked to assess the application as it is, not as commentators have characterised it.

6.3. The Impact of the Development is Minor and Has Been Independently Confirmed

Four independent specialist assessments were commissioned for this application, covering terrestrial biodiversity, fauna, aquatic ecology, and visual impact. Across all four disciplines, the conclusion is consistent: with the implementation of the mitigation measures recommended by the specialists and embedded in the EMPr, the residual impacts of the proposed development are minor and manageable.

Specifically:

- The terrestrial biodiversity specialist confirmed that, with EUA 4 repositioned and all SCC areas demarcated and protected, the development can proceed without compromising the conservation status of the identified Species of Conservation Concern.
- The faunal specialist found that the development, with mitigation, will result in only a minor negative impact on faunal habitat, and that the direct impact on fauna is anticipated to be negligible.
- The aquatic specialist confirmed that no watercourses are present on the site, that the Knysna Estuary is not classified as a watercourse under the National Water Act, and that no Section 21(c) or (i) water uses are triggered. The recommended aquatic buffers are incorporated into the site layout.
- The visual specialist found that the development, with the recommended screening and landscaping measures in place, is visually compatible with the landscape character of the area.

The site coverage of the entire development is 0.9% of the total property area. This is not a large-scale intervention. It is, by any objective measure, a low-impact development on a property that is already partially transformed.

6.4. The Property is Already Partially Transformed

A material fact that was not always fairly represented during the public participation process is that Portion 104 of Farm 216 is not pristine, untouched habitat. Approximately 70% of the broader landscape has already been transformed through pine and gum plantations, cultivation, urban sprawl, and road construction. The property itself was severely affected by the 2017 Knysna fires, and significant areas support pioneer and alien invasive species rather than intact fynbos.

The preferred alternative has been specifically designed to target the most disturbed areas of the property for development, leaving the more sensitive and potentially restorable areas undisturbed. The stilt construction method means that even within the development footprint, no concrete slab or hard surface is introduced at ground level, preserving natural drainage and allowing ecological recovery beneath and around the structures.

Granting authorisation for a carefully designed, specialist-informed, low-footprint development in an already-disturbed landscape is consistent with sound environmental management. It is not the same as approving development in intact, pristine habitat.

6.5. The Development Enables a Genuine Conservation Outcome Through Stewardship

This point is perhaps the most important argument in favour of approval, and one that distinguishes this application from a straightforward development proposal.
SANParks has confirmed that the property falls within its Land Inclusion Plan for the Garden Route National Park expansion, within the Knysna Sand Fynbos Coastal Corridor conservation initiative, and that it qualifies

as a Contract National Park stewardship property. SANParks has indicated that it would support development within the currently disturbed footprint subject to a formal conservation stewardship commitment from the landowner.

The Lovemore Children's Secondary Trust has engaged with SANParks in response to this invitation, and discussions regarding a formal stewardship arrangement are underway.
This is a transformative opportunity. Under the current Agriculture Zone I designation, the property has no formal conservation management obligations. If this application is approved and a stewardship agreement is concluded, the property will be brought under a legally binding conservation management framework for the first time. The alien invasive species on the property will be subject to a formal control plan. The fynbos and coastal thicket will be actively managed for ecological restoration. The Knysna Sand Fynbos Coastal Corridor, one of the most threatened vegetation types in South Africa, will gain an additional secured hectare.

Refusing this application does not achieve a better conservation outcome. It simply leaves the property in its current unmanaged state, with no formal conservation obligations, no structured alien clearing, and no stewardship agreement. Approving this application, with appropriate conditions, creates the platform for exactly the conservation outcome that SANParks, CapeNature, the Western Heads Goukamma Conservancy, and the competent authority all say they want for this landscape.

6.6. The Alternative of No Development Does Not Serve the Environment

The no development alternative in which no formal development takes place, is often presented as the environmentally conservative option. In this case, it is not.

Under the no development scenario, the Lovemore family continues to use the property for informal camping without any of the structured environmental management obligations that an EA approval imposes. There is no EMPr, no ECO appointment, no formal alien invasive species management plan, no structured wastewater treatment, no borehole yield monitoring, and no stewardship agreement. The eroded cliff edge and estuary buffer area that the aquatic specialist has identified for rehabilitation will not be rehabilitated. The alien vegetation that SANParks, the WHGC, and multiple I&APs have raised concern about will continue unmanaged.

Granting Environmental Authorisation with appropriate conditions achieves more for the environment than withholding it. The conditions of authorisation become the mechanism through which the management of this ecologically sensitive property is formalised and enforced.

6.7. The Concerns of Objectors Have Been Heard and Addressed

The EAP acknowledges and respects the volume and sincerity of the objections received during the public participation process. Neighbouring landowners, conservation bodies, and members of the public have expressed genuine concern about the ecological future of the Western Heads and the Knysna Estuary. Those concerns are not dismissed.

However, the function of the Environmental Impact Assessment process is not to eliminate development wherever objections are raised. It is to ensure that development is properly assessed that impacts are honestly characterised, and that appropriate mitigation is in place. That process has been followed rigorously in this application.
The objectors' concerns about noise, traffic, estuary congestion, waste, and precedent-setting are all predicated on a commercial tourism operation. This is not a commercial tourism operation. Where concerns were raised that could be meaningfully addressed, specialist study gaps, footprint clarity, services detail, SANParks engagement, stewardship commitment, they have been addressed in this Draft BAR.

The remaining objections, which amount to a fundamental opposition to any development on the property by the Lovemore family, fall outside the scope of what the EIA process is designed to adjudicate. The Trust is a private landowner exercising a reasonable and lawful use of its property. The competent authority must weigh the objections against the facts of the application as presented.

6.8. Summary

Alternative A is recommended for approval on the basis that:

- It is a lawful activity, assessed through the correct regulatory process
- It is exclusively for private family use with no commercial dimension
- The total development footprint is 0.9% of the site and targets already-disturbed areas
- All four independent specialist assessments confirm that residual impacts are minor with mitigation
- The stilt construction method minimises ground disturbance and ecological impact
- Formal wastewater treatment (Bio Bloo) is introduced where none previously existed
- The application creates the platform for a formal SANParks stewardship agreement, achieving a conservation outcome that the no development scenario cannot
- All commitments made during the first-round PPP have been addressed and incorporated into this Draft BAR and the accompanying EMPr

It is respectfully submitted that there is no sound environmental or legal basis on which to withhold authorisation for this proposal, and that approval, subject to appropriate conditions, is in the interests of both the Lovemore family and the long-term ecological management of Portion 104 of Farm Uitzicht 216.

SECTION F – APPLICABLE LISTED ACTIVITIES

In accordance with the National Environmental Management Act (Act 107 of 1998) (NEMA) and its amendments any proposal that triggers listed activities under Listing Notices 1 and 3 (R 327 & R 324) requires an Environmental Impact Assessment (EIA) process to secure Environmental Authorisation (EA) from the Department of Forestry, Fisheries, and the Environment (DFFE), prior to commencement.

Table 12: Relevant listed activities that require environmental authorisation

Listing Notice 1: GN No. R.327 of 2014 (as amended 2017)		
Activity	**Description**	**Development applicability**
17	Development— (i) in the sea; (ii) in an estuary; (iii) within the littoral active zone; (iv) in front of a development setback; or (v) if no development setback exists, within a **distance of 100 metres inland** of the high-water mark of the sea **or an estuary**, whichever is the greater; in respect of— (a) fixed or floating jetties and slipways; (b) tidal pools; (c) embankments; (d) rock revetments or stabilising structures including stabilising walls; or (e) **infrastructure or structures with a development footprint of 50 square metres or more** — but excluding— (aa) the development of infrastructure and structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;	The proposed development will exceed the minimum threshold for this listed activity and will therefore require environmental authorisation. **Applicable.**

	(cc) the development of temporary infrastructure or structures where such structures will be removed within 6 weeks of the commencement of development and where coral or indigenous vegetation will not be cleared; or (dd) where such development occurs within an urban area.	
19A	The infilling or depositing of any material of more than 5 cubic metres into, or the **dredging, excavation, removal or moving of** soil, sand, shells, shell grit, pebbles or rock of more than **5 cubic metres** from— (i) the seashore; (ii) the littoral active zone, an estuary or a distance of **100 metres inland** of the high-water mark of the sea or an **estuary**, whichever distance is the greater; or (iii) the sea; — but excluding where such infilling, depositing , dredging, excavation, removal or moving— (a) will occur behind a development setback; (b) is for maintenance purposes undertaken in accordance with a maintenance management plan; (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or i. where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.	Excavation quantities are to exceed the minimum threshold. **Applicable.**

Listing Notice 3: GN No. R.324 of 2014 (as amended 2017)		
Activity	**Description**	**Development Applicability**
6	The development of resorts, lodges, hotels, tourism or hospitality facilities that sleeps 15 people or more. **Western Cape:** i. Inside a protected area identified in terms of NEMPAA; ii. Outside urban areas; (aa) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; or (bb) Within 5km from national parks, world heritage sites, areas identified in terms of NEMPAA or from the core area of a biosphere reserve; - excluding the conversion of existing buildings where the development footprint will not be increased.	The total sleeping capacity exceeds 15 people across the property. Even though it will be for private family use, the physical infrastructure meets the definition of facilities that "sleep 15 or more." **Applicable.**
12	The **clearance of an area of 300 square metres or more of indigenous vegetation** except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. Western Cape: i. Within any **critically endangered** or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; iii. Within the littoral active zone or **100 metres inland from** high water mark of the sea or an **estuarine functional zone**, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open	It is anticipated that more than 300m^2 Knysna Sand Fynbos (CR) will be cleared within 100 meters of the Knysna Estuary. **Applicable.**

	space, conservation or had an equivalent zoning; or v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.	

SECTION G – ADDITIONAL POLICIES AND LEGISLATIVE CONTEXT

The applicant is required to comply with all the required legislation and policies for the proposed development. The following table below indicates the legislation, and guidelines of all spheres of government that are applicable to the application as contemplated in the EIA regulations.

LEGISLATION	**ADMINISTERING AUTHORITY**	**TYPE** Permit license authorization comment relevant consideration	**DEVELOPMENT APPLICABILITY**
NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT 107 OF 1998) AND THE 2014 EIA REGULATIONS AS AMENDED IN 2017	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	~~PERMIT / LICENSE/~~ **AUTHORIZATION** / ~~COMMENT/ RELEVANT CONSIDERATION~~	As per the identified listed activities in NEMA EIA Regulations 2014 as amended April 2017 (GN R324, R325, R326, R327). An application will be submitted to DFFE for Environmental Authorisation.
NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (ACT NO 10 OF 2004)	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	~~PERMIT / LICENSE/ AUTHORIZATION~~ / **COMMENT/** ~~RELEVANT CONSIDERATION~~	SANParks and CapeNature will be consulted. The applicant is reminded of his duty to comply with the NEM:BA Act and remove alien vegetation regardless of Environmental Authorisation being granted.
NATIONAL ENVIRONMENTAL MANAGEMENT: INTEGRATED COASTAL MANAGEMENT ACT (ACT NO 24 OF 2008)	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	~~PERMIT / LICENSE/ AUTHORIZATION /~~ **COMMENT**/ ~~RELEVANT CONSIDERATION~~	The ICM Act is a specific environmental management act under the umbrella of NEMA.
NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE ACT (ACT 59 OF 2008)	Department of Environmental Affairs, Republic of South Africa.	~~PERMIT / LICENSE/ AUTHORIZATION / COMMENT/~~ **RELEVANT CONSIDERATION**	The Waste Hierarchy will be adhered too during the construction and operational phase.

	All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.		
NATIONAL FORESTS ACT (ACT 84 OF 1998)	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	~~PERMIT / LICENSE/ AUTHORIZATION /~~ **COMMENT/ RELEVANT CONSIDERATION**	No protected trees will be cut, destroyed or damaged.
NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)	Department of Environmental Affairs, Republic of South Africa. All State and Provincial Departments as well as Local Authorities that have been identified as relevant Competent Authorities.	~~PERMIT / LICENSE/ AUTHORIZATION /~~ **COMMENT/ RELEVANT CONSIDERATION**	A Notice of Intent to Develop (NID) in terms of Section 38(1) and (8) of the National Heritage Resources Act (Act 25 of 1999) was submitted to Heritage Western Cape (HWC) for review of the proposed development. The submission was considered by the Heritage Officers Meeting (HOMS), and HWC issued a final comment confirming that no further heritage studies are required, as the proposed development is not expected to impact heritage resources. Heritage Western Cape further requested that the HWC Chance Finds Procedure and Accidental Finds Protocol be incorporated into the Environmental Management Programme (EMPr) and Environmental Authorisation conditions.

			These requirements will be included in the final Basic Assessment documentation and implemented during the construction phase should any heritage resources be encountered.
NATIONAL ENVIRONMENTAL MANAGEMENT: PROTECTED AREAS ACT (ACT NO 57 OF 2003)	Department of Environmental Affairs, Republic of South Africa.	~~PERMIT / LICENSE/ AUTHORIZATION /~~ **COMMENT**~~/ RELEVANT CONSIDERATION~~	Under the Regulations for the Proper Administration of the Knysna Protected Environment, SANParks will be consulted.

1. KNYSNA PROTECTED ENVIRONMENT AND DEVELOPMENT CONTROL AREA

Portion 104 of Farm Uitzicht 216 falls within the Knysna National Lake Area. The Knysna National Lake Area is a category of protected area recognised under Section 9(a) of NEM:PAA. The management authority responsible for the Proper Administration of the Knysna Protected Environment is South African National Parks (SANParks), acting in terms of Section 8 of the KPE Regulations.

The preferred alternative (Alternative A) has been designed with the development control area (DCA) provisions in mind. Specifically:

- All five Exclusive Use Areas (EUAs) and associated infrastructure have been positioned outside the 30-metre building line from the Knysna Estuary high-water mark, as indicated on the Site Development Plan (TMBA Architects, Appendix B - 104 of 216 SDP 2026-03-05).
- The aquatic specialist has recommended a minimum 10-metre rehabilitation buffer inland from the edge of the cliff, and a 36-metre vegetated buffer from the estuary, to reduce erosion and prevent sedimentation. These buffers are incorporated into the site layout and are given effect in the EMPr. No development is proposed within these buffer zones.
- The existing walkway providing access to the Knysna Estuary shoreline will be retained as-is. No new permanent structures providing access to the estuary are proposed.
- No jetty, mooring, or boat launch infrastructure is proposed on the property. The existing Brenton on Lake slipway will continue to be used by the Lovemore family in the same manner and at the same intensity as it has historically been used, with no increase in estuary users anticipated.

Notwithstanding the above, it is acknowledged that certain components of the proposed development and associated access infrastructure may fall partially within or in proximity to the 50-metre DCA boundary. SANParks' authorisation in terms of Section 8 of the KPE Regulations will be formally sought for any development within the DCA, prior to commencement of any construction activity in that zone. SANParks will be provided with the final Site Development Plan and will be given the opportunity to impose conditions on any activity within the DCA as part of its authorisation process.

SANParks confirmed in its comment of 29 April 2026 that the KPE Development Control Area extends 50 metres from the high-water mark into Portion 104, and that SANParks' authorisation in terms of Section 8 of the KPE Regulations is required for any development within the DCA. The application bundle, including the revised Site Development Plan (Alternative A, Tracey Mills Brink, 5 March 2026), was submitted to SANParks on 13 March 2026 for this purpose, and SANParks' authorisation in respect of any DCA component is being obtained as part of the present process. SANParks has indicated its support for the preferred Alternative A, subject to

the conditions set out in its 29 April 2026 letter, which are reproduced in full and responded to elsewhere in this report.

2. COASTAL PROTECTION ZONE

The property falls within the Coastal Protection Zone (CPZ) as defined in NEM:ICMA. The CPZ extends up to 1 kilometre from the high-water mark, which encompasses the entire property. The following provisions of NEM:ICMA are relevant:

- Section 62 prohibits any activity that would have an adverse effect on the character, integrity, or social value of the coastal environment, unless authorised under the Act or another applicable law. The proposed development, being a low-impact private family facility with a 0.9% site coverage, does not adversely affect the character of the coastal environment. Appropriate setbacks from the estuary edge are maintained.
- Section 63 requires that organs of state take measures to manage and protect the coastal environment. This obligation informs the conditions that DFFE and SANParks may impose on the proposed development.
- Section 15 of NEM:ICMA provides that no person may construct, maintain, or extend any structure on coastal public property to prevent or promote erosion or accretion of the seashore, except as provided for in the Act. The applicant is aware of this provision. The proposed development does not involve any structures on coastal public property. The rehabilitation measures recommended by the aquatic specialist, specifically the re-vegetation of the cliff-edge and estuary buffer areas using appropriate indigenous species, are management measures on private property and do not contravene Section 15.

The applicant further acknowledges the risks associated with coastal erosion and storm surge in this location, as highlighted by SANParks during the PPP. Adequate setbacks from the cliff edge have been applied in the site layout, consistent with CPZ setback requirements, to safeguard both the development and the coastal zone from future climate-change related coastal risks.

3. NATIONAL FORESTS ACT — PROTECTED TREES

Two nationally protected tree species were identified on the property during the terrestrial biodiversity specialist assessment:

- Afrocarpus falcatus (Outeniqua Yellowwood)
- Sideroxylon inerme (White Milkwood)

In terms of the National Forests Act (Act 84 of 1998, as amended), these species may not be damaged, removed, or relocated without a permit issued by DFFE. The preferred alternative has been designed to avoid disturbance to these species. Should it be determined during the pre-construction phase that any protected tree requires disturbance, a separate permit application will be submitted to DFFE prior to commencement of any work in that area.

4. ALIEN AND INVASIVE SPECIES

The property supports significant stands of alien and invasive plant species, which pose a fire risk and suppress the recovery of indigenous Knysna Sand Fynbos. In terms of the National Environmental Management: Biodiversity Act (NEM:BA), Act No. 10 of 2004, and the Alien and Invasive Species Regulations (25 September 2020), the landowner is legally responsible for the management and removal of listed invasive species on their property.

An Invasive Alien Species (IAS) Management Plan will be developed for the property and will form part of the Final BAR submission as an integrated component of the EMPr. The applicant further undertakes to become a member of the Southern Cape Fire Protection Agency, consistent with the requirements of the National Veld and Forest Fire Act (Act 101 of 1998), to ensure that fire management obligations are properly discharged.

5. HERITAGE RESOURCES

A Notice of Intent to Develop (NID) in terms of Section 38(1) and (8) of the National Heritage Resources Act (Act 25 of 1999) was submitted to Heritage Western Cape (HWC) for review of the proposed development. The submission was considered by the Heritage Officers Meeting (HOMS), and HWC issued a final comment confirming that no further heritage studies are required, as the proposed development is not expected to impact heritage resources. Heritage Western Cape further requested that the HWC Chance Finds Procedure and Accidental Finds Protocol be incorporated into the Environmental Management Programme (EMPr) and Environmental Authorisation conditions. These requirements will be included in the final Basic Assessment documentation and implemented during the construction phase should any heritage resources be encountered.

6. AGRICULTURE COMPLIANCE

The property is zoned Agriculture Zone I under the Knysna Municipal Planning By-law, under which a camping facility is a permitted consent use. The proposed development formalises the family's long-standing, lawful camping use and does not introduce intensive agriculture or any incompatible activity. No subdivision of the property is proposed; accordingly, the consent of the Minister of Agriculture under the Subdivision of Agricultural Land Act (Act 70 of 1970) is not triggered. Should the parallel rezoning to Open Space III require a departure or consent in respect of the agricultural designation, this will be obtained through the competent planning authority. The development sterilises no agricultural resource of value: the affected areas are existing disturbed land of low agricultural potential, and the bulk of the property is committed to conservation through the proposed stewardship arrangement. The landowner's obligations under the Conservation of Agricultural Resources Act (Act 43 of 1983) (in particular the control of invasive alien plants and the prevention of soil erosion) are given effect through the Invasive Alien Species Management Plan and the rehabilitation and stormwater measures embedded in the EMPr.

7. MANAGEMENT-PLAN COMPLIANCE

The property adjoins the Garden Route National Park and the Knysna Estuary, and the proposed development is required to be consistent with the Garden Route National Park Management Plan 2020–2029 and the Knysna Estuary Management Plan 2025–2029. The development gives effect to the relevant objectives of these plans through: the 36-metre estuary 'no-go' buffer and 10-metre rehabilitation zone; the prohibition on direct estuary access for boat launching (the family will continue to use the Brenton-on-Lake SANParks facility, with no unauthorised moorings); compliance with SANParks' estuary-user licensing requirements under the Regulations for the Proper Administration of the Knysna Protected Environment; the control of invasive alien species; and the long-term conservation of the Western Heads Knysna Sand Fynbos Coastal Corridor through the proposed stewardship arrangement. Compliance with both management plans is committed to as an ongoing operational obligation and is reflected in the EMPr.

SECTION H – IMPACT ASSESSMENT

According to the DFFE Screening Tool report, potential impacts on the receiving environment were identified (Table 7), along with the necessary specialist input required (Table 8) for assessment. Site sensitivity verification can be found in **APPENDIX E,** based on the specialist input. It should be noted that the primary difference between the impact assessment of Alternative A and Alternative B, is that Alternative A has a slightly less impact on the identified SCC than Alternative B.

1. METHODOLOGY FOR ASSESSMENT OF IMPACTS

To assess the impact of the development on the receiving environment, the environmental considerations of the area were identified. This was followed by a detailed review of the project scope, an evaluation of its need and desirability within the Knysna region. The implications of the National Environmental Management Act (Act 107 of 1998) were accounted for, which necessitated environmental authorization based on the triggered listed activities.

Together with the with specialist input presented in APPENDIX D, the impact will be assessed with the mentioned considerations in mind, and according to the following criteria –

Each potential environmental impact and risk identified was assessed according to specific criteria. These included the nature, extent, duration, consequence, probability and frequency of identified impacts, including the degree to which these impacts can be reversed, may cause irreplaceable loss of resources, and can be avoided, managed or mitigated. The criteria are based on the EIA Regulations, published by the Department of Forestry, Fisheries and the Environment (April 1998) in terms of the Environmental Conservation Act No. 73 of 1989. These criteria include:

Nature of the impact

This is an estimation of the type of effect the construction, operation and maintenance of a development would have on the affected environment. This description should include what is to be affected and how.

Mitigation Measures

Ways in which an impact can be avoided, minimised, or managed to reduce its environmental significance.

Extent of the impact - the scale of the impact	
Rating	**Definition of Rating**
Very Limited	Extending only as far as the development site area
Limited	Limited to the site and its immediate surroundings
Local	Extending across the site and to nearby settlements
Regional	The region, which may be defined in various ways, e.g. cadastral, catchment, topographic.
National	National scale or across international borders

Duration of the impact - the lifespan or length of time the impact will last

Rating	**Definition of Rating**
Brief	Impact will not last longer than 1 year
Short term	Impact will last between 1 and 2 years
Medium Term	Impact will last between 2 and 15 years
Long Term	Impact will last more than 15 years
Permanent	Impact may be permanent, or in excess of 20 years
Very High	Natural and/ or social functions and/ or processes are severely altered

Intensity - the severity of the impact	
Rating	**Definition of Rating**
Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Low	Natural and/or social functions and/or processes are slightly altered
Medium	Natural and/or social functions and/or processes are notably altered
High	Natural and/ or social functions and/ or processes are significantly altered
Very High	Natural and/ or social functions and/ or processes are severely altered

Probability of occurrence - the probability of the impact occurring	
Rating	**Definition of Rating**
Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Possible	Has occurred here or elsewhere and could therefore occur
Probable	It is most likely that the impact will occur
Definite	There are sound scientific reasons to expect that the impact will occur

Reversibility - the ability of the impacted environment to return to its pre-impacted state	
Rating	**Definition of Rating**
Completely reversible	the impact can be reversed with the implementation of minor mitigation measures.
Partly reversible	the impact is reversible but more intense mitigation measures are required
Barely reversible	the impact is unlikely to be reversed even with intense mitigation measures
Irreversible	the impact is irreversible, and no mitigation measures exist

Irreplaceable loss of resources - the degree to which resources will be irreplaceably lost	
Rating	**Definition of Rating**
Negligible	No loss of resources
Low	Marginal loss, the resource is not damaged irreparably or is not scarce
Medium	the resource is damaged irreparably but is represented

	elsewhere
High	Irreparable damage and is not represented elsewhere

Cumulative effect - An effect which in itself may not be significant but may become significant if added to other existing or potential impacts that may result from activities associated with the proposed development.	
Rating	**Definition of Rating**
Negligible	the impact would result in negligible to no cumulative effect
Low	the impact would result in insignificant cumulative effects
Medium	the impact would result in minor cumulative effects
High	the impact would result in significant cumulative effects

Confidence - the level of confidence in the assessment rating	
Low	Judgement is based on intuition
Medium	Determination is based on common sense and general knowledge
High	Substantive supportive data exists to verify the assessment

Significance - Significance of impacts are determined through a synthesis of the assessment criteria		
Rating		**Definition of Rating**
	Very high negative (-)	The impact will have highly significant effects and are unlikely to be able to be mitigated adequately
	High negative (-)	The impact will have significant effects and will require significant mitigation measures to achieve an accepted level of impact
	Medium negative (-)	The impact will have moderate negative effects and will require moderate mitigation
	Low negative (-)	The impact will have minimal effects and would require little mitigation
	Negligible	The impact will have negligible effects and would require little or no mitigation
	Low positive (+)	The impact will have minor positive effects
	Medium positive (+)	The impact will have moderate positive effects
	High positive (+)	The impact will have significant positive effects
	Very High positive (+)	The impact will have highly significant positive effects.

2. (ALTERNATIVE A – PREFERRED) IMPACTS ASSOCIATED WITH THE CONSTRUCTION PHASE

Here follows impacts that may result from the construction phase for Alternative A (preferred). A brief description of potential impact, significance rating of impacts, proposed mitigation, and significance rating of impacts after mitigation will be provided.

Project Phase	**Construction**			
Impact	**Loss of terrestrial biodiversity**			
Description of impact	Loss of indigenous vegetation, sensitive vegetation, ecological processes, ecologically important species, ecological connectivity, and terrestrial biodiversity.			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• The vegetation in areas of thicket fynbos habitat that are not earmarked for development must be rehabilitated to a state that is at least partially representative of the original fynbos ecosystem and capable of supporting moderate to high levels of ecological functioning. • Rehabilitation must be implemented in a phased manner, guided by a formal rehabilitation plan and overseen by a qualified botanist or restoration ecologist. • The first step involves the removal and control of all invasive alien plant species (IAPs) on the property, with erosion control measures implemented where necessary. • Passive rehabilitation is recommended for areas where no earthworks have taken place. These areas should be allowed to recover for one winter season following IAP removal. • After this period, the site must be assessed by the restoration contractor to determine the appropriate level of active rehabilitation, which will be required in areas where topsoil has been disturbed or removed. • Follow-up clearing of all exotic and listed IAPs must occur every six months for the first three years, and annually thereafter, to prevent re-establishment and dominance within the fynbos vegetation. • Areas that will not be developed must be clearly marked before the commencement of any works to prevent unnecessary disturbance to adjacent vegetation. • Locations for storing building materials, vehicles, toilets, and other infrastructure must be clearly demarcated and restricted to within the building footprint, existing roads, or previously disturbed areas.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Permanent	Impact may be permanent, or in excess of 20 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Medium	Natural and/or social functions and/or processes are notably altered	Low	Natural and/or social functions and/or processes are slightly altered
Probability	Definite	Has occurred here or elsewhere and could therefore occur	Probable	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Barely reversible	The affected environment will only recover from the	Medium	The affected environment will only recover from the

		impact with significant intervention		impact with significant intervention
Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	**Low – negative (-)**		**Low – negative (-)**	
Comment on significance	The significance of the impact is assessed to be low. Implementation of the recommended mitigation measures will promote environmental best practice and further support the viability of the proposed development.			
Cumulative impacts	The impact would result in very low cumulative effects.			

Project Phase	**Construction**			
Impact	**Loss of species of conservation concern**			
Description of impact	Loss of indigenous vegetation pertaining to species of conservation concern.			
Potential for mitigation	Medium	There is a moderate probability that mitigation measures can be effectively implemented to reduce or manage the identified impact.		
Potential mitigation	• In cases where camping areas are located near SCC or protected trees and cannot be relocated, site layout and infrastructure placement must be carefully designed to avoid direct disturbance to these individuals. • All construction activities in proximity to SCCs must incorporate strict mitigation measures, including physical demarcation of the SCC locations, the establishment of no-go buffer zones, and supervision by a suitably qualified Environmental Control Officer (ECO) during construction. • Micro-siting of platforms and pathways must be adapted on-site to ensure minimal impact, and no excavation, vegetation clearing, or material storage may occur within the buffer zones surrounding SCCs or protected trees.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Short term	Impact will last between 1 and 2 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Medium	Natural and/or social functions and/or processes are notably altered	Low	Natural and/or social functions and/or processes are slightly altered
Probability	Definite	Has occurred here or elsewhere and could therefore occur	Possible	Has occurred here or elsewhere and could therefore occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	the impact is reversible, but more intense mitigation measures are required	Completely reversible	the impact can be reversed with the implementation of minor mitigation measures.
Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation			
Cumulative impacts	Regardless of whether the proposed mitigation measures are implemented, the cumulative impact has been assessed as very low.			

Project Phase	Construction			
Impact	**Disturbance / loss of faunal habitat**			
Description of impact	The proposed development will result in some loss of faunal habitat space.			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• Prior to construction, the disturbance footprint of the development should be clearly defined and demarcated to prevent unnecessary additional damage to the surrounding environment. • Where vegetation will be cleared to make way for construction, filled sandbags, silt socks or a silt fence must be used to reduce the intensity of water runoff and flow over the site and thereby reduce erosion potential. • Protection and reuse of topsoil can be critical for the success of rehabilitation of vegetation following construction processes as it contains valuable seedbank of indigenous plants that regenerate after the soil is replaced. Topsoil removed during construction should be treated with care for all the proposed developments on the property.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Permanent	Impact may be permanent, or in excess of 20 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	High	Natural and/ or social functions and/ or processes are significantly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Definite	Has occurred here or elsewhere and could therefore occur	Probable	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Barely reversible	The affected environment will only recover from the impact with significant intervention	Partly reversible	the impact is reversible, but more intense mitigation measures are required
Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	**Medium – negative (-)**		**Low – negative (-)**	
Comment on significance	The impact will have minimal effects and would require little mitigation			
Cumulative impacts	The impact would result in very low cumulative effects.			

Project Phase	Construction	
Impact	**Loss of fauna**	
Description of impact	Fauna may occur on site and be killed or seriously harmed during construction related activities.	
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.
Potential mitigation	• Construction should happen in phases, such that construction related activities are confined to one area at a time on the property and can be monitored for faunal impacts appropriately.	

	• Before construction commences at the start of new phase, an ECO should do a walk-through of the demarcated area and access roads that will be used to look fauna with limited mobility.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Short term	Impact will last between 1 and 2 years	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	High	Natural and/ or social functions and/ or processes are significantly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Definite	Has occurred here or elsewhere and could therefore occur	Probable	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Barely reversible	The affected environment will only recover from the impact with significant intervention	Partly reversible	the impact is reversible, but more intense mitigation measures are required
Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have minimal effects and would require little mitigation			
Cumulative impacts	The impact would result in very low cumulative effects.			

Project Phase	**Construction**	
Impact	**Sedimentation of estuarine habitat caused by removal of vegetation and erosion of soil.**	
Description of impact	As vegetation is cleared for construction, the highly erodible soils will be exposed to the elements, which will result in a short-term increase in the likelihood of erosion and runoff of sediments and other pollutants down the slope towards the estuary.	
Potential for mitigation	High	Mitigation exists and will considerably reduce the significance of impacts
Potential mitigation	• Do not clear vegetation outside the proposed development footprint. • Only use one access road for each camp unit. • Use the existing road as far as possible. • Install silt fences or sediment barriers around the perimeter of the construction site to trap sediment-laden runoff and prevent it from entering the estuary. • Implement phased construction to minimise the area of exposed soil at any given time and reduce the potential for erosion. • Apply mulch or erosion control mats on exposed slopes and disturbed areas to stabilise soils and reduce erosion rates. • A 36 m buffer from the Knysna Estuary must be maintained and demarcated as a no-go area. • The laydown areas must be constructed on flat surfaces with a minimum distance of 20 m from the buffer. • All stockpiles must be covered at the end of the day. • Install temporary drainage controls such as swales or berms to manage runoff where necessary. • All materials used during construction must follow the best practice guidelines set out for each product.	

	• Check weather reports ahead and prepare the site when rainfall is predicted. Discontinue any earthworks on the site during rainfall.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low Negative	
Duration	Short term	Impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Very limited	Limited to specific isolated parts of the site	Very limited	Limited to specific isolated parts of the site
Intensity	High	Natural and/ or social functions and/ or processes are significantly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Probable	It is most likely that the impact will occur	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation.			
Cumulative impacts	Without mitigation this impact could result in the loss of faunal species and cause potential erosion.			

Project Phase	**Construction**			
Impact	**Visual Impact**			
Description of impact	The proposed development might have an aesthetic impact on the surrounding			
Potential for mitigation	High	Mitigation exists and will considerably reduce the significance of impacts		
Potential mitigation	• Minimise vegetation clearance to only what is essential for construction and access. • Retain existing vegetation where possible to act as a natural screen, especially from key viewpoints (e.g. Leisure Island, Knysna Heads). • Define strict construction boundaries with visible demarcation to prevent accidental disturbance. • Use non-reflective, natural tones (earthy browns, greens) on all visible infrastructure (walls, roofs, decks) to blend with the landscape.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low Negative	
Duration	Short term	Impact will last between 1 and 5 years	Short term	Impact will last between 1 and 5 years
Extent	Local	Extending across the site and to nearby settlements	Local	Extending across the site and to nearby settlements

Intensity	Medium	Natural and/or social functions and/or processes are notably altered	Medium	Natural and/or social functions and/or processes are notably altered
Probability	Probable	It is most likely that the impact will occur	Probable	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	the impact is reversible, but more intense mitigation measures are required	Partly reversible	the impact is reversible, but more intense mitigation measures are required
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation.			
Cumulative impacts	Without mitigation this impact could result in the loss of faunal species and cause potential erosion.			

Project Phase	**Construction**			
Impact	**Waste Pollution**			
Description of impact	Pollution caused by waste generated by the construction process.			
Potential for mitigation	High	Mitigation exists and will considerably reduce significance of impacts		
Potential mitigation	• All construction waste generated on-site during construction must be adequately managed. Separation and recycling of different waste materials should be supported. • All construction waste materials must be collected and disposed of at a suitable waste facility. • No dumping of construction material within the site and surrounding areas may take place. • The site must be monitored on a weekly basis to clean-up any waste that may have been blown from the construction site. • Adequate sanitary facilities and ablutions must be provided for all personnel throughout the project area. Use of these facilities must be enforced.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low negative	
Duration	Short term	Impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Very limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Low	Natural and/or social functions and/or processes are somewhat altered	Very low	Natural and/or social functions and/or processes are slightly altered
Probability	Likely	The impact may occur	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere

Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	High	The affected environmental will be able to recover from the impact	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Low- negative (-)**		**Negligible – negative (-)**	
Comment on significance	Construction activities are likely to generate significant quantities of solid waste that could pollute natural areas. In addition, the high numbers of construction workers present on site will generate a significant amount of human waste, which could pollute the environment.			
Cumulative impacts	The impact would result in insignificant cumulative effects.			

Project Phase	**Construction**			
Impact	**Construction Vehicles**			
Description of impact	Pollution caused by the operation of vehicles and heavy machinery.			
Potential for mitigation	High	Mitigation exists and will considerably reduce significance of impacts		
Potential mitigation	• Construction activities must be confined to clearly demarcated areas so as to prevent unnecessary disturbance the surrounding environment. • No vehicles are to park or operate within "no-go" areas. • Excavators and all other machinery and vehicles must be checked for oil and fuel leaks daily. No machinery or vehicles with leaks are permitted to work on site. • Refuelling and fuel storage areas, and areas used for the servicing or parking of vehicles and machinery, must be located on impervious bases and should have bunds around them (sized to contain 110 % of the tank capacity) to contain any possible spills. • The contractors used for the project should have spill kits available to ensure that any fuel or oil spills are clean-up and discarded correctly.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low negative	
Duration	Short term	Impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Very limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Low	Natural and/or social functions and/or processes are somewhat altered	Very low	Natural and/or social functions and/or processes are slightly altered
Probability	Likely	The impact may occur	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	High	The affected environmental will be able to recover from the impact	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Low- negative (-)**		**Negligible – negative (-)**	

Comment on significance	Operation of vehicles could result in spillages or leaks of hydrocarbons (fuel and oil) and could lead to unnecessary disturbance of natural areas.
Cumulative impacts	The impact would result in insignificant cumulative effects.

Project Phase	**Construction**			
Impact	**Noise pollution**			
Description of impact	Noise caused by machinery and staff			
Potential for mitigation	Low	Mitigation does not exist; or mitigation will slightly reduce the significance of impacts		
Potential mitigation	• Construction activities must only take place during normal working times between 07:00-17:00 on weekdays. • Machinery may be fitted with silences to dampen noise. • Staff must be reminded that they are working within a residential area and noise levels must be kept low.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Brief	Impact will not last longer than 1 year	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Limited	Limited to the site and its immediate surroundings
Intensity	Very low	Natural and/ or social functions and/ or processes are slightly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Almost certain / Highly probable	It is most likely that the impact will occur	Almost certain / Highly probable	It is most likely that the impact will occur
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	High	The affected environmental will be able to recover from the impact	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Not relevant		Not relevant	
Significance	**Low- negative (-)**		**Negligible – negative (-)**	
Comment on significance	Some extent of noise pollution during construction is expected; however, with mitigation the impact will be reduced.			
Cumulative impacts	No cumulative impacts exist.			

Project Phase	**Construction**		
Impact	**Employment**		
Description of impact	Empowerment of the local community members living in the area relating to temporary employment opportunities		
Potential for mitigation	Medium	Mitigation only exists to ensure that the positive impact is followed through.	
Potential mitigation	• Use existing social structures and communication channels to ensure social representation. • Use local labour and source local materials as far as possible.		
Assessment	**Without mitigation**		**With mitigation**
Nature	Negative		Positive

Duration	Short term	Impact will last between 1 and 5 years	Short term	Impact will last between 1 and 5 years
Extent	Local	Extending across the site and to nearby settlements	Local	Extending across the site and to nearby settlements
Intensity	Low	Natural and/ or social functions and/ or processes are somewhat altered	Low	Natural and/ or social functions and/ or processes are somewhat altered
Probability	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere	Almost certain / Highly probable	It is most likely that the impact will occur
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	Not relevant		Not relevant	
Resource irreplaceability	Not relevant		Not relevant	
Significance	**Low – negative (-)**		**Negligible – positive (+)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation			
Cumulative impacts	Minor upliftment for the local community.			

3. (ALTERNATIVE A - PREFERRED) IMPACTS ASSOCIATED WITH THE OPERATIONAL PHASE

Project Phase	**Operational**	
Impact	**Loss of terrestrial biodiversity**	
Description of impact	Loss of indigenous vegetation, sensitive vegetation, ecological processes, ecologically important species, ecological connectivity, and terrestrial biodiversity.	
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.
Potential mitigation	• All operational-phase activities must remain strictly confined to the approved development footprint and previously disturbed areas. While informal footpaths may form naturally through use during hiking, no additional vegetation clearing should be permitted during the operational phase. • The vegetation from the thicket fynbos habitat that is not developed must be rehabilitated to a state where it is at least partially representative of the original fynbos ecosystem and supports ecological functioning to a moderate or high level. This rehabilitation must be undertaken in a phased approach, according to a rehabilitation plan and undertaken by a qualified botanist or restoration ecologist. • The initial step is to ensure that all IAPs on the property are removed, with erosion control implemented where necessary. Passive rehabilitation is recommended on the parts of the site where no earthworks have taken place. The site must be assessed by the restoration contractor to determine the level of active rehabilitation input. Active rehabilitation will be required for areas where topsoil has been removed. • Follow-up clearing of all exotic and listed IAPs is required every 6 months for the first three years, and annually thereafter to ensure that the IAPs do not dominate the fynbos.	
Assessment	**Without mitigation**	**With mitigation**

Nature	Negative		Negative	
Duration	Medium Term	Impact will last between 2 and 15 years	Medium Term	Impact will last between 2 and 15 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Low	Natural and/or social functions and/or processes are slightly altered	Low	Natural and/or social functions and/or processes are slightly altered
Probability	Probable	It is most likely that the impact will occur	Probable	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Barely reversible	The affected environment will only recover from the impact with significant intervention	Barely reversible	The affected environment will only recover from the impact with significant intervention
Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	**Negligible – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation			
Cumulative impacts	The impact would result in very low cumulative effects.			

Project Phase	**Operational**			
Impact	**Loss of species of conservation concern**			
Description of impact	Loss of indigenous vegetation pertaining to species of conservation concern.			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• All operational-phase activities must remain strictly confined to the approved development footprint and previously disturbed areas. While informal footpaths may form naturally through use during hiking, no additional vegetation clearing should be permitted during the operational phase. • All identified SCC locations must be demarcated as permanent no-go zones. These areas must be visibly marked on site. No foot traffic, landscaping, firewood collection, or infrastructure maintenance may occur within these zones.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Medium Term	Impact will last between 2 and 15 years	Medium Term	Impact will last between 2 and 15 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Low	Natural and/or social functions and/or processes are slightly altered	Low	Natural and/or social functions and/or processes are slightly altered
Probability	Probable	It is most likely that the impact will occur	Probable	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Barely reversible	The affected environment will only recover from the	Barely reversible	The affected environment will only recover from the

		impact with significant intervention		impact with significant intervention
Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	**Negligible – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation			
Cumulative impacts	The impact would result in very low cumulative effects.			

Project Phase	**Operational**			
Impact	**Disturbance of fauna due to noise and lighting**			
Description of impact	The development on the site will alter the disturbance regime of the largely natural area on the property through changes in noise and artificial lighting levels. For the most part, these disturbances will be restricted to the immediate surroundings of the road (i.e. traffic noise) and camping units (i.e. people talking/shouting, music). However, this can have a significant impact on biodiversity and alter the way fauna use the landscape (i.e. the creation of a landscape of fear resulting in animals avoiding certain habitats/areas around human disturbances; insects attracted to lights decreases their survival, negatively impacts on the ecosystem services they provide and has negative knock-on consequences for their associated predators).			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• Light pollution must be reduced and avoided wherever possible during the operational phase of the project. White LED lights have the worst negative effects for the environment, therefore dimmer lights with more natural warm light colours must be used. This must be outlined for guests making use of the camping facilities as well by means of visible signage. • Permanent lighting along roads must be avoided. Given the low traffic volumes expected for this development, road-side lighting along the access roads is unnecessary and will cause avoidable impacts on biodiversity, particularly increasing the risk of roadkill. • Noise should be minimised on the site and loud sirens/alarms must not be permitted. Guests are to be informed of this measure by signage.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	On-going		On-gong	
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Very High	Natural and/ or social functions and/ or processes are severely altered	Low	Natural and/or social functions and/or processes are slightly altered
Probability	Definite	There are sound scientific reasons to expect that the impact will occur	Definite	There are sound scientific reasons to expect that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	The impact is reversible, but more intense mitigation measures are required	Partly reversible	The impact is reversible, but more intense mitigation measures are required
Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	**Medium – negative (-)**		**Low – negative (-)**	

Comment on significance	The impact will have minimal effects and would require little mitigation
Cumulative impacts	The impact would result in very low cumulative effects.

Project Phase	**Construction**			
Impact	**Sedimentation of estuarine habitat due to erosion of soil caused by increased stormwater volumes.**			
Description of impact	The addition of hardened, impermeable surfaces (e.g. camping platforms, paving, roof of ablution blocks etc.) will lead to an increase in stormwater runoff which can increase the likelihood of erosion along the sandy cliff.			
Potential for mitigation	High	Mitigation exists and will considerably reduce the significance of impacts		
Potential mitigation	• Rainwater harvesting tanks should be installed at each ablution block. The tanks should be connected with the plumbing of the building (e.g. toilets and showers) to reduce the likelihood of the tanks overflowing and to save water. • Use of permeable paving must be implemented in all new paving area to encourage infiltration of water into the soil. • Maintain good vegetation cover around camp areas. • Maintain the 36 m buffer area. • Control of alien invasive plant species must be carried out within buffer areas to encourage recolonisation by indigenous vegetation and improve the structural integrity of the buffer. • Only use the existing access road for access to the camp areas. • Only use the existing staircase to access the beach. • Control of alien invasive plant species must be carried out within the buffer area to encourage recolonisation by indigenous vegetation and improve the structural integrity of the buffer.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low Negative	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Permanent	Impact may be permanent, or in excess of 20 years
Extent	Very limited	Limited to specific isolated parts of the site	Very limited	Limited to specific isolated parts of the site
Intensity	High	Natural and/ or social functions and/ or processes are significantly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Probable	It is most likely that the impact will occur	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Medium – negative (-)**		**Negligible – negative (-)**	

Comment on significance	The impact will have negligible effects and would require little or no mitigation.
Cumulative impacts	Without mitigation this impact could result in the loss of faunal species and cause potential erosion.

Project Phase	**Operation**			
Impact	**Visual / Sense of place**			
Description of impact	Visual impacts of structures / aesthetic consequences due to incorrect or excessive lighting, especially outdoor lighting			
Potential for mitigation	Medium	Mitigation exists and will notably reduce significance of impacts		
Potential mitigation	• Municipal by-laws need to be adhered to. • Re-vegetation and Landscaping of open space areas with suitable indigenous vegetation. • Systematic removal and follow-up operations of invasive alien plants. • Adhere to Architectural Design Guidelines.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative Low	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Limited	Limited to the site and its immediate surroundings
Intensity	Low	Natural and/ or social functions and/ or processes are somewhat altered	Very low	Natural and/or social functions and/or processes are slightly altered
Probability	Probable	Has occurred here or elsewhere and could therefore occur	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Not relevant		Not relevant	
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	Lighting, specifically outdoor lighting is not only aesthetic, but it provides a level of security to property owners. Therefore, outdoor lighting is essential, but should be implemented in a way which does not cause negative impacts to neighbours.			
Cumulative impacts	Without mitigation the development would not be meeting design guidelines enforced by the municipality. Specifically design guidelines for the local area.			

Project Phase	**Operation**	
Impact	**Stormwater Management**	
Description of impact	Accelerated erosion / pollution into sub-surface water.	
Potential for mitigation	High	Mitigation exists and will considerably reduce the significance of impacts

Potential mitigation	• The storm water drainage system must be adhered to, and the system should lead runoff water away from sensitive areas to prevent soil erosion. • Use rainwater collection tanks to serve as a retention vessel in downpours. • Driveways can also be utilised for rainwater harvesting. • Stormwater management should encourage collection and infiltration of water into the soil profile.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low Negative	
Duration	Short term	Impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to specific isolated parts of the site
Intensity	Low	Natural and/or social functions and/or processes are somewhat altered	Very low	Natural and/ or social functions and/ or processes are slightly altered
Probability	Almost certain	It is most likely that the impact will occur	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The stormwater design of the development will make provision for rainwater harvesting via collection from the roof and driveway / access road.			
Cumulative impacts	Without mitigation this impact could result in potential erosion on the site caused by stormwater flow.			

Project Phase	**Operation**			
Impact	**Eradication of Alien Vegetation**			
Description of impact	Impacts on biodiversity / natural habitats / increased fire risk			
Potential for mitigation	High	Mitigation exists and will considerably reduce significance of impacts		
Potential mitigation	• All invasive alien plants should be completely cleared from the property, and where a tree or bush cover is desired, replaced with suitable indigenous species. • Rehabilitation of disturbed areas, as well as previously invaded areas, should promote establishment of site-appropriate indigenous species. • A suitable planting list of trees and shrubs must be compiled and incorporated into the landscape planning. • Reduce fire hazard on site.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Positive	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Brief	Impact will not last longer than 1 year

Extent	Limited	Limited to the site and its immediate surroundings	Limited	Limited to the site and its immediate surroundings
Intensity	Very low	Natural and/or social functions and/or processes are slightly altered	Low	Natural and/or social functions and/or processes are somewhat altered
Probability	Certain / Definite	There are sound scientific reasons to expect that the impact will definitely occur	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	High	The affected environmental will be able to recover from the impact	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Not relevant		Not relevant	
Significance	**Low – negative (-)**		**Low – positive (+)**	
Comment on significance	With mitigation the impact is likely to have more beneficial impact on natural biodiversity.			
Cumulative impacts	Without mitigation this impact could result in the spread of alien invasive plants.			

Project Phase	**Operation**			
Impact	**Formal gardens**			
Description of impact	Habitat loss for terrestrial wildlife, fragmentation of ecological corridor			
Potential for mitigation	Low	Mitigation will slightly reduce the significance of impacts		
Potential mitigation	• Areas that are not required for development purposes should remain natural with indigenous vegetation. • All alien invasive plants must be removed from the site on an on-going basis. • Investing landowners within the proposed development should be encouraged to avoid planting exotic plants in favour of locally indigenous plants. • Landscaping must be done with locally occurring indigenous vegetation.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Positive	
Duration	Brief	Impact will not last longer than 1 year	Permanent	Impact may be permanent, or in excess of 20 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to specific isolated parts of the site
Intensity	Negligible	Natural and/ or social functions and/ or processes are negligibly altered	Very low	Natural and/ or social functions and/ or processes are slightly altered
Probability	Highly unlikely / None	Expected never to happen	Almost certain / Highly probable	It is most likely that the impact will occur
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge

Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	Not relevant	
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Not relevant	
Significance	**Low – negative (-)**		**Minor – positive (+)**	
Comment on significance	With mitigation the impact is likely to have more beneficial impact to retaining natural biodiversity, than without mitigation.			
Cumulative impacts	Without mitigation this impact could result in the spread of alien invasive plants and the loss of indigenous vegetation.			

Project Phase	**Operation**			
Impact	**Contamination of the estuarine and groundwater environment from on-site wastewater treatment**			
Description of impact	Potential release of inadequately treated effluent, or effluent from a system malfunction or flood event, to soil, groundwater or the Knysna Estuary during the operational phase.			
Potential for mitigation	Low	Mitigation will slightly reduce the significance of impacts		
Potential mitigation	• sealed, below-ground packaged treatment to DWS General Limits, anchored against flotation and sited landward of the 36 m buffer, above the 1:100-year flood line and outside the CML dynamic-erosion zone; • sealed inspection/access risers raised above the flood line; • zero discharge to the estuary, with beneficial reuse via controlled irrigation; • SANAS-accredited effluent sampling; • malfunction detection with automatic suspension of irrigation and containment/pump-out on failure; • scheduled maintenance and end-of-life replacement (all per EMPr).			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Long term	Impact will last more than 15 years	Long term	Impact will last more than 15 years
Extent	Local	Limited to the site and its immediate surroundings	Very limited	Extending across the site and to nearby settlements
Intensity	Medium	Natural and/or social functions and/or processes are slightly altered	Low	Natural and/or social functions and/or processes are notably altered
Probability	Possible	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere	Improbable	Has occurred here or elsewhere and could therefore occur
Confidence	Medium	Determination is based on common sense and general knowledge	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	the impact can be reversed with the implementation of minor mitigation measures.	Completely reversible	the impact is reversible but more intense mitigation measures are required

Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Not relevant	
Significance	**Medium – negative (-)**		**Low – negative (-)**	
Comment on significance	With the sealed below-ground General Limits system (anchored against flotation, sited above the flood line outside the dynamic coastal zone, zero-discharge by design, and supported by the EMPr monitoring and contingency measures) the residual risk to the estuary is low and readily managed. Below-ground placement additionally removes the visual impact that an above-ground installation would impose on this sensitive viewshed.			
Cumulative impacts	Negligible - the decentralised, zero-discharge design introduces no incremental loading to the estuary.			

4. (ALTERNATIVE B) IMPACTS ASSOCIATED WITH THE CONSTRUCTION PHASE

Here follows impacts that may result from the construction phase for Alternative B. A brief description of potential impact, significance rating of impacts, proposed mitigation, and significance rating of impacts after mitigation will be provided.

Project Phase	**Construction**			
Impact	**Loss of terrestrial biodiversity**			
Description of impact	Loss of indigenous vegetation, sensitive vegetation, ecological processes, ecological important species, ecological connectivity, and terrestrial biodiversity.			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• The vegetation in areas of thicket fynbos habitat that are not earmarked for development must be rehabilitated to a state that is at least partially representative of the original fynbos ecosystem and capable of supporting moderate to high levels of ecological functioning. • Rehabilitation must be implemented in a phased manner, guided by a formal rehabilitation plan and overseen by a qualified botanist or restoration ecologist. • The first step involves the removal and control of all invasive alien plant species (IAPs) on the property, with erosion control measures implemented where necessary. • Passive rehabilitation is recommended for areas where no earthworks have taken place. These areas should be allowed to recover for one winter season following IAP removal. • After this period, the site must be assessed by the restoration contractor to determine the appropriate level of active rehabilitation, which will be required in areas where topsoil has been disturbed or removed. • Follow-up clearing of all exotic and listed IAPs must occur every six months for the first three years, and annually thereafter, to prevent re-establishment and dominance within the fynbos vegetation. • Areas that will not be developed must be clearly marked before the commencement of any works to prevent unnecessary disturbance to adjacent vegetation. • Locations for storing building materials, vehicles, toilets, and other infrastructure must be clearly demarcated and restricted to within the building footprint, existing roads, or previously disturbed areas.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Permanent	Impact may be permanent, or in excess of 20 years

Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Medium	Natural and/or social functions and/or processes are notably altered	Low	Natural and/or social functions and/or processes are slightly altered
Probability	Definite	Has occurred here or elsewhere and could therefore occur	Probable	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Barely reversible	The affected environment will only recover from the impact with significant intervention	Medium	The affected environment will only recover from the impact with significant intervention
Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	**Low – negative (-)**		**Low – negative (-)**	
Comment on significance	The significance of the impact is assessed to be low. Implementation of the recommended mitigation measures will promote environmental best practice and further support the viability of the proposed development.			
Cumulative impacts	The impact would result in very low cumulative effects.			

Project Phase	**Construction**			
Impact	**Loss of species of conservation concern**			
Description of impact	Loss of indigenous vegetation pertaining to species of conservation concern.			
Potential for mitigation	Medium	There is a moderate probability that mitigation measures can be effectively implemented to reduce or manage the identified impact.		
Potential mitigation	• The relocate camping areas that would result in the disturbance or removal of SCCs. Based on the distribution of SCC in the surveyed area, only one camping area needs to be moved or excluded. Where other camping areas infringe on the presence of SCCs or protected trees, the final location of camping site can be designed in such a way that avoids disturbing these individuals.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Short term	Impact will last between 1 and 2 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Medium	Natural and/or social functions and/or processes are notably altered	Low	Natural and/or social functions and/or processes are slightly altered
Probability	Definite	Has occurred here or elsewhere and could therefore occur	Possible	Has occurred here or elsewhere and could therefore occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	the impact is reversible, but more intense mitigation measures are required	Completely reversible	the impact can be reversed with the implementation of minor mitigation measures.

Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	**High – negative (-)**		**Low – negative (-)**	
Comment on significance	The impact will have significant effects and will require significant mitigation measures to achieve an accepted level of impact.			
Cumulative impacts	Regardless of whether the proposed mitigation measures are implemented, the cumulative impact has been assessed as very low.			

Project Phase	**Construction**			
Impact	**Disturbance / loss of faunal habitat**			
Description of impact	The proposed development will result in some loss of faunal habitat space.			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• Prior to construction, the disturbance footprint of the development should be clearly defined and demarcated to prevent unnecessary additional damage to the surrounding environment. • Where vegetation will be cleared to make way for construction, filled sandbags, silt socks or a silt fence must be used to reduce the intensity of water runoff and flow over the site and thereby reduce erosion potential. • Protection and reuse of topsoil can be critical for the success of rehabilitation of vegetation following construction processes as it contains valuable seedbank of indigenous plants that regenerate after the soil is replaced. Topsoil removed during construction should be treated with care for all the proposed developments on the property.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Permanent	Impact may be permanent, or in excess of 20 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	High	Natural and/ or social functions and/ or processes are significantly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Definite	Has occurred here or elsewhere and could therefore occur	Probable	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Barely reversible	The affected environment will only recover from the impact with significant intervention	Partly reversible	the impact is reversible, but more intense mitigation measures are required
Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	**Medium – negative (-)**		**Low – negative (-)**	
Comment on significance	The impact will have minimal effects and would require little mitigation			
Cumulative impacts	The impact would result in very low cumulative effects.			

Project Phase	**Construction**

Impact	Loss of fauna			
Description of impact	Fauna may occur on site and be killed or seriously harmed during construction related activities.			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• Construction should happen in phases, such that construction related activities are confined to one area at a time on the property and can be monitored for faunal impacts appropriately. • Before construction commences at the start of new phase, an ECO should do a walk-through of the demarcated area and access roads that will be used to look fauna with limited mobility.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Short term	Impact will last between 1 and 2 years	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	High	Natural and/ or social functions and/ or processes are significantly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Definite	Has occurred here or elsewhere and could therefore occur	Probable	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Barely reversible	The affected environment will only recover from the impact with significant intervention	Partly reversible	the impact is reversible, but more intense mitigation measures are required
Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	Low – negative (-)		Negligible – negative (-)	
Comment on significance	The impact will have minimal effects and would require little mitigation			
Cumulative impacts	The impact would result in very low cumulative effects.			

Project Phase	Construction	
Impact	**Sedimentation of estuarine habitat caused by removal of vegetation and erosion of soil.**	
Description of impact	As vegetation is cleared for construction, the highly erodible soils will be exposed to the elements, which will result in a short-term increase in the likelihood of erosion and runoff of sediments and other pollutants down the slope towards the estuary.	
Potential for mitigation	High	Mitigation exists and will considerably reduce the significance of impacts
Potential mitigation	• Do not clear vegetation outside the proposed development footprint. • Only use one access road for each camp unit. • Use the existing road as far as possible. • Install silt fences or sediment barriers around the perimeter of the construction site to trap sediment-laden runoff and prevent it from entering the estuary. • Implement phased construction to minimise the area of exposed soil at any given time and reduce the potential for erosion. • Apply mulch or erosion control mats on exposed slopes and disturbed areas to stabilise soils and reduce erosion rates.	

	• A 36 m buffer from the Knysna Estuary must be maintained and demarcated as a no-go area. • The laydown areas must be constructed on flat surfaces with a minimum distance of 20 m from the buffer. • All stockpiles must be covered at the end of the day. • Install temporary drainage controls such as swales or berms to manage runoff where necessary. • All materials used during construction must follow the best practice guidelines set out for each product. • Check weather reports ahead and prepare the site when rainfall is predicted. Discontinue any earthworks on the site during rainfall.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low Negative	
Duration	Short term	Impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Very limited	Limited to specific isolated parts of the site	Very limited	Limited to specific isolated parts of the site
Intensity	High	Natural and/ or social functions and/ or processes are significantly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Probable	It is most likely that the impact will occur	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation.			
Cumulative impacts	Without mitigation this impact could result in the loss of faunal species and cause potential erosion.			

Project Phase	**Construction**	
Impact	**Visual Impact**	
Description of impact	The proposed development might have an aesthetic impact on the surrounding	
Potential for mitigation	High	Mitigation exists and will considerably reduce the significance of impacts
Potential mitigation	• Minimise vegetation clearance to only what is essential for construction and access. • Retain existing vegetation where possible to act as a natural screen, especially from key viewpoints (e.g. Leisure Island, Knysna Heads). • Define strict construction boundaries with visible demarcation to prevent accidental disturbance. • Use non-reflective, natural tones (earthy browns, greens) on all visible infrastructure (walls, roofs, decks) to blend with the landscape.	

Assessment	Without mitigation		With mitigation	
Nature	Negative		Low Negative	
Duration	Short term	Impact will last between 1 and 5 years	Short term	Impact will last between 1 and 5 years
Extent	Local	Extending across the site and to nearby settlements	Local	Extending across the site and to nearby settlements
Intensity	Medium	Natural and/or social functions and/or processes are notably altered	Medium	Natural and/or social functions and/or processes are notably altered
Probability	Probable	It is most likely that the impact will occur	Probable	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Partly reversible	the impact is reversible, but more intense mitigation measures are required	Partly reversible	the impact is reversible, but more intense mitigation measures are required
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation.			
Cumulative impacts	Without mitigation this impact could result in the loss of faunal species and cause potential erosion.			

Project Phase	Construction			
Impact	**Waste Pollution**			
Description of impact	Pollution caused by waste generated by the construction process.			
Potential for mitigation	High	Mitigation exists and will considerably reduce significance of impacts		
Potential mitigation	• All construction waste generated on-site during construction must be adequately managed. Separation and recycling of different waste materials should be supported. • All construction waste materials must be collected and disposed of at a suitable waste facility. • No dumping of construction material within the site and surrounding areas may take place. • The site must be monitored on a weekly basis to clean-up any waste that may have been blown from the construction site. • Adequate sanitary facilities and ablutions must be provided for all personnel throughout the project area. Use of these facilities must be enforced.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low negative	
Duration	Short term	Impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Very limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Low	Natural and/or social functions and/or processes are somewhat altered	Very low	Natural and/or social functions and/or processes are slightly altered

Probability	Likely	The impact may occur	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	High	The affected environmental will be able to recover from the impact	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Low- negative (-)**		**Negligible – negative (-)**	
Comment on significance	Construction activities are likely to generate significant quantities of solid waste that could pollute natural areas. In addition, the high numbers of construction workers present on site will generate a significant amount of human waste, which could pollute the environment.			
Cumulative impacts	The impact would result in insignificant cumulative effects.			

Project Phase	**Construction**			
Impact	**Construction Vehicles**			
Description of impact	Pollution caused by the operation of vehicles and heavy machinery.			
Potential for mitigation	High	Mitigation exists and will considerably reduce significance of impacts		
Potential mitigation	• Construction activities must be confined to clearly demarcated areas so as to prevent unnecessary disturbance the surrounding environment. • No vehicles are to park or operate within "no-go" areas. • Excavators and all other machinery and vehicles must be checked for oil and fuel leaks daily. No machinery or vehicles with leaks are permitted to work on site. • Refuelling and fuel storage areas, and areas used for the servicing or parking of vehicles and machinery, must be located on impervious bases and should have bunds around them (sized to contain 110 % of the tank capacity) to contain any possible spills. • The contractors used for the project should have spill kits available to ensure that any fuel or oil spills are clean-up and discarded correctly.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low negative	
Duration	Short term	Impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Very limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Low	Natural and/or social functions and/or processes are somewhat altered	Very low	Natural and/or social functions and/or processes are slightly altered
Probability	Likely	The impact may occur	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment

Reversibility	High	The affected environmental will be able to recover from the impact	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Low- negative (-)**		**Negligible – negative (-)**	
Comment on significance	Operation of vehicles could result in spillages or leaks of hydrocarbons (fuel and oil) and could lead to unnecessary disturbance of natural areas.			
Cumulative impacts	The impact would result in insignificant cumulative effects.			

Project Phase	**Construction**			
Impact	**Noise pollution**			
Description of impact	Noise caused by machinery and staff			
Potential for mitigation	Low	Mitigation does not exist; or mitigation will slightly reduce the significance of impacts		
Potential mitigation	• Construction activities must only take place during normal working times between 07:00-17:00 on weekdays. • Machinery may be fitted with silences to dampen noise. • Staff must be reminded that they are working within a residential area and noise levels must be kept low.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Brief	Impact will not last longer than 1 year	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Limited	Limited to the site and its immediate surroundings
Intensity	Very low	Natural and/ or social functions and/ or processes are slightly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Almost certain / Highly probable	It is most likely that the impact will occur	Almost certain / Highly probable	It is most likely that the impact will occur
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	High	The affected environmental will be able to recover from the impact	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Not relevant		Not relevant	
Significance	**Low- negative (-)**		**Negligible – negative (-)**	
Comment on significance	Some extent of noise pollution during construction is expected; however, with mitigation the impact will be reduced.			
Cumulative impacts	No cumulative impacts exist.			

Project Phase	**Construction**
Impact	**Employment**
Description of impact	Empowerment of the local community members living in the area relating to temporary employment opportunities

Potential for mitigation	Medium	Mitigation only exists to ensure that the positive impact is followed through.		
Potential mitigation	• Use existing social structures and communication channels to ensure social representation. • Use local labour and source local materials as far as possible.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Positive	
Duration	Short term	Impact will last between 1 and 5 years	Short term	Impact will last between 1 and 5 years
Extent	Local	Extending across the site and to nearby settlements	Local	Extending across the site and to nearby settlements
Intensity	Low	Natural and/ or social functions and/ or processes are somewhat altered	Low	Natural and/ or social functions and/ or processes are somewhat altered
Probability	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere	Almost certain / Highly probable	It is most likely that the impact will occur
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	Not relevant		Not relevant	
Resource irreplaceability	Not relevant		Not relevant	
Significance	**Low – negative (-)**		**Negligible – positive (+)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation			
Cumulative impacts	Minor upliftment for the local community.			

5. (ALTERNATIVE B) IMPACTS ASSOCIATED WITH THE OPERATIONAL PHASE

Project Phase	**Operational**	
Impact	**Loss of terrestrial biodiversity**	
Description of impact	Loss of indigenous vegetation, sensitive vegetation, ecological processes, ecologically important species, ecological connectivity, and terrestrial biodiversity.	
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.
Potential mitigation	• All operational-phase activities must remain strictly confined to the approved development footprint and previously disturbed areas. While informal footpaths may form naturally through use during hiking, no additional vegetation clearing should be permitted during the operational phase. • The vegetation from the thicket fynbos habitat that is not developed must be rehabilitated to a state where it is at least partially representative of the original fynbos ecosystem and supports ecological functioning to a moderate or high level. This rehabilitation must be undertaken in a phased approach, according to a rehabilitation plan and undertaken by a qualified botanist or restoration ecologist. • The initial step is to ensure that all IAPs on the property are removed, with erosion control implemented where necessary. Passive rehabilitation is recommended on the parts of the site where no earthworks have taken place. The site must be	

	assessed by the restoration contractor to determine the level of active rehabilitation input. Active rehabilitation will be required for areas where topsoil has been removed. • Follow-up clearing of all exotic and listed IAPs is required every 6 months for the first three years, and annually thereafter to ensure that the IAPs do not dominate the fynbos.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Medium Term	Impact will last between 2 and 15 years	Medium Term	Impact will last between 2 and 15 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Low	Natural and/or social functions and/or processes are slightly altered	Low	Natural and/or social functions and/or processes are slightly altered
Probability	Probable	It is most likely that the impact will occur	Probable	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Barely reversible	The affected environment will only recover from the impact with significant intervention	Barely reversible	The affected environment will only recover from the impact with significant intervention
Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	**Negligible – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation			
Cumulative impacts	The impact would result in very low cumulative effects.			

Project Phase	**Operational**			
Impact	**Loss of species of conservation concern**			
Description of impact	Loss of indigenous vegetation pertaining to species of conservation concern.			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• All operational-phase activities must remain strictly confined to the approved development footprint and previously disturbed areas. While informal footpaths may form naturally through use during hiking, no additional vegetation clearing should be permitted during the operational phase. • All identified SCC locations must be demarcated as permanent no-go zones. These areas must be visibly marked on site. No foot traffic, landscaping, firewood collection, or infrastructure maintenance may occur within these zones.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	Medium Term	Impact will last between 2 and 15 years	Medium Term	Impact will last between 2 and 15 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Low	Natural and/or social functions and/or processes are slightly altered	Low	Natural and/or social functions and/or processes are slightly altered

Probability	Probable	It is most likely that the impact will occur	Probable	It is most likely that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Barely reversible	The affected environment will only recover from the impact with significant intervention	Barely reversible	The affected environment will only recover from the impact with significant intervention
Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	**Negligible – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation			
Cumulative impacts	The impact would result in very low cumulative effects.			

Project Phase	**Operational**			
Impact	**Disturbance of fauna due to noise and lighting**			
Description of impact	The development on the site will alter the disturbance regime of the largely natural area on the property through changes in noise and artificial lighting levels. For the most part, these disturbances will be restricted to the immediate surroundings of the road (i.e. traffic noise) and camping units (i.e. people talking/shouting, music). However, this can have a significant impact on biodiversity and alter the way fauna use the landscape (i.e. the creation of a landscape of fear resulting in animals avoiding certain habitats/areas around human disturbances; insects attracted to lights decreases their survival, negatively impacts on the ecosystem services they provide and has negative knock-on consequences for their associated predators).			
Potential for mitigation	Low	Mitigation measures are unlikely to be effective or necessary, with minimal chance of significantly reducing the impact.		
Potential mitigation	• Light pollution must be reduced and avoided wherever possible during the operational phase of the project. White LED lights have the worst negative effects for the environment, therefore dimmer lights with more natural warm light colours must be used. This must be outlined for guests making use of the camping facilities as well by means of visible signage. • Permanent lighting along roads must be avoided. Given the low traffic volumes expected for this development, road-side lighting along the access roads is unnecessary and will cause avoidable impacts on biodiversity, particularly increasing the risk of roadkill. • Noise should be minimised on the site and loud sirens/alarms must not be permitted. Guests are to be informed of this measure by signage.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative	
Duration	On-going		On-gong	
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to the site and its immediate surroundings
Intensity	Very High	Natural and/ or social functions and/ or processes are severely altered	Low	Natural and/or social functions and/or processes are slightly altered
Probability	Definite	There are sound scientific reasons to expect that the impact will occur	Definite	There are sound scientific reasons to expect that the impact will occur
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment

Reversibility	Partly reversible	The impact is reversible, but more intense mitigation measures are required	Partly reversible	The impact is reversible, but more intense mitigation measures are required
Resource irreplaceability	Low	The impact is unlikely to be reversed even with intense mitigation measures	Low	The impact is unlikely to be reversed even with intense mitigation measures
Significance	**Medium – negative (-)**		**Low – negative (-)**	
Comment on significance	The impact will have minimal effects and would require little mitigation			
Cumulative impacts	The impact would result in very low cumulative effects.			

Project Phase	**Construction**			
Impact	**Sedimentation of estuarine habitat due to erosion of soil caused by increased stormwater volumes.**			
Description of impact	The addition of hardened, impermeable surfaces (e.g. camping platforms, paving, roof of ablution blocks etc.) will lead to an increase in stormwater runoff which can increase the likelihood of erosion along the sandy cliff.			
Potential for mitigation	High	Mitigation exists and will considerably reduce the significance of impacts		
Potential mitigation	• Rainwater harvesting tanks should be installed at each ablution block. The tanks should be connected with the plumbing of the building (e.g. toilets and showers) to reduce the likelihood of the tanks overflowing and to save water. • Use of permeable paving must be implemented in all new paving area to encourage infiltration of water into the soil. • Maintain good vegetation cover around camp areas. • Maintain the 36 m buffer area. • Control of alien invasive plant species must be carried out within buffer areas to encourage recolonisation by indigenous vegetation and improve the structural integrity of the buffer. • Only use the existing access road for access to the camp areas. • Only use the existing staircase to access the beach. • Control of alien invasive plant species must be carried out within the buffer area to encourage recolonisation by indigenous vegetation and improve the structural integrity of the buffer.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low Negative	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Permanent	Impact may be permanent, or in excess of 20 years
Extent	Very limited	Limited to specific isolated parts of the site	Very limited	Limited to specific isolated parts of the site
Intensity	High	Natural and/ or social functions and/ or processes are significantly altered	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
Probability	Probable	It is most likely that the impact will occur	Improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment

Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Medium – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The impact will have negligible effects and would require little or no mitigation.			
Cumulative impacts	Without mitigation this impact could result in the loss of faunal species and cause potential erosion.			

Project Phase	**Operation**			
Impact	**Visual / Sense of place**			
Description of impact	Visual impacts of structures / aesthetic consequences due to incorrect or excessive lighting, especially outdoor lighting			
Potential for mitigation	Medium	Mitigation exists and will notably reduce significance of impacts		
Potential mitigation	• Municipal by-laws need to be adhered to. • Re-vegetation and Landscaping of open space areas with suitable indigenous vegetation. • Systematic removal and follow-up operations of invasive alien plants. • Adhere to Architectural Design Guidelines.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Negative Low	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Limited	Limited to the site and its immediate surroundings
Intensity	Low	Natural and/ or social functions and/ or processes are somewhat altered	Very low	Natural and/or social functions and/or processes are slightly altered
Probability	Probable	Has occurred here or elsewhere and could therefore occur	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Not relevant		Not relevant	
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	Lighting, specifically outdoor lighting is not only aesthetic, but it provides a level of security to property owners. Therefore, outdoor lighting is essential, but should be implemented in a way which does not cause negative impacts to neighbours.			

Cumulative impacts	Without mitigation the development would not be meeting design guidelines enforced by the municipality. Specifically design guidelines for the local area.

Project Phase	**Operation**			
Impact	**Stormwater Management**			
Description of impact	Accelerated erosion / pollution into sub-surface water.			
Potential for mitigation	High	Mitigation exists and will considerably reduce the significance of impacts		
Potential mitigation	• The storm water drainage system must be adhered to, and the system should lead runoff water away from sensitive areas to prevent soil erosion. • Use rainwater collection tanks to serve as a retention vessel in downpours. • Driveways can also be utilised for rainwater harvesting. • Stormwater management should encourage collection and infiltration of water into the soil profile.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Low Negative	
Duration	Short term	Impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to specific isolated parts of the site
Intensity	Low	Natural and/or social functions and/or processes are somewhat altered	Very low	Natural and/ or social functions and/ or processes are slightly altered
Probability	Almost certain	It is most likely that the impact will occur	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	High	Substantive supportive data exists to verify the assessment	High	Substantive supportive data exists to verify the assessment
Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Low	The resource is not damaged irreparably or is not scarce
Significance	**Low – negative (-)**		**Negligible – negative (-)**	
Comment on significance	The stormwater design of the development will make provision for rainwater harvesting via collection from the roof and driveway / access road.			
Cumulative impacts	Without mitigation this impact could result in potential erosion on the site caused by stormwater flow.			

Project Phase	**Operation**	
Impact	**Eradication of Alien Vegetation**	
Description of impact	Impacts on biodiversity / natural habitats / increased fire risk	
Potential for mitigation	High	Mitigation exists and will considerably reduce significance of impacts
Potential mitigation	• All invasive alien plants should be completely cleared from the property, and where a tree or bush cover is desired, replaced with suitable indigenous species.	

	• Rehabilitation of disturbed areas, as well as previously invaded areas, should promote establishment of site-appropriate indigenous species. • A suitable planting list of trees and shrubs must be compiled and incorporated into the landscape planning. • Reduce fire hazard on site.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Positive	
Duration	Permanent	Impact may be permanent, or in excess of 20 years	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Limited	Limited to the site and its immediate surroundings
Intensity	Very low	Natural and/or social functions and/or processes are slightly altered	Low	Natural and/or social functions and/or processes are somewhat altered
Probability	Certain / Definite	There are sound scientific reasons to expect that the impact will definitely occur	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	High	The affected environmental will be able to recover from the impact	High	The affected environmental will be able to recover from the impact
Resource irreplaceability	Not relevant		Not relevant	
Significance	**Low – negative (-)**		**Low – positive (+)**	
Comment on significance	With mitigation the impact is likely to have more beneficial impact on natural biodiversity.			
Cumulative impacts	Without mitigation this impact could result in the spread of alien invasive plants.			

Project Phase	**Operation**			
Impact	**Formal gardens**			
Description of impact	Habitat loss for terrestrial wildlife, fragmentation of ecological corridor			
Potential for mitigation	Low	Mitigation will slightly reduce the significance of impacts		
Potential mitigation	• Areas that are not required for development purposes should remain natural with indigenous vegetation. • All alien invasive plants must be removed from the site on an on-going basis. • Investing landowners within the proposed development should be encouraged to avoid planting exotic plants in favour of locally indigenous plants. • Landscaping must be done with locally occurring indigenous vegetation.			
Assessment	**Without mitigation**		**With mitigation**	
Nature	Negative		Positive	
Duration	Brief	Impact will not last longer than 1 year	Permanent	Impact may be permanent, or in excess of 20 years
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to specific isolated parts of the site

Intensity	Negligible	Natural and/ or social functions and/ or processes are negligibly altered	Very low	Natural and/ or social functions and/ or processes are slightly altered
Probability	Highly unlikely / None	Expected never to happen	Almost certain / Highly probable	It is most likely that the impact will occur
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	Not relevant	
Resource irreplaceability	Low	The resource is not damaged irreparably or is not scarce	Not relevant	
Significance	**Low – negative (-)**		**Minor – positive (+)**	
Comment on significance	With mitigation the impact is likely to have more beneficial impact to retaining natural biodiversity, than without mitigation.			
Cumulative impacts	Without mitigation this impact could result in the spread of alien invasive plants and the loss of indigenous vegetation.			

6. NO GO' OR NO DEVELOPMENT SCENARIO

The 'No Go' or no development scenario takes into consideration the impacts associated with the no construction option. It is a prediction of the future state of the affected area in the event of no construction activities taking place and is based on the current and/or anticipated future land use. If no construction were to take place and the *status quo* would remain the same, it is likely that the site would remain in a similar condition. The owner currently removes IAPs from the property thereby reducing the likelihood of invasion. The exclusion of fire from the habitat is likely to result in further colonisation and proliferation of thicket species, ultimately leading to the loss of fynbos specialist species from the site. In the medium term the impact of the No-Go scenario is **Low Negative**, with a **Low Negative** impact in the long term. It should be noted that it is the legal responsibility of the landowner to remove and control these species so this should not be considered as a reason to allow development on the site.

SECTION I – DETAILS OF THE PUBLIC PARTICIPATION PROCESS

Public participation for the proposed development on Portion 104 of Farm 216, Uitzicht, Knysna, was undertaken in accordance with the requirements of the Environmental Impact Assessment Regulations, 2014 (as amended) under the National Environmental Management Act (Act 107 of 1998). Interested and Affected Parties (I&APs), including neighbouring landowners, relevant organs of state, and other stakeholders, were identified and notified of the proposed development and the commencement of the Basic Assessment process. The pre-application public participation process included the distribution of notification letters, the placement of site notices, and the provision of access to the draft Basic Assessment Report for review and comment. All comments received during this process were recorded and responded to in detail. A comprehensive record of stakeholder engagement, including all comments received and the corresponding responses provided by the Environmental Assessment Practitioner and project team, is contained in the Comments and Response Report (September 2025), which forms part of the supporting documentation to this Basic Assessment Report.

It should further be noted that it is requested that SANParks' comments be included in all application reports in their entirety and not just in a Comments and Responses report. Please refer to Appendix X for the full comments, and see below:

COMMENTS	**RESPONSE**
COMMENTS RECEIVED IN RESPONSE TO PRE-APPLICATION BAR: SANParks 29 April 2026	
SANParks provided comment on the 30 June 2025, on a Pre-application Draft Basic Assessment Report (PDBAR), prepared by Eco Route Environmental Consultancy (Eco Route), dated 29 May 2025. Please refer to this comment which describes the landscape context of Uitzicht 216, Portion 104, a site visit undertaken, the development proposal, points raised by SANParks, as well as a summary and way forward. A Draft Basic Assessment Report (DBAR) was submitted to SANParks, prior to undergoing public participation, by Eco Route Environmental Consultants (Eco Route) on the 13 March 2026, requesting SANParks' further comment, particularly relating to a revised Site Development Plan (SDP) and Contract National Park (CNP) stewardship applicability and requirements. From discussions with Eco Route (Mr. J. Brittion) it was noted density proposed would likely be five EUAs x 10/12 people, therefore 50/ 60 people in season at full development capacity. This density is the long-term stewardship vision, and not all EUs would be developed immediately.	
Point 1: Buffer, Climate Change Adaptation and SDP SANParks supports the implementation of a 36m buffer from the edge of the estuary proposed in the Aquatic Biodiversity Site Sensitivity Verification and Impact Assessment report, prepared by Confluent, dated 24 July 2024 (Fig. 3). A 10m rehabilitation Zone within this buffer is further supported. Stormwater on site	Thank you for the detailed input. The recommendations regarding the 36 m buffer, the 10 m rehabilitation zone, and careful stormwater management are acknowledged and will be incorporated into the project design and compliance framework. The guidance on the proposed Future Exclusive Use Area as a climate change retreat strategy is also noted, with the understanding that any future

should further be carefully designed and managed so as not to exacerbate any further estuary bank erosion/ destabilisation. It is recommended that the proposed Future Exclusive Use Area situated next to the entrance road on the northern sector of Uitzicht 216 Portion 104 only be developed as a climate change 'retreat' strategy, should EU1 and 2 become compromised from climate change coastal erosion affects in the future. The development of this area would be subject to a separate EIA application and SANParks comments. The remainder of the SDP is supported by SANParks.	development would require a separate EIA application and further SANParks review. We appreciate SANParks' support for the remainder of the SDP.
Point 2: Sewerage Infrastructure SANParks will not support a sewerage product/s which do not:	
1) Provide/s effluent quality data that demonstrates compliance with regulatory standards and include a clear disposal or reuse plan to prevent contamination of estuarine or wetland environments.	All sewage specifications will be finalised with SANParks during further engagement regarding the formal stewardship agreement.
2) Have sewage treatment systems located away from areas where they may become damaged by flooding/ coastal erosion or pose a risk to sensitive environmental areas.	
3) Have operational monitoring protocols for the sewerage system built into the EMPr.	
4) Include monitoring which focuses on detecting any malfunction of the system/s with appropriate mitigation measures proposed.	
5) Include actions to be taken for ongoing maintenance and end-of-life replacement of the system stipulated within the EMPr.	
6) Include placement of structures above ground (not buried), except where this is not possible and structures that are not designed for climate change risks.	
A long-term sustainable and compliant sewerage solution must be finalised and presented to SANParks for consideration.	
Point 3: Contract National Park Stewardship	

As stated in SANParks comment of 30 June 2025, Portion 104 Uitzicht 216 falls within SANParks Land Inclusion Plan (LIP) for the Period 2023/24 - 2025/26 and is included in the revised LIP for the Period 2026/27 – 2028/29 for the Garden Route National Park (GRNP).
The property is within the Western Heads Knysna Sand Fynbos Coastal Corridor, which is the subject of a collaborative conservation initiative being supported by SANParks, CapeNature, the Table Mountain Fund, WWF-SA, the Western Heads Goukamma Conservancy (WHGC), and landowners.
Several biodiversity stewardship categories exist that a landowner can opt into (Fig. 4). Stewardship categories in the top-tier of the table require the greatest commitment level from a landowner, but receive the greatest support from conservation authorities and greater financial incentives
Uitzicht 216 Portion 104 is supported for inclusion by SANParks through a Contract National Park (CNP) agreement (top tier). A CNP is an area of privately owned land that is declared as part of a National Park in terms of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) (NEMPAA). The landowner retains ownership of their property but commits the property to formal conservation and co-manages the property with SANParks. In return, the landowner may derive financial benefits, such as income tax deductions and municipal property rate exclusions.
The landowner has sent a letter of commitment to the process of including its land in the GRNP. The landowner has however not yet given its formal consent for the declaration of its property as part of the Park as contemplated in section 20(3) of NEMPAA.
To ensure that the property is put into conservation, SANParks recommends that the landowner is required to request that its property is declared as part of the GRNP in terms of NEMPAA, alternatively that the landowner requests the declaration of the property as a nature reserve in terms of NEMPAA, and if the Minister of the MEC refuses such declaration, that a conservation servitude in favour of SANParks is registered in respect of the Property (coupled with a request to the Knysna Local Municipality to spot zone the undeveloped parts of the property as Open Space III or IV).
It is further recommended that no construction should be permitted before there is proof of binding status of one of the stewardship options outlined in this paragraph. A "written agreement" referred to in section 20(3) (an agreement in which the landowner consents to the declaration of its property as part of the GRNP would constitute proof of binding status in the event that the landowner opts to include its property in the GRNP.

Summary and Way Forward

SANParks supports Alternative A preferred SDP, Tracey Mills Brink, 5 March 2026.
The following conditions are recommended should the activity be authorised

1. Achieving conservation outcomes on the property, in a high-value sensitive conservation area would leave a legacy for future generations	Conservation in the form of stewardship will be finalised with SANParks.
2. A long-term sustainable and compliant sewerage solution must be finalised and presented to SANParks for consideration.	Sewage specifications are discussed in detail as best as possible, additional discussions will be made with SANParks to finalise sewage systems during the stewardship agreement.

3. SANParks encourages that Section 4 risk management measures applicable for new infrastructure seaward of the CML and existing infrastructure in areas at risk to dynamic coastal process be applied, as per the Coastal Management Line for the Garden Route National Park notice (GNR. No. 3668, 14 July 2023).	All risks will be mitigated according to the specified mitigation strategies.
4. A 36m 'no-go' development buffer from the estuary edge is supported.	Noted and accepted.
5. Compliance is required with the GRNP Management Plan 2020-2029, and the Knysna Estuary Management Plan 2025-2029.	The proposed development will not contradict the GRNP Management Plan 2020-2029, and the Knysna Estuary Management Plan 2025-2029.
6. The landowner and guests should not access the estuary directly for boat launching, but via the Brenton on Lake SANParks facilities. No unauthorised moorings are permitted.	Noted and accepted.
7. All other SANParks estuary user licensing requirements, as stipulated within the Regulations for the proper Administration of the Knysna Protected Environment and other associated legislation would need to be complied with	Noted and accepted.
8. Measures to mitigate visual impact as suggested by Mr. P Buchholtz, 5 September 2024 should be implemented.	Noted and accepted.
9. SANParks wishes to comment on the siting of solar panels, to mitigate potential glare visible from sensitive receptor areas, and to avoid the placement of any solar array area/s in sensitive natural environments.	Visual mitigation to avoid glare of solar panels form part of visual mitigation during the operational phase.
10. SANParks should be consulted for any fencing needs. Fencing should not inhibit wildlife movement.	Noted and accepted.
11. The EMPr, Eco Route, March 2026 should be implemented.	Noted and accepted.
12. A suitably qualified Environmental Control Officer (ECO) should be appointed to monitor the EMPr.	Noted and accepted. This is motivated in the EMPr.
13. 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.	Noted and accepted. This is motivated in the EMPr.

14. Topsoil should be set-aside for reuse.	Noted and accepted. This is motivated in the EMPr.
15. Permeable paving surfaces should be used where possible to limit excess surface runoff. Care should be exercised with stormwater design and management to limit soil erosion and any destabilisation of the embankment that is susceptible to coastal erosion.	Noted and accepted. This is motivated in the EMPr.
16. The landowner's attention is drawn to the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEMBA) 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 NEMBA. Large areas of Uitzicht 216 Portion 104 are invaded with Alien and Invasive Species, which poses a fire risk.	Noted and accepted. This is motivated in the EMPr.
17. 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.	This has been discussed during engagement of the stewardship agreement. The property owner now forms part of the Southern Cape Fire Protection Agency.
18. A permit from the Department of Forestry, Fisheries & the Environment (DFFE) should be attained should any protected tree species be disturbed on the property, as per the National Forests Act, 84 of 1998, as amended.	Noted and accepted.
19. Should any suspected resources of heritage value be uncovered during clearing, Heritage Western Cape (HWC) should be contacted immediately for instructions.	Noted and accepted.

20. Should coastal erosion stabilisation structures be required to safeguard any buildings/ infrastructure now or in the future, the landowner's attention is drawn to Section 15 of NEMICMA, which states: 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; and 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.	Noted and accepted.

ECTION J – CONCLUSION AND RECOMMENDATIONS

To be completed upon review.