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Comments and Response Report - V1

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.

PREPARED FOR:	Lovemore Children's Secondary Trust
PREPARED BY:	Eco Route Environmental Practitioners Janet Ebersohn (2019/1286); assisted by Justin Brittion (Can. EAPASA 2023/6648)
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DFFE REF:	TBC

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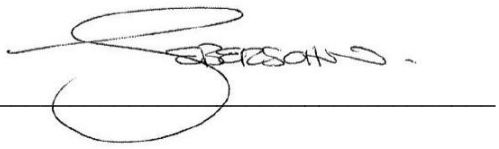
STATEMENT OF INDEPENDENCE

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: 

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1. INTRODUCTION

Eco Route Environmental Consultancy has been appointed by the applicant, **Lovemore Children's Secondary Trust** to ensure compliance with the regulations contained in the National Environmental Management Act (NEMA, No. 107 of 1998, as amended) and the Environmental Impact Assessment Regulations, 2014 (as amended) for the 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.

This report serves as the first version Public Participation Process (PPP) document, that will accompany the Draft Basic Assessment Report (BAR) to be submitted to the competent authority as part of the formal application process. It outlines the public participation conducted during the Pre-Application BAR phase **(29/05/2025 – 30/06/2025).**

Take note:

- The Pre-application BAR and associated appendices were available for a 30-day commenting period (Pre-application PPP: 29/05/2025 – 30/06/2025).
- All comments received during this time is included in this report.
- A second round PPP will be done for a 30-day commenting period during the application phase.

2. REQUIREMENTS OF THE PUBLIC PARTICIPATION PROCESS (PPP) IN ACCORDANCE WITH THE ACT

Section 41 of the Environmental Impact Assessment Regulations, 2014 (as amended) specifies that a person conducting a public participation process must comply with the following minimum requirements (Table 1):

Table 1: Specification of Public Participation that must be adhered to (Environmental Impact Assessment Regulations, 2014 (as amended)

Regulation Specifications	**Description to adherence**
1) If the proponent is not the owner or person in control of the land on which the activity is to be undertaken, the proponent must, before applying for environmental authorisation in respect of such an activity, obtain written consent of the landowner or person in control of the land to undertake such activity on that land	The proponent (applicant) is the landowner and therefore consent is not required.
2) The person conducting a public participation process must take into account any relevant guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties on an application or proposed application which is subjected to public participation by -	

(a) Fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of – (i) The site where the activity to which the application or proposed application relates or is to be undertaken; (ii) Any alternative site	(i) A site notice was placed on site. (ii) There is no alternative site.
(b) Giving written notice, in any of the manners provided for in section 47D of the Act, to – (i) The occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site where the activity is to be undertaken and to any alternative site where the activity is to be undertaken. (ii) Owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken and any alternative site where the activity is to be undertaken. (iii) The municipal councillors of the ward in which the site and alternative site is situated and any organisation of ratepayers that the represent the community. (iv) The Municipality which has jurisdiction in the area (v) Any organ of state having jurisdiction in respect of any activity; and (vi) Any other party as required by the competent authority	(i) The applicant is the owner of the site and is in control of the site. The site is vacant and there is only one site. (ii) The owners of the land adjacent to the site have been notified. (iii) The ward counsellor was notified. (iv) Knysna Municipality has been notified. (v) Please refer to Table 2 showing a list of organs of state notified. (vi) Please refer to Table 2 showing a list of all organisations, NGO's and public notified.
(c) Placing an advertisement in – (i) One Local Newspaper; or (ii) Any official Gazette that is published specifically for the purpose of providing public notices of applications or other submissions made in terms of these Regulations;	(i) Knysna Plett Herald Newspaper a local free newspaper was advertised in on 25/05/2023.
(d) Placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond its boundaries of the metropolitan or district	(d) This is not applicable to this proposed activity as there is no impact (i.e air emissions) that extends beyond the boundaries of the district municipality.

municipality in which it is or will be undertaken: Provided that this paragraph need not to be complied with if an advertisement has been placed in an official gazette referred to in paragraph (c)(ii); and	
(e) Using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to – (i) Illiteracy (ii) Disability; or (iii) Any other disadvantages	N/A at this stage. But if required will comply.
3) A notice, notice board or advertisement referred to in sub regulation (2) must – (a) Give details of the application or proposed application which is subjected to public participation ; and (b) State – (i) Whether basic assessment or S&EIR procedures are being applied to the application; (ii) The nature and location of the activity to which the application relates; (iii) Where further information on the application or proposed application can be obtained; and (iv) The manner in which and the person to whom representations in respect of the application or proposed application may be made.	The notice board was compliant with this requirement.
4) A notice board referred to in sub regulation (2) must – (a) Be of a size of at least 60cm by 42cm; and (b) Display the required information in lettering and in a format as may be determined by the competent authority	The notice board was compliant with this requirement.
5) Where public participation is conducted in terms of this regulation for an application or proposed application, sub regulation (2)(a), (b), (c) and (d) need not be complied with again during the additional public participation process contemplated in regulations 19(1)(b) or 23(1)(b) or the public participation process contemplated in regulations 21(2)(d), on condition that –	This is the pre-application phase, an additional 30-day PPP will be undertaken to include all revisions for the Draft BAR.

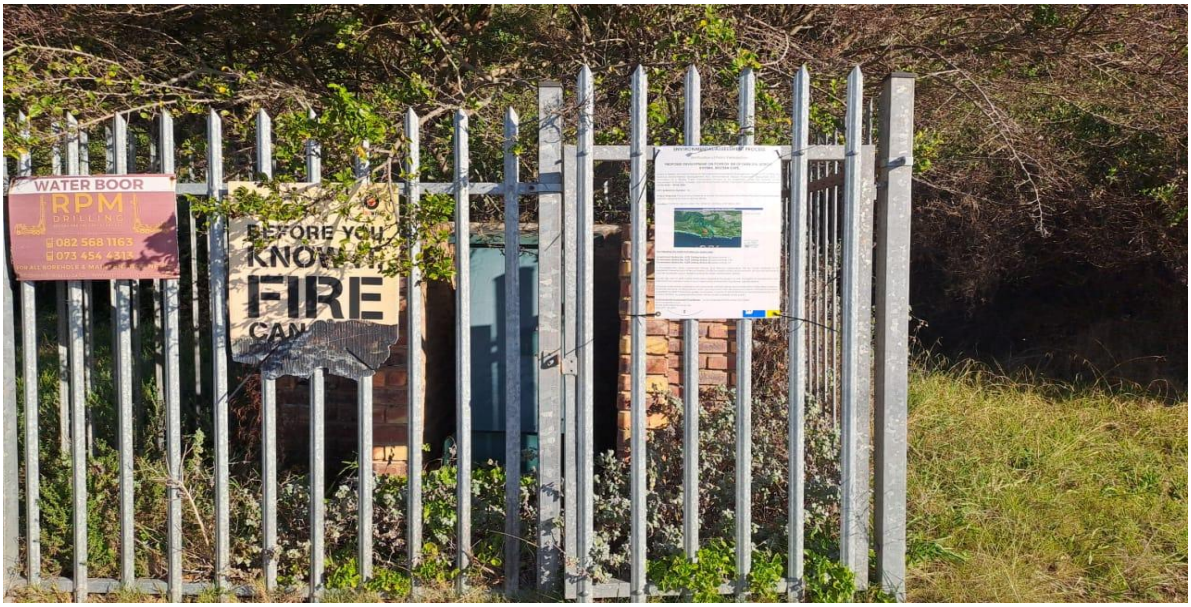
(a) Such a process has been preceded by a public participation process which included compliance with sub regulation (2)(a), (b), (c) and (d); and (b) Written notices is given to registered I&AP's regarding where the – (i) Revised basic assessment report or , EMPr or closure plan, as contemplated in regulation 19(1)(b); (ii) Revised environmental impact assessment report or EMPr as contemplated in regulation 23(1)(b); or (iii) Environmental impact assessment report and EMPr as contemplated in regulation 21(2)(d); (iv) May be obtained, the manner in which and the person to whom representations on these reports or plans may be made and the date on which such representations are due.	
6) When complying with this regulation, the person conducting the public participation process must ensure that – (a) Information containing all relevant facts in respect of the application or proposed application is made available to potential interested and affected parties; and (b) Participation by potential or registered interested and affected parties is facilitated in such a manner that all registered interested and affected parties are provided with a reasonable opportunity to comment on the application or proposed application.	These requirements have been complied with.
7) Where an environmental authorisation is required in terms of these Regulations and an authorisation, permit or licence is required in terms of a specific environmental management Act, the public participation processes contemplated in this Chapter may be combined with any public participation processes prescribed in terms of a specific environmental management Act, on condition that all relevant authorities agree to such a combination of processes.	No other permit or licenses are required at this stage.

3. PUBLIC PARTICIPATION PROCESS (PPP)

This report earmarks the Public Participation Process with comments received and response thereto regarding the first round of the Public Participation Process (PPP) according to the National Environmental Management Act (Act 107 of 1998) (NEMA).

The 30-day Pre-Application Public Participation Process commenced 29/05/2025 – 30/06/2025.

- Two site signs were erected in proximity to the proposed development area (Portion 104 of Farm 216).



- According to the Regulations, the following written Notices have been provided.

  - The landowner is the applicant and as such does not need to be notified.

- Authorities are automatically entered as Registered I&APs (unless they indicate otherwise).
- The local authority and ward councillor have been notified.

ENVIRONMENTAL ASSESSMENT PROCESS

Notification of Public Participation:

PROPOSED DEVELOPMENT ON PORTION 104 OF FARM 216, UITZICHT, KNYSNA, WESTERN CAPE.

Notice is hereby provided in terms of the National Environmental Management Act (Act 107 of 1998), the National Environmental Management Act: Environmental Impact Assessment Regulations 2014, as amended, of a 30-day Public Participation Process to be undertaken under the authority of the Department of Forestry, Fisheries, and the Environment (DFFE). The Public Participation Process will run from **29/05/2025 – 30/06/2025**

DFFE Reference Number: TBC

Project Proposal: The preferred alternative entails the development of facilities intended to accommodate assisted camping for the Lovemore family.

Location: PORTION 104 OF FARM 216, UITZICHT, KNYSNA, WESTERN CAPE

<u>The following EIA Listed Activities are applicable:</u>

Government Notice No. R327 (Listing Notice 1): Listed Activity 17
Government Notice No. R327 (Listing Notice 1): Listed Activity 19A
Government Notice No. R324 (Listing Notice 3): Listed Activity 12

A Pre-Application Basic Assessment Report and relevant appendices will be made available to all registered Interested and Affected Parties (I&APs) for public review and comment. All relevant documents may be accessed via our website during the public participation period.

Should you wish to gain further information regarding the project or wish to register as an Interested and Affected Party please contact the Environmental Assessment Practitioner (details below).

Please provide written comments with your name, contact details and an indication of any direct business, financial, personal, or other interest which you may have in the development. Please note that information submitted by I&AP's becomes public information. In terms of the Protection of Personal Information Act 4 of 2013 (POPIA), no personal information will be made available to the public.

Environmental Assessment Practitioner: Joclyn Marshall (EAPASA Reg 2022/5006)
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Email: admin@ecoroute.co.za
Cell: 072 126 6393

- Other persons and organizations were informed of the need to register as I&APs in order to be entered onto the I&AP database and to continue to receive information pertaining to this application, via an advert in the Knysna-Plett Harald.

Table 2 serves as a register for all I&APs that have been included during the public participation process. It should be noted that not all I&APs have provided input and will therefore be assumed that there is no objection.

Table 2: Interested and Affected Parties database

STATE DEPARTMENTS	
Affiliation	**Contact Person**
Department of Environmental Affairs and Development Planning (DEA & DP)	Danie Swanepoel
DFFE Directorate: Biodiversity & Conservation	Mr Seoka Lekota
Department of Forestry, Fisheries and the Environment (DFFE): Integrated Environmental Authorisations	Ms Bathandwa Ncube Ms Lydia Kutu
DFFE Protected Areas, Planning and Management Effectiveness	Mr Thivhulawi Nethononda
Department of Health	Nathan Jacobs
Heritage Western Cape	Noluvo Toto Stephanie Barnardt
Transport & Public Works / Department of Infrastructure	Vanessa Stoffels
Dept of Agriculture Land Use Management	Cor van der Walt Brandon Layman
Department of Water & Sanitation	John Roberts
DFFE: Forestry Management	Innocent Mapokgole
DFFE: Oceans and Coast	Rueben Molale
Coastal Management Unit, DEA&DP	Ieptieshaam Bekko Mercia J Liddle Hilda Hayward Ryan Apolles
Department of Rural Develop. & Land Reform	Melvin Schwartz
ORGANS OF STATE	
Affiliation	**Contact Person**

Breede-Olifants Catchment Management Agency	Andiswa Sam R Mphahlele SI Ndluvo
Cape Nature Land Use Advice	Megan Simons Carlo van Tonder
Southern Cape Fire Protection Agency	Dirk Smit
SANPARKS	Dr. Vanessa Weyer
SANRAL	Nicole Abrahams
South African Civil Aviation Authority	Canny Mosebjadi Mothapo
MUNICIPALITIES	
Affiliation	**Contact Person**
Knysna Municipality – Environmental Management	Pamela Booth Kate Southey
Ward 5 Councillor Knysna Municipality	Cllr Hilton Stroebel
Knysna Municipality – Town Planning	Hennie Smit
Garden Route District Municipality	Dr. Nina Viljoen
Garden Route District Municipality	Mr. Lusanda Menze
NGO	
Affiliation	**Contact Person**
Western Heads Goukamma Conservancy	Dr David Alan Edge
The Western Heads Goukamma Conservance (WHGC)	Johan Labuschagne
Brenton Ratepayers Association	
Brenton Blue Butterfly Trust	Ernest Pringle (LSA) Dave Edge (EWT) Lorna Watt (WESSA) Andrew Morton (LSA) Jeremy Dobson (LSA)
Uitzicht Property Owners (Dr Chris Gow)	
LANDOWNER (APPLICANT)	
Affiliation	**Contact Person**
104/216	Rob Lovemore Far Side Knysna/ Lovemore Children Secondary Trust
SURROUNDING LANDOWNER	
Affiliation	**Contact Person**
59 of 216	Kobus Smit
58/216	
60/216	

61/216	Pieter Le Roux
62/216	
63/216	
64/216	
114/216	John & Anne Sole
	Eugene Marais
117/216	Peter & Ursula Pickering
	Rob Carlisle
100/216 Uitzicht Glenrise PTY LTD	Michael Stuart
	Uschi Shultz
	John Macey
	Janine Greeff / Regional Content Researcher Projects
REQUESTED / REGISTER I&APS	
Affiliation	**Contact Person**
	Vernon Rice
	Gavin Whitfield
	TB Paterson
	David Burns
	Jacqui Drobczyk
	Bryn van Vuuren
	Cindy Hoffmann
Resident of Brenton on Lake	Pavlina Papadakis
LBRA Committee (Lake Brenton Residents Association)	Glen Stephen Henry Fairweather Roz Messenger
	Rita
	Picca de Bruin
Resident/Property Owner Erf 1692 Leisure Isle 39 Cearn Drive	Alison Collier
Lake Brenton Resident	Lee Blasich
	Chris Richards
1st Property on access Rd	Johan Boshoff
	Colin Burns
	S Greeff
	Michelle Zeidler
	Craig
371 Tuna Avenue.	Lauren Brauer

Neighbour/share CJ Langenhoven Road	John Macey
	Margi Bern (Mr & Mrs PJ Bern)
Portion 58, 59 of Uitzicht 216 Phambi Properties	Sonja Douglas
Portion 103 of 216 Uitzicht	Witgoud Beleggings (Vernon Rice)
	Hewat Dale Kuys / Occidental Investment Company Pty Ltd
73 Bayswater Road, Leisure Isle, Knysna (Velo Sports Pty Ltd)	Rob Gilmour
Portion 101 of 216 Uitzicht	Rob Gilmour

4. COMMENTS RECEIVED IN RESPONSE TO PRE-APPLICATION DRAFT BAR: (29/05/2025 – 30/06/2025).

The following table contains all comments received during the Pre-Application Public Participation Process.

COMMENTS	RESPONSE
COMMENTS RECEIVED IN RESPONSE TO PRE-APPLICATION BAR:	
STATE DEPARTMENTS	
Department Forestry, Fisheries & the Environment (DFFE) - Biodiversity Conservation - Portia Makitla – 26 June 2025	
The Directorate: Biodiversity Conservation has reviewed and evaluated the reports.	
The site classified as a CBA 1 and CBA 2 according to the Western Cape Biodiversity Spatial Plan (WCBSP). The CBA 1 area would be more accurately classified as CBA 2 due to the poor condition of the vegetation. Two SCC were found in this habitat (*Lebeckia gracillis* & *Selago villicaulis*). Two distinct vegetation units are identified within the study area: Groenvlei Coastal Forest (Endangered) and Sedgefield Thicket-Fynbos (Least Threatened).	This was accurately conveyed in the Pre-Application basic assessment in Section C.
The site is currently dominated by pioneer species, with IAPs still prevalent on neighbouring properties. Almost 70% already transformed (pine and gum plantations, cultivation, Knysna urban sprawl, building of roads).	This was accurately conveyed in the Pre-Application basic assessment in Section C.
To ensure the continued persistence of ecosystems and that national conservation targets are achieved, it is essential that	Engagement with the relevant biodiversity and planning specialists informed the site layout and design process from the

impacts on sensitive and highly localised habitats are minimized or avoided altogether.	outset. As a result, the proposed development has been strategically positioned to avoid areas of highest sensitivity, and where avoidance was not possible, impacts have been minimised through design and management measures. This approach ensures alignment with national conservation targets and supports the persistence of sensitive and localised habitat types, as guided by the terrestrial biodiversity specialist and EMPr commitments
The Directorate reserves the right to revise initial comments presented here if additional information becomes available.	
Department Forestry, Fisheries & the Environment (DFFE) – Protected Areas Planning & Management Effectiveness – Mashudu Mudau – 30 June 2025	
The Directorate: Protected Areas Planning and Management Effectiveness would like to thank you for the opportunity to review the Pre-Application Basic Assessment report for the aforementioned project. The proposed project will entail the construction of assisted camping which includes five (5) nodes, each consisting of five (5) platforms.	
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.	
After conducting the review of the submitted documents, we have noted that the proposed powerline and associated infrastructures will take place within a protected area in terms of Section 9 of the National Environmental Management: Protected Areas Act (NEMPAA), Act No. 57 of 2003. Portion104 of Farm Uitzicht 216 falls within the Knysna National Lake Area declared as a Protected Environment as per NEMPAA.	The classification of Portion 104 of Farm 216 as falling within the Knysna National Lake Area is correct. However, the reference to a "proposed power line and associated infrastructure" does not accurately reflect the nature of the development described in the Pre-Application Basic Assessment Report. Furthermore, the environmental sensitivities of the property, given its location within a Protected Environment, have been assessed in consultation with SANParks.

After review, the directorate has the following comments/concerns:	
• Section B of the pre-application Draft Basic Assessment report only gives description of the location and property description. There is no detail/ proper introduction of the proposed development within the report.	The Pre-Application Basic Assessment Report (BAR) follows a structured and logical format. Introducing the proposed layout in Section B would result in unnecessary repetition. A comprehensive overview and description of the proposed development, including the preferred layout, is provided in Section E and should be referred to for full context.
• Section E of the report details the proposed development; however, the EAP starts by indicating that "Following feedback from the terrestrial biodiversity specialist regarding the identified Species of Conservation Concern (SCC), the original site plan was revised.", with no formal indication of the original proposed development, it is this directorate opinion that the EAP failed to clearly articulate the project description. Both alternatives must be clearly articulated, with pros and cons for each.	Section E of the Draft Basic Assessment Report has been updated to clearly present the project description. It now includes a comprehensive introduction referring to how the proposed development was adapted from the original layout to the preferred alternative. It also has a detailed comparison of the preferred and alternative layouts, outlining the respective advantages and disadvantages of each.
• The tittle of Figure 10 in the report refers to area for EUA 4, however, the legend and the map itself does not indicate the EUA 4 referred to.	Figure 10 has been entirely removed and now indicates the preferred alternative site development plan as produced by TMBA 2025.
• Section 1.2 states that "One ablution facility will be provided per node, shared among family members. Wastewater from these facilities will be managed through the installation of a bio-septic treatment plant". It is not clear whether each node will have its own septic tank, or one septic tank will serve the 5 nodes. The	The ablution installation company will be consulted regarding the capacity of each system to determine first and foremost how many facilities will be included into the final design. There after the placement will be determined and indicated in the final Site Development Plan.

location of the mentioned septic tank is not indicated in the report.	
• Page 25 indicates that "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." This is also indicated by the images on Table6. It is a concerning that the applicant is proposing for a large number of camps which will results in large areas being disturbed, while the current available vegetation within the property is struggling to mitigate the excessive erosion that is currently taking place.	The condition of the sandy cliff and ongoing erosion has been carefully considered in the environmental assessment, particularly in relation to surface water runoff and the existing mowed lawn area adjacent to the cliff edge. As highlighted by the aquatic specialist, the lawn currently provides an inadequate buffer to overland flow, contributing to cliff-face erosion. To address this, the aquatic specialist has recommended a rehabilitation strategy for the lawn area, which includes re-vegetation using appropriate indigenous plant species capable of stabilising soil and slowing down surface runoff. The implementation of this rehabilitation will serve as a functional buffer, significantly reducing stormwater velocity and mitigating further erosion of the sandy cliff. It is important to note that the proposed camping platforms are designed to be elevated on stilts, with no hard surfacing introduced. This means that the development will not increase stormwater runoff, as the permeable ground conditions beneath the platforms will be preserved. Additionally, the development footprint has been strategically placed away from the cliff edge and sensitive drainage lines to ensure that existing erosion issues are not exacerbated. Through careful site planning, use of low-impact construction techniques, and adherence to the specialist-recommended

	rehabilitation measures, the project aims to enhance the ecological resilience of the property and actively contribute to the stabilisation of erosion-prone areas.
• The report further states that "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." The EAP/Applicant must take note that:	It is acknowledged that the entire property falls within a protected area according to the 2023 WCBSP. Engagement with SANParks have been transparent since the Pre-application public participation process (29/05/2025 – 30/06/2025).
o The proposed area falls within a protected area, the Knysna National Lake Area Protected Environment which is managed by the South African National Parks. Therefore, the proposed development must be consistent with Regulations for the Proper Administration of the Knysna Protected Environment, 2009. In terms of the regulations, prior authorizations must also be obtained from the management authority before certain activities can be undertaken.	
o The EAP must take account of the Knysna Development Control Area (this must be fully articulated in draft BAR).	The updated Draft-Basic Assessment Report will articulate the Knysna Development Control Area. **To include in DBAR**
o Furthermore, the development must be undertaken within the appropriate zones of the protected area.	Upon submission of the Final-Basic Assessment Report, all appropriate zones of the protected area will be considered.
ORGANS OF STATE	

SANParks - Dr Vanessa Weyer – 30 June 2025
Portion 104 Uitzicht 216 is situated in the Buffer Zone of the Garden Route National Park (GRNP), in its entirety within the Knysna Protected Environment (KPE), within the Coastal Protection Zone (CPZ), and partially within the KPE Development Control Area (DCA). The property directly borders the Knysna Estuary on the north-eastern boundary, and Featherbed Private Nature Reserve (PNR) on its western boundary **(Fig. 1)**.
The Estuarine Functional Zone (EFZ) extends into parts of the north-eastern section of Portion 104 Uitzicht 216 **(Fig. 2)**, whilst the Coastal Management Line (CML) for Protected Areas extends across the lower half of the property **(Fig. 3)**. The CML was included in the Knysna Spatial Development Framework 2020, is shown on the Knysna GIS Viewer and the Western Cape Department of Environmental Affairs & Development Planning's (DEA&DP) Coastal Management Map Viewer. Risks associated with developing in this area are known and have been published.
Critically Endangered (CE) Knysna Sand Fynbos is mapped by Mucina and Rutherford, 20061 and as revised by SANBI, 20182 across most of Portion 104 Uitzicht 216 (Fig. 4).
Critical Biodiversity Areas (CBAs) in terms of the 2023 Western Cape Biodiversity Spatial Plan (WC BSP), which was formally adopted into law on the 13 December 2024 (Gazette Extraordinary 9017) in alignment with the Western Cape Biodiversity Act (No. 6 of 2021), are no longer shown as mapped in the KPE.

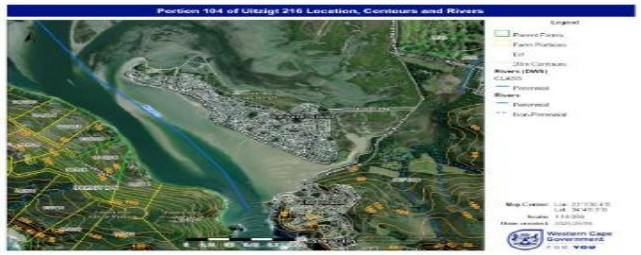

Fig. 1: Location, rivers and contours of Portion 104 Uitzicht 216 (CapeFarmMapper3).

Fig. 2: The Estuarine Functional Zone extends into parts of the north-eastern section of Portion 104 Uitzicht 216 (CapeFarmMapper3).

Fig. 3. The Coastal Management Line for Protected Areas extends across the lower half of the property (DEA&DP Coastal Management Map Viewer).

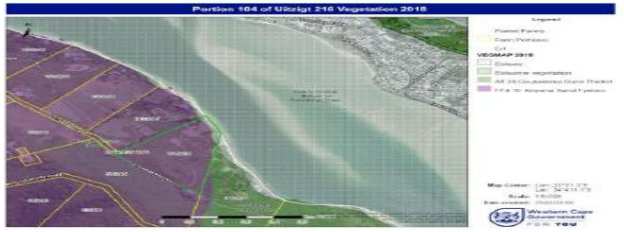

Fig. 4: Knysna Sand Fynbos (FFd 10) (CE) is mapped across most of Portion 104 Uitzicht 216 (CapeFarmMapper3).

Fig. 5: Portion 104 Uitzicht 216 is zoned as Agriculture Zone I (Knysna GIS Viewer).

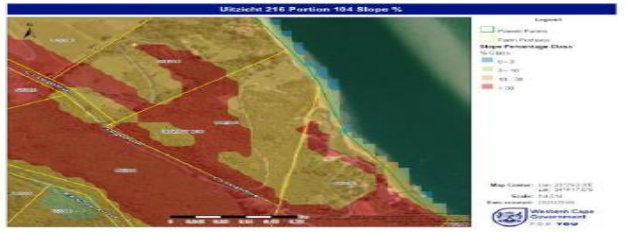

Fig. 6: Slope Percentage Class is >30% in the south-western sector of the property (CapeFarmMapper3).

This is as the KPE is defined as a "Protected Area" in terms of the National Environmental Management: Protected Areas Act of 2003 (NEM: PAA)., i.e., as, "any of the protected areas referred to in section 9". Section 9(a) includes Protected Environments, therefore the KPE is a Protected Area, with CBA mapping therefore not applicable. The desired management objective for a Protected Area is, "Must be kept in a natural state, with a management plan focused on maintaining or improving the state of biodiversity. A benchmark for biodiversity".

Portion 104 Uitzicht 216 is 9.93ha in extent and is zoned, Agriculture Zone I **(Fig. 5)**. The property is situated outside the Urban Edge. Slope Percentage Class is >30% in the south-western sector of the property, flattening out in the north-eastern sector, with a steep, sandy, cliff/embankment which drops to the Knysna Estuary on the lower portion of the property **(Fig. 6)**. Signs of coastal erosion are evident on this embankment, likely due to stormwater runoff and undercutting from estuarine waters.

The landowner is, Lovemore Children's Secondary Trust, represented by Mr. Rob Lovemore.

The current development application submitted is a, ***"Pre-Application Basic Assessment report for Proposed Development of Assisted Camping Facilities for the Lovemore Family – Portion 104 of Farm Uitzicht 216, Uitzicht, Knysna, Western Cape"***, refer to extracts below from the report prepared by Eco Route Environmental Consultancy, dated 29 May 2025, which will be submitted to the Competent Authority, the Department of Forestry, Fisheries and the Environment (DFFE). No DFFE Reference Number has been assigned.

1.1. Development Components

Since the initial alternative, which followed a more traditional camping style, the preferred alternative has evolved towards an assisted camping model. The layout still includes five (5) nodes, each consisting of five (5) platforms. The primary distinction between Alternative A (the preferred alternative) and Alternative B is that Alternative A includes two (2) platforms per node designated for indoor sleeping arrangements. One (1) platform will serve as a communal space, featuring a functional kitchen and relaxation area, while the remaining two (2) platforms will accommodate traditional tent-style camping (Figure 11). This concept will be implemented for all five (5) nodes.

1.2. Service considerations

- Access

  It has been confirmed that the proposed development will utilise the existing dirt road solely for access during construction. The road itself will not form part of the construction activities and will not be altered, upgraded, or expanded in any way. During the rehabilitation phase, the road will be retained and, if necessary, returned to its current condition. No construction work will be undertaken on the road.

- Water / Sewage / Electrical

  Each node will make use of harvested rainwater, collected from roofs and gutters, for general use. In addition, a borehole located on the property will supplement the water supply during periods when the Lovemore family is in residence. During times of absence, the aquifer will be allowed to recharge to maintain sustainable capacity.

  One ablution facility will be provided per node, shared among family members. Wastewater from these facilities will be managed through the installation of a bio-septic treatment plant, ensuring environmentally responsible disposal.

  The proposed development is not expected to place any significant additional strain on the property's existing electricity supply. It has therefore been confirmed that the development will connect to the current electrical system servicing the property.

Fig. 7: Preferred Site Development Plan (Alternative A). Green – Proposed Camping Areas; Brown – Camping Area to be removed; and Yellow – Alternative location of Brown camping area. As extracted from the Pre-Application Assessment report, Eco Route Consultancy, 29 May 2025.

Fig. 8. Visual representation of assisted camping, Pre-Application Assessment report, Eco Route Consultancy, 29 May 2025.

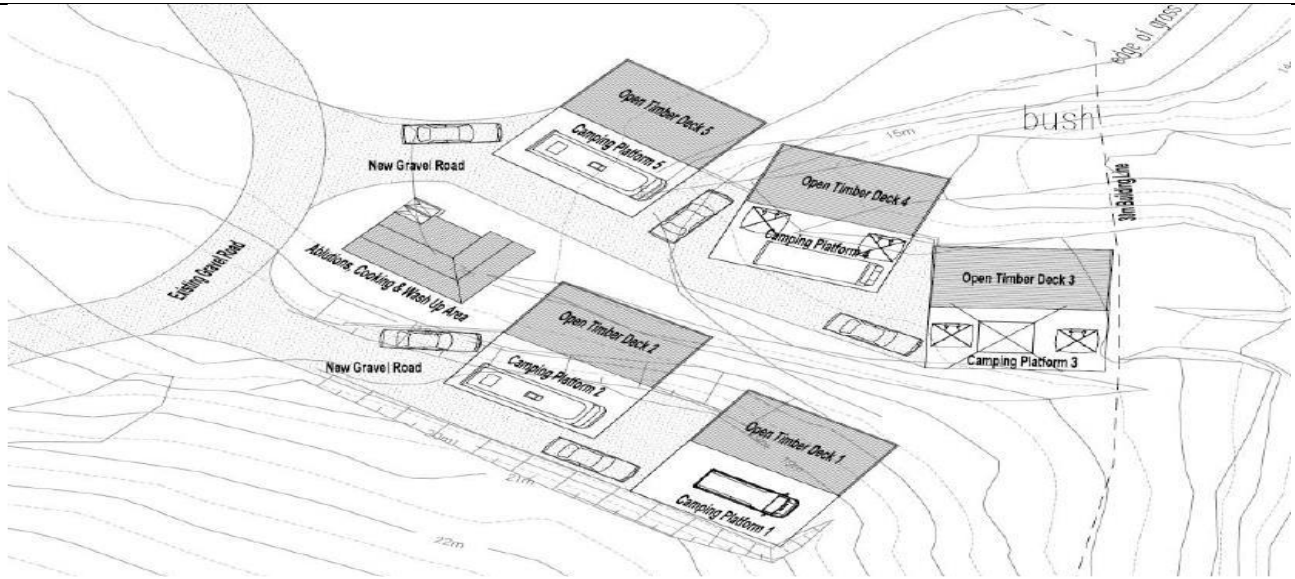

Fig. 9. Close up layout Area 1, TMBA Architects, 2023

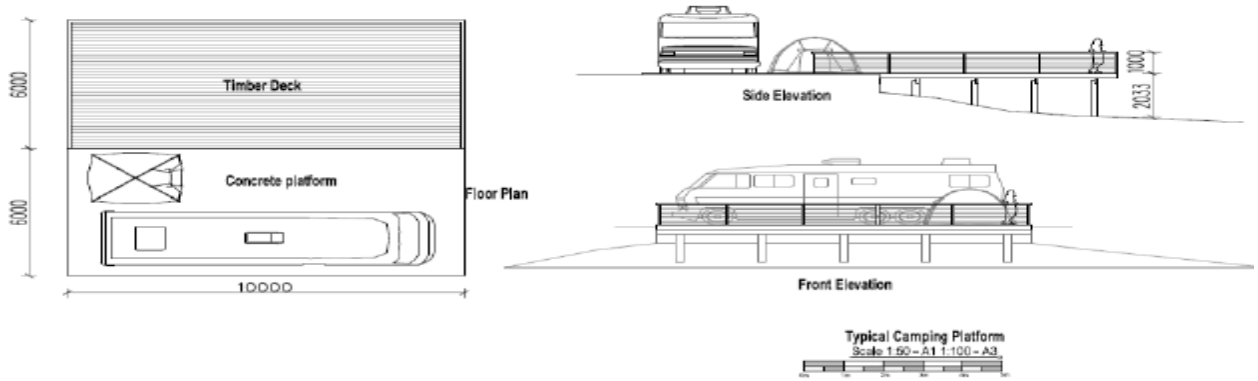

Fig. 10. Dimensions of camping platforms, TMBA Architects, 2023.

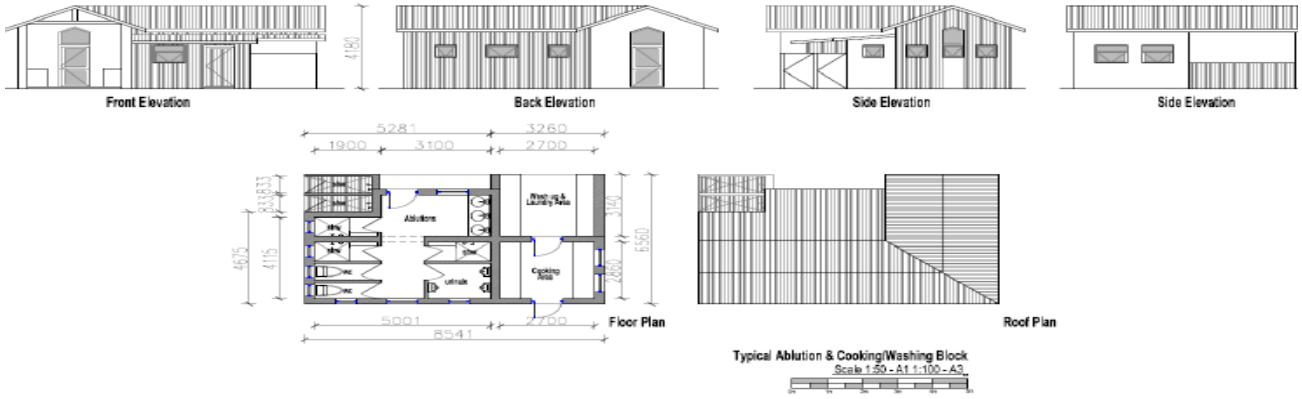

Fig. 11. Layout of Ablutions/ Cooking/ Washing block, TMBA Architects, 2023.

The summary of development components, as per the application (Eco Route and TMBA Architects documents) is noted as follows: • 5 separate nodes. • 5 ablution/ cooking areas • 25 camping platforms, sleeping approx. 4 people. • >29 vehicles in season. • Approx. 100 people in season. • Existing walkway access to Knysna Estuary to remain as is. • Existing road access to remain as is. • Lake Brenton Slipway and jetty to be used for boat launching. • The existing dwelling house, garage, and existing platforms on the property are to be renovated. Building line relaxations are required for the dwelling house and garage. • A second dwelling could be constructed. • No jetty or moorings exists for the property. • Proposed re-zoning from Agricultural Zone I with Consent Use for Camping Facilities to Open Space III, with	Please note that this comment may require revision upon submission of the Final Basic Assessment Report (BAR), as the Site Development Plan is expected to be updated to incorporate additional information requested during the first round of public participation. **To include in DBAR**

Consent Use for Tourist Accommodation and a Function Venue (<500m2).	

SANParks previously commented on a Rezoning application for Portion 104 Uitzicht 216 on 20 March 2023, with a similar layout and proposal. See extracts below:

A range of developments are proposed to include:

1. Five (5) camping areas with 5 camping platforms, open timber decks, ablution facilities and cooking facilities to provide tourist accommodation. Twenty-five camping areas in total are proposed. It is unclear how many people each campsite can accommodate.
2. A second dwelling unit.
3. The existing garage building that burnt down in the fire will be reinstated on its existing footprint.

Layout of some of the camping areas

SANParks noted the following points in this comment:

SANParks needs confirmation that a Basic Assessment (BAR) is not triggered, as Listing Notice 3, Activity 6, may be relevant. "The development of resorts, lodges, hotels, tourism or hospitality facilities that sleeps 15 people or more" in the Western Cape.

A good conservation outcome can be achieved on this property while supporting the tourism economy.

- SANParks objects to camping area five (EUA 5) as the road and disturbance footprint will destroy Knysna Sand Fynbos that could be avoided.

- SANParks will support tourism facilities in the currently disturbed footprint but needs a commitment that the Landowner is willing to declare the property in terms of the NEMPA as either Contract National Park or enters into a Biodiversity Stewardship agreement with Cape Nature.

The intention of the Landowner to rezone the property to Open Space III seems admirable, however commitment to achieve a conservation outcome is required. SANParks would welcome a meeting with the Landowner to discuss the SANPark's Contract National Park option.

We further require additional detailed information of what exactly is planned. Twenty-five (25) camping areas with 4 people per site (numbers were not stated in the

Motivation Report) will result in 100 people camping with additional people present in the existing dwelling and proposed second dwelling.

SANParks requires further clarity regarding the rezoning application before we can support it and clarity from the DFFE that a BAR is not triggered.

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

Yours sincerely

Maretha Alant
Principal Planner
Garden Route National Park

CC:	Pat Bopape	SANParks
	Owen Govender	SANParks
	Pam Booth	Knysna Municipality
	Megan Simons	Cape Nature

A site visit was undertaken by SANParks (Dr. Vanessa Weyer and Mr. Thabang Kgaphola) and Eco Route Consultancy (Mr. Justin Brittion and Ms. Joclyn Marshall) and the Knysna Municipality (Ms. Kate Southey) on the 11 June 2025 **(Figs. 12 – 15)**.

Fig. 12: Indigenous vegetation and grassed areas present (11/06/2025).

Fig. 13: Existing camping sites (11/06/2025).

Fig. 14: Coastal erosion is evident adjacent to the Knysna Estuary, on the property's estuary boundary (11/06/2025).

Fig. 15: Acess to grassed areas (11/06/2025).

Point 1: Clarity Required	
SANParks seeks clarity on the following:	
• SANParks wishes to know the total 'disturbance' footprint area, inclusive of all development elements (five nodes, 25 platforms, parking areas, infrastructure, access road widening if required, other roads, services, embankments, etc. A Site Development Plan is requested to depict these areas clearly. The Terrestrial	All assessment related documentation will be updated to clearly reflect the total disturbance footprint. **To include in DBAR**

Biodiversity assessment states 1ha/ 10 000m2 will be transformed, clarity is required.	
• It is not stated whether additional camping will be permitted on the existing open grassed areas, nor if day visitors will be permitted. Confirmation is required.	The facility will be strictly for use of the family. Engagement with SANParks will be arranged to further discuss this matter.
• Clarity is sought on the expected numbers and types of estuary users and their boats/ vehicles etc.	Engagement with SANParks will be arranged to further discuss this matter.
• The capacity of the Brenton on Lake slipway and parking area to accommodate additional users (boats, canoes/kayaks etc.) requires investigation.	The facility is intended strictly for private family use, and as such, no additional users will be making use of the slipway. The slipway will continue to be used in the same manner and intensity as it has historically been used by the Lovemore family since acquiring the property.
• Mention is made of Exclusive Use Areas and Sectional Title Laws, with the facility to be run by the Lovemore Children's Trust to provide overnight accommodation by means of short-term rentals. Confirmation is required on whether the proposed development will be a Section Title Scheme.	This will be addressed in engagement with SANParks.
• It is noted that one ablution facility will be required per node and that a bio-septic treatment plant will be installed. Further details of this are requested.	The ablution installation company will be consulted regarding the capacity of each system to determine first and foremost how many facilities will be included into the final design. There after the placement will be determined and indicated in the final Site Development Plan.
• Whilst it is desirable that the landowner proposes to rezone the property from Agricultural I to Open Space III. Open Space III when combined with a formal	Engagement with SANParks will be arranged to further discuss this matter.

stewardship mechanisms will afford stronger long-term conservation outcomes for the property and region.	
• The property falls within SANParks' current Land Inclusion Plan, i.e., the protected area expansion footprint of the GRNP, and in the Knysna Sand Fynbos Coastal Corridor, which is the subject of a conservation initiative being supported by SANParks, CapeNature, Table Mountain Fund, WWF, and the Western Heads Goukamma Conservancy (WHGC). Achieving a conservation outcome on this property is important to SANParks. The property qualifies as a Contract National Park stewardship property. SANParks would welcome discussions with the landowner on Contract National Park options and incentives.	Engagement with SANParks will be arranged to further discuss this matter.
Point 2: Issues of Concern	
• SANParks is concerned about the current density proposed, and believes that five diffuse nodes, with 25 camping platforms, i.e., >100 people is excessive for the site, and surrounding area.	The facility is intended strictly for private family use, thereby there will be no increase in density regarding use of site. The same amount of people that have been using the property will continue to remain the same.
• Although described as assisted camping structures, structures appear more permanent, and nodes could be considered as five separate, 'de-constructed' tourist dwellings or chalets. The property currently has an existing dwelling, and the construction of a garage is proposed.	Designs and footprints of the proposed development will be clearly described in the revision documentation.

• Disturbance footprint areas could be significant.	Designs and footprints of the proposed development will be clearly described in the revision documentation. **To include in DBAR**
• SANParks is concerned about the cumulative impact of this and similar high-density tourism offerings in the area and on neighbouring properties, which will impact on the Knysna Estuary, altering landscape tranquillity and character, being adjacent to a national park, and the Western Heads Knysna Sand Fynbos Corridor Contract National Park areas.	The facility is intended strictly for private family use, thereby there will be no increase in density regarding use of site. The same amount of people that have been using the property will continue to remain the same.
• Noise, visual, and increased estuary users are potential negative impacts.	The facility is intended strictly for private family use, thereby there will be no increase in density regarding use of site. The same amount of people that have been using the property will continue to remain the same.
• Such high-density tourism developments may set a dangerous precedent for the area.	The facility is intended strictly for private family use, thereby there will be no increase in density regarding use of site. The same amount of people that have been using the property will continue to remain the same.
Point 3: General	
• Section 62 and 63 of the National environment Coastal Management Act, Act No. 24 of 2008 (NEM: ICMA) are relevant in authority decision-making to prevent harm to and afford protection to the CPZ. Adequate setbacks should be applied to safeguard the landowner from potential future climate change risks, i.e., particularly coastal erosion/ storm surge affects, and to protect the	All mitigation measures proposed by the independent specialists will be implemented in this regard.

coastal zone; this should be in line with CPZ setback requirements for the property.	
• The Applicants attention is drawn to Section 15 of NEM: ICMA, which states:	This will be addressed in engagement with SANParks.
• (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.	This will be addressed in engagement with SANParks.
(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.	
In terms of the National water Act, 1998 (Act No. 36 of 1998), Revision of General Authorisations for the Taking and Storing of Water, GNR. No 40243, 2 September 2016, Section 2.3; a Water Use License (WUL) may be required if any proposed boreholes are situated within 500m of the High Water Mark of the ocean.	
Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. The owner should join the local Fire Protection Association, if not already a member.	
The landowner's attention is drawn to the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEM:BA) Alien and Invasive Species Regulations, 25 September 2020, where a landowner is legally responsible for the removal of alien vegetation on their property. The owner should formalise an Invasive Alien Vegetation Control Plan as required by the NEM:BA. Large areas of Uitzicht 216 Portion 104 are invaded with Alien and Invasive Species, which poses a fire risk.	

A permit from the Department of Forestry, Fisheries & the Environment (DFFE) must be attained should any protected tree species be disturbed on the property, as per the National Forests Act, 84 of 1998, as amended.	
Should any resources of suspected heritage value be uncovered during clearing, Heritage Western Cape (HWC) must be contacted immediately for instructions.	
The Coastal Management Line for the Garden Route National Park was established in GNR. No. 3668, 14 July 2023, in terms of NEM: ICMA. Section 4 describes development risk management measures applicable for new infrastructure seaward of the CML and existing infrastructure in areas at risk to dynamic coastal process. The new and existing infrastructure provisions are what is being applied to SANParks infrastructure. SANParks encourages that these measures be applied to private property adjacent to SANParks land.	
SANParks is responsible for the Proper Administration of the KPE (GN 1175 of 2009) Regulations, and for the authorisation of any development (as defined in the Regulations) in the DCA, as per Section 8. The KPE DCA extends 50m from the high-water mark into Portion 104, and as such SANParks' authorisation is required for development to proceed in these areas.	
As per Section 9 and 10 of the KPE Regulations SANParks may request additional studies to be undertaken, should it be deemed that these are required.	
Points 4: Summary and Way Forward	SANParks' comments on the proposed development are acknowledged and will be further discussed during a dedicated engagement meeting prior to the submission of the revised documentation. All final inputs from SANParks will be formally addressed as part of the second round of public participation.
SANParks objects to and does not support the proposed development in its current form. Density and disturbance areas should be decreased.	
SANParks requests clarity on the issues raised in Point 1 above.	
SANParks' previous comments from the 23 March 2023 stand where a good conservation outcome is possible on the property whilst supporting the tourism economy.	
SANParks will support tourism accommodation facilities in the currently disturbed footprint but needs a conservation stewardship commitment that the landowner is willing to	

declare the property in terms of the NEM: PAA as either Contract National Park with SANParks or by entering into a Biodiversity Stewardship agreement with CapeNature.	
As noted, the property falls within SANParks' current Land Inclusion Plan, i.e., the protected area expansion footprint of the GRNP, and in the Knysna Sand Fynbos Coastal Corridor, which is the subject of a conservation initiative being supported by SANParks, CapeNature, Table Mountain Fund, WWF, and the Western Heads Goukamma Conservancy (WHGC). The property qualifies as a SANParks Contract National Park stewardship property.	
SANParks would welcome discussions with the landowner on Contract National Park options and incentives.	
Achieving conservation outcomes on the property, in a high-value sensitive conservation area would leave a lasting legacy for future generations.	
SANParks wishes to comment on the Draft Basic Assessment Report (DBAR), when this is circulated for public comment.	
It is requested that SANParks' comments be included in all environmental application reports in their entirety and not just in a Comments and Responses report.	
SANParks reserves the right to revise comments if additional information becomes available.	
Breede-Olifants Catchment Management Agency (BOCMA) – SI Ndlovu – 13 June 2025	

The following are BOCMA comments relating to Pre-application Basic Assessment for proposed development of assisted camping facilities on Portion 104 of Farm Uitzicht 216, which should be adhered to:	
1. The Breede-Olifants Catchment Management Agency has reviewed the draft Basic Assessment Report and has no objections to the proposed activities. No watercourses observed on site that will be affected by the proposed activities as it is located in the Knysna Estuarine functional zone.	It is noted that the Breede-Olifants Catchment Management Agency has reviewed the draft Basic Assessment Report and has no objections to the proposed activities.
2. An estuary Is not defined as a watercourse, therefore no section 21(c) and (i) water uses are triggered, and no water use authorisation required in terms of the National Water Act, (Act No. 36 of 1998).	It is noted that the Breede-Olifants Catchment Management Agency confirms no section 21(c) and (i) water uses are triggered, and no water use authorisation required in terms of the National Water Act, (Act No. 36 of 1998).
3. No water shall be derived from any water resource and used on Portion 104 of Farm Uitzicht 216 for any purposes without prior approval by means of a water use authorisation in terms of section 22 of the National Water Act, 1998 (Act No. 36 of 1998), if activities exceed Schedule 1 limits.	This comment will be considered.
4. The harvesting of rainwater and storing of rainwater in tanks does not trigger any water use(s) in terms of section 21 of the National Water Act, 1998 (Act No. 36 of 1998) and it doesn't require an authorisation.	It is noted that the Breede-Olifants Catchment Management Agency states harvesting of rainwater and storing of rainwater in tanks does not trigger any water use(s) in terms of section 21 of the National Water Act, 1998 (Act No. 36 of 1998) and it doesn't require an authorisation.
5. For off-grid sanitation facilities, it is recommended to dispose domestic wastewater into conservancy tank serving no more than 50 households, that must be emptied on regular basis. Septic tanks/French drains are	It is proposed that all domestic wastewaters be treated on-site using a bio-septic package treatment plant. The need for a Water Use Authorisation in relation to the discharge of treated effluent is currently being assessed. Final confirmation on

not recommended as they are likely to impact on groundwater resources.	whether authorisation is required will be included in the Draft Basic Assessment Report. **To include in DBAR**
6. Please note that no treated or untreated wastewater shall be disposed to the environment or discharged into a water resource or even used to irrigate without a water use authorisation.	
7. All reasonable measures shall have to be taken to prevent the potential pollution of the groundwater resources due to the proposed onsite sanitation facilities i.e. a service provider must be appointed to remove domestic wastewater from conservancy/septic tanks.	
As required by section 22 of the National Water Act, 1998 (Act No. 36 of 1998), a Water use Authorisation is required prior to commencement with any water use activity contemplated in section 21 of National Water Act. Moreover, commencement with any water use activity without an authorisation as required by section 22 of National Water Act constitutes an offence in terms of section 151(1)(a) of the National Water Act. In terms of section 151(2) of the National Water Act, any person who contravenes is guilty of an offence and liable, on first conviction to a fine or an imprisonment of a period not exceeding five years or both such a fine and imprisonment.	
In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of National Water Act that is associated with the proposed development.	
Kindly note that this office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.	
The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.	

Should you wish to apply for a water use authorisation for unregistered water uses triggered by the proposed activities, you may apply electronically by logging onto the Department of Water and Sanitation (DWS) website at http://www.dws.gov.za/e-WULAAS	
Should you have further enquiries, the office can be contacted or alternatively contact Mr SI Ndlovu at the above-mentioned contact number or on sndlovu@bocma.co.za	
NGO	
Lake Brenton Residents Association (LBRA) – Glen Stephen (Communications) – 24 June 2025	
The **Lake Brenton Residents Association (LBRA)** is a voluntary, non-profit civic body representing the interests of homeowners and residents of **Lake Brenton**, Knysna. With reference to land developments bordering Lake Brenton, the association is committed to: • Ensuring that residents are informed, engaged, and included in matters of public participation, planning, and development • Maintaining the unique biodiversity and natural beauty of the Brenton area • Advocating for safe, well-planned infrastructure that respects both the ecological sensitivity and rural character of the area Actively participating in environmental review processes to help ensure that planning decisions are made transparently, lawfully, and in the public interest.	
1. Environmental Concerns	
Critically Endangered Vegetation Unit	
The proposed development site falls entirely within the Critically Endangered Knysna Sand Fynbos vegetation type (as per VEGMAP). While portions of the site are currently degraded — largely due to invasive alien plant infestations	While the proposed development area is largely degraded, it retains significant ecological restoration potential. As such, the project includes a rehabilitation component, which involves the removal of invasive alien vegetation and the implementation of ecological management and restoration.

and the 2017 Knysna fires — these areas retain substantial ecological restoration potential.	These measures are detailed in both the Basic Assessment Report and the accompanying Environmental Management Programme (EMPr).
Species of Conservation Concern	
The site hosts two plant species listed as of conservation concern: • *Lebeckia gracilis* (Endangered • *Selago villicaulis* (Vulnerable)	
Protected Tree Species	
Two nationally protected tree species were identified on the site: • *Afrocarpus falcatus* (Outeniqua Yellowwood) • *Sideroxylon inerme* (White Milkwood)	
Under the **National Forests Act (Act 84 of 1998)**, these species may not be damaged, removed, or relocated without appropriate authorisation.	It has been noted that if it becomes necessary to disturb the identified protected trees, a separate application process must be followed in terms of the National Forests Act (Act 84 of 1998). The need for such application can only be identified during the pre-construction of construction phase.
Restoration Imperative	
LBRA strongly asserts that any development within this area must be paired with a credible, enforceable restoration plan, which should include: • Alien invasive species removal • Replanting with indigenous fynbos species	The need for restoration has been acknowledged and will be addressed within the Environmental Management Programme (EMPr). Should the Competent Authority require separate documentation outlining a detailed restoration plan, such documents will be prepared. Otherwise, restoration measures will be incorporated into the EMPr to the extent possible.

• Erosion and stormwater management	
• Long-term ecological monitoring	
2. Access and Road Safety Concerns: Use of Servitude Road	
The proposed access appears to rely on an existing agricultural servitude, which was not designed or legally established for high-volume commercial use. This raises:	Access and Road safety concerns have been noted and will be addressed in the Draft-Basic Assessment Report. **To include in DBAR.**
• Legal questions regarding permitted land use	
• Concerns over degradation, and environmental impact from increased traffic	
• Potential safety risks for wildlife such as bushbuck and caracal	
Blind Corner onto Dolly Raats Road	
We also note that the BAR gives scant attention to the connection into JC Langenhoven Drive, which would serve as the feeder route to and from Dolly Raats Road. The compounded tragic impact on this route has not been addressed.	
The proposed entrance to the development intersects Dolly Raats Road at a blind corner, where visibility is dangerously limited in both directions. The anticipated increase in traffic — including caravans, service vehicles and guest vehicles — will significantly elevate the risk of accidents at this point.	

Additionally, this intersection lies within a well-known wildlife crossing zone, particularly for bushbuck, increasing the risk to local fauna and the potential for animal-vehicle collisions. Three bushbuck have died in motor car collisions at this point in recent times.	
The Lake Brenton Residents Association (LBRA) calls for a formal, independent Traffic Impact Assessment (TIA) and a professional road safety engineering review of the proposed access point. Without this, public safety cannot be assured.	
<u>3. Broader Environmental and Social Concerns</u>	
The cumulative impact of increasing development in the Farm 216 Uitzicht and Lake Brenton area is a growing concern. The area is already under pressure from:	Details regarding water, greywater, sewage, or solid waste will be re-addressed during the Draft-Basic Assessment. **To include in DBAR**
• Habitat loss and ecological fragmentation	
• Increased fire risk in a high-risk wildland-urban interface	

• Strained infrastructure, particularly: o Water supply, which is already limited ▪ Sewage treatment capacity, which is not designed to accommodate unzoned tourism developments There is no detailed servicing plan provided in the current BAR to demonstrate how potable water, greywater, sewage, or solid waste will be sustainably managed on-site.	
Johan Labuschagne – Western Heads Goukamma Conservancy – 02 June 2025	
Thank you for the email below. We will go through the report and send our comments before closing date. One question; Is the camping facilities exclusively for the Lovemore family or is the intention to make it available for the general public (tourist facility)?	The facility is intended strictly for private family use.
Western Heads-Goukamma Conservancy NPO: 285-693 – Johan Labuschagne – Chairman – 30 June 2025	
Find attach the comments from the WHGC on the pre-BAR Uitzicht 216-104: PROPOSED DEVELOPMENT OF ASSISTED CAMPING	
We are especially concerned about the information provided:	
1. That the property has already an **existing campsite without the required land use consent** and approved SDP	During Public Participation engagement, representatives from the Knysna Municipality was on site. There was no mention of transgression regarding these matters. All future matters will proceed to fulfil the required legislative requirements.
2. The addition of linear infrastructure & disturbance areas since 2015 without the required EA or OSCAE. (Ref	Based on the available information, no notable linear infrastructure or disturbance areas were identified on the proposed development property. While the concerns raised by

Knysna Public Viewer - Orthophoto 2015, Orthophoto 2019, Google Earth Historic Satellite photos)	the commenting body regarding compliance with environmental legislation are acknowledged, it should be noted that no transgressions have been observed on the property.
3. The lack of Invasive Alien Species management as per Article 73(2) Biodiversity Act 10 of 2004 (NEM:BA)	Alien Invasive Vegetation Species management will be included in the requests and conditions of the Environmental Management Programme (EMPr). If the Competent Authority deem it necessary to produce a separate Control Plan, it will be supplemented as an appendix to the EMPr. **To include in DBAR.**
The following are comments regarding the Project proposal, Pre-Application Basic Assessment Report and relevant appendices.	
Context of the Western Heads Goukamma Conservancy	
The Western Heads Goukamma Conservancy, hereafter referred to as the, "WHGC" is supported by a Table Mountain Fund (TMF) project, specifically towards strengthening one of the WHGC's mandates for the conservation and restoration of the Knysna Sand Fynbos (KSF). The WHGC covers the area from the western bank of the Knysna Estuary to the eastern bank of the Goukamma Estuary, and from the beach (high water mark) inland to the N2 national highway - more at https://westernheadsgoukamma.co.za/.	
Uitzicht 216 Portion 104	
Portion 104 (9.93ha) falls in an area of very high conservation, historical and aesthetic value for Knysna. The Property of 9.93ha is situated within an exceptionally sensitive biodiversity area that is legally mapped as CBA 1. The property is bordering the Knysna Estuary (SANParks) (NE border) and Feather Bed Nature Reserve (SE and S Border).	The Terrestrial Biodiversity input (Capensis, 2025) provides an assessment of the biodiversity sensitivity of the proposed development property. However, it should be noted that the comment does not accurately reflect the site-specific biodiversity findings. According to the Terrestrial Biodiversity Specialist Report, the highest sensitivity rating assigned to the

<table>
<tr><td></td><td>property is Medium, with no areas classified as exceptionally sensitive. For an accurate representation of the property's biodiversity sensitivity, please refer to the Terrestrial Biodiversity Report.</td></tr>
<tr><td colspan="2">Overview of the classifications of Portion 104:</td></tr>
<tr><td colspan="2">The property falls within the following “zones” and “classifications” with specific regulatory frameworks and requirements:</td></tr>
<tr><td>SANParks Buffer Zone – bordering SANParks Garden Route National Park’ Knysna Lakes Protected Area.</td><td rowspan="7">During the process of Basic Assessment, there is transparent engagement of with all management and competent authorities regarding the mentioned “zones” and “classifications”.</td></tr>
<tr><td>SANParks Priority Expansion Area and Priority Natural Areas, defined in terms of the approved Garden Route National Park Management Plan.</td></tr>
<tr><td>Falls outside of the urban edge and is legally mapped as Critical Biodiversity Area (CBA) designated CORE1 in terms of the Western Cape Biodiversity Spatial Plan (WCBSP).</td></tr>
<tr><td>Coastal Protection Zone (which extends up to 1km from the high-water mark – Includes the Ocean and Tidal Rivers) with specific reference to the Western Heads Goukamma dune cordon.</td></tr>
<tr><td>Knysna Protected Environment, which has been mapped with associated promulgated Regulations, that designates a Development Control Area.</td></tr>
<tr><td>the Estuarine Functional Zone (EFZ),</td></tr>
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- the Development Control Area (DCA) as per Knysna Protected Environment (KPE) Regulations 2009 Gaz 23797

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- the National Heritage Resources Act

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- bordering the Featherbed Nature Reserve (Uitzicht portion 59 and 60)

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<tr><td>

- within 1km from a known Archaeological site of an undisturbed Earlier Stone Age site on the Featherbed Nature reserve.

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Pre - Application Basic Assessment Report - Lovemore - Ptn 104 of Farm 216 Proposed development of assisted camping facilities for the Lovemore Family

Table 10: Assessment of need and desirability

1.	Explain how the proposed development is in line with the existing land use rights of the property?
The existing land use rights are agriculture with consent use for camping facilities. The new proposal is to expand the camping facilities in line with the growth of the family, so that each sibling and their family can have their own dedicated camping facility.	

Ambiguous Scope of the project and current land use permissions

The Pre-BAR states that the campsite (expansion) development is for the use of the Lovemore Family in line with the growth of the family

- Table 10 refers to an **existing campsite** on the property to **be expanded**. Omitted information of the existing land use consent for an existing camping and

</td><td>The proposed project scope will be addressed in greater detail during the upcoming application phase of the Basic Assessment process. This will serve to clarify and resolve any current uncertainties or ambiguities regarding the scope of the development. **To be included in DBAR.**</td></tr>
</table>

an approved SDP. "The new proposal is to expand the camping facilities in line with the growth of the family, so that each sibling and their family can have their own dedicated camping facility"	
• No Title Deed was provided	
• The Pre-BAR attempts to make it clear that the campsite development is Solely for the use of the Lovemore Family, however, there are various other references to guests in the Pre-BAR	
• The addendum "Portion 104 of Farm Uitzicht 216 Rezoning Motivation for comment.pdf" clearly states that the intent of the development is **Tourist Accommodation**.	
• "Appendix D4 - Report - Visual impact assessment for the proposed Portion 104 of Farm 216 development Knysna" clearly states "Visual impact assessment for the **proposed** tourist facilities development of portion 104 of farm 216, Knysna"	
Tourist accommodation consent use will be valuable for the Landowners as it will allow them to continue using the property for their own camping purposes but will also allow them to develop the land in a sustainable and precautionary manner through a harmoniously designed and built holiday development that will be used for holiday and recreational purposes, by letting visitors and tourists share in and enjoy being in nature and specifically Knysna's unique environment by providing facilities for those visitors and tourists to stay on the property. Reference "Portion 104 of Farm Uitzicht 216 Rezoning Motivation for comment.pdf"	

The conclusion is that the intent of the Campsite Development is to be a **fully-fledged Tourist development**.	
Proposed Size of the Camp Site	
• The proposed Camping Site exceeds reasonable family use	
• The 5 proposed camp nodes with 4 camp platforms in total 20 Camping areas. Four (4) to five (5) persons per camp area **totalling 80 to 100 persons**. This far exceeds reasonable family use and points towards Tourist Accommodation	
Summary:	
• The proposed size of the campsite and the Rezoning motivation, contradicts the pre-BAR disclosure of family use. The intent of the Campsite (expansion) Development is a **fully fledged Tourist development.**	
• **The pre-BAR falls short on providing the required consideration for a fully-fledged Tourist development**.	
• The existing Land Use consent use for the existing campsite is omitted and must be provided with an approved SDP	
• The Title Deed is omitted and must be provided.	
Western Cape Biodiversity Spatial Plan (WCBSP) and Western Cape Land Use Planning Guidelines Rural Areas (WCLUPGRA)	
The **WCBSP** and **WCLUPGRA** scheme describes zones in which various land-uses that are either allowed or prohibited on	**Town planner**

certain portions of land, regulated through a permitting system. The WCBSP is very specific regarding Land-use guidelines within land-use zones for CBA/CORE1. (Ref Section 4 of WCLUPGRA). Portion 104 is classified as CBD or CORE1 in a Rural Area.	
The WCBSP and WCSPFRA is very specific regarding **not allowing a development of campsite (resort)** in a CBA/CORE1 and within the coastal management line	It should be noted that the proposed development should not be referred to as development of a campsite (resort). It is simply formalisation of existing family facilities, and will only be used in such way.
Expansion of linear infrastructure & disturbance areas since 2016 without EA	There have been no known compliance issues associated with the property to date. However, this request will be reviewed in detail to ensure that any potential misunderstandings or uncertainties regarding the property's history are appropriately clarified and addressed. **To include in DBAR.**
The pre-BAR did not provide information regarding expansion of linear infrastructure & disturbance areas since 2015 that can be seen from historical Satellite images. (Ref Knysna Public Viewer - Orthophoto 2015, Orthophoto 2019, Google Earth Historic Satellite photos) The WHGC has no record of EA or OSCAE's being issued for the linear and disturbance area expansions described below and require clarification.	
1) Reference made to the disturbed area called "*disturbed patch of grass*" that has been "*retained in the same originally disturbed area*".	
The historical Satellite images shows that the "disturbed patch of grass" has been expanded. The notion that the "disturbed patch of grass" that has been "retained in the same originally disturbed area" is <u>not supported by historical Satellite images</u>.	

In contrast, it shows the **expansion of the disturbance "grassy patch" since 2015** with an estimated 1000sqm or more.	
The pre-Bar also states that the "disturbed patch of grass" has been used as an unofficial campsite as per Pre-BAR page 35 that require specific land use approval that is not in place.	
The intent of the "maintenance" and the expansion of "disturbed patch of grass" could be interpreted as an attempt to <u>prevent the recovery/revival of the critically endangered vegetation</u> that could ease future development objectives.	There is no intend future development objectives. Using the disturbed grass patches is only in attempt of conservation of existing sensitive vegetation.
2) **Construction of linear infrastructure (Road and parking area)** to connect to a Slipway on Portion 103	There were no activities noted of this kind and will be reviewed for inclusion in the Draft-Basic Assessment. **To include in DBAR**
It was also noticed from the Historical Satellite images from 2015 to date, the Construction of	
a. a. a "parking area" (estimated 50m x 5m) on the eastern boundary close to the slipway on Portion 103 as well as	
b. b. a road (~120m x 4m) linking the slipway to the "patch of grass".	
This new road and parking area is also shown in pre-Bar Fig 4 page 17 as disturbed areas; however, no information was provided.	
The owners are reminded of the "duty of care" as per NEMA Section 28, especially for an area classified as CBA that requires that "*Degraded areas should be rehabilitated*". Ref WCBSP Degraded CBA's should be rehabilitated and not being seen as an opportunity to develop.	The owners shall be reminded of Section 28 of the National Environmental Management Act (Act 107 of 1998).

General Comments	
1. A Visual Impact Assessment (VIA) is **insufficient due to**	
a. The lack of **relevant observation points** from the Estuary (boats), Eastern Heads Suburb and Featherbed Nature reserve.	The visual impact specialist was appointed on the basis of a detailed Terms of Reference, which outlined the required scope of work in accordance with the guidelines provided by the Department's Screening Tool. Should the Department hold a differing opinion regarding the adequacy or scope of the assessment, the specialist will be informed accordingly to address any identified gaps. Additionally, the visual impact specialist will be provided the opportunity to give feedback on this comment.
b. **The use of the <u>least visually impact Alternative B</u>** "camping platforms consisting out of a concrete platform and an open timber deck located within each" (Ref 3.2 page 16). **<u>Visually impact did not consider Alternative A (preferred alternative).</u>**	
2. **A NOISE Impact assessment might be required** due to the site topography and the proximity of the proposed development in respect of the nearby neighbourhoods (Leisure Island and East Heads).	There have been no complaints to date regarding any noise pollution under the use of the property by the Lovemore family. There are no additional users expected, and therefore it is not anticipated that there would be a noise increase that warrants the assessment of noise impact.
3. Archaeological study required as the site is within 1km from a known Archaeological site on the Featherbed nature reserve.	As stated on p26 of the Pre-Application BAR. "A Notice of Intent to Develop (NID) under Section 38(1) and (8) of the NHR Act will be submitted to Heritage Western Cape. Heritage Western Cape will determine whether the proposed development might have an impact on heritage resources".
4. **IAS Control Plan missing**: Reference is made in the pre-Bar and Appendix to the IAS Control Plan; however, the plan and progress of control are not provided. Further, the pre-Bar made reference to "*e.g. disturbance caused by alien invasive plant*	Alien Invasive Vegetation Species management will be included in the requests and conditions of the Environmental Management Programme (EMPr). If the Competent Authority deem it necessary to produce a separate Control Plan, it will

species and the 2017 Knysna veld fires" page 16 needs to be reviewed. All the evidence shows that the Knysna 2017 fires benefited the Fynbos habitats affected. Landowners that updated and executed the Invasive Alien Species (IAS) Control Plans after the fires saw an excellent reemergence of the fynbos from dormant seedbanks.	be supplemented as an appendix to the EMPr. **To be included in DBAR.**
Conclusion	
The development proposal in its current form is not supported because:	
1. Uitzicht Portion 104 is situated in an area that has exceptional Environmental, Ecological, Archaeological and Heritage characteristics. This area requires the highest level of Environmental and Heritage conservation consideration. **Degraded CBA's should be rehabilitated and not be seen as an opportunity to develop**.	All protocols for assessment are followed to the highest possible standard applicable.
2. Portion 104 Uitzicht falls outside of the Urban Edge, in a CBA and adjacent to the Knysna Estuary (National Park) bordering a Private Nature reserve, falls in the KMZ, etc. that requires careful consideration in planning the land use, expanding and scoping development.	Planning of the proposed development considers the applicable surroundings and sensitivities.
3. 3. The WCBSP has clear guidelines for CBA. The WCSPFRA does **not allow a development of campsite (resort)** in a CBA1/CORE1 and within the coastal management line.	As per the updated Western Cape Biodiversity Spatial Plan (WCBSP) the entire proposed development property is considered as Protected Area and not CBA 1 anymore. According to the general guidelines included in the WCBSP for protected areas – "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, <u>are subject to NEMA authorisation</u> and the protected area management plan".
4. The conclusion is that the **Campsite (expansion) Development is a fully fledged Tourist development** that necessitates the BAR to the consider the full human activity, design and impact as per Tourist Development. The site development also needs to be updated to reflect the correct information. Please note that either, Rezoning as Resort OR Consent use (Agri I), does not have conditions "for family use" only. Once campsite permissions are granted, it can be operated as per definition.	This comment is noted and will form part of the received comments database.
5. 5. Portion 104 already has a main dwelling house, a garage, and other unknown infrastructure, which is the maximum infrastructure allowed for Agri I zone in a CBA1/Core1 area within the Coastal Protection Zone. The landowner is requested to consider low impact alternatives that is fitting for the area, e.g. guesthouse	All recommendations will be presented to the property owner, if any changes to the proposed development occur, they will be presented to all I&APs transparently.
6. The property falls in a CBA that is crucial for maintaining biodiversity and ecosystem functioning; therefore, developments other than a main residence within this area are not supported.	This comment is noted and will form part of the received comments database.
The WHGC reserves the right to revise its initial comments and to request further information based on any additional information that may be received.	
PUBLIC	

Gavin Whitfield – 31 May 2025	
I object to this development as it will lead to other developments encroaching an already sensitive ecosystem around the Knysna Estuary.	This is a speculative comment; however, the objection to the proposed development is acknowledged and forms part of the formal public participation record
Johan Boshoff – 29 May 2025	
I'm representing, as a trustee, the Riana Boshoff Trust, owner of Portion 119 (en route to Portion 104) and will need to know, what precisely is meant by "assisted camping facility", and if you please, the impact on traffic, the handling of refuse, as well as any relevant links in order to access planning and reports.	**Reply to email – 02 June 2025** I'd like to provide some clarity on your query regarding the term "assisted camping" as used in our correspondence. The term was coined to best describe the vision the Lovemore family has for the property. To fully understand the concept, it's helpful to consider their initial idea (referred to as Alternative B, which is not the preferred alternative). Their original plan involved setting up five platforms for traditional tented camping—essentially a simple, family-style camping experience. As the concept developed, the family opted for a more comfortable arrangement. They now propose that three of the five platforms be converted to what we termed "assisted camping": Two platforms will function similarly to small chalets, including basic sleeping facilities such as beds, cupboard space, and similar room-like features.

	The third platform will serve as a communal living area, featuring a kitchen, lounge/TV area, and toilet facilities. The remaining two platforms will still be reserved for traditional tent camping. In essence, the family aims to retain the camping spirit while incorporating a few modest comforts—hence the term "assisted camping." In terms of sanitation, they intend to install a bio-septic treatment plant at each platform that includes toilet facilities. This is to minimise reliance on the municipal wastewater system. Lastly, we generally refrain from providing detailed input on town planning matters, as our role is limited to environmental consulting. For any town planning-related queries, I recommend contacting the project architect, Tracey Mills Brink of TMBA Architects (we have her details attached as part of the documentation on our website), who is overseeing that aspect of the development.
Chris Gow - 29 May 2025	
This announcement tells one very little. More info please. Add me as an I&AP.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
Rita – 19 June 2025	
I strongly opposed the development into a camping facility	This objection to the proposed development is acknowledged and forms part of the formal public participation record.
Picca de Bruin – 18 June 2025	

Objection to Proposed Development – Environmental and Legal Concerns	
I'm raising this objection based on protecting wildlife and their environmental. For generations wildlife has been living in the conservancy, roaming free. Owners of properties bought here with the knowledge of environment and its living creatures. This is part of a National Park.	The appointed faunal specialist has indicated that, provided mitigation measures are properly implemented, the proposed development is expected to result in only a minor negative impact on faunal habitat, and the direct impact on fauna is anticipated to be negligible. Surrounding property owners can be reassured that the natural features they value will be protected to the greatest extent reasonably possible, in line with specialist recommendations and environmental best practice. It is important to note, however, that the development is proposed on privately owned land, which does not fall within the boundaries of the Garden Route National Park, although it is located within a broader environmental buffer area.
1. Sensitive and Protected Environment	
The site falls within a Critical Biodiversity Area (CBA) and includes both terrestrial and aquatic ecosystems, as well as an Ecological Support Area (ESA). These designations exist to protect areas of high ecological value, and any development here should be approached with great caution. Allowing development would result in the loss of indigenous vegetation, damage to ecological systems, and likely harm to species of conservation concern—all of which would be irreversible and contrary to our national goals for biodiversity protection.	The entire proposed development site is located within a designated Protected Environment. All specialist assessments and planning processes have been undertaken with this designation in mind, ensuring that the area's environmental sensitivities are fully considered. The development layout and impact mitigation measures have been carefully designed to align with the conservation objectives applicable to the protected area.

2. Protected and Conservation Status	
According to Section 50(5) of the Act: "No development, construction or farming may be permitted in a national park, nature reserve or world heritage site without the prior written approval ofthe management authority." As far as we are aware, this written approval has not been provided. Moving forward without it would go against the law.	The Management Authority (SANParks) was consulted for their input during this first round of Public Participation. Further engagement with SANParks is anticipated.
3. Construction Impacts	Review of the specialist studies conducted for the proposed development is strongly encouraged. All findings, along with the corresponding mitigation measures recommended by the specialists, have been incorporated into the Pre-application Basic Assessment Report and will remain part of the final submission. Any additional specialist studies identified as necessary will be incorporated into both the Draft and Final Basic Assessment Reports. All registered Interested and Affected Parties (I&APs) will be provided with the opportunity to review and comment on these documents as part of the public participation process.
Development will likely have several negative effects during the construction phase, including:	
Wildlife being killed and injured leading to euthanasia due to broken legs and internal injuries. At the turnoff from Dolly Raats to Featherbed and surrounding properties a number of buck has been killed,	
• Loss of natural habitat and biodiversity	
• More traffic into the area, walkers and wildlife at risk	
• Fences blocking wildlife routes	
• Damage to areas important for threatened species	
• Erosion and runoff affecting nearby streams or wetlands	
• Pollution from equipment and waste	
• Noise and lights affecting both the environment and local residents.	

These are especially worrying given how ecologically sensitive the site is.	
4. Community and Cultural Impacts	
The application doesn't seem to properly consider cultural or heritage resources, or the broader impact on the local community.	As stated on p26 of the Pre-Application BAR. "A Notice of Intent to Develop (NID) under Section 38(1) and (8) of the NHR Act will be submitted to Heritage Western Cape. Heritage Western Cape will determine whether the proposed development might have an impact on heritage resources". **To include in DBAR.**
Important issues that need closer attention include:	
• Change in land use that could set a dangerous precedent	
• Increased traffic and pressure on infrastructure,	
• Impact on local identity, livelihoods, and rural character	
• The long-term consequences of altering title deed conditions.	
Once this door is opened, it may lead to more development in areas that should be preserved.	
5. Zoning and Legal Issues	
The proposed development doesn't appear to align with current zoning rules or spatial development plans	**Town Planner**
There is also no clear justification for changing the land's current use from agriculture or conservation to tourism.	**Town Planner**

Approving this development could encourage further subdivision and even more inappropriate development in future.	**Town Planner**
Given the above, I strongly urge the authorities to reject this proposal. The environmental risks, legal contradictions, and potential harm to the community are too great.	**Town Planner**
The precautionary principle, as included in our environmental laws, should apply here: where there is doubt, we should protect nature first.	
Adri Engelbrecht – 19 June 2025	
Please please no more development specially on Portion 104 of Farm 216, Uitzicht Knysna!	This objection to the proposed development is acknowledged and forms part of the formal public participation record.
Lee Blasich – 23 June 2025	
Good day, I am against the proposed camping site. A total NO NO.	This objection to the proposed development is acknowledged and forms part of the formal public participation record.
It is a conservation area with free roaming wildlife and a camping site would totally ruin the area.	Review of the specialist studies conducted for the proposed development is strongly encouraged. All findings, along with the corresponding mitigation measures recommended by the specialists, have been incorporated into the Pre-application Basic Assessment Report and will remain part of the final submission. The appointed faunal specialist has indicated that, provided mitigation measures are properly implemented, the proposed development is expected to result in only a minor negative

	impact on faunal habitat, and the direct impact on fauna is anticipated to be negligible
it simply just won't work. as far as sewerage problems especially and more traffic on that road will be very destructive for our wildlife	Additional emphasis will be placed on clarifying the proposed development's servicing strategy, as it is understood that the information previously provided may not have been sufficient to fully support stakeholder engagement.
This is not what I bought into 10 years ago when I purchased a property in Lake Brenton.	This objection to the proposed development is acknowledged and forms part of the formal public participation record.
Another note, the Lagoon will not be able to accommodate extra boat activities as we already see a problem over the Holiday periods with not enough parking etc.	No additional boat users are anticipated as the proposed development is intended exclusively for private use by the Lovemore family. This intention will guide both the management and use of the facility going forward.
We have spent a lot of money for cameras, and I feel having a camping site with hinder our security.	As per description of the preferred alternative, the property will not be transformed to a camping site. The facilities are strictly for the family use.
Please do not consider accepting the proposal.	This objection to the proposed development is acknowledged and forms part of the formal public participation record.
Chris Richards – 24 June 2025	
I hereby object to the above mentioned rezoning application as it will have a disastrous effect on the environmental aspect of the natural flora and fauna of that beautiful area.	Review of the specialist studies conducted for the proposed development is strongly encouraged. All findings, along with the corresponding mitigation measures recommended by the specialists, have been incorporated into the Pre-application Basic Assessment Report and will remain part of the final submission.

	The appointed faunal specialist has indicated that, provided mitigation measures are properly implemented, the proposed development is expected to result in only a minor negative impact on faunal habitat, and the direct impact on fauna is anticipated to be negligible.
Brenda Neall – 24 June 2025	
Please note my opposition to this untenable proposed development on the Western Head. I write this as a long-time owner and resident of Leisure Isle.	
Topline of concerns with this proposed development & rezoning this land:	
• Will enable an extra 80-120 people (allowing for tourist accomm) staying overnight.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users other than what have been present on the property since in possession of the Lovemore family.
• Sets a precedent for land use to be changed to allow for "commercial overnight tourism/ resort use" for beachfront property on Western Head.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users other than what have been present on the property since in possession of the Lovemore family.
• Building will disturb the natural bush & fauna. Extra activity & people will disturb this further.	Specialist input has confirmed that that the prosed development impact will have a minor effect.
• A visual eye-sore all day, and light at night.	This comment will be noted, however, contrast the findings of the visual specialist input.
• Noise pollution (esp in the evenings when there is no wind)	There have been no recorded complaints related to noise during the entire period of ownership by the Lovemore family. Based on this history and the intended low-impact use of the property, noise pollution is not anticipated to be a concern.

• Extra sewage (septic tanks very close to lagoon) & rubbish to be removed on single-lane access road	No extra sewage or waste will be generated. Only in the same amounts that have been generated in the past by the family. It has been managed in the past without complaints, and is anticipated to continue in such a manor.
• Cliff to the beach is already eroding. No space to moor boats/canoes so likely they'll anchor in the channel in front of beach making lagoon even busier/more congested &dangerous.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the impact of the eroded cliff area.
What are these people thinking?! An appalling concept.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
Richard Tunstall - Next Generation Capital (owner of Erf 2015, Thornely Road Leisure Isle) - 26 June 2025	
I would like to register as an interested and affected party in relation to the above-mentioned proposal. I represent Next Generation Capital, the owner of Erf 2015, 23 Thornely Road Leisure Isle. This property is directly opposite the lagoon to the proposed development, and my concerns arise in relation to the environmental assessment process and any further zoning applications that may arise.	
I attached comments in relation to this objection as well as highlighting my concerns around noise and light pollution across the lagoon.	
<u>Attachment to email:</u>	
At the outset, it is submitted that the pre-application BAR, albeit not a mandatory requirement in terms of the Environmental Regulations (2014 as amended), does not in our opinion, comply with the minimum requirements of Appendix 1 of the Environmental Regulations in that there are critical information shortcomings, as well as that minimum information we believe should be included/reflected correctly, is not reflected, in order for the pre-application BAR to be	The purpose of circulating a Pre-Application Basic Assessment Report (BAR) is to invite early public engagement, ensure Interested and Affected Parties (I&APs) are registered, and to raise awareness of the proposed development at an early stage of the process. As stated throughout the document, this is a draft version and not the final submission to the competent authority.

considered as part of the formal application process. This submission details the aspects we believe to not be adequately addressed in the pre-application BAR and thus forms the basis for this objection.	While the pre-application BAR is not a mandatory requirement in terms of the 2014 Environmental Impact Assessment (EIA) Regulations (as amended), it is a recognised and often encouraged practice to promote transparency and inclusivity in the environmental assessment process. It is acknowledged that certain information components may not yet be complete at this stage; however, the final BAR, which will be submitted as part of the formal application process, will fully comply with the minimum content requirements outlined in Appendix 1 of the EIA Regulations. All identified gaps will be addressed, and inputs received during this pre-application phase will assist in improving the quality and comprehensiveness of the final submission.
For ease of reference, our objections are dealt with under specific headings, and we would appreciate if the EAP can respond accordingly as well.	
APPLICANT & LANDOWNER DETAILS:	
The Front page of the BAR indicate that the application is prepared for the 'Lovemore Children's Secondary Trust', however under the Applicant Details section in the main report, it is stated as Rob Lovemore.	The property on which the proposed development is located is legally registered in the name of the Lovemore Children's Secondary Trust. Mr. Rob Lovemore is acting in his capacity as a trustee and family representative of the Trust. He has been engaging with all relevant authorities and specialists on behalf of the Trust for the purpose of obtaining Environmental Authorisation.
Under the same section the Landowner Details are listed as the Lovemore Children Secondary Trust, however no contact details are supplied for the Trust as is required in the form.	

• The EAP must clarify whether the Applicant is Mr Lovemove in his **private capacity**, or the **Trust**. Furthermore if the Applicant and Landowner are not the same entity, the necessary written landowner consent must be provided as part of formal documentation.	Although his name appears under the applicant details, this is purely for operational and correspondence purposes. Mr. Lovemore will be responsible for ensuring adherence to the terms and conditions of any environmental authorisation issued, in his capacity as a trustee. Written landowner consent, where applicable, will be submitted as part of the final documentation to confirm the Trust's support for the application.
<u>ALTERNATIVES:</u>	
The BAR refers to the Preferred Alternative as having five nodes, one (Unit 4) which had to either be repositioned, or alternatively refigured to avoid SCCs identified in the Botanical/Biodiversity Assessment Report. It also refers to the 'preferred design alternative' that allows for three enclosed buildings per node i.e. 15 enclosed structures vs the 'original design alternative' that all specialists considered and assessed, that had only one (1) enclosed structure namely the ablution facility i.e. 5 enclosed structures.	The preferred development alternative has been revised. Please refer to the updated alternative for the most current and accurate representation of the proposed development.
The EAP submits that Unit Node 4 could not be repositioned because of the Applicant's preference (no further details provided), as well as topography/slope and therefore preference is given to refiguring the layout for Unit Node 4 instead – which it is noted has the highest density of SCCs in proximity to its location.	

If slope is a disqualifying criteria for repositioning of Unit 4, then the same criteria (steep slope) is likely to be appliable to the unit node immediately to North-West of the alternative as well, since both locations are on similar contours namely the range between 30m contour and the 45m contour according to the 5m contours taken from the CapeFarmMapper dataset.

Figure 1: Approximately location of the alternative position for Unit 4 with 5m contour overlay (CapeFarmMapper).

• The EAP must clarify how it is that the slope / steepness of terrain is different for the two nodes and if the slope is similar, why the northern unit node is not also deemed to be on too steep an area because it does brings into question the location of the northern node in the landscape as well (nothing that site specific contours may be different to the 5m contour dataset).	
• The EAP must clarify whether the statement about slope/topography being restrictive for Unit Node 4 was informed by a slope analysis, or desktop only.	
It is noted that all of the specialist studies were completed in 2024, however the BAR is dated June 2025 which indicate almost a year gap between when the studies were undertaken and when the BAR was compiled. As a result, it appears that the 'preferred alternative' and 'preferred design alternative' which either repositions Unit 4, or refigures the layout of Unit 4, and has much more enclosed structures, was **not considered/assessed by specialists** in their earlier (2024) investigations/assessments. There is also no indication in the BAR that specialists will be given the opportunity to update their reports to consider and assess the new 'preferred' alternatives.	As previously stated, the Pre-Application Basic Assessment Report (BAR) is not intended to present all information as if it were the final version of the assessment. Its purpose is to facilitate early public engagement, ensure the registration of Interested and Affected Parties (I&APs), and raise awareness of the proposed development at an early stage of the process. At the time of this initial engagement, the family had not yet finalised the exact location of the preferred alternative, and the content of the Pre-Application BAR reflects this. All specialist studies will be updated to incorporate the most current and relevant environmental information based on the finalised development alternatives, prior to submission of the Final BAR
Not only does this imply that the **BAR does not address the alternatives in the detail necessary**, concerningly it means that the BAR does **not reflect accurate findings / recommendations** made by all of the specialists. As a result, I&APs are unable to provide informed comment on the specialist findings/recommendations.	

• The EAP must clarity why specialist studies/assessments **reflecting only the 'original' alternative** have been used and referenced without assessment of the 'preferred alternatives', alternatively the EAP must provide further details/reasoning why some alternatives have been eliminated from comparative assessment.	
HERITAGE:	
Although this is deemed a pre-application BAR, an application for Environmental Authorisation, must include, where applicable, the investigation, assessment and evaluation of the impact of any proposed listed or specified activity on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), excluding the national estate contemplated in section 3(2)(i)(vi) and (vii) of that Act.	As stated in Section C of the Pre-application BAR. "A Notice of Intent to Develop (NID) under Section 38(1) and (8) of the NHR Act will be submitted to Heritage Western Cape. Heritage Western Cape will determine whether the proposed development might have an impact on heritage resources." All I&APs will have the opportunity to comment on these findings during the application phase of this process.
Similarly, where Section 38 of the NHRA is triggered, the Standard Operating Procedure between Heritage Western Cape and the Department of Environmental Affairs must be followed. If Section 38 is applicable to the proposed development, then the proponent/applicant is required to submit a Notice of Intent to Develop ("NID") to Heritage Western Cape and attach a copy to thereof to the EIA application form. If Heritage Western Cape requires a Heritage Impact Assessment, the Heritage Impact Assessment must be undertaken as one of the specialist studies of the EIA process to be undertaken in terms of the NEMA EIA Regulations, 2014.	
The BAR does indicate that a NID is yet to be submitted. It is understood that the NID can be incorporated with the draft	

BAR at a later stage during the formal process, however by excluding this from the pre-app BAR, I**&APs are not afforded the opportunity to provide informed comment** on the possible heritage/landscape/archaeological aspects that may be applicable be available for stakeholder review and comment.	
Furthermore, by not having the NID available and/or feedback from Heritage Western Cape (HWC) at this stage, it does raise concern about the **outcome of the visual impact assessment (VIA)** that was already completed in 2024 as **not reflecting on potential cultural landscape/heritage** aspects yet.	
• The EAP should endeavour to provide I&APs access to the NID as well as feedback from HWC in a timeous manner so as to ensure transparency and meaningful participation by I&APs.	
<u>TERRESTRIAL BOTANICAL & BIODIVERSITY ASSESSMENT</u>:	
The specialist reflects on the fact that the initial seasonal plant survey done to inform the study is **sub-optimal due to geophytic and annual plant species only flowering during Spring**. The specialist further states that other measures were taken to compensate for the shortcoming and that it should therefore not have a highly significant effect on the sampling efforts. However, given that nearly a year has passed between when the botanical survey was initially undertaken and when the pre-app BAR is published, it would have **added great value** to the process to have had a **follow-up botanical survey** done during Spring, especially given the **noted presence of SCCs** on the site.	All specialist report will be updated to accurately reflect the most recent findings.

The specialist confirms that the majority of site is mapped as a CBA 2 with CBA 1 (smaller area) in vicinity of the development footprint. According to the specialist the CBA 1 area should in fact be corrected and reclassified as CBA 2. • The EAP must confirm whether the necessary application has been submitted to SANBI to have this correction reflected as part of the environmental process.	Once the specialists have had the opportunity to update their reports, the relevance of this comment will be re-evaluated. This is particularly important given that the entire property has since been reclassified as a Protected Area, rather than a Critical Biodiversity Area (CBA).
According to the information contained in the BAR, the management objective for CBA 1 is to "…*maintain in natural or near natural state with no further loss of natural habitat, only low impact biodiversity sensitive land uses to be considered*". Similarly the management objective for CBA 2 is to "…*maintain a functional, natural or near natural state with no further loss of natural habitat, only low impact biodiversity sensitive land uses to be considered*". It is submitted that the proposal in its **current form, appears not to conform** to the applicable spatial planning guidelines and potentially will **not achieve the management objectives** for a designated CBA property. • The Western Cape Rural Development Guideline reflects on density linked to scale, in areas deemed to be rural in character (which Portion 104/216 definitely qualifies as) indicating that a development with unit numbers between 11-30 is deemed to be of **'medium'** size/scale. Not having a clear definition of what the CBA Handbook meaning of 'low impact' biodiversity land use is, the next best qualifying criteria linked to number of units, is the rural development guideline, which implies that the	**Town Planner**

<table>
<tr><td>development as proposed ito the preferred alternative (25 units) is unlikely to qualify as a ‘low’ impact land use given its ‘medium’ scale classification.</td><td rowspan="2"></td></tr>
<tr><td>

- The EAP must obtain confirmation from the Provincial and Local *spatial planners* on compatibility of the proposal with the Rural Development Guidelines as a key document.

SIZE	DESCRIPTION
Small	1-10 units and floor area not being more than 120m² per unit
Medium	11-30 units and floor area not being more than 120m² per unit
Large	31-50 units and floor area not being more that 120m² per unit (Approval of a resort of more than 50 units, though not impossible, is discouraged)

TABLE 4: RESORT SIZE CATEGORIES
</td></tr>
<tr><td>It is mentioned in the SSVR contained in the BAR “….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”. The goal is to have land use activities that support the primary function of these areas as sites for biodiversity conservation. Activities i.e. land use must be consistent with CBA 1 category (at least one criteria).</td><td>The entire property has been reclassified. This reclassification will be reflected across all documents prior to submission of the Final BAR.</td></tr>
<tr><td>

- Although the BAR indicates that the remainder of the property will be zoned Open Space III (presumably private nature reserve) it does not appear clear from the specialist studies or the BAR, that the implication of **this statement** has been properly considered and addressed as part of the investigations/BAR report. This is **not**

</td><td>All specialists, including the Environmental Assessment Practitioner (EAP), will be given the opportunity to review the previous reports. This comment will be presented for consideration, and if it is found that the concern was not adequately addressed, Interested and Affected Parties (I&APs)</td></tr>
</table>

reflected in the VIA, Botanical/Biodiversity Assessments as it may have bearing on the findings of these studies.	will have another opportunity to raise the issue during the next round of public participation.
The habitat identification by the specialist indicates the *majority* of the site consist of degraded Fynbos/Thicket with **low to moderate restoration** potential with active management inputs, but with depleted species richness. This is further supported by the specialist stating that continued removal of invasive species, ecological burning and proximity to established protected areas, will allow for potential re-establishment of naturally occurring species.	The recommended mitigation measures were considered and incorporated into the Pre-Application BAR and supporting documentation. However, it is important to note that this was not the only comment of its kind. Similar requests were received, calling for the inclusion of additional information on rehabilitation, ecological burning, and alien vegetation clearing as part of the mitigation measures. These considerations will be fully considered and clearly reflected in the Draft BAR during the application phase.
The specialist specifically recommends that the fynbos-thicket **must be rehabilitat**ed to support ecological functioning to a **moderate to high level** and that development must be phased in accordance with **rehabilitation plan**. Further recommendations made by the specialist is that the fynbos/thicket must be subjected to **(ecological) burning regimes** in order to achieve the optimal ecological functioning (of moderate to high level). In addition, the specialist recommends that **alien clearing** be done in support of rehabilitation and to reduce the risk of wild fires.	
• Despite the fact that the specialist refers to the rehabilitation, ecological burning and alien clearing as <u>mitigation measures</u> necessary to reduce/minimise impacts, the BAR does not contain a **Rehabilitation Plan, Fire Management Plan or Alien Control Plan**.	
• Contrary to what is presented in the pre-app BAR, in the absence of these plans, it is **not possible for the specialist or the EAP** to give **accurate impact statements**. These	

plans must be developed in consultation with the relevant specialist(s) and the specialist(s) must be able to consider the contents of these plans to confirm whether or not they will in fact be effective as mitigation measures.	
The specialist makes specific recommendation for the upper slopes to be burnt to sustain and regenerate fynbos. Yet, the BAR and specialist assessment **does not reflect on the need for creating and maintaining fire breaks** to separate and protect the development from the northern slopes.	
• As is evident from the 2017 Knysna Fire, fire management on this property will be crucial to ensure not only regeneration of fynbos, but also the safety of numerous guests. Creating and maintaining fire breaks between the development and the upper slopes will require substantial trimming and maintenance of fynbos/thicket to reduce biomass fuel load (presumably no less than 6-8m wide fire break?). The **impact of maintaining such a fire break** on biodiversity has **not been addressed/assessed** by the specialist and it is noted that the most likely location would ultimately be in the 'medium' sensitive area as per the specialists ecological sensitivity map.	
• The EAP indicates that Unit 4 should not be repositioned due to **steep slopes/topography** which raises concern about **erodibility** of this area in general as a steep area. This steep areas is the likely position for a **fire break**. Reduced vegetation cover along an extended fire break along the contour of a steep slope has the	

potential for significant erosion and since siltation and erosion have already been noted by the botanical and aquatic specialists, the **absence of assessing an effective fire break is noted with concern**.

- Below image is of the SDP evaluated by the botanical/biodiversity specialist (excluding the alternative location for Unit 4 or the reconfiguration of Unit 4) which has **not been assessed** as an alternative.

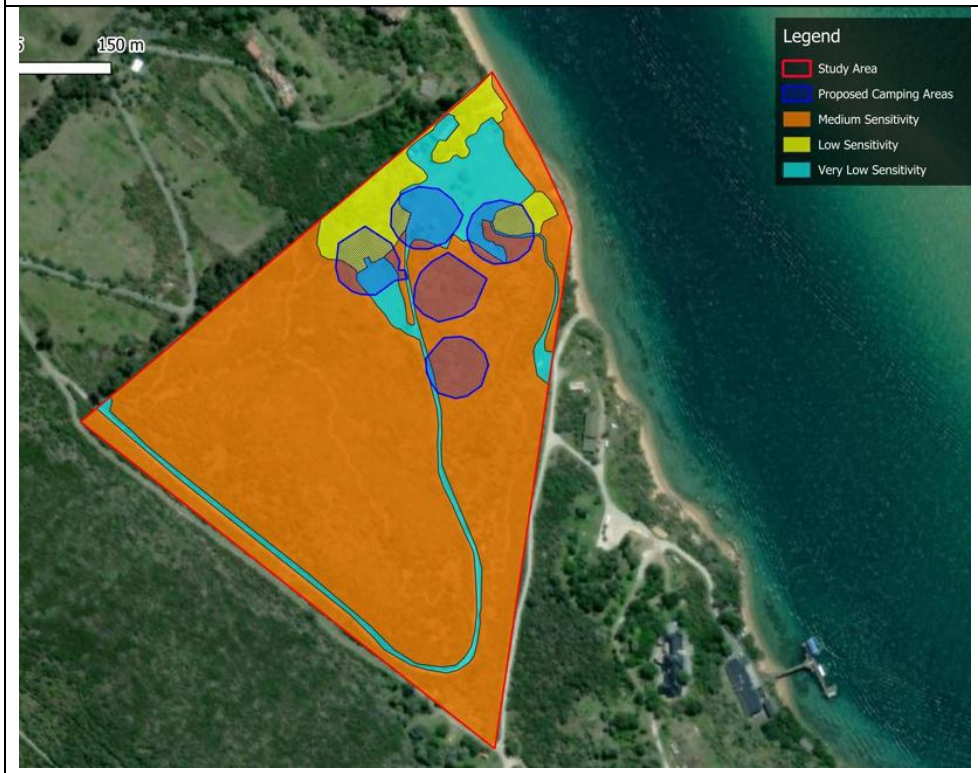


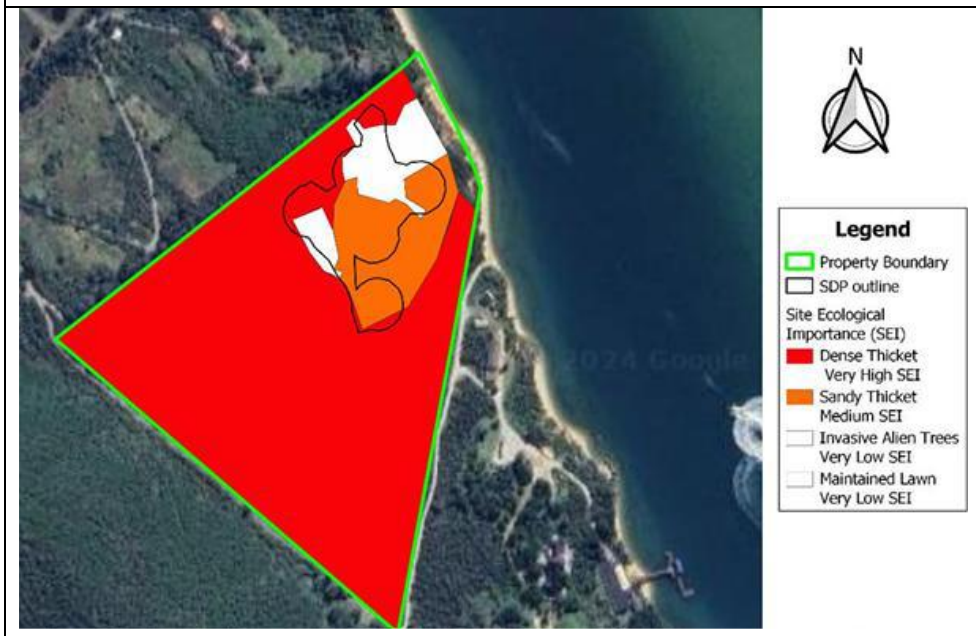
Figure 2: Ecological sensitivity map (biodiversity specialist) with approximate indication of repositioning of Unit 4, 2024.

AQUATIC:	
• Similar to the Biodiversity/Botanical Assessment that was done in 2024, the Aquatic Assessment (also done in 2024) **does not assess the preferred alternative** reported by the EAP in the BAR (issued June 2025) which is viewed as a **shortcoming in the BAR.**	All specialist report will be updated to accurately reflect the most recent findings.
• The **BAR lacks information and detail** about (A) the location of **sewage package plants/treatment facilities** ito **location, discharge of treated effluent, risk of contamination/pollution of the nearby Estuary**. As such the aquatic specialist assessment has **not investigated/assessed the impact thereof** and the study is therefore deemed to be **incomplete.**	The ablution installation company will be consulted regarding the capacity of each system to determine first and foremost how many facilities will be included into the final design. There after the placement will be determined and indicated in the final Site Development Plan. **To include in DBAR.**
• Similarly the provision for on-site sewage package plant/treatment facility appears not to have been considered ito the need for a **General Authorisation or Water Use License (WULA)** depending on the volumes and/or methodology for discharge of treated effluent and the BAR is silent on the need for such integrated permitting processes as may be deemed necessary i.e. for irrigation with treated effluent (especially in a Controlled Area).	
The specialist makes very specific reference to the **recommended mitigation measures** that include rehabilitation of a **minimum 10m buffer** inland from edge of cliff and rehabilitation of a vegetated **buffer of 36m** from the estuary to reduce the likelihood of increased erosion and prevent/reduce sedimentation as a result of the development.	This comment is acknowledged. The requests for additional information will be considered and clearly reflected in the Draft BAR during the application phase. **To be included in DBAR.**

Having these buffers in place appears to be critical in terms of how the specialist assessed the potential impact of this development.	
• Yet the BAR and specialist report does **not include a Rehabilitation Plan** for these buffers (or the site for that matter) and therefore the details and **efficiency of these mitigation measures are to be questioned**. Especially in light of the fact that the Visual specialist also makes recommendations for **landscaping as a mitigation** measure, but with **no detailed landscaping/rehabilitation plans** these specialists are unable to provide **meaningful and detailed assessment findings**. If the intention is for these plans to only be developed at a post-decision making stage, it is highly likely that the plans will be contradictory to each other i.e. visual requires long-term clearing of invasive alien vegetation to allow natural landscaping to establish whereas fire management and alien control plans may require more robust and faster clearing of invasive vegetation. Without proper integration of these Plan, to inform I&AP comment as well as decision-making, the mitigated impact ratings of the various specialist studies cannot be accurate.	
Although the BAR includes a single comment about there **not being development within the coastal area**, there is no information provided about how **residents/visitors will be able to access the lagoon** down the steep cliff (which is highly erodible and shows signs of erosion already) **or how they will be prevented** from doing so to avoid further erosion/siltation.	This comment is acknowledged. The requests for additional information will be considered and clearly reflected in the Draft BAR during the application phase.

The Western Cape Rural Development Guidelines, the Knysna SDF as well as the Resort Guidelines all refer to resorts (tourist accommodation) as being something that must have a 'resource' that justifies the development, especially in rural areas. The reality is that people visiting the development will want to access the lagoon (as a resource) and this has **not been reasonable interrogated as a potential long-term impact** ito the lifecycle of this activity**.**	
• Because of the sensitive nature of this steep slope/coastal area, the specialist recommends a buffer along the dune/estuary. The **BAR lacks details** about how residents/visitors/guests will be prevented from moving through or accessing the lagoon through this buffer.	This comment is acknowledged. The requests for additional information will be considered and clearly reflected in the Draft BAR during the application phase.
 Figure 3: Image from the BAR indicating the exposed and eroded steep dune of the property.	

 Figure 4: Screenshot of the aquatic buffer recommended as a mitigation measure by the specialist.	
FAUNA:	
As with the other specialist assessments, the faunal study does not reflect or assess the preferred alternatives which is presented in the BAR, which highlights a shortcoming in the assessment process. A rough estimate of where the repositioned Unit Node 4 was considered, indicate that it could extend into the Very High SEI for fauna. Without clarification about slopes as the criteria for excluding this position, it remains important for the specialists to consider and assess the preferred alternative that is reflected in the BAR.	All specialist report will be updated to accurately reflect the most recent findings.
Very specifically, the Faunal Assessment states on p. 53 that a new site layout must be (re)assessed by the a faunal specialist.	

Alternatives that are different to the 'original' SDP considered by the specialist must be assessed by specialists to ensure that the outcome of the BAR process has been done in terms of Best Practice Principles.	
 *Figure 5*: Faunal sensitivity map with an estimated indication of the repositioned Unit 4 that extends into the Very High SEI or a reconfiguration of Unit 4 (not to scale).	
The area of Medium sensitivity relates to the presence or potential habitat of **Sparkling Opal Butterfly** species habitat. Although a faunal assessment was done to inform the BAR, it is best practice for a butterfly specialist to conduct a more accurate assessment because of the specialisation required for assessment/occurrence of butterflies, especially	The specialist will be consulted for input regarding this comment received.

considering the location of the site in what is otherwise a known butterfly hotspot. • We submit that an independent **butterfly assessment** must be undertaken to compliment the more generic faunal assessment. The presence/absence of butterfly food plants as well as the breeding cycle/requirements of the Opal can then be detailed and used to inform the BAR process for effectively. Notably such an assessment must also be integrated with the fire management plan as well as the rehabilitation and/or landscape plan considering how such mitigation requirements deemed necessary by other specialists, may impact on butterfly habitat.	
AGRICULTURE: The BAR does not include an Agricultural Compliance Statement or Impact Assessment which appears to be contrary to the Specialist Protocol requirements. • Considering that the property is zoned Agriculture 1 and the proposal it so rezone the property to Open Space III (with tourist accommodate), it is unlikely that **no agricultural study** will be required. The EAP must confirm why no agricultural study has been undertaken.	The Site Sensitivity Verification Report (SSVR) (Appendix E – 2025.09.08 – Pre-Application Site Sensitivity Verification Report 104-216) indicates that the majority of the property is classified as having medium agricultural sensitivity. In accordance with the relevant protocols, this would typically require the submission of an agricultural compliance statement. It was initially argued that a compliance statement was not necessary, as the proposed development is not expected to significantly reduce the property's agricultural production potential, nor result in the loss of arable land. Portion 104 of Farm 216 is characterised by terrain and soil conditions that limit its suitability for intensive agricultural use. Site assessments and specialist input confirm that the area earmarked for development consists largely of marginal land, including

	sloped and naturally vegetated areas, which are of low agricultural value. However, although this rationale was originally included in the SSVR, an agricultural compliance statement will now be sought as a precautionary measure. **To include in DBAR**
VISUAL:	
As with the other specialist studies all undertaken during 2024, the visual specialist did not assess the preferred alternatives presented in the BAR. The Assessment only considered the original SDP which is a shortcoming in the BAR process.	The specialist will be consulted for input regarding this comment received.
In addition, it is noted that the VIA assessed the 'original design' and did not consider the 'preferred design' which allows for several enclosed structures for each node. Under the 'original design' it would have been a platform and open deck with one ablution (enclosed) structure. Under the 'preferred alternative' there are at least three (3x) enclosed structures, with two open platform and deck structures. This amounts to a difference of 5 enclosed structures vs 15 enclosed structures.	
• The fact that the VIA has not considered the preferred alternative design (or layout) is considered a notable and significant shortcoming in the BAR process especially considering the rural landscape, located against a slope and within a designated CBA area;	

• Concurrently without having access to the NID, it is also not possible for I&APs or HWC to consider the potential change in landscape character under the preferred alternative design.	As stated on p26 of the Pre-Application BAR. "A Notice of Intent to Develop (NID) under Section 38(1) and (8) of the NHR Act will be submitted to Heritage Western Cape. Heritage Western Cape will determine whether the proposed development might have an impact on heritage resources"..
 Figure 6: Image taken from the BAR indicating the preferred alternative design which appear to not have been taken into account in the 2024 VIA.	The specialist will be consulted for input regarding this comment received.
A specific recommendation made in the 2024 VIA include **visual and ecological planting patterns** to **achieve landscape patterns** that emulate existing mixes of tree and grass cover in the surrounding landscape to **screen and filter views** of the project areas. The specialist specifically state that it is necessary to prepare **an internal landscape plan** by a **professional registered Landscape Architect** that must **indicate phasing of planting** and **alien clearing** with a **lifespan of 20-years** inclusive of the construction phase and operational phase impacts) for **rehabilitation areas**.	Updated assessment documentation will clearly reflect all recommended mitigation measures. **To include in DBAR.**

• Despite this recommendation by the specialist, the **BAR does not contain any of these mitigation plans** which raises serious **concern about the effectiveness** of the recommended **mitigation measures** and outcome of the specialist study.	
• It is also noted from the (Planning) motivation report that **solar PV panels** will be installed on the roof(s) of the (enclosed?) structures as electrical supplementary. Although the VIA consider glint and glare, it appears to be limited to the windows of what would have been only five ablution facilities with windows. There is **no mention in the VIA of roof PV solar panels** ito the glint and glare considerations, neither is the VIA considering the cumulative glint/glare associated with 15x enclosed structures. Con	The specialist will be consulted for input regarding this comment received.
Curiously the **key visual points** discussed in the VIA area all taken from **locations East of Knysna Lagoon** although **neighbouring properties directly to the North and South** (including Featherbed Nature Reserve) **are not assessed** even though these fall within the 1km distance zone and within the **'probably view catchment' and 'zone of visual influence'.**	The specialist will be consulted for input regarding this comment received.
• The VIA appears to be silent on **why neighbouring properties** that fall within these view catchment and zone of visual influence are **not also assessed** as key **visual points**.	The specialist will be consulted for input regarding this comment received.

The Western Cape Rural Development guidelines state that "*…tourist development should not result in or contribute to visually obtrusive or ribbon development along the coastline, visually sensitive areas, cliffs or ridges*". The site is situated along the western heads which is a mostly rural character along the coastline/estuary.	**Town Planner**
Furthermore, the Rural Development Guidelines state that '*scenic landscapes of high significance are under threat and require strategies to ensure their long-term protection, these include undeveloped coastal landscapes under major development pressure…*' which resembles the western head.	**Town Planner**
• It appears as though the development in its preferred format/alternative, does not aligned with the **Rural Development Guidelines** in this sense. The EAP must clarify with the visual specialist and Provincial/Local *spatial planners* whether or not this proposal is in line with the Guidelines or not as it may have an impact on the outcome of the VIA altogether.	
LAND USE HISTORY:	
Although mention is made of the 2017 Knysna fire and maintenance of grassed lawn areas, it appears as though there has been transformation of some kind between at least 2000 and 2024. There is also mention of 'consent use' camping areas under the current Agricultural zoning, however it is important to understand whether the transformation and (historic) camping activities/structures/infrastructure are lawful prior to applying for further development on the property.	**Town Planner**

• Considering the location of this property in proximity to the estuary, within an areas designated as a CBA, the EAP should provide clarity on the historical land uses and verify the lawfulness of such i.e. permitted consent use / development of camping sites etc. 2000 2024	
SERVICES:	
Even though the report made available for public review and comment resembles the pre-application BAR it is a notable concern that it does not include a Service Report, or any services layout maps indicating services capacity or location. The absence of this important information is concerning not only because an application of this nature, for 25 stands cannot be considered without also considering the potential impact of services that is necessary to support such a development, but also because none of the specialists have been given the opportunity to apply their minds to the potential impacts associated with disturbance / pollution etc.	The ablution installation company will be consulted regarding the capacity of each system to determine first and foremost how many facilities will be included into the final design. There after the placement will be determined and indicated in the final Site Development Plan. **To include in DBAR.**

• It is deemed a serious flaw in the BAR that no concrete information is available ito services.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
• Mention is made of a borehole on the property that will be the source of supply for the 25 camping stands, however there is no confirmation that the borehole is registered or that the borehole has sufficient, sustainable yield to support a development of this nature. The development cannot be considered without surety of supply especially if the development will not be linked to Municipal potable water supply.	This comment is noted and will be considered and addressed in the Draft Basic Assessment Report (DBAR), including confirmation of borehole registration and an assessment of sustainable yield to ensure adequate and reliable water supply for the proposed development. **To include in DBAR**.
• In the event that the borehole is registered with DWS, its likely to be registered for Schedule 1 water use and not for tourism/commercial purposes in which case there may be a requirement for GA or WULA. The EAP must verify these potential process requirements as it will have bearing on the BAR process and is critical information to inform I&APs comment as well as decision-making.	
• There is no details provided on how sewage will be treated other than refence to on-site package plant/septic treatment facility. Will there be one, or several? Where will these be located on the site? How/Where will treated effluent be discharged? Given the proximity to the Knysna Lagoon Estuary and the very real threat of contamination of (a) the on-site borehole and/or (b) the coastal estuarine environment, this service aspect is critical to the understanding of potential impacts and also the feasibility of the proposal. None of these aspects have been detailed or assessed.	The ablution installation company will be consulted regarding the capacity of each system to determine first and foremost how many facilities will be included into the final design. There after the placement will be determined and indicated in the final Site Development Plan. **To include in DBAR.**

• Considering the highly erodible nature of the property (as confirmed by specialists), as well as the slope of the site, it is worrisome that there is no provision for a detailed Stormwater Management Plan for how to deal with runoff from increased hard surface areas to avoid erosion and avoid siltation of the Estuary.	All stormwater management practices are informed by the relevant specialist inputs and proposed mitigation measures. Thereby, the Environmental Management Programme (EMPr) addresses both pre-construction design considerations and operational phase activities related to stormwater control. During construction, it will be the responsibility of the appointed contractor to implement site-specific stormwater management measures through method statements, which must be submitted for review by both the Competent Authority (DFFE) and the Environmental Control Officer (ECO) as and when site conditions require. **To include in DBAR.**
The BAR states that the existing gravel road will be utilised solely for access during construction (what access will be used for operational traffic then?).	All final design details will be addressed in the formal application documentation. However, it is provisionally noted that the existing gravel access road will continue to be used during the operational phase of the proposed development.
• To convert an agricultural farming access to an access, that will be able to cater for a tourist development of this nature, is likely to require consideration from a traffic perspective yet there is **no mention of either a Traffic Statement or Traffic Impact Assessment** that may be needed to inform comment or decision-making.	No increase in traffic is anticipated, as the number of occupants accessing the property will remain consistent with historical use by the Lovemore family. The proposed development is intended strictly for private family use. The current access have been sufficient and will remain sufficient without the need for a traffic statement.
OSCA REGULATIONS:	
The BAR does not comment on the applicability of the OSCA Regulations. This **must be verified** by the EAP and the Knysna	This will be verified and discussed in the final application documentation. **To include in DBAR.**

Municipality's environmental directorate approached for comment.	
PLANNING:	
The BAR contains a (Planning) Motivation Report compiled by an Architect. It is unclear whether this qualifies as a Planning Report (which would typically be compiled by an Urban Planner in preparation of a rezoning application). The suggested zoning is for Open Space III with Consent use for Tourist Accommodation. We believe that 'tourist accommodation' by implication is deemed to be a 'resort' in terms of the Environmental Regulations.	**Town Planner**
The Western Cape Rural Development Guidelines indicate that large tourist facilities should not be accommodated in rural areas as such will detract from agricultural practices/landscapes. Similarly large scale tourist facilities is not supported in conservation areas (Open Space III alludes to conservation outcomes or an area designated as a conservation area). Considering the classification of 'medium' size/scale for tourist accommodation ranging between 10 – 30 units, the proposed development could be termed a 'medium scale tourist facility'.	**Town Planner**
• Once again, it appears that the development proposal **may not be consistent with the Western Cape Rural Development Guidelines** and it is important that this be clarified with the mandated authorities by the EAP.	**Town Planner**
In addition the Rural Development Guidelines refer to "Camping establishments should be restricted to a low impact	**Town Planner**

scale and intensity in keeping with the context of the area and its surrounding character. Permanent tents are regarded to be additional dwelling units".	
• The EAP to clarify whether the 'overnight structures' that are proposed ito the preferred alternative design are deemed to be 'additional dwelling units' given its 'permanent' nature and if so, how does that impact on the number of camping sites ito scale/density.	**Town Planner**
LISTED ACTIVITIES:	
The BAR lists a number of 'listed activities' however the description/explanation for each of the listed activities is vague and does not speak to what component of the development affects which listed activity in particular.	This will be verified and discussed in the final application documentation. **To include in DBAR.**
• The EAP must be more specific ito what the specific component is, that will be triggering each activity.	
Although the BAR contains a disclaimer about the listed activities not being an exhaustive list, it is still the EAPs responsibility to provide a decent and accurate list of potential listed activities that may be triggered by the activity, as well as reasons why certain listed activities may not be deemed applicable rather than waiting for stakeholders/Authorities to point out additional listed activities that may be applicable.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
Considering that tourist nature, as well as possible historical accommodation components, the following listed activities	The applicability of the listed activities will be carefully reviewed, and where relevant to the proposed development,

appear to be applicable in addition to what is listed in the pre-app BAR: • **LN1(27)** – Clearance of an area of 1ha or more but less than 20ha of indigenous vegetation, except where such clearance of indigenous vegetation (must be all inclusive with services and development components); • **LN3 (12)** Botanist states that the vegetation is not Knysna Sand Fynbos – why apply for this listed activity? • **LN3 (5)** – The development of resort, lodges, hotels, tourism or hospitality facilities that sleeps less than 15 people (could have been applicable for the existing camping sites – must be verified by the EAP); • **LN3 (6)** – The development of resorts, lodges, hotels, tourism or hospitality facilities that sleeps 15 people or more (applicable but not listed in the BAR). • **LN3 (17)** – The expansion of a resort, lodge, hotel, tourism or hospitality facilities where the development footprint will be expanded and the expanded facility can accommodate an additional 15 people or more (considering the historical camp sites as well).	they will be included in the Final Application documentation. **To be included in DBAR.**
Should it be determined by the EAP that the listed activities must be added – it is noted that the legal advert would then be incorrect (possibly the site notice as well) because it would not have included all of the applicable listed activities.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
GENERAL:	

The BAR makes reference to the facility being 'for the benefit of the Lovemore children/family/friends' yet, the application is characterised and motivated as being in line with a tourist / accommodation type development both in terms of the land use type/zoning and socio-economic benefits (supporting tourism in the area).	This comment is noted. All documentation will be updated to clearly reflect that the proposal is strictly for the benefit of the Lovemore family members. **To include in DBAR.**
• It is unclear whether the facility is intended to be a public facility or a completely private facility that is to the benefit of the Lovemore family members/friends only and this must be clearly stated by the EAP to ensure that the context of the application is accurate.	
Again, in terms of the Rural Development Guidelines, resort/tourist type developments are only supported in rural areas "*….to offer more people access to unique tourism and recreational resources in sought-after natural areas, where it would not otherwise have been possible" and "…tourist accommodation in the rural landscape should cater exclusively for the temporary accommodation for in transit visitors"*.	**Town Planner**
In closing, the pre-app BAR does not appear to comply with the minimum requirements in terms of the Environmental Regulations for the reasons stipulated throughout this report. Although it is understood that the pre-app BAR will be updated and provided to registered stakeholders as a Draft BAR for further comment during the formal application process, it is concerning that the document that's made available for initial comment falls short of vital information and considerations that	The comment has been noted and contact details for all comments received have been added to the I&AP database.

otherwise would be important to inform meaningful stakeholder participation and input.	
Given the shortcomings and/or absence of important information, the development application in its current format cannot be supported and should not be considered for approval by the Competent Authorities. Most notably the compatibility of this development proposal (whether it be private or open to the public) with the Western Cape Rural Development Guidelines must be established as a critical aspect ito the need and desirability of the proposal of an assisted camping facility on Portion 104/214.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
Anthony Millard – Director of Josdel Property No 100 Pty Ltd Portion 102 of 216 Uitzicht - 25 June 2025	
I am very concerned with regards the above proposed development and would like to object as part of the environmental assessment process and any further planning or zoning applications that may arise.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
The reasons for my objections are as follows:	
1. Increased noise and light levels with potentially up to 100 campers using the property.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the impact of noise and light levels. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices.
2. Concerns about waste and sanitation, litter, inadequate waste disposal and/or strain on sewerage systems.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the impact of waste management. There have been no complaints to date regarding the use of this property,

	and it is not anticipated that the proposed development will alter the existing practices.
3. Landscape degredation. The cliff face is already badly eroded.	Mitigation measures have been proposed to reinstate the condition of the eroded cliff naturally. The proposed development will in no way add impact to the current state of the eroded cliff.
4. Increased fire risk. Campfires that are not correctly regulated and monitored and/or beach braais could increase fire hazards.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the risk of fire. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices. Additionally, the property owners will be advise to become members of the Southern Caper Fire Protection Agency.
5. Precedent setting. Approving one such development may open the door to further such commercial enterprises that would disturb the peaceful lifestyle of other landowners.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
6. Excessive traffic on the single lane access road which is not designed for heavy traffic use and large vehicles. This road is privately funded and maintained by the Western Heads landowners.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the traffic. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices. It should however be noted that a traffic management statement will form part of the final application documentation to inform how the construction phase should be managed. **To include in DBAR**.

7. Increaased pollutiuon of the lagoon.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the lagoon pollution. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices.
8. Disturbance to the wildlife with increased vehicular traffic, campers and foot traffic.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the traffic. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices. It should however be noted that a traffic management statement will form part of the final application documentation to inform how the construction phase should be managed. **To include in DBAR.**
9. Our refuse facility, which is limited, will not cope the additional refuse.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the impact of waste management. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices.
10. The property does not have a jetty which will result in the camper's potential boats being moored on the beach or in the lagoon which could cause a danger to an laready very b usy area especially during the summer and holidays.	Please take note that the development is exclusive the Lovemore family. There will be no additional estuary users that what has been introduced historically by the Lovemore family.
11. Loss of privacy for neighbours and extra security risks.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users

	impacting the surrounding privacy. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices.
Anthony Millard – Josdell Property N0 100 Pty Ltd - comment from Environmental Specialist – 25 June 2025	
Same as Richard Turnstall	The comment has been noted and contact details for all comments received have been added to the I&AP database.
Tony Millard (Josdell Property No 100 Pty Ltd – comments from Water Expert – 25 June 2025	
1. Service Considerations	
1.2 Water / Sewage / Electrical	
Each node will make use of harvested rainwater, collected from roofs and gutters, for general use. In addition, a borehole located on the property will supplement the water supply during periods when the Lovemore family is in residence. During times of absence, the *aquifer will be allowed to recharge to maintain sustainable capacity. One ablution facility will be provided per node, shared among family members. Wastewater from these facilities will be managed through the installation of a bio-septic treatment plant, ensuring environmentally responsible disposal. The proposed development is not expected to place any significant additional strain on the property's existing electricity supply. It has therefore been confirmed* *that the development will connect to the current electrical system servicing the property.*	

Each of the 5 nodes will have a "Bio-septic" treatment plant. It is assumed that a Bio-septic treatment plant will be a septic tank and a soak-away system.	The ablution installation company will be consulted regarding the capacity of each system to determine first and foremost how many facilities will be included into the final design. There after the placement will be determined and indicated in the final Site Development Plan. **To include in DBAR.**
What is the expected volume of the daily discharge during the high seasons – December January, April and to a lesser extent, July?	
The assumption is that 15—20 people could be accommodated at each node during high season and that the disposal of septic tank overflow could be problematic as the septic tank would contain all the sewage, laundry wastewater and kitchen wastewater. The liquid content of the system would then have to be disposed of in french drains/soak-aways which could pollute the aquifer/groundwater/borehole – especially if over-utilized. A further assumption is that these soak-aways would be less than 100 meters from the lagoon.	
The water usage per person per day could be as high as 150 litres and the water usage for each node would then be in the order of 150 x 20 = 3000 litres. This includes the domestic, laundry and all kitchen uses of water.	This comment is noted and will be considered and addressed in the Draft Basic Assessment Report (DBAR), including confirmation of borehole registration and an assessment of sustainable yield to ensure adequate and reliable water supply for the proposed development. **To include in DBAR**
So, the high season usage of water could be a total of 15kl/day for the 5 nodes.	
It has not been indicated where the the borehole supplying drinking water is situated and this ground water could be	

contaminated by the wastewater seepage during the high season.	
The use of the additional groundwater required for this development from the existing borehole could affect the availability of groundwater from some of the neighbouring boreholes.	
A Hydrocensus is recommended for the site to gather all relevant information relating to the use of the groundwater and what the potential impacts to other legitimate users within the area would be.	
It is also recommended that the BGCMA and the Knysna Municipality agree to the source of water, the use of water, the quality of the drinking water and the disposal of the wastewater in terms of their legislation and regulations	
Under 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	The Breede-Gouritz Catchment Management Agency was included in the first round of Public Participation, and their comments are reflected in this report. All relevant considerations arising from their feedback will be addressed in the Final Application documentation. **To include in DBAR.**
• There is no mention of compliance with the National Water Act or the Water Services Act	
The Breede Gouritz Catchment Management Agency must be contacted to determine if	

• Registration of the borehole is necessary	
• A license of General authorization is required to use the water and/or the disposal of wastewater by seepage into the ground in an area which is closer than 100 m from the lagoon.	
Colin Burns (email) – 06 July 2025	
To whom it may concern. Herewith my comments re the development ofthe Lovemore Farm.	
1. General	
I am concerned at the cumulative impact of increasing development in theFarm 216 Uitzicht and Lake Brenton area. The area is already under pressure from:	The Basic Assessment requirements in terms of the National Environmental Management Act (NEMA) (Act 107 of 1998) is set up in a way that all concerns are accounted for during the application process. Highlighted concerns are noted and addressed in the application documentation.
• Habitat loss and ecological fragmentation	
• Increased fire risk in a high-risk wildland-urban interface	
• Strained infrastructure, particularly:	
• Water supply, which is already limited	
• Sewage treatment capacity, which is not designed to accommodate unzoned tourism developments	
• There is no detailed servicing plan provided to demonstrate how portable water, greywater, sewage, or solid waste will be sustainably managed on-site.	
2. Environmental	

The proposed development site falls entirely within the Critically Endangered Knysna Sand Fynbos vegetation type (as per VEGMAP). While portions of the site are currently degraded — largely due to invasive alien plant infestations and the 2017 Knysna fires —these areas retain substantial ecological restoration potential.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
Species of Conservation Concern	It should be noted that the proposed development preferred alternative has been shifted to accommodate retention of the species of conservation concern. No protected species are permitted to be removed without licensing under the National Forests Act (Act 84 of 1998). This will clearly be communicated in the application documentation.
The site hosts two plant species listed as of conservation concern:	
• Lebeckia gracilis (Endangered)	
• Selago villicaulis (Vulnerable)	
Protected Tree Species	
Two nationally protected tree species were identified on the site:	
• Afrocarpus falcatus (Outeniqua Yellowwood)	
• Sideroxylon inerme (White Milkwood)	
Under the **National Forests Act (Act 84 of 1998),** these species may not bedamaged, removed, or relocated without appropriate authorisation.	
Any development within this area must be paired with a credible,enforceable restoration plan, which should include:	Suggestion of the mentioned documentation will be considered, and where applicable be included in the final application documentation.
• Alien invasive species removal	

• Replanting with indigenous fynbos species	
• Erosion and stormwater management	
- Long-term ecological monitoring	It will be recommended that an Environmental Control Officer (ECO) be appointed during the construction phase. Thereafter, the onus fall onto the property owner to continue ecological monitoring.
3. Roads	
The proposed access relies on an existing agricultural servitude which was not designed or legally established for high-volume commercial use. This raises:	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the traffic. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices. It should however be noted that a traffic management statement will form part of the final application documentation to inform how the construction phase should be managed. **To include in DBAR.**
• Legal questions regarding permitted land use	
• Concerns over degradation, and environmental impact fromincreased traffic	
The entrance off Dolley Raats is on a steep hill and blind corner where visibility is dangerously limited in both directions. The basis of how this will be dealt with is not covered at all. The compounded traffic impact on this route has not been addressed. – including caravans, service vehicles and guest vehicles — will significantly elevate the risk of accidents at this point. Potential safety risks for wildlife such as Bushbuck, Bushpig and Caracal as this point is a well-known wildlife crossing zone, particularly for bushbuck, increasing the risk to local fauna and the potential for animal-vehicle collisions. Three bushbuck have died in motor car collisions at this point in recent times.	

Hewat Dale Kuys (Occidental Investment Company Pty Ltd, Portion 90 of Farm 216 Uitzicht – 26 June 2025	
I wish to register as an interested and affected party in the above-mentioned matter. The propertyowned by Occidental Investment Company Pty Ltd, portion 99 of farm 216 Uitzicht, gains accessfrom CJ Langenhoven Street. I wish to express my concern, and would like to object as part of theenvironmental assessment process and any further planning or zoning applications that may arise.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
CJ Langenhoven Street provides the only access to the landowners' properties, and was initially anunimproved dirt-road. Approximately 30 years ago the landowners, at their expense as the DivisionalCouncil refused to have anything to do with it, had the road surfaced with road-stones. This was doneto gain all-weather access as erosion on the steeper parts was severe. All maintenance is still beingundertaken by the landowners. The road is a single lane with blind rises and curves. The landownersare aware of this and drive cautiously, as when encountering an on-coming vehicle one driver has tomove off the paving onto the verge, which in many places has an extremely steep drop-off. The roadwas never constructed to cope with high volumes of traffic nor heavy construction vehicles."Improving" the road to local authority standards would be an expensive undertaking and requirewidening the current road reserve by expropriating land from the properties on either side, scarringthe landscape along the Western Head.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the traffic. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices. It should however be noted that a traffic management statement will form part of the final application documentation to inform how the construction phase should be managed. **To include in DBAR.**
Preservation of the coastal thicket on the lower portion and vynbos on the upper portion is importantto maintaining Knysna's image in the Garden Route. Healthy vynbos needs	The property owners will be recommended to join the Southern Cape Fire Protection Agency to discuss management of the fire risks. Additionally, an alien invasive management plan will

periodic fires; furtherdevelopment in the area will lead to the suppression of fires leading to overgrown, choked-up vynbos.	form part of the final application documentation. **To include in DBAR**.
Mr & Mrs PJ Bern (35 Cearn Drive, Leisure Isle) – 26 June 2025	
We are opposed to this development in its entirety for the following reasons:	
This portion of land *already* allows for consent use of camping. It is unnecessary to rezone it to provide for tourist accommodation.	**Town Planner**
This proposed development will cause long term and irreversible detriment to this unique environment on the shores of the Knysna lagoon.	The specialist
If this proposed development is allowed, it will open the door to further development in this area, which is rated the highest in conservation importance among South African estuaries, and protected areas. Knysna relies on tourism, and tourists and nature lovers are drawn to this area precisely because of the natural beauty and charm of this unique estuary.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
One only needs to look at the eastern Head to see what could happen in time.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
We are campers ourselves of many years' experience and in many African countries. We avoid, if possible, camps such as are envisaged, as often campers travel in groups and congregate together for breakfast and evening braais with lots of drinking. The noise is anything but harmonious with nature.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the impact of noise. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices.

Also, in our experience and those of others, there is no such thing as a full camp. Late arrivals are allowed to camp on the fringes.	The proposed development is intended exclusively for private use by the Lovemore family.
Where are the braai areas? Campers like to braai irrespective of whether there is a kitchen or not, and this is going to be a huge fire risk in what is already a fire hotspot for Knysna.	The final site development plan will focus on highlighting the mentioned facilities.
We have never heard of the term "Assisted Camping!" Call it what it is, camping AND chalets, and this is the real reason to seek rezoning.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
We assume that the preferred version of the "camping" is the one that we must look at. There is no indication of the size of these units, nor are we shown what the ablution block consists of. This is not acceptable.	The provided documentation included all relevant and available details at the time. Please refer to the updated site development plan for details regarding the preferred alternative.
Whatever it may be, we are not shown what the <u>total</u> capacity of these units are, and neither is anything indicated of the proposed new house and 2nd dwelling, which appears to be too small, so that a new application will be needed to enlarge this.	
Imagine the eyesore of these (probably in excess of 30 units) facing the lagoon, all with solar panels on top, PLUS the main house AND the 2nd dwelling, which we are told there may be the necessity to apply in future to increase its size. There is no indication of the water tanks alongside these units either.	
There is no mention staff accommodation.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no staff accommodation.

Imagine all the people on the property. Eighty people "camping," plus the people in the house and second dwelling and all the staff! Easily 100 people, plus all their vehicles!	
The fact that all these people will be able to access the lagoon on this narrow beach and the lagoon is unacceptable, because of the sheer weight of numbers., concentrated in a small area.	Access will be gained via an existing dirt road. It is the same way the family has gained access historically without any complaints of increased traffic during their visits.
We are also not told if this will be a pet-friendly site. And even if it isn't, who will be there to check that nobody is bringing their dogs? Imagine what this will do to the protected area, if campers bring dogs. They will not pick up after them and this will be extremely detrimental to the ecosystem, not to mention the birds who breed and nest on the property and on the beach at the edge of the lagoon.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
<u>Water Supply</u>	
Run- off water is to come off the roofs of the ablution blocks, from a bore hole and from the Knysna municipality. We are constantly having water restrictions in Knysna - and often recently we haven't had water at all. The additional water needs will come then from the borehole, and the family when they stay will then allow the aquifer to replenish.	This comment is noted and will be considered and addressed in the Draft Basic Assessment Report (DBAR), including confirmation of borehole registration and an assessment of sustainable yield to ensure adequate and reliable water supply for the proposed development. **To include in DBAR.**
Basically, what this means is that the tourists will be allowed to drain the aquifer (surely not a good thing in a protected area) and to mitigate this, the family will let it replenish when they are there. This is not good enough. This mitigation measure cannot be enforced and who knows when the family will be there? If it	

cannot be enforced, it shouldn't be allowed and certainly not in a protected area.	
And what about when there is a drought or periods of low rainfall? What then? There is no guarantee of water supply, and one wonders what the requirements are for all these people.	
There is certainly not enough water available in case there is a fire, and they need water pressure to run fire hoses etc.	
Fire	
We personally witnessed the catastrophic fire sweep (termed incorrectly as a "Veld Fire" in this application!) across this portion of the western Head in front of us, and how fast it travelled.	The comment has been noted and contact details for all comments received have been added to the I&AP database. Furthermore, the property owners will be recommended to join the Southern Cape Fire Protection Agency to discuss management of the fire risks.
It ignited in small patches ahead of the main fire and within an amazingly short time. We ran out onto our veranda to see that the house of the Lovemore's neighbour was already about to be enveloped in flames, and before we knew it, we couldn't see the other side for smoke and the lagoon was whipped to a frenzy. Imagine this scenario replayed with umpteen camper vehicles trying to exit this property on the single lane road, which in any event they couldn't do, as they would have been driving into the fire.	
It wouldn't have helped either to go down onto the beach. The few people that were picked up that day were extremely lucky, and one person died of a heart attack, no doubt as a	

result of stress. It was positively dangerous to put a boat on the lagoon, and you couldn't see anything for the smoke.	
<u>Sewage and rubbish removal</u>	
Sewage is of a major concern. We live alongside an accommodation establishment of 15 rooms plus staff, and the "Honey Sucker" is here, in season time, sometimes 3 times a week AND does multiple trips! It can spend half a day next-door! Sometimes two Honey Suckers at a time are required!	The ablution installation company will be consulted regarding the capacity of each system to determine first and foremost how many facilities will be included into the final design. There after the placement will be determined and indicated in the final Site Development Plan. To include in DBAR.
It's a huge vehicle to take on the single-track road, and in a protected area, and will definitely disturb wildlife let alone tourists.	
There will be a lot of rubbish to be removed, sorted and taken off the property on the single lane road. At present it gets dumped at the end of the road at the intersection with the tarred road. A lot of it will be perishable waste which attracts flies. We also have experience of this (living next to an accommodation establishment that serves food).	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the impact of waste management. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices.
<u>Flora and Fauna</u>	
The owners should as a matter of course remove alien vegetation, especially after the experience of the 2017 fire, not just because of this application.	The property owners will be recommended to join the Southern Cape Fire Protection Agency to discuss management of the fire risks. Additionally, an alien invasive management plan will form part of the final application documentation. To include in DBAR.
There are Knysna Loeries on the Western Head and no doubt Oyster Catchers as well. There is a large colony of breeding Kingfishers to the east of this property. We don't know if there	The comment has been noted and contact details for all comments received have been added to the I&AP database

are any Kingfisher nests in the cliff side at the beach. On occasions we can hear the Buff Spotted Fluff tail, and Night Jars, from across the water.	
Also there appear to be bushpigs and we have seen a porcupine and tortoises. There may be other animals and birds, that we're not aware of.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
There is mention of Golden Mole tunnels. Has this mole been identified in this area?	All specialist findings will be clearly reflected in the final application documentation.
This is a protected area, and it is also important to know if a change of zoning will affect the protected area status. One certainly hopes not, and one would assume that a change of zoning would only happen in *extreme* cases, which this certainly is not, giving that the property *already* allows for camping.	The Lovemore family wishes to follow the appropriate legislative channels. By doing so there will be no effect on the protected area status.
John Russell Macey – Portion 100 of 216 Uitzicht (Glenrise Pty Ltd)- Owner & Director – 26 June 2025	
Kindly register me as an affected and interested party. I am a neighbour, and I share the CJ Langenhoven access road.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
I am concerned about the impact of the proposed development and would like to object as part of the environmental assessment process. This includes possible objections or inputs into further planning or zoning applications that may arise.	
Kindly find attached objection document (see document as per Richard Tunstall	

Johannes Jakobus Boshoff pp Riana Boshoff Trust (Owner) – Portion 119 of 216 Uitzicht – 28 June 2025	
Possible adverse effect on Property Market Value and Lifestyle due to doubling of traffic, visitors and workers: 1. Noise levels to increase 2. Privacy concerns, more trespassers and crime 3. Environmental impact 4. Piecemeal Development	There is no means to respond to the potential fluctuations in property market value. However, the remaining concerns are and will continue to be addressed in the application documentation.
Craig – 29 June 2025	
Against the development as it will impact on our: • Infrastructure • Wildlife • Traffice • Environment	The comment has been noted and contact details for all comments received have been added to the I&AP database
Lauren Brauer (371 Tuna Avenue) – 30 June 2025	
We are writing to formally object to the proposed development on Portion 104 of Farm 216, Uitzicht, in Knysna, Western Cape. While we understand the need for thoughtful growth and development, we have serious concerns about the potential negative impacts this particular project may have on the local community, environment, and overall quality of life. They say that they want to make camping/	The comment has been noted and contact details for all comments received have been added to the I&AP database.

glamping sites but any re zoning could potentially become much more than that.	
<u>Environmental Impacts:</u>	
The proposed development poses significant environmental risks. It may lead to the destruction of natural habitats and the displacement of local wildlife. It is already very sad to see how many buck and caracul are hit by cars, and the council does nothing to implement speed curbing solutions. Additionally, construction activity and increased vehicular presence will likely result in heightened pollution levels. The creation of impervious surfaces such as paved areas will exacerbate stormwater runoff and heighten the risk of water pollution in the area.	Environmental impacts will be mitigated through mitigation strategies proposed by specialists and included in the environmental management programme document.
<u>Traffic and Congestion:</u>	
This development, particularly as a mixed-use space with both residential and commercial components, will undoubtedly increase traffic volumes in the area. The resulting congestion, especially during peak hours, will strain existing infrastructure and significantly lengthen commute times for current residents.	The proposed development is intended solely for the Lovemore family. Access will be gained via an existing dirt road. It is the same way the family has gained access historically without any complaints of increased traffic during their visits
<u>Noise and Disruption:</u>	
Introducing commercial activity into or near residential zones inevitably increases noise and disruption levels. This will impact the tranquillity and peaceful character of the surrounding homes, diminishing the well-being of those living nearby.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the impact of noise. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices.

Reduced Privacy:	
High-density developments can severely reduce the privacy of existing residents. Without adequate buffer zones or green belts, the daily lives of those in surrounding properties will be negatively affected by increased foot and vehicle traffic and the close proximity of new buildings.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users impacting the privacy of the surrounding properties. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices.
For all of the above reasons, we urge you to reconsider and ultimately reject this development proposal in its current form. We believe that any new development in Knysna should be approached with sensitivity to the environmental context and the needs and rights of the existing community.	
David Burns – 07 June 2025	
This is a proclaimed nature conservancy.	The comment has been noted and contact details for all comments received have been added to the I&AP database. It should however be noted that rezoning enables the Lovemore family to engage with SANParks and achieve an increased conservation outcome that what is currently applicable under agricultural zoning.
We cannot have title deed restrictions being lifted in favour of development.	
As soon as one is lifted it will cause an avalanche of applications.	
The infrastructure on the western head is already under severe strain.	
Cindy Hoffmann (email) – 09 June 2025	
I object to this rezoning on the grounds that it is located in an eco-sensitive conservancy.	The comment has been noted and contact details for all comments received have been added to the I&AP database. It should however be noted that rezoning enables the Lovemore family to engage with SANParks and achieve an

	increased conservation outcome that what is currently applicable under agricultural zoning.
The proposed rezoning will result in increased traffic through the conservancy, as well as more residents in an area that is already under serviced with respect to sewage & refuse removal.	The proposed development is intended solely for the Lovemore family. Access will be gained via an existing dirt road. It is the same way the family has gained access historically without any complaints of increased traffic during their visits
I see this as the first step in making the land saleable to prospective developers, which would be a catastrophe to our eco sensitive conservancy	The comment has been noted and contact details for all comments received have been added to the I&AP database. It should however be noted that rezoning enables the Lovemore family to engage with SANParks and achieve an increased conservation outcome that what is currently applicable under agricultural zoning.
Jacqui Drobczyk (email) – 07 June 2025	
As a resident of Brenton on lake I feel that rezoning this land will have a negative effect on the landscape that we enjoy.	The comment has been noted and contact details for all comments received have been added to the I&AP database. It should however be noted that rezoning enables the Lovemore family to engage with SANParks and achieve an increased conservation outcome that what is currently applicable under agricultural zoning.
Our infrastructure cannot handle it, and we have to consider the wildlife which will be affected too.	Impacts on environmental sensitives are included in the application documentation.

There are already so many places for visitors to stay, and no need to add to this.	The comment has been noted and contact details for all comments received have been added to the I&AP database. It should however be noted that the proposed development is exclusively for private use by the Lovemore family
The fact that the residents were not approached on the idea is also unfair, as it affects us and our living conditions.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
Pavlina Papadakis – 10 June 2025	
I, Pavlina Papadakis, hereby submit a formal objection to the Pre-Application Basic Assessment Report for the proposed development of assisted camping facilities on Portion 104 of Farm 216, Uitzicht, Knysna, Western Cape.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
This objection is grounded in serious environmental, ecological, and legal concerns that render the development inappropriate and potentially unlawful.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
<u>1. Location within Environmentally Sensitive Areas</u>	
The proposed development site is situated within a Critical Biodiversity Area (CBA), containing both terrestrial and aquatic ecological features.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
The property also includes an Ecological Support Area (ESA).	The comment has been noted and contact details for all comments received have been added to the I&AP database.
These designations underscore the ecological importance of the site, and any development within such areas must be subject to the strictest environmental scrutiny	All environmental sensitivities have been considered during the first phases of the basic assessment and will remain the central point during final application.
The loss of indigenous vegetation, ecological processes, and biodiversity—particularly species of conservation concern—	Specialist input provided mitigation measures to ensure the best possible environmental conservation. All mitigations

would be irreversible and contrary to national conservation objectives.	measures will be included in the environmental management programme (EMPr) and monitored by the recommended appointment of an environmental control officer (ECO).
<u>2. Protected and Conservation Area Status</u>	
The proposed site falls within both a South African Conservation Area and a Protected Area, as governed by the National Environmental Management: Protected Areas Act (Act 57 of 2003), read together with the National Environmental Management Act (NEMA), Act 107 of 1998. Section 50(5) of the Protected Areas Act explicitly states:	The comment has been noted and contact details for all comments received have been added to the I&AP database.
"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. "To date, there is no evidence of such written approval, and development under these conditions would be in direct contravention of national legislation.	Engagement with the management authority will be scheduled, and feedback regarding this engagement will be incorporated into the final application documentation. **To be included in DBAR.**
<u>3. Environmental Impacts During Construction</u>	
The construction phase is expected to result in significant negative impacts, including:	All impacts will be thoroughly assessed and represented in the final application documentation. It should be noted that all potential impacts are mitigated to an extent that it poses the least risk to environmental related sensitivities.
• Loss of terrestrial biodiversity and faunal habitat.	
• Destruction of habitat for species of conservation concern.	
• Increased erosion and sedimentation of nearby aquatic habitats.	

• Pollution from vehicles, heavy machinery, and construction waste.	
• Disruption of ecological connectivity and ecological processes.	
• Noise and light pollution affecting fauna and the surrounding community.	
These impacts are particularly concerning given the sensitive nature of the site and its ecological value.	
<u>4. Socio-Economic and Cultural Concerns</u>	
There is insufficient attention paid in the report to heritage resources and the cultural significance of the site. Furthermore, socio-economic impacts on the local community must be more thoroughly assessed, particularly with respect to:	As stated on p26 of the Pre-Application BAR. "A Notice of Intent to Develop (NID) under Section 38(1) and (8) of the NHR Act will be submitted to Heritage Western Cape. Heritage Western Cape will determine whether the proposed development might have an impact on heritage resources".
• Land use change and precedent for further subdivision or commercialisation.	The proposed development is intended solely for the Lovemore family. This means that there will be no commercialisation.
• Increased traffic, noise, and pressure on existing infrastructure.	The proposed development is intended exclusively for private use by the Lovemore family. There will be no additional users increasing the traffic, noise, and / or pressure on existing infrastructure. There have been no complaints to date regarding the use of this property, and it is not anticipated that the proposed development will alter the existing practices.

• Potential displacement or alienation of current local land uses and identities.	The proposed development is intended solely for the Lovemore family. This means that there will be no changes as compared to how the property is currently used.
• Changing title deed restrictions to enable this development may set a dangerous precedent, encouraging further fragmentation and inappropriate development in ecologically sensitive areas.	**Town Planning.**
5. Non-Compliance with Zoning and Legal Frameworks	
The development appears to be inconsistent with existing zoning laws, spatial development frameworks, and biodiversity stewardship obligations. No legal justification has been provided for amending the land use from conservation or agricultural zoning to commercial tourism use. Any future subdivision of the land following approval would open the door to further, potentially uncontrolled, development.	**Town Planning.**
Conclusion	
In view of the above, I strongly urge the competent authority to reject the proposal in its current form. The risks to biodiversity, ecological function, legal compliance, and community wellbeing are too significant to be ignored. The precautionary principle, as enshrined in NEMA, must be applied in full force.	The comment has been noted and contact details for all comments received have been added to the I&AP database
Alison Lloyd – 30 May 2025	
Please can you send me the actual plans for this application for development.	The comment has been noted and contact details for all comments received have been added to the I&AP database. All relevant information was made publicly available.

Alison Lloyd (2nd email) – 1 June 2025	
As we are neighbours on the Western head, please could you supply more information and if possible, the plans of what is to be built on this site as per this notification	The comment has been noted and contact details for all comments received have been added to the I&AP database. All relevant information was made publicly available.
Steve Kapp – 01 June 2025	
The owner of Portions 58 & 59 has requested more information as to what the following entails: **The Project Proposal**: "***Development facilities intended to accommodate assisted camping forthe Lovemore Family***" In principle they don't have any objections but would like more details.	**Reply to email 2 June 2025** Please visit the link in the email below. All relevant information currently available is attached on our website. If you have any additional queries, do not hesitate to contact me.
Adrian Young – 20 June 2025	
I'm a property owner residing in Lake Brenton area and interested in any application to rezone zone 1 agricultural land which will have an impact to the environment and to the community.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
In terms of the applicant (Chris Lovemore/Lovemore Children secondly trust) he has provided clarification to Lake Brenton "Neighbours" (as per the attached memo/letter that was sent to me) that he is actually requesting permission to provide a camping site for his direct and extended family.	The comment has been noted and contact details for all comments received have been added to the I&AP database.

Any application should therefore be a Zone 1 consent use to establish a camping area for his "family" and definitely not a rezoning application.	**Town Planning**
Such a consent/family use would obviously not require fixed structures, permanent buildings, upgrades to roads etc. etc.	
Rob Gilmour – 25 June 2025	
I represent portion 73 Bayswater road, Leisure Isle, Knysna owned by Velo Sports Pty Ltd. As the authorised Director I would like to register as an interested and affected party.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
We are neighbours across the lagoon opposite the Lovemore property.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
We would like to state in no uncertain terms that we are against the proposed development and zoning application and have laid out some of the areas the we feel the environmental application is deficient. As concerned neighbours we would like to object as part of the environmental assessment process and any further planning or zoning applications that may arise.	The comment has been noted and contact details for all comments received have been added to the I&AP database. The mentioned concerns will be reviewed and addressed. Where the application documentation was insufficient, updates will be made.
Rob Gilmour (attachments) – 25 June 2025	
• **Same attachment received as Tony Millard (Josdell Property No 100 Pty Ltd – comments from water expert – 25 June 2025**	The comment has been noted and contact details for all comments received have been added to the I&AP database. All same comments retain the same response.
Rob Gilmour – attachment – 25 June 2025	

Same attachment as **Richard Tunstall**	The comment has been noted and contact details for all comments received have been added to the I&AP database. All same comments retain the same response.
Vernon Rice – Witgoud Beleggings, Portion 103 of Farm 216 - 26 June 2025	
I live on Portion 103 of Farm 216, Uitzicht and am a direct neighbour of the proposed development and share the CJ Langenhoven access road.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
I am extremely concerned about the proposed development, and would like to object strongly as part of the environmental assessment process and any further planning or zoning applications that may arise.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
Vernon Rice (Knysna Municipality Objection Form – Witgoud Beleggins, Portion 103 of Farm 216 – 23 June 2025	
Direct neighbour with many objectives which are attached as an Interested party.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
We would like to object as part of the Environmental Assessment Process and any further planning or zoning application in the future.	The comment has been noted and contact details for all comments received have been added to the I&AP database.

5. CONCLUSION

The public participation process for the proposed development on Erf 2924, Knysna, has been concluded. All concerns raised by the Stakeholders and / or Interested and Affected Parties (I&APs) have been adequately and appropriately addressed throughout the basic assessment process. This report will form part of the submission of the Final Basic Assessment Report to the Department of Forestry, Fisheries, and the Environment (DFFE) for their review and decision making.

Annexure A: Evidence of Comments Received