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Dear Sir

SANPARKS COMMENTS, DRAFT BASIC ASSESSMENT, CONTRACT NATIONAL PARK APPLICABILITY, UITZICHT 216, PORTION 104, KNYSNA

DFFE Ref No. Not Assigned

SANParks provided comment on the 30 June 2025, on a Pre-application Draft Basic Assessment Report (PDBAR), prepared by Eco Route Environmental Consultancy (Eco Route), dated 29 May 2025.

Please refer to this comment which describes the landscape context of Uitzicht 216, Portion 104, a site visit undertaken, the development proposal, points raised by SANParks, as well as a summary and way forward.

A Draft Basic Assessment Report (DBAR) was submitted to SANParks, prior to undergoing public participation, by Eco Route Environmental Consultants (Eco Route) on the 13 March 2026, requesting SANParks' further comment, particularly relating to a revised Site Development Plan (SDP) and Contract National Park (CNP) stewardship applicability and requirements.

Development proposal details as extracted from the DBAR include:

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

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

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

addo elephant
agulhas
augrabies
bontebok
camdeboo
golden gate highlands
karoo
kglalagadi transfrontier
knysna lake area
kruger
mapungubwe
marakele
mokala
mountain zebra
namaqua
table mountain
tankwa karoo
tsitsikamma
richtersveld
west coast
wilderness

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

All structures are elevated on stilts, there is no concrete slab or hard surface at ground level beneath the platforms. This design minimises disturbance to soil structure, natural drainage, and the movement of small fauna. Lightweight timber and prefabricated modular components are used, reducing the need for heavy machinery and limiting the import of construction materials onto the site.

NOTE:

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

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

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

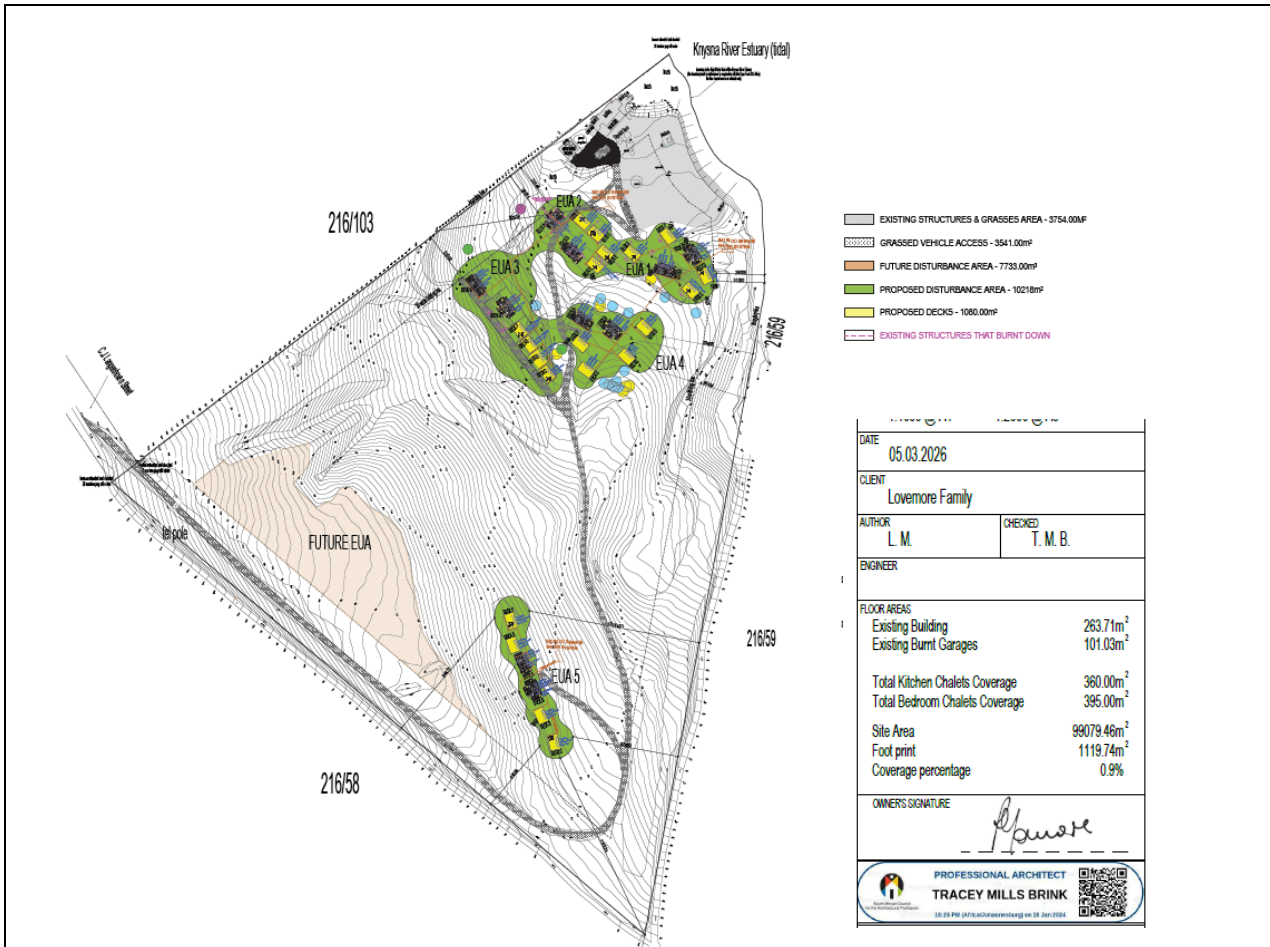


Fig. 1: Alternative A preferred SDP, Tracey Mills Brink, 5 March 2026



Fig. 2. Close-up of EU layouts, all have same deck configuration, in differing locations.

2.3. Wastewater and Sewage Treatment

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

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

2.6. SANParks Stewardship Engagement

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

In response, the Lovemore Children's Secondary Trust has engaged with SANParks regarding the formalisation of a stewardship arrangement for the property, exploring options including a Contract National Park arrangement with SANParks. This engagement is ongoing and demonstrates the family's genuine commitment to the long-term conservation of the property and to the restoration of the Knysna Sand Fynbos Coastal Corridor.

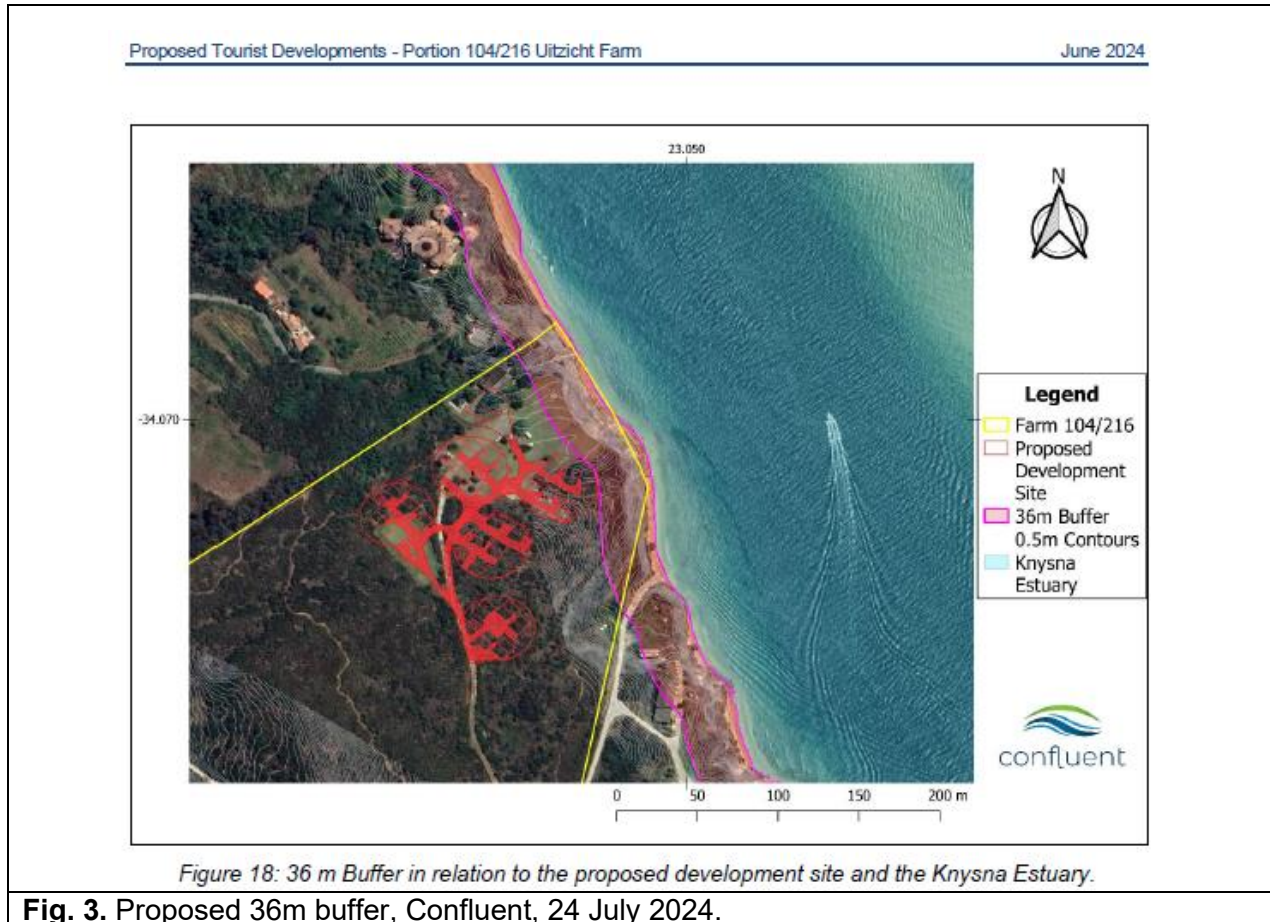
The outcome of the stewardship engagement will be formally reported. SANParks' authorisation for any development within the 50-metre Development Control Area (DCA) of the Knysna Protected Environment will be sought as part of the overall authorisation process, in accordance with Section 8 of the KPE Regulations (GN 1175, 2009).

- The aquatic specialist has recommended a minimum 10-metre rehabilitation buffer inland from the edge of the cliff, and a 36-metre vegetated buffer from the estuary, to reduce erosion and prevent sedimentation. These buffers are incorporated into the site layout and are given effect in the EMP. No development is proposed within these buffer zones.
- The existing walkway providing access to the Knysna Estuary shoreline will be retained as-is. No new permanent structures providing access to the estuary are proposed.
- No jetty, mooring, or boat launch infrastructure is proposed on the property. The existing Brenton on Lake slipway will continue to be used by the Lovemore family in the same manner and at the same intensity as it has historically been used, with no increase in estuary users anticipated.

From discussions with Eco Route (Mr. J. Britton) it was noted density proposed would likely be five EUAs x 10/12 people, therefore 50/ 60 people in season at full development capacity. This density is the long-term stewardship vision, and not all EUs would be developed immediately.

Point 1: Buffer, Climate Change Adaptation and SDP

SANParks supports the implementation of a 36m buffer from the edge of the estuary proposed in the Aquatic Biodiversity Site Sensitivity Verification and Impact Assessment report, prepared by Confluent, dated 24 July 2024 (**Fig. 3**). A 10m rehabilitation Zone within this buffer is further supported. Stormwater on site should further be carefully designed and managed so as not to exacerbate any further estuary bank erosion/ destabilisation.



It is recommended that the proposed Future Exclusive Use Area situated next to the entrance road on the northern sector of Uitzicht 216 Portion 104 only be developed as a climate change ‘retreat’ strategy, should EU1 and 2 become compromised from climate change coastal erosion affects in the future. The development of this area would be subject to a separate EIA application and SANParks comments.

The remainder of the SDP is supported by SANParks.

Point 2: Sewerage Infrastructure

SANParks will not support a sewerage product/s which do not:

- 1) Provide/s effluent quality data that demonstrates compliance with regulatory standards and include a clear disposal or reuse plan to prevent contamination of estuarine or wetland environments.
- 2) Have sewage treatment systems located away from areas where they may become damaged by flooding/ coastal erosion or pose a risk to sensitive environmental areas.

- 3) Have operational monitoring protocols for the sewerage system built into the EMPr.
- 4) Include monitoring which focuses on detecting any malfunction of the system/s with appropriate mitigation measures proposed.
- 5) Include actions to be taken for ongoing maintenance and end-of-life replacement of the system stipulated within the EMPr.
- 6) Include placement of structures above ground (not buried), except where this is not possible and structures that are not designed for climate change risks.

A long-term sustainable and compliant sewerage solution must be finalised and presented to SANParks for consideration.

Point 3: Contract National Park Stewardship

As stated in SANParks comment of 30 June 2025, Portion 104 Uitzicht 216 falls within SANParks Land Inclusion Plan (LIP) for the Period 2023/24 - 2025/26 and is included in the revised LIP for the Period 2026/27 – 2028/29 for the Garden Route National Park (GRNP).

The property is within the Western Heads Knysna Sand Fynbos Coastal Corridor, which is the subject of a collaborative conservation initiative being supported by SANParks, CapeNature, the Table Mountain Fund, WWF-SA, the Western Heads Goukamma Conservancy (WHGC), and landowners.

Several biodiversity stewardship categories exist that a landowner can opt into (**Fig. 4**). Stewardship categories in the top-tier of the table require the greatest commitment level from a landowner, but receive the greatest support from conservation authorities and greater financial incentives

Uitzicht 216 Portion 104 is supported for inclusion by SANParks through a Contract National Park (CNP) agreement (top tier). A CNP is an area of privately owned land that is declared as part of a National Park in terms of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) (NEMPAA). The landowner retains ownership of their property but commits the property to formal conservation and co-manages the property with SANParks. In return, the landowner may derive financial benefits, such as income tax deductions and municipal property rate exclusions.

The landowner has sent a letter of commitment to the process of including its land in the GRNP. The landowner has however not yet given its formal consent for the declaration of its property as part of the Park as contemplated in section 20(3) of NEMPAA.

To ensure that the property is put into conservation, SANParks recommends that the landowner is required to request that its property is declared as part of the GRNP in terms of NEMPAA, alternatively that the landowner requests the declaration of the property as a nature reserve in terms of NEMPAA, and if the Minister of the MEC refuses such declaration, that a conservation servitude in favour of SANParks is registered in respect of the Property (coupled with a request to the Knysna Local Municipality to spot zone the undeveloped parts of the property as Open Space III or IV).

It is further recommended that no construction should be permitted before there is proof of binding status of one of the stewardship options outlined in this paragraph. A “written agreement” referred to in section 20(3) (an agreement in which the landowner consents to the declaration of its property as part of the GRNP would constitute proof of binding status in the event that the landowner opts to include its property in the GRNP.

Table 1 - Biodiversity stewardship categories

TYPE OF AGREEMENT	LEGAL MECHANISM	DESCRIPTION
BIODIVERSITY STEWARDSHIP CATEGORY 1: PROTECTED AREAS		
Nature Reserve or National Park	National Environmental Management: Protected Areas Act (Act 57 of 2003)	<ul style="list-style-type: none"> Suitable for sites with highest biodiversity importance Binding on property: declaration of Nature Reserve, and a title deed restriction Binding on landowner: contract with landowner usually for 99 years/in perpetuity** Considered to be part of South Africa's protected area estate, and contributes to meeting protected area targets
Protected Environment	National Environmental Management: Protected Areas Act (Act 57 of 2003)	<ul style="list-style-type: none"> Suitable for declaration over multiple properties Less restrictive land use than Nature Reserve or National Park Binding on property: declaration of Protected Environment. Optional title deed restriction. Binding on landowner Considered to be part of South Africa's protected area estate, and contributes to meeting protected area targets
BIODIVERSITY STEWARDSHIP CATEGORY 2: CONSERVATION AREAS		
Biodiversity Management Agreement	National Environmental Management: Biodiversity Act (Act 10 of 2004)	<ul style="list-style-type: none"> Less restrictive than protected area declaration Must have a Biodiversity Management Plan (in terms of Biodiversity Act) on all/part of the property Binding on landowner: contract with landowner for a minimum of 5 years, or longer in 5 year increments
Biodiversity Agreement	Contract law	<ul style="list-style-type: none"> Less restrictive than protected area declaration Binding on landowner: contract with landowner for a minimum of 5 years or longer
Conservation Servitude	Property	<ul style="list-style-type: none"> Less restrictive than protected area declaration Binding on landowner: notarial deed registered at the Deeds Registry for a minimum of 99 years or in perpetuity Binding on successor in title Provides management conditions particular to the area in question
Business, Industry and Biodiversity initiatives		Examples: <ul style="list-style-type: none"> Conservation Champions Programme Water Stewards Sustainable Farming
Conservation agreements		<ul style="list-style-type: none"> Offers direct incentives for conservation through a negotiated benefit package in return for conservation actions by communities. Signed for a 3-year duration (with the option for renewal)
BIODIVERSITY STEWARDSHIP CATEGORY 3: PARTNERSHIP AREAS		
This is an informal category of biodiversity stewardship which involves a registration of a site within this category by the provincial conservation authority or conservation NGO. <ul style="list-style-type: none"> No legal certainty, duration and intent Involves collective action by landowners or communities Biodiversity conservation management benefits without formal agreements or accountability Registration of mechanisms is advised 		Examples of such include (but are not limited to): <ul style="list-style-type: none"> Conservancies Buffer Zones and Transition Zones of Biosphere Reserves Sites of Conservation Significance Community conservation areas
** Eligibility for tax incentives requires a minimum of a 99 year or in perpetuity title deed restrictions		

Increasing biodiversity importance

Increasing support from conservation authority

Increasing commitment to conservation

Fig. 14. Biodiversity stewardship categories, as extracted from Pg.3 SANBI 2018 Stewardship Guideline³.

³SANBI. 2018. Biodiversity Stewardship Guideline. A guideline produced for the Department of Environment, Forestry and Fisheries. Developed by Wilson, N., Kershaw, P., Marnewick, D. and Purnell, A.

Summary and Way Forward

SANParks supports Alternative A preferred SDP, Tracey Mills Brink, 5 March 2026.

The following conditions are recommended should the activity be authorised:

1. Achieving conservation outcomes on the property, in a high-value sensitive conservation area would leave a legacy for future generations:

Option 1 (preferred option): Inclusion in the Garden Route National Park: a “written agreement,” in terms of which the landowner consents to the declaration of its land as part of the GRNP in perpetuity, with SANParks is signed before construction may commence.

Option 2 (alternative option): Declaration of a nature reserve: a “written agreement,” in terms of which the landowner consents to the declaration of its property as a nature reserve in perpetuity, is signed between the landowner and the MEC before construction may commence.

Option 3 (only applicable if the Minister or MEC does not declare the property as part of the Park or as a nature reserve): The registration of a conservation servitude in respect of the property and a request to the Knysna Local Municipality to spot zone the undeveloped area of the property as Open Space III or IV before any construction on the property may commence.

2. A long-term sustainable and compliant sewerage solution must be finalised and presented to SANParks for consideration.
3. SANParks encourages that Section 4 risk management measures applicable for new infrastructure seaward of the CML and existing infrastructure in areas at risk to dynamic coastal process be applied, as per the Coastal Management Line for the Garden Route National Park notice (GNR. No. 3668, 14 July 2023).
4. A 36m 'no-go' development buffer from the estuary edge is supported.
5. Compliance is required with the GRNP Management Plan 2020-2029, and the Knysna Estuary Management Plan 2025-2029.
6. The landowner and guests should not access the estuary directly for boat launching, but via the Brenton on Lake SANParks facilities. No unauthorised moorings are permitted.
7. All other SANParks estuary user licensing requirements, as stipulated within the Regulations for the proper Administration of the Knysna Protected Environment and other associated legislation would need to be complied with
8. Measures to mitigate visual impact as suggested by Mr. P Buchholtz, 5 September 2024 should be implemented.
9. SANParks wishes to comment on the siting of solar panels, to mitigate potential glare visible from sensitive receptor areas, and to avoid the placement of any solar array area/s in sensitive natural environments.
10. SANParks should be consulted for any fencing needs. Fencing should not inhibit wildlife movement.
11. The EMPr, Eco Route, March 2026 should be implemented.
12. A suitably qualified Environmental Control Officer (ECO) should be appointed to monitor the EMPr.
13. The disturbance footprint/no-go areas should be fenced off during the construction phase with a barrier material, such as shade cloth to prevent workers from encroaching into adjacent vegetation, and to ensure that animals are not injured on the building site.
14. Topsoil should be set-aside for reuse.
15. Permeable paving surfaces should be used where possible to limit excess surface runoff. Care should be exercised with stormwater design and management to limit soil erosion and any destabilisation of the embankment that is susceptible to coastal erosion.

16. The landowner's attention is drawn to the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEMBA) Alien and Invasive Species Regulations, 25 September 2020, where a landowner is legally responsible for the removal of alien vegetation on their property. The owner should formalise an Invasive Alien Vegetation Control Plan as required by the NEMBA. Large areas of Uitzicht 216 Portion 104 are invaded with Alien and Invasive Species, which poses a fire risk.
17. Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. The owner should join the local Fire Protection Association, if not already a member.
18. A permit from the Department of Forestry, Fisheries & the Environment (DFFE) should be attained should any protected tree species be disturbed on the property, as per the National Forests Act, 84 of 1998, as amended.
19. Should any suspected resources of heritage value be uncovered during clearing, Heritage Western Cape (HWC) should be contacted immediately for instructions.
20. Should coastal erosion stabilisation structures be required to safeguard any buildings/ infrastructure now or in the future, the landowner's attention is drawn to Section 15 of NEMICMA, which states:
 - 1) No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or such other coastal public property, or of land adjacent to coastal public property, unless the erosion is caused by an intentional act or omission of that organ of state or other person; and
 - 2) No person may construct, maintain, or extend any structure, or take other measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided for in this Act, the National Environmental Management Act, or any other specific environmental management Act.

SANParks is responsible for the Proper Administration of the Knysna Protected Environment (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 the DCA.

SANParks' comments are based on the information pack, emailed by Eco Route, 13 March 2026.

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 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.



Yours sincerely

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PRINCIPAL PLANNER
GARDEN ROUTE NATIONAL PARK

DATE: 29 April 2026

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