



COMMENTS AND RESPONSE REPORT — CONSOLIDATED (APPLICATION READY)

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		
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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: _____

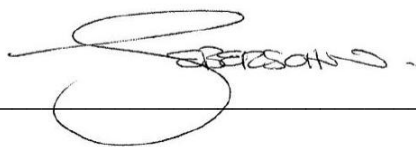
A handwritten signature in black ink, appearing to read 'J. Ebersohn', is written over a horizontal line.

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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 is the consolidated Public Participation Process (PPP) Comments and Response Report that accompanies the Basic Assessment Report (BAR) submitted to the competent authority as part of the formal application process. It records both rounds of public participation conducted for this application: the Pre-Application Phase (29/05/2025 – 30/06/2025) and the Application Phase (10/06/2026 – 20/07/2026, inclusive of a 5-day extension). All comments received during both rounds, and Eco Route's response to each, are recorded in this report – Part A for the Pre-Application Phase and Part B for the Application Phase.

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).
- The Application Phase Draft BAR and associated appendices were subsequently made available for a further 30-day commenting period (Application Phase PPP: 10/06/2026 – 13/07/2026), extended by 5 days to 20/07/2026 following a technical fault that required the documentation to be reloaded to the hosting website.
- All comments received during both rounds are addressed in this report (Part A: Pre-Application Phase; Part B: 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	The proponent (applicant) is the landowner and therefore consent is not required.

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	
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	(i) Knysna Plett Herald Newspaper a local free newspaper was advertised in on 25/05/2023.

public notices of applications or other submissions made in terms of these Regulations;	
(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 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	(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.
(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 – (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.	An additional 30-day Public Participation Process was undertaken during the Application Phase (10/06/2026 – 20/07/2026, inclusive of a 5-day extension), in terms of Regulations 19(1)(b)/23(1)(b), during which written notice was given to all registered Interested and Affected Parties (I&APs). In accordance with the proviso to this sub-regulation, fresh compliance with sub-regulation (2)(a)–(d) – including a new site notice, newspaper advertisement, and notification of adjacent landowners – was not required for this round, as these steps had already been completed during the Pre-Application Phase.
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	No other permit or licenses are required at this stage.

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.	
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3. PUBLIC PARTICIPATION PROCESS (PPP)

This section documents the Public Participation Process conducted across both rounds of this application, in accordance with the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA) and the Environmental Impact Assessment Regulations, 2014 (as amended).

Pre-Application Phase (Round 1)

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



The following EIA Listed Activities are applicable:

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.

Application Phase (Round 2)

Written notice of the Application Phase Draft Basic Assessment Report was issued on 10 June 2026 to the Department of Forestry, Fisheries and the Environment (DFFE) and all other registered organs of state, departments, and Interested and Affected Parties (I&APs), opening a 30-day commenting period from 10/06/2026 to 13/07/2026.

On 30 June 2026, a technical fault required all Draft Basic Assessment Report documentation to be reloaded to the hosting website. A 5-day extension was accordingly granted to all registered I&APs, revising the closing date for comment to 20 July 2026. All comments received during the Application Phase Public Participation Process, up to and including this revised closing date, are addressed in Part B of this report.

As this additional Public Participation Process falls under Regulations 19(1)(b)/23(1)(b) (see Table 1, above), written notice to registered I&APs satisfied the notification requirement; a new site notice, newspaper advertisement, and notification of adjacent landowners were not required, as these had already been completed during the Pre-Application Phase (Round 1, above).

Evidence of the notifications issued for the Application Phase (including confirmation of the extension) is held on file and referenced in "Evidence of Notifications Draft BAR sent to I&APs Ptn 104 of 216.pdf". In accordance with the Protection of Personal Information Act, 2013 (Act 4 of 2013), individual I&APs' personal email addresses are not reproduced in this report; the Interested and Affected Parties database (Table 2, below) records the applicable stakeholders and organisations by name and affiliation only.

Table 2

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	leptieshaam 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 Stroebe
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 Conservancy (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
1 st 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 tables contain the verbatim comments received during the Pre-Application Public Participation Process, together with Eco Route's response to each, as originally captured in the 2025.09.12 Comments and Response Report.

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 (<i>Lebeckia gracillis</i> & <i>Selago villicaulis</i>). 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 outset. As a result, the proposed development has been

impacts on sensitive and highly localised habitats are minimized or avoided altogether.	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. Portion 104 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 title 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).
○ 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.	
○ 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
○ 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.

Your request for comment from the Sub-directorate: Coastal Management on the above-mentioned pre-application Draft basic assessment report received on 29 May 2025, refers.	Noted. See the responses to the specific points raised under this heading below.
1. CONTEXT	Noted. See the responses to the specific points raised under this heading below.
1.1. The Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("NEM: ICMA") is a Specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"). The NEM: ICMA sets out to manage the nation's coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment. In terms of Section 38 of the NEM: ICMA, the Department of Environmental Affairs and Development Planning ('the Department') is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the "Management of public launch sites in the coastal zone (GN No. 497, 27 June 2014) "Public Launch Site Regulations".	
1.2. The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme ("PCMP"). The Western Cape Provincial Coastal Management Programme ("WC: PCMP 2022-2027) is a five (5) year strategic document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the Province. This WC: PCMP 2022-2027 was adopted by the Provincial MEC for Local Government, Environmental Affairs and Development Planning on 19 May 2023 and available upon request.	
1.3. A key priority of the PCMP is the Estuary Management Programme, which is implemented in accordance with the NEM: ICMA and the National Estuarine Management Protocol ("NEMP"). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The Department is in the process of approving a series of Estuarine Management Plans.	
1.4. The facilitation of public access to the coast is an objective of the NEM: ICMA as well as a Priority in the WC: PCMP 2022-2027. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 ("PCASP") and commissioned coastal access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NEM: ICMA. The PCASP as well as the coastal access audits are available upon request.	
2. COMMENT	Noted. See the responses to the specific points raised under this heading below.
2.1 The sub-directorate: Coastal Management ("SD: CM") has reviewed the information as specified above and have the following commentary:	
2.1.1. The proposal entails the development of facilities intended to accommodate assisted camping on Farm 104/216, Uitzicht, Knysna.	The acknowledgement of the CBA/ecological work, the confirmation that the development will not impinge on the Estuarine Functional Zone, and the confirmation per the DFFE Coastal Viewer that the development is not located within the estuarine flood-risk area, are noted with appreciation.
2.1.2. The applicant has considered all critical biodiversity and ecological support areas in accordance with the to the Western Cape Biodiversity Spatial Plan (2023) and proposed mitigation measures as stipulated in the draft EMPr to address environmental concerns are both appropriate and practical and should be strictly adhered to.	

2.1.3. The applicant adequately considered Farm 104/216 in relation to the Coastal Protection Zone ("CPZ") as defined in Section 16 of the NEM: ICMA and the purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes, including the risk of sea level risks.	
2.1.4. Be advised the portion of Farm 104/216 where the proposed development is said to occur, is located seaward of the Garden Route District's Coastal Management Line ("CML"). The technical delineation of the CML was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk flooding, wave run-up modelling, <i>inter alia</i> and was delineated in conjunction with and supported by organs of state. The principal purpose of the CML is to protect coastal public property, private property, and public safety; to protect the coastal protection zone; and to preserve the aesthetic value of the coastal zone. The use of CMLs is of particular importance in response to the effects of climate change, as it involves both the quantification of risks and pro-active planning for future development.	The applicant acknowledges the technical delineation of the CML under GNR 3668 of 14 July 2023 and accepts that portions of the proposed Alternative A development footprint may fall seaward of the CML for the Garden Route National Park. SANParks, as the management authority for the Knysna Protected Environment and the Garden Route National Park, was formally consulted (correspondence of 30 January, 30 June 2025 and 29 April 2026 refers). SANParks supports Alternative A subject to conditions, including the application of "Section 4 risk management measures applicable for new infrastructure seaward of the CML... as per the Coastal Management Line for the Garden Route National Park notice (GNR. No. 3668, 14 July 2023)" (SANParks letter, 29 April 2026, Condition 3). The applicant commits to apply these Section 4 risk-management measures; the commitment is reflected in Section G of the Draft BAR and in the operational-phase rows of the EMPr. The development's elevated stillt-platform design, recessive lightweight materials, 0.9% site coverage, retention of the 36 m estuary buffer and 10 m rehabilitation zone, and the SD:CM's own findings that the development sits above the estuarine flood-risk area and away from the EFZ, together constitute a defensible response to the dynamic-coastal-process and sea-level-rise concerns that the CML is intended to manage. Final discretion on the location of the development rests with the competent authority (DFFE), to whom both DEA&DP's and SANParks' comments are commended.
2.1.5. Be advised that the proposed development is proposed to be located seaward of the CML and in a protected area. Although the subject property is unlikely to be impacted by coastal processes, it is essential that the applicant obtains comments from SANParks on the proposed development and its position on the subject property.	
2.1.6. The applicant indicated that the subject property is elevated and is located adjacent to the Knysna Estuary. The SD: CM can confirm that the proposed development will not occur near the estuarine functional zone ('EFZ') which equates to the 5m contour along an estuary.	The acknowledgement of the CBA/ecological work, the confirmation that the development will not impinge on the Estuarine Functional Zone, and the confirmation per the DFFE Coastal Viewer that the development is not located within the estuarine flood-risk area, are noted with appreciation.
2.1.7. According to the DFFE Coastal Viewer – the proposed development will not occur within the estuarine flood risk area due to its elevation. However, the applicant must be advised that any	The applicant accepts the requirement to align with the Knysna Estuary Management Plan 2025–2029. A new subsection in Section G

proposed development must align with the Knysna Estuary Management Plan, which the applicant did not consider in this application.	of the Draft BAR records this commitment, and the corresponding operational obligations (no direct estuary access for boat launching - use of the Brenton-on-Lake SANParks facility, no unauthorised moorings, compliance with KPE estuary-user licensing, alien invasive species control, and conservation of the Western Heads Knysna Sand Fynbos Coastal Corridor through the proposed stewardship arrangement) are reflected in the EMPr.
2.1.8. The SD: CM notes on page 19 of the Pre-Application BAR, that the architect designed the layout of the preferred alternative to avoid impacting species, however, the layout did not consider the NEM: ICMA.	The applicant respectfully clarifies that NEM:ICMA was considered in the design. Section G of the Draft BAR specifically addresses the Coastal Protection Zone in terms of Section 16 of NEM:ICMA, the prohibition under Section 62, the obligations under Section 63, and the limitation under Section 15 in respect of coastal public property. The Section G text is being expanded to include explicit consideration of the CML, the Knysna Estuary Management Plan, and the General Duty of Care under Section 28(1) of NEMA and Section 58 of NEM:ICMA referenced in point 3 of the SD:CM comment.
2.1.9. Based on the information provided, the SD: CM acknowledges that adherence to the EMPr will mitigate any adverse impact of the proposed development and associated infrastructure on Farm 104/216. However, the SD: CM does not support the location of the proposed development seaward of the CML and advises that the applicant reconsiders the position of the proposed development on the subject property noting that the suitability of the proposed development in its proposed location is at the discretion of the competent authority.	The applicant has carefully considered repositioning. Moving the EUAs landward of the CML would push the disturbance footprint into the upper portion of the property, which carries the highest concentration of the identified Species of Conservation Concern (<i>Lebeckia gracilis</i> EN and <i>Selago villicaulis</i> VU) and the protected tree species (<i>Afrocarpus falcatus</i> and <i>Sideroxylon inerme</i>), and would therefore worsen the ecological impact that DEA&DP itself, SANParks and the GRDM agree must be avoided. Alternative A was specifically shaped by the terrestrial biodiversity specialist's SCC findings (BAR Section E, Comparative Assessment of Alternatives), with EUA 4 already relocated for this reason. The applicant therefore retains the Alternative A layout, with the CML risk addressed through the Section 4 risk-management measures committed above, and submits the question of suitability of location to the competent authority for determination.
3. The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: <i>"...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot</i>	The General Duty of Care obligation is noted and accepted; the EMPr operationalises this through its full mitigation, monitoring and reporting regime

reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment..." together with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.	
4. The SD: CM reserves the right to revise or withdraw its comments and request further information from you based on any information that may be received.	
ORGANS OF STATE	
SANParks - Dr Vanessa Weyer – 30 June 2025	
Portion 104 Uitzicht 216 is situated in the <u>Buffer Zone</u> of the Garden Route National Park (GRNP), in its entirety within the <u>Knysna Protected Environment (KPE)</u>, within the <u>Coastal Protection Zone (CPZ)</u>, and partially within the KPE <u>Development Control Area (DCA)</u>. 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 <u>Estuarine Functional Zone (EFZ)</u> extends into parts of the north-eastern section of Portion 104 Uitzicht 216 (Fig. 2), whilst the <u>Coastal Management Line (CML)</u> 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.	
<u>Critically Endangered (CE) Knysna Sand Fynbos</u> is mapped by Mucina and Rutherford, 2006¹ and as revised by SANBI, 2018² across most of Portion 104 Uitzicht 216 (Fig. 4).	
<u>Critical Biodiversity Areas (CBAs)</u> 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).

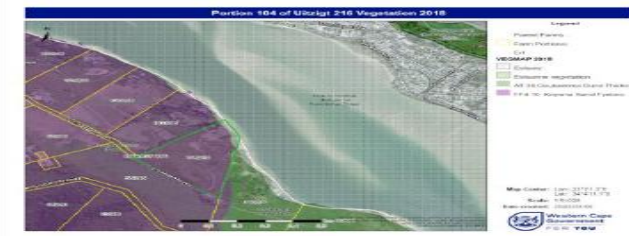


Fig. 4: Knysna Sand Fynbos (FFd 10) (CE) is mapped across most of Portion 104 Uitzicht 216 (CapeFarmMapper3).



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

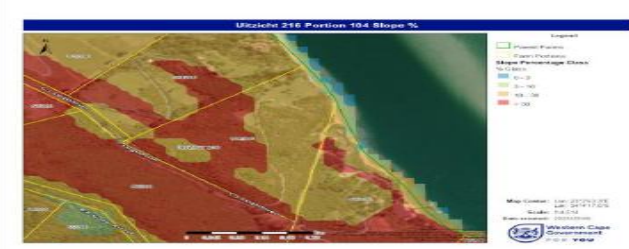


Fig. 6: Slope Percentage Class is >30% in the south-western sector of the property (CapeFarmMapper3).

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.

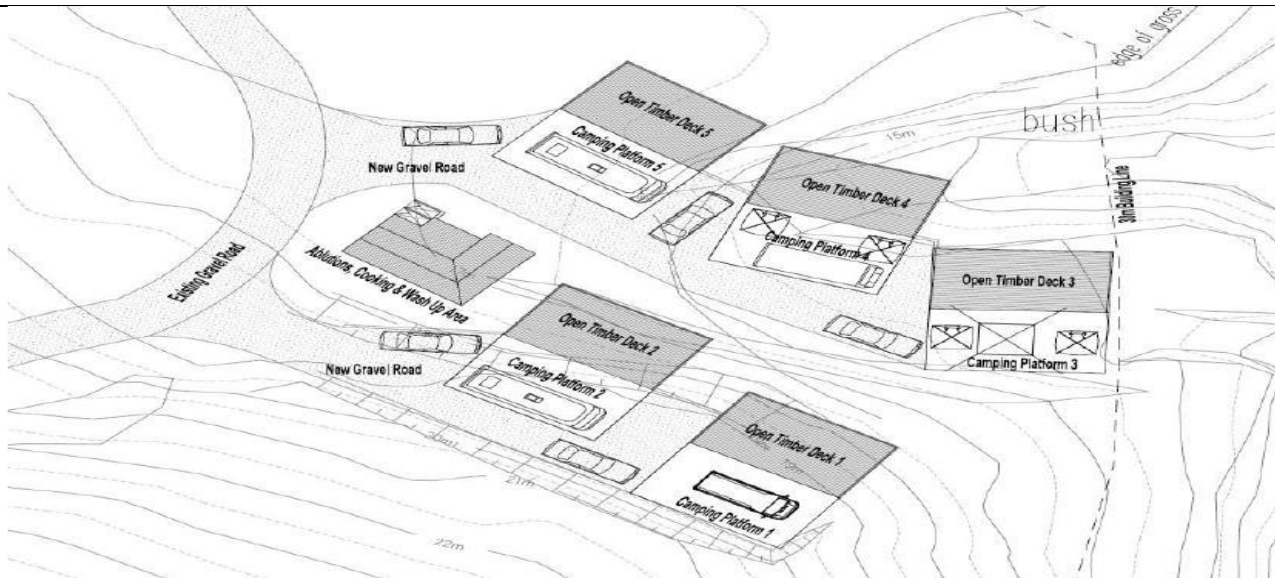


Fig. 9. Close up layout Area 1, TMBA Architects, 2023

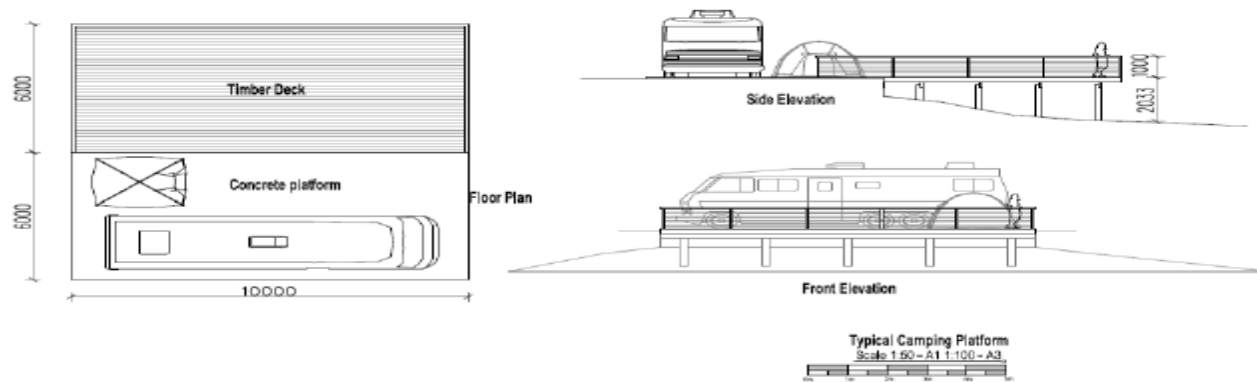


Fig. 10. Dimensions of camping platforms, TMBA Architects, 2023.

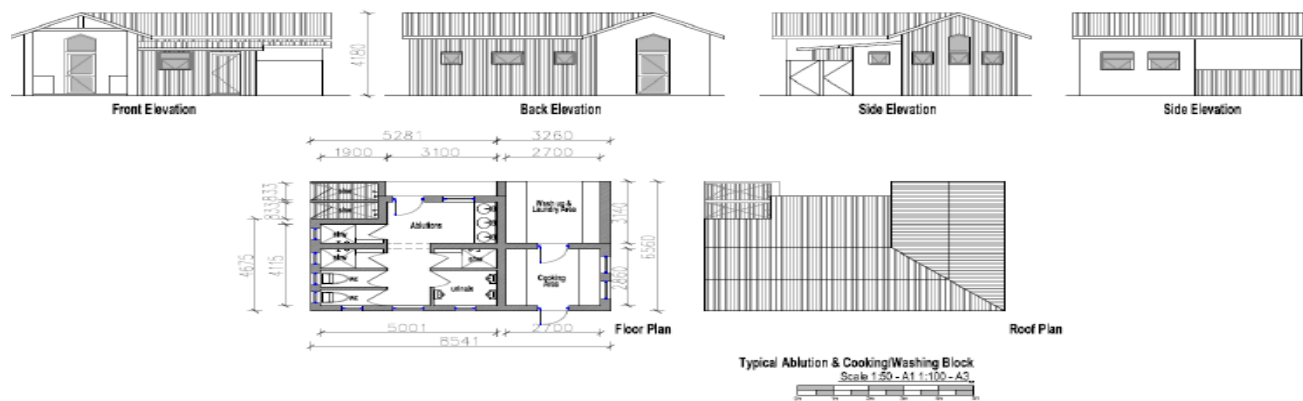


Fig. 11. Layout of Ablutions/ Cooking/ Washing block, TMBA Architects, 2023.

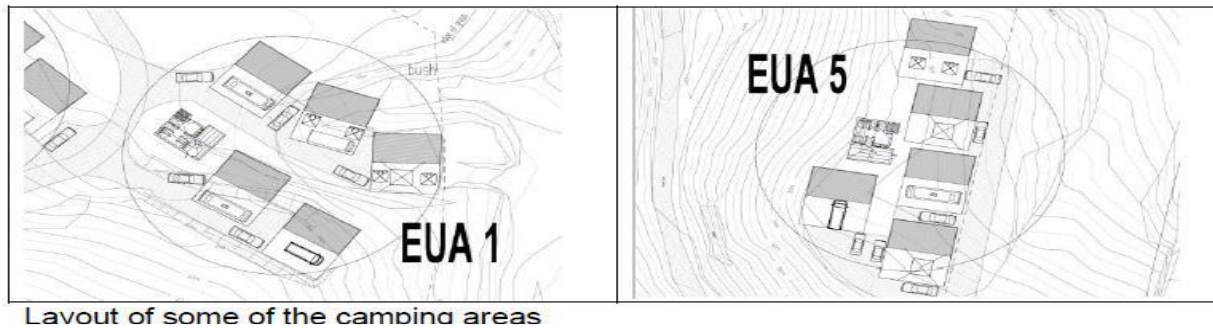
The <u>summary of development components</u>, as per the application (Eco Route and TMBA Architects documents) is noted as follows:	Please note that this comment may require revision upon submission of the Final Basic Assessment Report (BAR), as the Site Development Plan is expected to be updated to incorporate additional information requested during the first round of public participation. To include in DBAR
• 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	

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.



Lavout 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
Owen Govender
Pam Booth
Megan Simons

SANParks
SANParks
Knysna Municipality
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: Access to grassed areas (11/06/2025).

Point 1: Clarity Required

Noted. See the responses to the specific points raised under this heading below.

SANParks seeks clarity on the following:

Noted. See the responses to the specific points raised under this heading below.

- 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,

All assessment related documentation will be updated to clearly reflect the total disturbance footprint. **To include in DBAR**

embankments, etc. <u>A Site Development Plan is requested to depict these areas clearly.</u> The Terrestrial Biodiversity assessment states 1ha/ 10 000m² will be transformed, clarity is required.	
It is not stated whether <u>additional camping</u> will be permitted on the existing open grassed areas, nor if <u>day visitors</u> 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. <u>Confirmation is required on whether the proposed development will be a Section Title Scheme.</u>	This will be addressed in engagement with SANParks.
It is noted that one ablution facility will be required per node and that <u>a bio-septic treatment plant will be installed.</u> 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. <u>Open Space III when combined with a formal stewardship mechanisms will afford stronger long-term conservation outcomes for the property and region.</u>	Engagement with SANParks will be arranged to further discuss this matter.
The property <u>falls within SANParks' current Land Inclusion Plan</u>, i.e., the protected area expansion footprint of the GRNP, and in the <u>Knysna Sand Fynbos Coastal Corridor</u>, 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. <u>The property qualifies as a Contract National Park stewardship property. SANParks would welcome discussions with the landowner on Contract National Park options and incentives.</u>	Engagement with SANParks will be arranged to further discuss this matter.
<u>Point 2: Issues of Concern</u>	Noted. See the responses to the specific points raised under this heading below.
SANParks is concerned about the current <u>density proposed</u>, 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	Designs and footprints of the proposed development will be clearly described in the revision documentation.

existing dwelling, and the construction of a garage is proposed.	
• <u>Disturbance footprint areas</u> 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 <u>cumulative impact</u> 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.
• <u>Noise, visual, and increased estuary users</u> 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 <u>precedent for the area</u>.	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.
<u>Point 3: General</u>	Noted. See the responses to the specific points raised under this heading below.
• <u>Section 62 and 63 of the National environment Coastal Management Act, Act No. 24 of 2008 (NEM: ICMA)</u> are relevant in authority decision-making to prevent harm to and afford protection to the CPZ. <u>Adequate setbacks should be applied</u> to safeguard the landowner from	All mitigation measures proposed by the independent specialists will be implemented in this regard.

potential future climate change risks, i.e., particularly coastal erosion/ storm surge affects, and to protect the coastal zone; this should be in line with CPZ setback requirements for the property.	
The Applicants attention is drawn to <u>Section 15 of NEM: ICMA</u>, 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; <u>a Water Use License (WUL) may be required if any proposed boreholes are situated within 500m of the High Water Mark of the ocean.</u>	
Compliance with the <u>National Veld and Forest Fire Act (Act 101 of 1998)</u> is required. The owner should join the local Fire Protection Association, if not already a member.	
The landowner's attention is drawn to the <u>National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEM:BA)</u> 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 <u>protected tree species</u> be disturbed on the property, as per the National Forests Act, 84 of 1998, as amended.	
Should any <u>resources of suspected heritage value</u> 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 <u>risk management measures applicable for new infrastructure seaward of the CML and existing infrastructure in areas at risk to dynamic coastal process</u>. 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. <u>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.</u>	
As per Section 9 and 10 of the KPE Regulations <u>SANParks may request additional studies to be undertaken</u>, should it be deemed that these are required.	
<u>Points 4: Summary and Way Forward</u>	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	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

emptied on regular basis. Septic tanks/French drains are not recommended as they are likely to impact on groundwater resources.	effluent is currently being assessed. Final confirmation on 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	
MUNICIPALITIES	
Garden Route District Municipality – Dr NS Viljoen – 20 June 2025	
The Garden Route District Municipality (GRDM) acknowledge receipt and review of the Pre-Application Basic Assessment Report (BAR) for the above-mentioned development proposal. We would like to thank you for providing the Municipality with the opportunity to comment on this pre-application, and would like to provide the following comments:	The Garden Route District Municipality's supportive comment, subject to the conditions listed, is acknowledged with appreciation. The applicant confirms that each of the GRDM's recommended conditions has been (or will be) addressed as follows:
Site sensitivity and ecological concerns: The proposed site is of significant ecological value and environmental sensitivity: • The property lies within areas designated as Critical Biodiversity Areas (CBA1 and CBA2) and Ecological Support Areas (ESA2) per the 2017 Western Cape Biodiversity Spatial Plan.	Site sensitivity (CBA/ESA, SCC, Protected Area status): The Terrestrial Biodiversity Assessment (Appendix D1) identifies the Species of Conservation Concern present on the property. Alternative A was specifically shaped by these findings, including the relocation of EUA 4 to reduce ecological impact. The Western Cape Biodiversity Spatial Plan (2023) Protected Area classification of the entire property is recognised in Section G of the Draft BAR, and the property's intended inclusion in the Garden Route National Park through a Contract National Park stewardship arrangement (SANParks letter, 29 April 2026) gives operational effect to this status.
• As per the updated 2023 WC Biodiversity Spatial Plan, the entire property now falls within an area designated as a Protected Area.	
• The presence of Species of Conservation Concern (SCC) such as <i>Lebeckia gracilis</i> (EN) and <i>Selago villicaulis</i> (VU) necessitates strict protection.	
• The proposed footprint is located in a landscape with a history of disturbance (Knysna fires, invasive alien plant infestation), with moderate restoration potential.	
Development Impacts and Mitigation While the project design has incorporated environmental sensitivities (e.g. stilted structures, bio-septic systems, rainwater harvesting), additional emphasis must be placed on: • Avoidance and clear demarcation of SCC prior to site clearing or earthworks.	SCC demarcation prior to clearing: The Environmental Management Programme records, as a binding construction-phase obligation, the demarcation and protection of all identified SCC prior to and throughout site clearing and earthworks.
	Appointment of a qualified ECO: A suitably qualified Environmental Control Officer will be appointed to monitor the EMPr throughout construction and initial operations. This obligation is reflected in the EMPr and is consistent with SANParks Condition 12 (29 April 2026).

• Appointment of a qualified Environmental Control Officer (ECO) to oversee daily compliance during construction and initial operations.	Erosion control near the cliff and runoff pathways: The Stormwater Management Plan (appended to the EMPr) addresses surface-water management, permeable surfacing where possible, and erosion controls in the vicinity of the cliff edge and the estuary. Coastal-cliff stabilisation is further informed by the aquatic specialist's recommendation of a 10 m rehabilitation buffer inland from the cliff edge and the 36 m vegetated estuary buffer (Appendix D3).
• Formal integration of erosion control measures, particularly near the steep coastal cliff edge and runoff pathways leading to the Knysna Estuary.	
Pending Issues to Resolve in Final Bar: We recommend that the following items be included in or addressed as part of the Final BAR:	SANParks consultation (NEMPAA s.50(5)): Formal SANParks consultation has been undertaken. SANParks' comments of 30 January 2026, 30 June 2025 and 29 April 2026 are reproduced in full in the application bundle and responded to in this Comments and Response Report and in Section G of the Draft BAR.
• Confirmation of consultation with SANParks, as the Garden Route National Park borders the site and falls under Section 50(5) of the National Environmental Management: Protected Areas Act (Act 57 of 2003).	
• Completion of the Heritage Impact Assessment and review by Heritage Western Cape.	
• Final inclusion of operational-phase monitoring protocols for ecological integrity, visual impact, and light/noise intrusion.	Heritage Impact Assessment and HWC review: A Notice of Intent to Develop was submitted to Heritage Western Cape under Section 38(1) and (8) of the National Heritage Resources Act. HWC issued a final comment confirming that no further heritage studies are required, and requested that the HWC Chance Finds Procedure be incorporated into the EMPr and EA conditions. These requirements are reflected in the EMPr and in Section G.5 of the Draft BAR.
Recommendations: We do not object to the proposed development proceeding, provided that:	
• The final authorisation explicitly binds the applicant to the mitigation and management measures proposed in the EMPr.	
• No-go areas for SCC are enforced.	
• A full ECO monitoring and reporting system is implemented.	Operational-phase monitoring (ecological, visual, light, noise): The EMPr operational-phase tables include monitoring rows for ecological integrity (vegetation rehabilitation and SCC condition), visual impact (compliance with the Visual Impact Assessment, Appendix D4, and the measures proposed by Mr P. Buchholtz, 5 September 2024), noise (operational noise regime), and light intrusion (downward-directed, low-level external lighting designed to avoid spillage to the estuary and surrounding conservation areas).
• The project avoids any encroachment or disturbance within the estuarine functional zone or buffer areas without further assessment.	
The proposed assisted camping facility, in its revised form, presents a potentially acceptable low-impact land use if all mitigation measures are properly implemented.	The applicant accepts the GRDM's recommended conditions as conditions of authorisation, including the binding of the applicant to the EMPr, the enforcement of SCC no-go areas, the full ECO monitoring and reporting system, and the prohibition on encroachment within the estuarine functional zone or buffer areas without further assessment.
However, the site's biodiversity significance, protected area overlap, and ecological function demand stringent conditions of authorisation. We request that our concerns and recommendations be considered in the drafting of the Final BAR and any resulting Environmental Authorisation.	
The Garden Route District Municipality reserves the right to provide comment/s or to amend initial comment/s.	

NGO	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.	
<u>1. Environmental Concerns</u>	
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 and the 2017 Knysna fires — these areas retain substantial ecological restoration potential.	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. 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:	
• <i>Lebeckia gracilis</i> (Endangered) • <i>Selago villicaulis</i> (Vulnerable)	
Protected Tree Species	
Two nationally protected tree species were identified on the site:	
• <i>Afrocarpus falcatus</i> (Outeniqua Yellowwood) • <i>Sideroxylon inerme</i> (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:	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.
• Alien invasive species removal	
• Replanting with indigenous fynbos species	
• 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>	Noted. See the responses to the specific points raised under this heading below.
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: ○ 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.	The facility is intended strictly for private family use.
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)?	
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 Knysna Public Viewer - Orthophoto 2015, Orthophoto 2019, Google Earth Historic Satellite photos)	Based on the available information, no notable linear infrastructure or disturbance areas were identified on the proposed development property. While the concerns raised by 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 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.
Overview of the classifications of Portion 104:	
The property falls within the following “zones” and “classifications” with specific regulatory frameworks and requirements:	
• SANParks Buffer Zone – bordering SANParks Garden Route National Park' Knysna Lakes Protected Area.	During the process of Basic Assessment, there is transparent engagement of with all management and competent authorities regarding the mentioned “zones” and “classifications”.
• SANParks Priority Expansion Area and Priority Natural Areas, defined in terms of the approved Garden Route National Park Management Plan.	
• 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).	
• 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.	
• Knysna Protected Environment, which has been mapped with associated promulgated Regulations, that designates a Development Control Area.	
• the Estuarine Functional Zone (EFZ),	

the Development Control Area (DCA) as per Knysna Protected Environment (KPE) Regulations 2009 Gaz 23797					
the National Heritage Resources Act					
bordering the Featherbed Nature Reserve (Uitzicht portion 59 and 60)					
within 1km from a known Archaeological site of an undisturbed Earlier Stone Age site on the Featherbed Nature reserve.					
Pre - Application Basic Assessment Report - Lovemore - Ptn 104 of Farm 216 Proposed development of assisted camping facilities for the Lovemore Family	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.				
Table 10: Assessment of need and desirability <table><tr><td>1.</td><td>Explain how the proposed development is in line with the existing land use rights of the property?</td></tr><tr><td colspan="2">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.</td></tr></table>		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.	
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					

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 "<i>disturbed patch of grass</i>" that has been "<i>retained in the same originally disturbed area</i>".	
The historical Satellite images shows that the "<i>disturbed patch of grass</i>" has been expanded. The notion that the "<i>disturbed patch of grass</i>" that has been "<i>retained in the same originally disturbed area</i>" 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 “parking area” (estimated 50m x 5m) on the eastern boundary close to the slipway on Portion 103 as well as	
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 “ <i>Degraded areas should be rehabilitated</i> ”. 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 " <i>e.g. disturbance caused by alien invasive plant</i>	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

<i>species and the 2017 Knysna veld fires"</i> 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 <u>or tourism infrastructure</u> 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 and the protected area management plan</u> ".
4. The conclusion is that the Campsite (expansion) Development is a fully fledged Tourist development that necessitates the BAR to 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	Noted. See the responses to the specific points raised under this heading below.
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 of the 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	Noted. See the responses to the specific points raised under this heading below.
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	Noted. See the responses to the specific points raised under this heading below.
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.	Noted, and agreed that the precautionary principle applies. As set out throughout Part B of this report (Application Phase), this has been applied practically through independent specialist assessments, siting within already-disturbed areas, a confirmed binding occupancy limit, and EMPr mitigation and monitoring commitments.
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>	Noted. See the responses to the specific points raised under this heading below.
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	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

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 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.	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. 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.	
<u>APPLICANT & LANDOWNER DETAILS:</u>	Noted. See the responses to the specific points raised under this heading below.
The Front page of the BAR indicate that the application is prepared for the 'Lovemore Children's Secondary Trust',	The property on which the proposed development is located is legally registered in the name of the Lovemore Children's

however under the Applicant Details section in the main report, it is stated as Rob Lovemore.	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. 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.
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 Lovemore 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.	
<u>ALTERNATIVES:</u>	Noted. See the responses to the specific points raised under this heading below.
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 applicable 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 bring 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.	Eco Route confirms the repositioning of Unit Node 4 (EUA 5) was informed by the terrestrial biodiversity specialist's field survey findings (identification of Species of Conservation Concern), and by the site's physical topography as reflected on the Site Development Plan; a standalone desktop-only slope analysis was not separately commissioned. An updated Terrestrial Biodiversity Assessment (Capensis, 12 November 2024) was subsequently prepared specifically to assess this repositioned layout, as confirmed in response to the equivalent comment raised by Glenrise (Pty) Ltd / JR Macey in Part B of this report.
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.
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.	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

• The EAP must clarify 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.	
<u>HERITAGE:</u>	Noted. See the responses to the specific points raised under this heading below.
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>	Noted. See the responses to the specific points raised under this heading below.
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	All specialist report will be updated to accurately reflect the most recent findings.

during Spring, especially given the noted presence of SCCs on the site.	
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 <u>reclassified as CBA 2</u>.	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).
• The EAP must confirm whether the necessary application has been submitted to SANBI to have this correction reflected as part of the environmental process.	
According to the information contained in the BAR, the management objective for CBA 1 is to “...<i>maintain in natural or near natural state with no further loss of natural habitat, only low impact biodiversity sensitive land uses to be considered</i>”. Similarly the management objective for CBA 2 is to “...<i>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</i>”.	Town Planner
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 development as proposed to the preferred alternative (25 units) is unlikely to qualify as a 'low' impact land use given its 'medium' scale classification.									
The EAP must obtain confirmation from the Provincial and Local <i>spatial planners</i> on compatibility of the proposal with the Rural Development Guidelines as a key document. <table><tr><th>SIZE</th><th>DESCRIPTION</th></tr><tr><td>Small</td><td>1-10 units and floor area not being more than 120m² per unit</td></tr><tr><td>Medium</td><td>11-30 units and floor area not being more than 120m² per unit</td></tr><tr><td>Large</td><td>31-50 units and floor area not being more than 120m² per unit (Approval of a resort of more than 50 units, though not impossible, is discouraged)</td></tr></table> TABLE 4: RESORT SIZE CATEGORIES	SIZE	DESCRIPTION	Small	1-10 units and floor area not being more than 120m ² per unit	Medium	11-30 units and floor area not being more than 120m ² per unit	Large	31-50 units and floor area not being more than 120m ² per unit (Approval of a resort of more than 50 units, though not impossible, is discouraged)	
SIZE	DESCRIPTION								
Small	1-10 units and floor area not being more than 120m ² per unit								
Medium	11-30 units and floor area not being more than 120m ² per unit								
Large	31-50 units and floor area not being more than 120m ² per unit (Approval of a resort of more than 50 units, though not impossible, is discouraged)								
It is mentioned in the SSVR contained in the BAR “....<i>it should be noted that that property is not proclaimed as a protected area, but as of the introduction of the 2023 WCBSP, the <u>entire property will be dealt with according to the general guidelines for protected areas</u></i>”. The goal is to have land use activities that support the primary function of these areas as <u>sites for biodiversity conservation</u>. Activities i.e. land use must be consistent with CBA 1 category (at least one criteria).	The entire property has been reclassified. This reclassification will be reflected across all documents prior to submission of the Final BAR.								
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	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								

statement has been properly considered and addressed as part of the investigations/BAR report. This is not reflected in the VIA, Botanical/Biodiversity Assessments as it may have bearing on the findings of these studies.	adequately addressed, Interested and Affected Parties (I&APs) will have another opportunity to raise the issue during the next round of public participation.
The habitat identification by the specialist indicates the <i>majority</i> 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 rehabilitated 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.

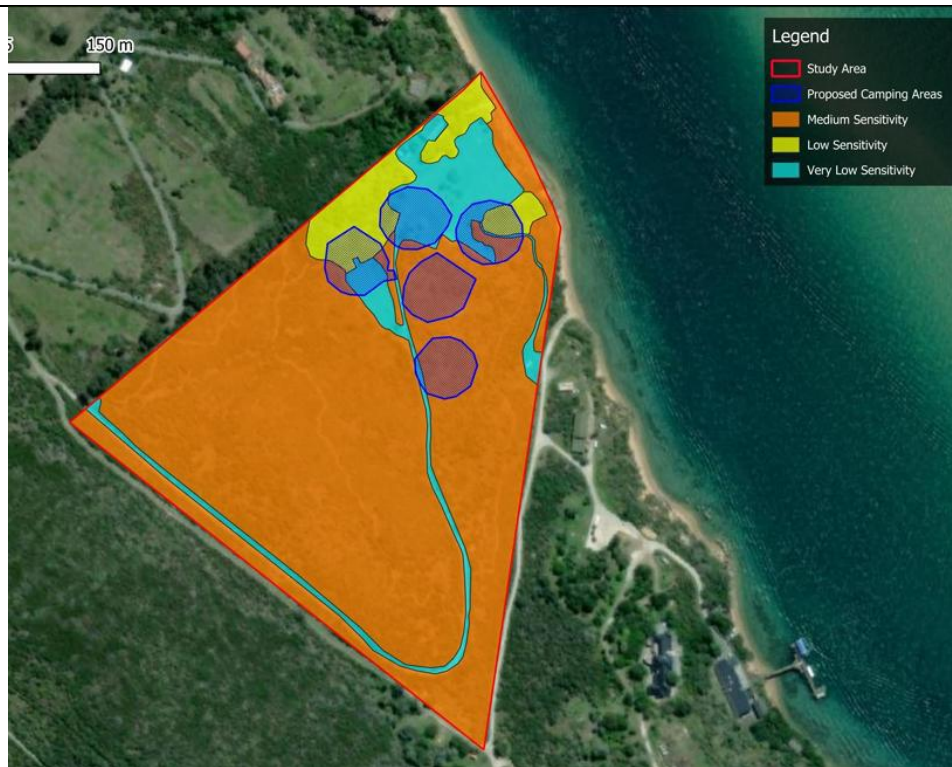


Figure 2: Ecological sensitivity map (biodiversity specialist) with approximate indication of repositioning of Unit 4, 2024.	
<u>AQUATIC:</u>	Noted. See the responses to the specific points raised under this heading below.
Similar to the Biodiversity/Botanical Assessment that was done in 2024, the Aquatic 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 its 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 abluent 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 its 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	This comment is acknowledged. The requests for additional information will be considered and clearly reflected in the

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. Having these buffers in place appears to be critical in terms of how the specialist assessed the potential impact of this development.	Draft BAR during the application phase. To be included in DBAR.
• 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 to the lifecycle of this activity.	Eco Route commits, as set out in response to the equivalent comment raised by Glenrise (Pty) Ltd / JR Macey in Part B of this report, to confirming that no lagoon access infrastructure is proposed as part of this development, and that any estuary access will be via the Brenton-on-Lake SANParks facility only, consistent with prior SANParks correspondence (6 August 2026). Eco Route further commits to confirming in the Final BAR what measures will prevent informal, erosion-prone pedestrian access to the lagoon from the property.
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.

Noted.



Noted.

Figure 4: Screenshot of the aquatic buffer recommended as a mitigation measure by the specialist.	
<u>FAUNA:</u>	Noted. See the responses to the specific points raised under this heading below.
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.	

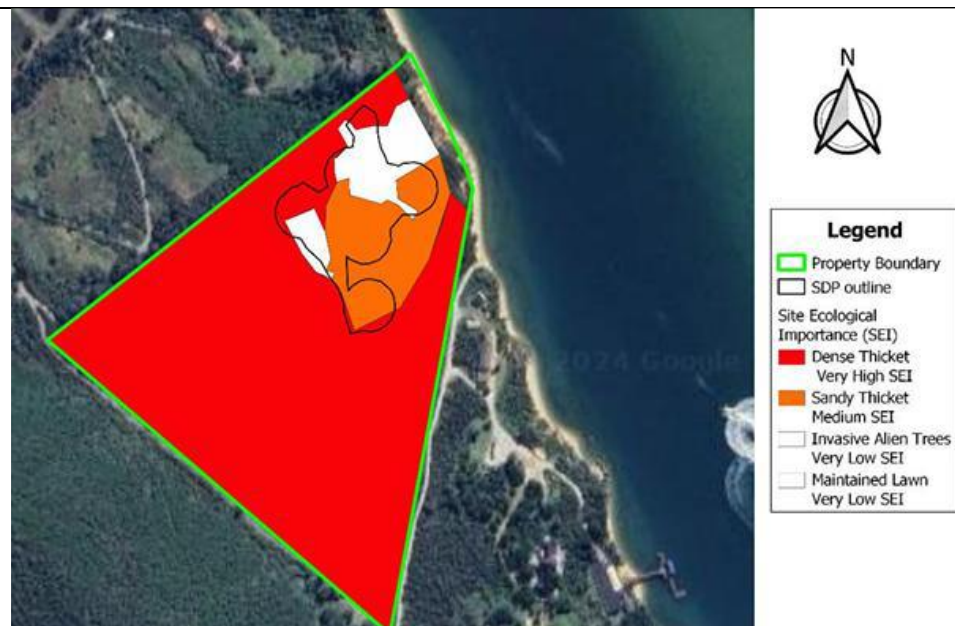


Figure 5: Faunal sensitivity map with an estimated indication of the repositioned Unit 4 that extends into the Very High SEI or a reconfiguration of Unit 4 (not to scale).

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 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

The specialist will be consulted for input regarding this comment received.

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 Site Sensitivity Verification Report (SSVR) (Appendix E – 2026.09.23 – FINAL Site Sensitivity Verification Report, Portion 104 of Farm 216) has been reviewed and updated. Further site verification confirms the Agriculture theme as being of low sensitivity, correcting the Screening Tool's original 'High' rating. Portion 104 of Farm 216 is characterised by terrain and soil conditions that limit its suitability for intensive agricultural use. The area proposed for development comprises largely marginal land, including slopes and naturally vegetated areas, of low agricultural value. The property was not used for agricultural production historically, is not used for agricultural production currently, and will not be used for agricultural production going forward. On this basis, an Agricultural Compliance Statement prepared by a specialist would add no additional information to this assessment, and none has been commissioned.
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.	
VISUAL:	Noted. See the responses to the specific points raised under this heading below.
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"..



The specialist will be consulted for input regarding this comment received.

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.

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 to 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 “...<i>tourist development should not result in or contribute to visually obtrusive or ribbon development along the coastline, visually sensitive areas, cliffs or ridges</i>”. 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 <i>'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...'</i> 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 <i>spatial planners</i> 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.	Eco Route commits, as set out in response to the equivalent comment raised by Glenrise (Pty) Ltd / JR Macey in Part B of this report, to obtaining the town planner's written confirmation of the applicable consent-use category and its alignment with the Rural Development Guidelines, and to confirming with the visual specialist whether the current preferred alternative has been assessed, for inclusion in the Final BAR.
LAND USE HISTORY:	Noted. See the responses to the specific points raised under this heading below.
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	
<u>SERVICES:</u>	Noted. See the responses to the specific points raised under this heading below.
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 to 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	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

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.	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.
<u>OSCA REGULATIONS:</u>	Noted. See the responses to the specific points raised under this heading below.
The BAR does not comment on the applicability of the OSCA Regulations. This must be verified by the EAP and the Knysna Municipality's environmental directorate approached for comment.	This will be verified and discussed in the final application documentation. To include in DBAR.
<u>PLANNING:</u>	Noted. See the responses to the specific points raised under this heading below.

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 <u>low impact scale</u> and intensity in keeping with the <u>context of the area</u> and its surrounding <u>character</u>. Permanent tents are regarded to be <u>additional dwelling units</u>".	Town Planner

The EAP to clarify whether the 'overnight structures' that are proposed to 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 to scale/density.	Town Planner
<u>LISTED ACTIVITIES:</u>	Noted. See the responses to the specific points raised under this heading below.
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 to 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 appear to be applicable in addition to what is listed in the pre-app BAR:	The applicability of the listed activities will be carefully reviewed, and where relevant to the proposed development, they will be included in the Final Application documentation. To be included in DBAR.

• 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).	
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.
<u>GENERAL:</u>	Noted. See the responses to the specific points raised under this heading below.
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 otherwise would be important to inform meaningful stakeholder participation and input.	The comment has been noted and contact details for all comments received have been added to the I&AP database.

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 to 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:	Noted. See the responses to the specific points raised under this heading below.
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 degradation. 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. Increased pollution 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 already very busy area especially during the summer and holidays.	Please take note that the development is exclusive to 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 – Josedell Property NO 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 (Josedell Property No 100 Pty Ltd – comments from Water Expert – 25 June 2025	
1. Service Considerations	Noted. See the responses to the specific points raised under this heading below.
1.2 Water / Sewage / Electrical	Noted. See the responses to the specific points raised under this heading below.
<i>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</i> <i>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</i>	Noted, and this is an accurate description of the water supply and (at the time) proposed wastewater design. Eco Route confirms the wastewater design has since been updated to the closed-loop Bio Bloo system described in Part B of this report (superseding the bio-septic reference in this comment), and that the confirmed maximum occupancy and services capacity are as set out in the responses to the equivalent comments raised by Vernon Rice and Glenrise (Pty) Ltd / JR Macey in Part B.

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 $150 \times 20 = 3000$ 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 of the Lovemore Farm.	Noted. See the responses to the specific points raised under this heading below.
1. General	Noted. See the responses to the specific points raised under this heading below.
I am concerned at the cumulative impact of increasing development in the Farm 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	Noted. See the responses to the specific points raised under this heading below.
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 be damaged, 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 falls onto the property owner to continue ecological monitoring.
3. Roads	Noted. See the responses to the specific points raised under this heading below.
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 from increased 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 property owned by Occidental Investment Company Pty Ltd, portion 99 of farm 216 Uitzicht, gains access from CJ Langenhoven Street. I wish to express my concern, 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.
CJ Langenhoven Street provides the only access to the landowners' properties, and was initially an unimproved dirt road. Approximately 30 years ago the landowners, at their expense as the Divisional Council refused to have anything to do with it, had the road surfaced with road-stones. This was done to gain all-weather access as erosion on the steeper parts was severe. All maintenance is still being undertaken by the landowners. The road is a single lane with blind rises and curves. The landowners are aware of this and drive cautiously, as when encountering an on-coming vehicle one driver has to move off the paving onto the verge, which in many places has an extremely steep drop-off. The road was never constructed to cope with high volumes of traffic nor heavy	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.

construction vehicles. "Improving" the road to local authority standards would be an expensive undertaking and require widening the current road reserve by expropriating land from the properties on either side, scarring the landscape along the Western Head.	
Preservation of the coastal thicket on the lower portion and vynbos on the upper portion is important to maintaining Knysna's image in the Garden Route. Healthy vynbos needs periodic fires; further development in the area will lead to the suppression of fires leading to overgrown, choked-up vynbos.	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.
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 <i>already</i> allows for consent use of camping. It is unnecessary to rezone it to provide for tourist accommodation.	Town Planner
<u>This proposed development will cause long term and irreversible detriment to this unique environment on the shores of the Knysna lagoon.</u>	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 2 nd 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!	Eco Route confirms the applicant has since provided a binding, confirmed maximum occupancy figure, which supersedes the estimate implied in this comment: a maximum of 8 people per EUA and 60 registered Lovemore family members and Lovemore Children's Secondary Trust beneficiaries in total across the property at any one time, inclusive of any staff present, as set out in Part B of this report. This is now incorporated into the Final BAR (Section 2.3) and EMPr as a fixed ceiling.
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>	Noted. See the responses to the specific points raised under this heading below.
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.	
<u>Fire</u>	Noted. See the responses to the specific points raised under this heading below.
We personally witnessed the catastrophic fire sweep (termed incorrectly as a "Veld Fire" in this application!) across this	The comment has been noted and contact details for all comments received have been added to the I&AP database.

portion of the western Head in front of us, and how fast it travelled.	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>	Noted. See the responses to the specific points raised under this heading below.
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>	Noted. See the responses to the specific points raised under this heading below.
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 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.	The comment has been noted and contact details for all comments received have been added to the I&AP database
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 <i>extreme</i> cases, which this certainly is not, giving that the property <i>already</i> 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:	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.
1. Noise levels to increase	
2. Privacy concerns, more trespassers and crime	

3. Environmental impact	
4. Piecemeal Development	
Craig – 29 June 2025	
Against the development as it will impact on our:	The comment has been noted and contact details for all comments received have been added to the I&AP database
• Infrastructure	
• Wildlife	
• Traffice	
• Environment	
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/ glamping sites but any re zoning could potentially become much more than that.	The comment has been noted and contact details for all comments received have been added to the I&AP database.
<u>Environmental Impacts:</u>	Noted. See the responses to the specific points raised under this heading below.
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	Environmental impacts will be mitigated through mitigation strategies proposed by specialists and included in the environmental management programme document.

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.	
<u>Traffic and Congestion:</u>	Noted. See the responses to the specific points raised under this heading below.
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>	Noted. See the responses to the specific points raised under this heading below.
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.
<u>Reduced Privacy:</u>	Noted. See the responses to the specific points raised under this heading below.
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	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

negatively affected by increased foot and vehicle traffic and the close proximity of new buildings.	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	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

already under serviced with respect to sewage & refuse removal.	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>	Noted. See the responses to the specific points raised under this heading below.
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—would be irreversible and contrary to national conservation objectives.	Specialist input provided mitigation measures to ensure the best possible environmental conservation. All mitigations 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>	Noted. See the responses to the specific points raised under this heading below.
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>	Noted. See the responses to the specific points raised under this heading below.
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>	Noted. See the responses to the specific points raised under this heading below.
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.
<u>5. Non-Compliance with Zoning and Legal Frameworks</u>	Noted. See the responses to the specific points raised under this heading below.
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.
<u>Conclusion</u>	Noted. See the responses to the specific points raised under this heading below.
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: “<i>Development facilities intended to accommodate assisted camping for the Lovemore Family</i>” In principle they don't have any objections but would like more details.	<u>Reply to email 2 June 2025</u> 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 Beleggings, 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.
Vernon Rice - Addendum to objection Form – 24 June 2025	
The Lovemore's current application to develop a low-impact family orientated camping site for their personal family use, is nothing more than a ruse and intention to develop a commercial campsite which will be able to accommodate up to 100 campers at any one time. This intention flies in the face of their application statement, where they explain that it is "not intended to increase density, or commercialize The Far Side, or introduce disruptive activities."	Noted. The objection proceeds from an incorrect premise. The proposed development is exclusively for use by members of the Lovemore family and beneficiaries of the Lovemore Children's Secondary Trust. There is no commercial campsite, no public booking system, no marketing, no revenue generation and no admission of members of the public. The Application-Phase Draft BAR records this position explicitly in Section E.1 ("Clarification on the Nature of the Proposed Development") and motivates it in Section E.6.2. The design density is approximately 50–60 people at full long-term capacity across five Exclusive Use Areas (per SANParks letter of 29 April 2026), not 100. Not all EUAs will be developed immediately. The applicant has voluntarily submitted the development to the full NEMA Environmental Impact Assessment process precisely so that any

	concerns of this nature can be tested and confirmed by the competent authority.
In order to accomplish this aim, they will need to rezone their property status from Agricultural 1 (A1) to Resort 2. Resort 2 implies a considerable spread of 5 nodes each consisting of 5 platforms, tents, and caravans.	This is not accepted. The applicant is applying to rezone to Open Space III with Consent Use for Tourist Accommodation, not to a Resort zone, as confirmed in the Rezoning Motivation (TMBA, 21 August 2026) and addressed in detail in Part B of this report. Tourist Accommodation is available as a Consent Use directly within Open Space III's own consent-use schedule and does not require rezoning to a Resort zone.
Should this permission to re-zone be granted to the Lovemores, it could set a precedent and motivate other landowners on the Western Head to follow suit. Mostly, the Landowners on the Western Heads have purchased their farms in the expectation that commercial enterprises would be impermissible.	Noted. The development is for strictly private family use and is paired with a binding conservation outcome (stewardship inclusion in the Garden Route National Park, declaration as a nature reserve, or registration of a conservation servitude - all in terms of NEMPAA). The application therefore does not set a precedent for commercial development on the Western Heads; if anything, it establishes a precedent for binding conservation commitments on privately owned land in this corridor.
The properties either side of the Lovemore property i.e Featherbed nature Reserve and Rice, would undoubtedly be negatively impacted in terms of the values of these direct neighbouring properties.	Noted. Property valuation effects on neighbouring properties are not a consideration falling within the scope of an environmental authorisation under NEMA. The applicant nevertheless records that the development is low-impact (0.9% site coverage, elevated stilt platforms, recessive materials, no ground-level hard surfacing), is private family use only, and is paired with a conservation stewardship commitment that, on balance, enhances the conservation status of the area in which neighbouring properties are situated.
Over-development of the Western Head will simply damage the natural habitat and diminish what little remains of Knysna's natural beauty in terms of flora and fauna. Additionally, it would give rise to a number of serious issues unique to the Western Head.	Noted. The development footprint is 0.9% of the 9.93 ha site. The preferred Alternative A was shaped by the Terrestrial Biodiversity Specialist Assessment (Appendix D1) and the Faunal Specialist Assessment (Appendix D2), with the EUA layout specifically designed to avoid identified Species of Conservation Concern (EUA 4 was relocated for this reason). The remainder of the property is committed to conservation through the proposed stewardship arrangement, and the EMPr embeds rehabilitation, alien invasive species removal and cliff-edge stabilisation across the property.

Increased pollution of the lagoon by this potentially huge increase in numbers of campers, is a major concern. Currently refuse, faeces and clothes are strewn on the beach and washed into the lagoon with the next outgoing tide. Of concern too, is the increase in effluent that will undoubtedly soak down through the soil and contaminate not only the underground water, but also the lagoon.	Noted. The sewage solution is a sealed, packaged biological treatment plant per EUA (BIOBLOO, certified through Agrément South Africa), treating effluent to the DWS General Limits standard, with beneficial reuse via controlled irrigation outside the 36 m estuary buffer and zero discharge to the estuary, any wetland or any watercourse. The systems do not rely on ground infiltration and are not septic tanks with French-drain soakaways (a configuration explicitly excluded on the recommendation of the Breede-Olifants/Gouritz Catchment Management Agency). Refuse is managed privately on site. The description of "refuse, faeces and clothes" being strewn on the beach is not reflective of the family's actual use of the property and is not anticipated under the formalised arrangement, which is governed by the binding EMPr.
Increase in noise pollution will inevitably result from large groups of campers who socialize into the early hours of the morning.	Noted. The development is private family use at the densities described above, not large groups of campers. The EMPr includes an operational-phase noise regime (NM-1 to NM-4) to manage noise during occupied periods.
Increase in risk of fire by campers who negate to extinguish braais both on the beach and on the campsite. Hot coals are easily reignited with a slight breeze.	Noted. The applicant will join the Southern Cape Fire Protection Association as required by the National Veld and Forest Fire Act (Act 101 of 1998), as recorded in Section G.4 of the Draft BAR. The EMPr stipulates fire-management obligations including controlled use of open fires, ash management and on-site fire-fighting equipment.
Increased smoke/air pollution in the area by the camper's fires.	As above, the use intensity is private family camping, not a commercial campsite. Fire management is governed by the Veld and Forest Fire Act obligations and the EMPr.
Overuse of our privately funded road will result in deterioration and collapse, and will increase the danger of accidents. Our single-lane farm road, which is adequate for our current use, will not withstand repeated use by large numbers of campers' heavy vehicles.	Noted. No road widening, upgrade or new access construction is proposed. The existing grassed vehicle access track that has historically served the Lovemore family will continue to be used at the historical baseline intensity. No increase in vehicle movements is anticipated during the operational phase, as the same family members who have historically accessed the property will continue to do so (Draft BAR Section E.2.5). A Traffic Management Method Statement for the construction phase will

	be prepared by the appointed Contractor prior to commencement.
The wild life on the Western Head is beautiful and will be disturbed by a huge influx and increase of campers to the area.	Noted. The wildlife concerns are addressed through the Faunal Specialist Assessment (Appendix D2) which informed the design, the avoidance of sensitive ecological zones, the construction-phase fencing of the disturbance footprint with shade cloth to prevent worker encroachment and animal injury, and the binding operational-phase obligations in the EMPr. The use intensity is private family use, not a continuous influx of large numbers of campers.
Refuse removal is currently a concern for the Western Head's neighbours. Our facility is limited and completely unable to cope with the additional refuse of a campsite!	Noted. Refuse is managed privately on the property. The development does not increase the demand on municipal refuse services (Draft BAR Section E.5, Question 3.2).
Substantial overuse of a borehole will put additional pressure on underground water supplies.	Noted. The water supply is primarily harvested rainwater (3 × 5 250 L JoJo tanks per EUA, total 78 750 L across all five EUAs) supplemented by the existing on-site borehole only during periods when the family is in residence (Draft BAR Section E.2.4). During periods of non-use the borehole will not be operated, allowing the aquifer to recharge naturally. Borehole registration and any applicable General Authorisation under the National Water Act will be confirmed with the Breede-Gouritz Catchment Management Agency and the Department of Water and Sanitation prior to construction (see also response to the Tony Millard / Phambi Properties water-expert attachment).
Lack of mooring facilities for camper's boats which, if anchored in the channel, will pose a danger to other boats, skiers and watersports.	Noted. No new jetty, mooring, slipway or boat-launch infrastructure is proposed on the property. The Lovemore family will continue to use the existing Brenton-on-Lake SANParks slipway facility at the historical baseline intensity (Draft BAR Section G.1; SANParks letter of 29 April 2026, Condition 6). No unauthorised moorings are permitted, consistent with SANParks' KPE estuary-user licensing requirements (Condition 7).
Increased dependence on the Knysna Municipality for refuse removal, firefighting capabilities, local emergency services; road maintenance; and sewerage removal by municipal septic trucks.	Noted. All services on the property are managed privately: water by rainwater harvest with borehole supplement, sewage by on-site packaged biological treatment with reuse, refuse by on-site management. The development does not increase

	demand on municipal water, sewage or waste services (Draft BAR Section E.5, Question 3.2). Firefighting and emergency services obligations are addressed through Fire Protection Association membership and the EMPr
Increased loss of privacy from increased foot traffic and presence of temporary visitors; increase in noise on the beach; increased security risk from transient populations; concerns re theft, trespassing and loss of general safety.	Noted. The development is private family use with no public admission, no marketing and no transient population. The premise of the concern (increased foot traffic from temporary visitors) is therefore not applicable. The number of people accessing the property will not increase beyond the historical baseline of family use.
Increased risk of damage to an already-eroding cliff face edging the lagoon.	No development is proposed within the 36 m estuary buffer or the 10 m rehabilitation zone inland from the cliff edge, as recommended by the Aquatic Biodiversity Specialist (Appendix D3) and supported by SANParks (letter of 29 April 2026). The existing walkway to the estuary is retained as-is with no upgrade. Cliff-edge rehabilitation through re-vegetation with appropriate indigenous species is embedded in the EMPr. Stormwater management is addressed in the Stormwater Management Plan to prevent runoff-driven erosion.
Disturbance of the tranquil, private lifestyle which is currently enjoyed by all the neighbours along the Western Heads, in particular.	The development is low-intensity private family use, consistent with the historical pattern of use on the property over many years. The applicant does not anticipate any material change to the experience of neighbouring properties beyond the formalisation of an existing use under structured environmental management.
Sonja Douglas (email) – Phambi Properties (Pty) Ltd – Portion 58 & 59 of Uitzicht 216 - 26 June 2025	
I live on Portion 58 & 59 of Farm 216, Uitzicht and am a direct neighbour of the proposed development, and share the CJ Langenhoven access road.	Standing as a direct neighbour and shared user of the CJ Langenhoven access road is acknowledged. The applicant confirms that the existing access track has historically served the Lovemore family without alteration, and that no road widening, upgrade or new access construction is proposed. The existing access has been adequate for historical family use and will remain so during the operational phase, with no anticipated increase in vehicle movements (Draft BAR Section E.2.5).

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 objection is registered. The substantive concerns raised in the accompanying Phambi Properties attachment are responded to separately below.
Sonja Douglas (attachment) – Phambi Properties (Pty) Ltd – Portion 58 & 59 of Uitzicht 216 - 26 June 2025	
Same attachment received as Tony Millard (Josdell Property No 100 Pty Ltd – comments from water expert – 25 June 2025	See same comments as for Tony Millard.
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	
There is no mention of compliance with the National Water Act or the Water Services	
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 wastewater by seepage into the ground in an the lagoon. to use the water and/or the disposal of area which is closer than 100 m from the lagoon	

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.
Alison S. Collier – MD Endeavor SA - 20 June 2025	
I am writing to you to as I have just become aware that the Lovemore's have applied to build various structures on their land (for potential tourism use) and to re-zone their land From: Agricultural Zone 1 with Consent Use for Camping Facilities;	The comment of Ms A.S. Collier is acknowledged. The applicant respectfully notes that the comment proceeds from the premise that the proposed development is intended for commercial tourist accommodation. This is not correct, and the position is addressed as follows:

To: Open Space III with Consent Use for Tourist Accommodation	
My ask is that the land remains zoned as it is today (Agricultural Zone 1 with Consent Use for Camping Facilities) and no commercial tourist accommodation or tourism is allowed on this land.	
Topline of my concerns as a resident on Leisure Isle, is the building of so many structures, the increased number of people potentially staying overnight and the change in use of "Portion 104 of Farm 216 Uitzicht" from "Agricultural Zone 1 with Consent Use for Camping Facilities" to: "Open Space III with Consent Use for Tourist Accommodation", as well as wording included in the development application saying <i>"...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..."</i>	
I am opposed to "Portion 104 of Farm 216 Uitzicht" land use to be revised to allow tourism and to offer overnight tourist accommodation.	
— The additional number of tourists that would potentially stay overnight and visit the site in the day could be up to 80-120people per day (80-120people = 5x camping nodes, each with 4x platforms/cabins and assume 4-6people per platform/cabin	
— Additional Staff needed to oversee and clean tourist campsite	
The Leisure Isle residents will be negatively affected through:	
— Setting a precedent for land use of beachfront property on Western Head to be changed to allow for "commercial overnight tourism/ resort use". Our aim is to keep land along the lagoon in its natural state and to preserve the flora and fauna of the lagoon.	
— Noise pollution. extra 80-120people (potentially tourists) every night camping will cause a lot of additional noise, especially in the evenings, at night and early mornings. When there is no wind, the noise travels easily over the lagoon from featherbed to leisure isle and is heard clearly on the front of the island.	
— Eye sore & Light pollution: Today the land is covered in vegetation (bush, grass, trees) and has no light coming from	Nature of the development - private family use only: The proposed development is exclusively for use by members of the Lovemore family and beneficiaries of the Lovemore Children's Secondary Trust. There is no commercial tourist accommodation, no public booking system, no marketing, no revenue generation, and no admission of members of the public to the property. The number of people accessing the property will not increase beyond the historical baseline of family use established over many years of informal camping. This position is set out explicitly in Section E.1 ("Clarification on the Nature of the Proposed Development") and motivated in Section E.6.2 of the Draft BAR. References to "tourist accommodation" in earlier documentation (including the Visual Impact Assessment title and the rezoning motivation document) reflect the strict planning-law terminology applicable to the Open Space III consent-use sought, and not an intention to operate as a tourist facility; this has been clarified throughout the Application-Phase Draft BAR. Density: The development is sized for private family use, comprising five Exclusive Use Areas at a long-term stewardship-vision capacity of approximately 50–60 people at full seasonal occupancy (per SANParks comment of 29 April 2026), not the 80–120 figure assumed in the comment. Not all EUAs will be developed immediately. Rezoning: The rezoning from Agriculture Zone I (with consent use for camping) to Open Space III is sought to create a stronger conservation outcome and to enable the formal stewardship arrangement with SANParks (Contract National Park, nature reserve, or conservation servitude in terms of NEMPAA). It is not sought to enable commercial tourism. Confirmation of the legal effect of the consent use will be provided by the appointed town planner.

the site at night. There will be significant light at night for the extra 80-120 people camping on the site.	
— The bank from the site going down to the beach is already eroding with current limited use by the Lovemore family over summer months. With extra 80-120 people going up and down the cliff, the sand and bank will erode further	
— There is no space on the beach area in front of this site to moor boats or canoes (the high tide comes right up to the steep cliff). Perhaps the tourist's boats will anchor in the channel blocking an already congested lagoon channel during the summer months making it dangerous for swimmers & boaters alike.	
— Additional sewage and rubbish from the extra 80-120 people using the site (plan is for 1x bio-septic tanks at each camping node). Having 5x extra soak away sewage systems for 80-120 additional people daily is a lot of extra human excrement very close to the lagoon. Septic tanks give problems from time to time, and tanks will need to be drained by a honey sucker. The current access road (single lane) is not easy for the "honey sucker truck" to navigate, and no place for other vehicles to pass. Same issues with removal of all the extra rubbish daily / weekly from the site.	
— The natural bush, birdlife & fauna will be damaged / disturbed through the construction of the additional slabs, cabins, sheds and septic tanks. Should the land be occupied by up to 80-120 overnight guests, the natural bush and fauna will suffer further.	
80-120 overnight guests, the natural bush and fauna will suffer further. Portion 104 is classified as CBD1 or CORE1 with objective of <i>"Keep natural, with no further loss of habitat. Degraded areas should be rehabilitated. Only low impact, biodiversity-sensitive land-uses are appropriate"</i>	Noise: The development is private family use at the densities described above. The EMPr includes an operational noise regime (NM-1 to NM-4) to manage noise during occupied periods. Light pollution: The EMPr stipulates downward-directed, low-level external lighting designed to avoid spillage onto the estuary or surrounding conservation areas, consistent with the visual specialist's recommendations. Visual impact ("eye-sore"): The development uses elevated lightweight stilt platforms with recessive natural materials and finishes, the wastewater treatment units are placed below ground with vegetated cover, and the visual specialist (Appendix D4) and the measures proposed by Mr P. Buchholtz (5 September 2024, supported by SANParks) have shaped the visual mitigation strategy. Bank erosion / cliff stability: No development is proposed within the 36 m estuary buffer or the 10 m rehabilitation zone. The existing estuary-access walkway is retained as-is with no upgrade. Erosion controls are addressed in the Stormwater Management Plan and the EMPr. Estuary access / boat mooring / channel congestion: The development includes no new jetty, mooring, slipway or boat-launch infrastructure. The Lovemore family will continue to use the existing Brenton-on-Lake SANParks facility for any boat access, at no greater intensity than has historically been the case. No unauthorised moorings are permitted, consistent with SANParks' KPE estuary-user licensing requirements. Sewage: The sewage solution is a fully sealed, packaged biological treatment plant per EUA (BIOBLOO, certified through

Agrément South Africa) treating to the DWS General Limits standard, with beneficial reuse via controlled irrigation outside the 36 m estuary buffer and zero discharge to the estuary or any watercourse. The systems do not rely on ground infiltration. They are not septic tanks with French-drain soakaways (a configuration explicitly excluded on the recommendation of the Breede-Olifants Catchment Management Agency). Servicing access is provided via the existing access track; honey-sucker servicing would be infrequent given the small private occupancy and the packaged-plant design. Operational monitoring, malfunction-detection and end-of-life replacement are stipulated in the EMPr.

Wildlife / fauna disturbance: The development is located within an already-disturbed footprint of 0.9% site coverage. The Faunal Specialist Assessment (Appendix D2) informs the design. Construction-phase fencing of the disturbance footprint (shade-cloth barrier) and avoidance of SCC areas are operational obligations in the EMPr.

CBA1 / CORE1 protected-area status: The applicant accepts the conservation imperative of the CORE1 / Protected Area status. The development footprint is 0.9% of site coverage, the layout has been shaped by SCC avoidance, the remainder of the property is committed to conservation through the proposed stewardship arrangement with SANParks, and the EMPr embeds rehabilitation and alien invasive species control across the property. The development is consistent with the CORE1 management objective.

The Application-Phase Draft BAR addresses each of Ms Collier's concerns through the design, the EMPr controls and the stewardship commitment summarised above. The applicant submits the application to the competent authority on the basis that the strictly private family-use nature of the development,

	together with the binding mitigation, monitoring and stewardship obligations, adequately respond to the concerns raised.
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Following the public participation process conducted between **29 May 2025 and 30 June 2025**, additional engagements were held with SANParks to formalise a stewardship agreement. The subsequent comments from SANParks, arising from this formal engagement, are outlined below.

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

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. <u>The remainder of the SDP is supported by SANParks.</u>	understanding that any future development would require a separate EIA application and further SANParks review. We appreciate SANParks' support for the remainder of the SDP.
<u>Point 2: Sewerage Infrastructure</u> SANParks will not support a sewerage product/s which do not:	
1) Provide/s effluent quality data that demonstrates compliance with regulatory standards and include a clear disposal or reuse plan to prevent contamination of estuarine or wetland environments.	All sewage specifications will be finalised with SANParks during further engagement regarding the formal stewardship agreement.
2) Have sewage treatment systems located away from areas where they may become damaged by flooding/ coastal erosion or pose a risk to sensitive environmental areas.	
3) Have operational monitoring protocols for the sewerage system built into the EMPr.	

4) Include monitoring which focuses on detecting any malfunction of the system/s with appropriate mitigation measures proposed.	
5) Include actions to be taken for ongoing maintenance and end-of-life replacement of the system stipulated within the EMPr.	
6) Include placement of structures above ground (not buried), except where this is not possible and structures that are not designed for climate change risks.	
A long-term sustainable and compliant sewerage solution must be finalised and presented to SANParks for consideration.	

Point 3: Contract National Park Stewardship

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

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

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

Uitzicht 216 Portion 104 is supported for inclusion by SANParks through a Contract National Park (CNP) agreement (top tier). A CNP is an area of privately owned land that is declared as part of a National Park in terms of the National Environmental

Management: Protected Areas Act, 2003 (Act No. 57 of 2003) (NEMPAA). The landowner retains ownership of their property but commits the property to formal conservation and co-manages the property with SANParks. In return, the landowner may derive financial benefits, such as income tax deductions and municipal property rate exclusions.

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

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

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

Summary and Way Forward

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

The following conditions are recommended should the activity be authorised

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

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

10. SANParks should be consulted for any fencing needs. Fencing should not inhibit wildlife movement.	Noted and accepted.
11. The EMPr, Eco Route, March 2026 should be implemented.	Noted and accepted.
12. A suitably qualified Environmental Control Officer (ECO) should be appointed to monitor the EMPr.	Noted and accepted. This is motivated in the EMPr.
13. The disturbance footprint/no-go areas should be fenced off during the construction phase with a barrier material, such as shade cloth to prevent workers from encroaching into adjacent vegetation, and to ensure that animals are not injured on the building site.	Noted and accepted. This is motivated in the EMPr.
14. Topsoil should be set-aside for reuse.	Noted and accepted. This is motivated in the EMPr.
15. Permeable paving surfaces should be used where possible to limit excess surface runoff. Care should be exercised with stormwater design and management to limit soil erosion and any destabilisation of the embankment that is susceptible to coastal erosion.	Noted and accepted. This is motivated in the EMPr.
16. The landowner's attention is drawn to the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEMBA) Alien and Invasive Species Regulations, 25 September 2020, where a landowner is legally responsible for the removal of alien vegetation on their property. The owner should formalise an Invasive Alien Vegetation Control Plan as required by the NEMBA. Large areas of Uitzicht 216 Portion 104 are invaded with Alien and Invasive Species, which poses a fire risk.	Noted and accepted. This is motivated in the EMPr.

17. Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. The owner should join the local Fire Protection Association, if not already a member.	This has been discussed during engagement of the stewardship agreement. The property owner now forms part of the Southern Cape Fire Protection Agency.
18. A permit from the Department of Forestry, Fisheries & the Environment (DFFE) should be attained should any protected tree species be disturbed on the property, as per the National Forests Act, 84 of 1998, as amended.	Noted and accepted.
19. Should any suspected resources of heritage value be uncovered during clearing, Heritage Western Cape (HWC) should be contacted immediately for instructions.	Noted and accepted.
20. Should coastal erosion stabilisation structures be required to safeguard any buildings/ infrastructure now or in the future, the landowner's attention is drawn to Section 15 of NEMICMA, which states: 1) No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or such other coastal public property, or of land adjacent to coastal public property, unless the erosion is caused by an intentional act or omission of that organ of state or other person; and 2) No person may construct, maintain, or extend any structure, or take other measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided for in this Act, the National Environmental	Noted and accepted.

Management Act, or any other specific environmental management Act.	
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5. PART A CONCLUSION — PRE-APPLICATION PHASE

The Pre-Application Phase Public Participation Process for the proposed development on Portion 104 of 216, Uitzicht, Knysna, has been concluded. All concerns raised by Stakeholders and/or Interested and Affected Parties (I&APs) during this round have been adequately and appropriately addressed (Part A, above).

6. PART B — APPLICATION PHASE: COMMENTS AND RESPONSE

The following table contains the verbatim comments received during the Application Phase Public Participation Process (10/06/2026 – 20/07/2026), together with Eco Route's response to each, organised by commenter category (Organs of State, State Departments, NGO, and Public). Responses to SANParks and DFFE comments are complete; responses to the remaining categories are being finalised (see Phase 2 of the Final BAR close-out).

COMMENTS	RESPONSE
COMMENTS RECEIVED IN RESPONSE TO APPLICATION PHASE DRAFT BAR:	
ORGANS OF STATE	
SANParks – Dr Vanessa Weyer – 20 July 2026	
SANParks has provided comments on the following applications for Uitzicht 216 Portion 104 Knysna: (vii) 30 June 2025, Pre-application Draft Basic Assessment Report (PDBAR), prepared by Eco Route Environmental Consultancy (Eco Route), dated 29 May 2025; and (viii) 29 April 2026, DBAR, Contract National Park Applicability, prepared by Eco Route, dated 13 March 2026.	Noted. This accurately summarises the two prior submissions on which SANParks' current comments are based.
Please refer to these comments which describe the landscape context of Uitzicht 216, Portion 104, a site visit undertaken on the 11 June 2025, the development proposals at the time, points raised by SANParks, as well as summaries and the way forward.	Noted.
A DBAR was submitted to SANParks by Eco Route on the 30 June 2026, requesting SANParks' further comment.	Noted. This is confirmed; the DBAR was submitted to SANParks by Eco Route on 30 June 2026 seeking further comment ahead of the application-phase Public Participation Process.

*** Note – the snippets as included in the SANParks comments all originate from the Basic Assessment documentation, and where excluded from this comment capture.**

From previous discussions with Eco Route (Mr. J. Brittion) it was noted occupation density proposed would likely be five EUAs x 10/12 people, therefore 50/ 60 people in season at full development capacity. This density was noted to be a long-term vision, and that not all EUs would be developed immediately.	Noted. This restates the discussion referred to above. The occupation density question raised here is addressed in detail in the response to SANParks' follow-up query of 21 July 2026 below. Further to that discussion, Eco Route confirmed to SANParks in writing on 6 August 2026 that the FINAL Basic Assessment Report will be updated to specify an explicit, binding maximum occupancy figure for the site, rather than the estimate discussed to date.
Occupational density of the camp sites should be in-keeping with definitions and numbers permitted by the Knysna Municipality for camping sites, and in terms of the Knysna Municipality: Zoning Scheme By-law, and other town planning requirements. Precedents already set for camping sites in environmentally sensitive areas in the Knysna region should be considered.	This comment cannot be dismissed and is accepted. Eco Route confirmed to SANParks in writing on 6 August 2026 that the Draft Basic Assessment Report will be updated to specify an explicit, binding maximum occupancy figure for the site. This figure will be confirmed against the rated treatment capacity of the Bio Bloo sewage systems specified for the development (see Wastewater and Sewage Treatment, BAR) and recorded in the Basic Assessment Report and EMPr as a condition of the design. Eco Route will also confirm, through the Knysna Local Municipality meeting committed to below, that the proposed density is consistent with the Municipality's Zoning Scheme By-law definitions and any relevant precedent for camping sites in environmentally sensitive areas in the Knysna region.
Traffic impacts from users of the campsite along C.J. Langenhoven Street should be adequately addressed.	This comment is addressed in the Draft BAR. The 'Access and Traffic' section confirms that access is via the existing, historically-used grassed vehicle track off C.J. Langenhoven Street, that no road widening, upgrading or new access construction is proposed, and that no increase in vehicle movements is anticipated during the operational phase, as the same family members who have historically accessed the property will continue to do so. For the construction phase, a Traffic Management Method Statement will be prepared by the appointed contractor prior to

	commencement, addressing delivery scheduling, management of the Dolly Raats Road intersection (including the blind corner), and wildlife collision risk mitigation on the access road. On this basis, Eco Route considers traffic impacts to be adequately addressed and does not propose further mitigation beyond what is already recorded in the BAR and EMPr.
Point 1: Buffers, Climate Change, and Site Development Plan — As previously noted, 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. 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.	This comment is noted and has already been given effect to in the design. The 36 m 'no-go' buffer from the estuary edge and the 10 m rehabilitation zone within it, both recommended in the Aquatic Biodiversity Site Sensitivity Verification and Impact Assessment (Confluent, 24 July 2024), are incorporated into the Site Development Plan (Alternative A, Tracey Mills Brink, 5 March 2026) and are reflected throughout the BAR and EMPr. The Bio Bloo wastewater units are sited landward of the 36 m buffer, and stormwater management (see Stormwater Management Plan and EMPr) is specifically designed to direct runoff away from the buffer and to avoid exacerbating bank erosion or destabilisation.
SANParks 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.	Noted and accepted, consistent with Eco Route's response to this same recommendation when it was first raised in SANParks' pre-application comment. The Future Exclusive Use Area referred to will not be developed as part of the current application. Should it ever be developed in future as a climate-change retreat strategy, this would be the subject of a separate EIA application and further SANParks review, as SANParks recommends.
The remainder of the SDP is supported by SANParks.	This comment is noted and welcomed.
Point 2: Sewerage Infrastructure — As previously stated, 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	Eco Route considers this requirement to be substantively met by the wastewater design already set out in the BAR, and responds to each numbered point in turn: (1) each Bio Bloo unit is a certified (Agrément South Africa) packaged treatment plant designed and warranted to treat effluent to the DWS General Limits standard, with

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.	treated effluent reused on site via controlled sub-surface/drip irrigation rather than discharged to the estuary, wetland or any watercourse; (2) each unit is sited landward of the 36 m estuary buffer, above the 1:100-year flood line, and outside the CML dynamic coastal-process zone, and is constructed as a watertight tank anchored against flotation; (3) and (4) the EMPr's Malfunction Detection & Contingency provisions require each system to indicate malfunction, require all processing and irrigation to stop immediately on detection, require the responsible party to be contacted within 24 hours, and require SANParks to be notified of any malfunction; (5) scheduled maintenance and end-of-life replacement of the units is specified in the EMPr; (6) on placement above versus below ground, Eco Route respectfully disputes literal compliance with this sub-point and explains why: the property lies within a highly sensitive coastal and estuarine viewshed, and above-ground treatment tanks would directly undermine the visual-mitigation strategy that the whole application design rests on (elevated stilt platforms, recessive materials, no ground-level hard surfacing), which SANParks itself has supported via the Buchholtz visual mitigation measures. Below-ground placement, with the disturbed area rehabilitated over the tank and only sealed, raised inspection risers left visible at the surface, is considered the environmentally preferable option in this specific setting, and falls squarely within the sub-point's own exception for cases 'where this is not possible.' The flood, flotation and climate-risk safeguards required by the same sub-point are met as described above.
A long-term sustainable and compliant sewerage solution must be finalised and presented to SANParks for consideration.	Eco Route accepts that final sign-off with SANParks is still required and commits to it. The Bio Bloo system's design, certification basis, effluent quality specification and siting rationale are set out in full in the BAR (Wastewater and Sewage Treatment) and EMPr (Malfunction Detection & Contingency). Eco Route commits to formally providing SANParks with the supporting effluent test data

	and operations and maintenance documentation for this system as part of the ongoing stewardship-agreement engagement, ahead of finalisation.
The EMPr should include not only construction management aspects of the development, but also operational management aspects, particularly for the life of the sewerage infrastructure, to ensure that no sewage pollution impacts are experienced in the long-term, and that any property managing body takes responsibility for pollution events and applies Duty of Care. Maintenance responsibilities of sewerage infrastructure should be included.	This comment is addressed. The EMPr's Malfunction Detection & Contingency provisions cover the operational, not only the construction, phase of the sewerage infrastructure: they require ongoing malfunction detection, immediate cessation of processing/irrigation and notification of the responsible party and SANParks on any malfunction, and they record scheduled maintenance and end-of-life replacement responsibilities. The Applicant is recorded as the responsible party for these ongoing obligations on an 'Ongoing' basis, giving effect to the Duty of Care principle SANParks refers to.
Point 3: Conservation Stewardship — As stated in SANParks previous comments, Portion 104 Uitzicht 216 falls within SANParks Land Inclusion Plan (LIP) for the Period 2026/27 - 2028/29 for the Garden Route National Park (GRNP).	Noted.
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.	Noted.
Uitzicht 216 Portion 104 is supported for inclusion by SANParks through a Contract National Park (CNP) agreement.	This comment is noted and welcomed. Eco Route confirms the Lovemore family's continued commitment to CNP inclusion, as evidenced by the signed SANParks Commitment Letter (13 March 2026, Appendix Y).
The following steps, which can be undertaken in two phases, form part of the CNP process, with the property remaining owned by the landowner, co-managed by the landowner and SANParks, and declared as part of the GRNP in terms of the National	Noted. This description of the CNP process is understood and is being progressed. Phase 1, step (1) is already complete: the landowner signed the SANParks Commitment Letter on 23 March 2026 (Appendix Y). The remaining Phase 1 steps – registration of a

Environmental Management: Protected Areas Act (NEMPAA), Act No. No. 57 of 2003: Phase 1: (1) An initial Commitment Letter is to be signed by the landowner – the landowner has signed this letter; (2) A Conservation Servitude should be registered against the undeveloped portion of the land in favor of SANParks; (3) The undeveloped portion of the land should be re-zoned to Open Space III or IV (as permitted by the declaration process), whilst the area where the camp sites are proposed could be zoned Open Space III/ remain Agriculture 1. Discussions should be held between the landowner, their consultants, the Knysna Municipality and SANParks to attain a suitable zoning/s. The outcome of these discussions should form part of any Land Use Application (LUA); and (4) The Written Agreement required in terms of Section 20(3) of NEMPAA should be agreed on and signed by the landowner and SANParks. The Written Agreement gives consent to declaration and is the primary contract between the landowner and SANParks. Phase 2: (5) The Co-management Agreement required in terms of Section 42 of NEMPAA and the Property Operational Plan should be developed, agreed on and signed by both the landowner and SANParks. The Co-management Agreement details the nature of and responsibilities for co-management aspects of the property. The Property Operational Plan provides more specific details of co-management at a property level. It includes a Zonation Map and Use Zone descriptions that are applied to various uses on the property. This zonation is in line with the GRNP Park Management Plan, for the period 2020 – 2029. Examples and templates of these documents may be shared with the landowner. The landowner would in addition be required to comply with required Municipal Zoning requirements, i.e. Open Space III, IV etc., and any land use consents required. Management actions for implementation are described in detail in the Property Operational Plan, pertaining to biodiversity i.e., ecosystem process programme, species of special concern, responsible tourism, constituent building and benefit	conservation servitude, rezoning of the undeveloped portion, and conclusion of the Section 20(3) Written Agreement – are being progressed in parallel with the Open Space III rezoning application referred to in the BAR's land use and zoning sections. Eco Route, as the appointed environmental consultant, commits to continuing to facilitate this engagement between the landowner, the Knysna Municipality and SANParks.
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sharing, and infrastructure management. Fences, alien vegetation and fire management are key aspects that are included. Any changes to the agreed use of the property in terms of use areas, activities or densification would need to be re-negotiated with SANParks; and (6) Declaration of the property as part of the GRNP in terms of NEMPAA will follow.	
Phase 1 should be completed prior to construction taking place, whilst Phase 2 could be completed after construction activities. The final phasing of these steps should be agreed on by the landowner and SANParks, however it is important that the landowner signs a binding commitment to CNP and provides proof thereof. It is suggested that this be included as a Condition of Authorisation within the Environmental Authorisation.	Eco Route agrees with and accepts this recommendation. Eco Route commits to recommending to the competent authority that a Condition of Authorisation be included requiring the landowner to provide proof of a binding CNP commitment (or one of the alternative stewardship routes) prior to any construction activity commencing on the property, consistent with SANParks' suggestion.
Contract National Park with SANParks is a voluntary process. The landowner may alternatively request the declaration of the property as a nature reserve in terms of NEMPAA, via CapeNature. Should the Minister of the MEC refuse such declaration, a conservation servitude should be registered in favour of SANParks or CapeNature, in respect of the undeveloped portion of the land, coupled with a request to the Knysna Local Municipality to zone this as Open Space III or IV.	Noted. This alternative pathway is understood. The landowner is currently proceeding on the primary CNP route with SANParks, evidenced by the signed Commitment Letter (Appendix Y); the NEMPAA nature reserve/conservation servitude route referred to here has not been required to date but is noted as a fallback should the CNP process not conclude.
Summary and Way Forward — SANParks supports Alternative A preferred SDP, Tracey Mills Brink, 5 March 2026.	This comment is noted and welcomed. SANParks' support for Alternative A (Tracey Mills Brink, 5 March 2026) as the preferred Site Development Plan is acknowledged, and this alternative forms the basis of the current application.
Achieving a conservation outcome on the property, situated in a high-value sensitive conservation area is important to SANParks.	This comment is noted and the sentiment is shared.
It is recommended that the following conditions of approval are considered: 1. The landowner should sign a binding commitment to CNP and provide proof thereof for Uitzicht 216 Portion 104. It is	As set out in the response to Point 3 (Conservation Stewardship) above, Eco Route accepts and is progressing the recommended CNP steps: the Commitment Letter is signed (Appendix Y); the

recommended that the landowner undertake the following steps towards declaration of the property as CNP. The final phasing of these steps should be agreed on by the landowner and SANParks. Phase 1: to be completed prior to any construction activities being permitted to take place on the property should include: (1) An initial Commitment letter to be signed by the landowner; (2) A Conservation Servitude should be registered against the undeveloped portion of the land in favor of SANParks; (3) The undeveloped portion of the land should be re-zoned to Open Space III or IV (as permitted by the declaration process), whilst the area where the camp sites are proposed could be zoned Open Space III/ remain Agriculture 1. Discussions should be held between the landowner, their consultants, the Knysna Municipality and SANParks to attain a suitable zoning/s. The outcome of these discussions should form part of any Land Use Application (LUA); and (4) The Written Agreement required in terms of Section 20(3) of NEMPAA should be agreed on and signed by the landowner and SANParks. Phase 2: may be completed before or after construction activities. This would include: (5) The Co-management Agreement required in terms of Section 42 of NEMPAA and the Property Operational Plan should be prepared, agreed on and signed by both the landowner and SANParks. Any future changes to the agreed use of the property in terms of use areas, activities or densification would need to be re-negotiated with SANParks; and (6) Declaration of the property as part of the Garden Route National Park in terms of NEMPAA will follow.	conservation servitude, rezoning of the undeveloped portion, and Section 20(3) Written Agreement are being progressed in parallel with the Open Space III rezoning application; and Eco Route commits to recommending a Condition of Authorisation requiring proof of binding CNP status prior to construction, as set out in the response to point 21 above.
2. The landowner may alternatively request the declaration of the property as a nature reserve in terms of NEMPAA, via CapeNature. Should the Minister of the MEC refuse such declaration, a conservation servitude could be registered in favour of SANParks or CapeNature, coupled with a request to the Knysna Local Municipality to zone this as Open Space III or IV.	Noted, consistent with the response given above: this alternative route is understood and is available should the primary CNP process not conclude, but is not currently required given the landowner's signed commitment to the CNP route.

3. A long-term sustainable and compliant sewerage solution must be finalised and presented to SANParks for consideration.	As set out in the response to point 15 above, Eco Route accepts that final sign-off on the sewage solution with SANParks is still required, and commits to providing SANParks with the supporting effluent test data and O&M documentation as part of the stewardship-agreement engagement.
4. No pollution should emanate from the development that will compromise the water quality of the Knysna Estuary.	This comment is addressed and Eco Route confirms compliance is designed in: the Bio Bloo system treats all effluent to DWS General Limits and reuses it on site via controlled irrigation rather than discharging it, so no pollution pathway to the Knysna Estuary is created by the proposed development.
5. The EMPr should include not only construction management aspects of the development, but also operational management aspects, particularly for the life of the sewerage infrastructure, to ensure that no sewage pollution impacts are experienced in the long-term, and that any property managing body takes responsibility for pollution events and applies Duty of Care. Maintenance responsibilities of sewerage infrastructure should be included.	As set out in the response to point 16 above, the EMPr's operational-phase malfunction detection, maintenance and Duty of Care provisions for the sewerage infrastructure are already included and are not limited to the construction phase.
6. 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).	This comment is addressed. The Bio Bloo units are sited outside the zone of dynamic coastal processes associated with the Coastal Management Line (GNR 3668, 14 July 2023), as set out in the BAR's Wastewater and Sewage Treatment section, and the relevant Section 4 risk-management measures are given effect through this siting and the associated EMPr mitigation measures.
7. A 36m 'no-go' development buffer from the estuary edge is supported.	Noted and accepted. As set out in the response to point 11 above, the 36 m 'no-go' buffer is already incorporated into the Site Development Plan and reflected throughout the BAR and EMPr.
8. The undeveloped portion/s of the property should be rehabilitated.	This comment is addressed. The BAR's Eradication of Alien Vegetation mitigation measures require rehabilitation of disturbed and previously invaded areas using site-appropriate indigenous

	species, supported by a suitable planting list to be incorporated into the landscape plan.
9. Compliance is required with the GRNP Management Plan 2020-2029, and the Knysna Estuary Management Plan 2025-2029.	This comment is addressed. The BAR confirms that compliance with the Garden Route National Park Management Plan 2020–2029 and the Knysna Estuary Management Plan 2025–2029 is committed to as an ongoing operational obligation, and this is reflected in the EMPr.
10. 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.	This comment is addressed. The BAR confirms that the family will continue to access the estuary only via the Brenton-on-Lake SANParks facility for boat launching, with no unauthorised moorings, consistent with this requirement.
11. All other SANParks estuary user licensing requirements, as stipulated within the Regulations for the proper Administration of the Knysna Protected Environment and other associated legislation would need to be complied with.	Noted and accepted. The BAR records that SANParks will be consulted under the Regulations for the Proper Administration of the Knysna Protected Environment, and Eco Route confirms this and all other applicable estuary-user licensing requirements will be complied with.
12. Measures to mitigate visual impact as suggested by Mr. P Buchholtz, 5 September 2024 should be implemented.	This comment is addressed. The visual mitigation measures proposed by Mr P. Buchholtz (5 September 2024), which SANParks itself has previously supported, underpin the low-visual-impact design rationale of the development (elevated stilt platforms, recessive materials, no ground-level hard surfacing) and are detailed further in the Visual Impact Assessment (Appendix D4).
13. 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.	Noted and accepted. Visual mitigation to avoid glare from solar panels forms part of the visual mitigation measures applicable during the operational phase, and no solar array is proposed in a sensitive natural environment; all infrastructure is confined to the approved development footprint.
14. SANParks should be consulted for any fencing needs. Fencing should not inhibit wildlife movement.	Noted and accepted. The EMPr already requires disturbance footprint/no-go areas to be fenced off during construction with a barrier material such as shade cloth, both to prevent worker

	encroachment and to avoid injury to animals. Eco Route commits to consulting SANParks on the design of any permanent (post-construction) fencing to ensure it does not inhibit wildlife movement.
15. The EMPr, Eco Route, March 2026 should be implemented.	Noted and accepted. The EMPr forms part of this application and its implementation is a binding commitment of the applicant.
16. A suitably qualified Environmental Control Officer (ECO) should be appointed to monitor the EMPr.	This comment is addressed. The EMPr requires a suitably qualified Environmental Control Officer (ECO) to be appointed, with a recommended site visit at least once during the pre-construction phase, two visits per month during construction, and one visit per month during the operational phase (frequency ultimately at the ECO's discretion), together with a formal Non-Conformance Report and Stop Works process for non-compliance.
17. 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.	This comment is addressed, per the response to point 38 above: the EMPr requires disturbance footprint/no-go areas, including identified Species of Conservation Concern locations, to be demarcated as permanent no-go zones and fenced off with a barrier material such as shade cloth during construction.
18. Topsoil should be set-aside for reuse.	This comment is addressed. The EMPr requires topsoil and subsoil stockpiles to be kept separate and topsoil to be set aside for reuse as part of construction no-go protection and land rehabilitation.
19. 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.	This comment is addressed. The Stormwater Management Plan specifies permeable stepping stones or timber boardwalk sections for any new ground-level pathways between EUAs, and the development design (elevated stilt structures, no impermeable ground surface at platform level) is itself stormwater-sensitive. Stormwater and erosion management measures to protect the estuary embankment are set out in detail in the Stormwater Management Plan and EMPr.

20. 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.	This comment is addressed. A dedicated Alien Invasive Vegetation Management Plan (2026.09.16) has been developed for the property under NEM:BA and its Alien and Invasive Species Regulations, and forms part of this application as an integrated component of the EMPr.
21. 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.	Noted and accepted. The applicant has committed to Southern Cape Fire Protection Agency (SCFPA) membership, consistent with the National Veld and Forest Fire Act, 1998, and this is recorded in the BAR, EMPr and Alien Invasive Management Plan. Eco Route will confirm the landowner's current membership status and record it formally in the Final BAR.
22. 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.	This comment is addressed. Two nationally protected tree species (White Milkwood and Outeniqua Yellowwood) were identified on the property by the terrestrial biodiversity specialist. The preferred alternative has been designed to avoid disturbing them, and the BAR confirms that should disturbance to any protected tree become necessary during the pre-construction phase, a separate permit application will be submitted to DFFE under the National Forests Act, 1998, prior to any work in that area.
23. Should any suspected resources of heritage value be uncovered during clearing, Heritage Western Cape (HWC) should be contacted immediately for instructions.	This comment is addressed. A Notice of Intent to Develop was submitted to Heritage Western Cape (HWC), which confirmed that no further heritage studies are required. HWC's Chance Finds Procedure and Accidental Finds Protocol will be incorporated into the EMPr and Environmental Authorisation conditions, and will be implemented, including immediate notification to HWC, should any heritage resources be encountered during clearing.

24. 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 NEM:ICMA, which states: 1) No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or such other coastal public property, or of land adjacent to coastal public property, unless the erosion is caused by an intentional act or omission of that organ of state or other person; and 2) No person may construct, maintain, or extend any structure, or take other measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided for in this Act, the National Environmental Management Act, or any other specific environmental management Act.	Noted and accepted. The BAR confirms the applicant's awareness of Section 15 of NEM:ICMA. No structures on coastal public property are proposed by this development, and the rehabilitation measures recommended by the aquatic specialist (re-vegetation of the cliff-edge and estuary buffer using indigenous species) are management measures on private property and do not contravene Section 15.
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. This is separate from any stewardship agreements.	This comment is addressed. The BAR sets out the applicable Knysna Protected Environment Development Control Area (DCA) provisions in detail, confirms the 50 m DCA extent from the high-water mark, and confirms that SANParks' authorisation under Section 8 of the KPE Regulations is being sought as part of this process for any development component within the DCA, separately from the stewardship arrangement.
SANParks' comments are based on the information pack, emailed by Eco Route, 30 June 2026.	Noted.
It is requested that SANParks' comments be included in all application reports in their entirety and not just in a Comments and Responses report.	Eco Route accepts this request and commits to including SANParks' comments in full within the application reports, not only in the Comments and Response report.
SANParks reserves the right to revise comments if additional information becomes available.	Noted.

SANParks – Dr Vanessa Weyer – 21 July 2026 (follow-up email requesting clarity)	
Further to SANParks comments submitted as below, and to assist SANParks with developing the stewardship aspects of the project is it possible to provide clarity on the following issues:	Noted.
1. Occupational density: There are Five EUAs, each with 4 open decks and 1 cabin with two bedrooms with a double bed sleeping 4 people. Assuming that only one 2 person tent is pitched on the decks, this would equate to 8 additional people. Therefore, each EU would sleep 12 people. The total for the five EUAs would then be 60 people, as a minimum, with full occupation. Could you confirm if density would be more than this? If two tents were pitched on the decks (not one) this would add an additional 40 people, with numbers utilizing the camp site sitting at approx.. 100 people.	As confirmed in writing to SANParks on 6 August 2026, Eco Route accepts that a binding, explicit maximum occupancy figure is required rather than the estimate previously discussed. This figure will be finalised against the rated treatment capacity of the Bio Bloo sewage systems and recorded in the updated Basic Assessment Report and EMPr as a condition of the design, ahead of finalisation of the application-phase documentation.
2. Camping definition and Zoning: In terms of the Knysna Municipality: Zoning Scheme By-law the Camping Site definition is the following: “camping site” land use description: “camping site” means land set aside for camping where tents or caravans are used for short term accommodation of transient guests and may include facilities for use by guests including facilities for outdoor food preparation, resort shop, road access for vehicles, picnic facilities, raised platforms on which to set up tents or caravans, ablution facilities, communal scullery and laundry facilities and waste disposal facilities, but does not include permanent tents, such as tented camps, or caravans. This excludes permanent tents and caravans.	Noted. This is an accurate quotation of the Knysna Municipality: Zoning Scheme By-law camping site definition, and Eco Route agrees that the definition, as quoted, excludes permanent tents and caravans.
Further, the zoning allowances for Agriculture 1, Open Space III and IV are the following: Agricultural Zone I (AI) — objective: to promote and protect agriculture on farms; primary use: Agriculture; consent uses: Abattoir, Additional dwelling units, Agricultural industry (>2000m² floor space), Airfield, Animal care centre, Aqua-culture,	Noted. This is an accurate summary of the consent-use tables for the Agriculture I, Open Space III and Open Space IV zones.

Camping site, Farm graveyard, Farm shop, Freestanding base telecommunication station, Function venue, Guest house, Guest Lodge, Helicopter landing pad, Off road trail, Plant nursery, Quarry, Renewable energy structure, Service trades, Shooting range, Tourist facilities, Utility service. Open Space Zone III (OSIII) — objective: conservation of natural resources in areas not proclaimed as nature areas (non-statutory conservation); primary use: Nature conservation area; consent uses: Conference facilities, Environmental facilities, Freestanding base telecommunication station, Function venue, Harvesting of natural resources, Rooftop base telecommunication station, Tourist accommodation, Tourist facilities, Tuck shop, Utility service, Wellness centre. Open Space Zone IV (OSIV) — objective: conservation of natural resources in areas proclaimed as nature areas (statutory conservation); primary use: Nature reserve; consent uses: Conference facility, Freestanding base telecommunication station, Function venue, Rooftop base telecommunication station, Tourist accommodation, Tourist facilities, Utility service.	
Agriculture 1 is the only zone that permits camping, but camping by definition would exclude the permanent tents and caravans (i.e. the 5 cabins with two bedrooms proposed/ anything permanent).	This point is accepted as raised and cannot reasonably be disputed: as currently zoned Agriculture I, the property's permitted 'camping site' consent use, read literally against the Municipality's own definition, would exclude the five permanent two-bedroom cabins as designed. This tension is precisely the subject of the meeting Eco Route has committed to convening with the Knysna Local Municipality (confirmed to SANParks on 6 August 2026), to confirm the applicable zoning and consent-use category for the development as currently designed, and whether a rezoning or land use departure is required.
Conversely if the property was zoned to Open Space III or IV, camping is excluded as a consent use, but tourism accommodation is included as a consent use.	Noted, and this reinforces the need for the municipal confirmation referred to in the response to point 58 above: Open Space III/IV zoning would exclude camping as a consent use but would include tourist accommodation, which may be the more appropriate

	consent-use category for the development as designed. This will be confirmed through the committed engagement with the Knysna Local Municipality.
Therefore, could you confirm which zonation and consent use will be applied?	As confirmed in writing to SANParks on 6 August 2026, Eco Route commits to convening a meeting with the Knysna Local Municipality to confirm which zoning and associated consent-use category applies to the development as currently designed, and whether any rezoning or land use departure is required. A formal update confirming the outcome will be provided to SANParks once concluded, ahead of finalisation of the application-phase documentation.
It terms of permissible zoning for the Contract National Park declaration process, Agric 1, as well as Open Space III or IV are usually permitted.	Noted. This is consistent with Eco Route's understanding of the permissible zoning categories for the CNP declaration process.
These aspects are important to clarify for any upcoming Land Use Application and to move the stewardship aspects of the proposal forward.	Noted, and agreed. Eco Route confirms these aspects – occupancy density and applicable zoning/consent use – will be resolved through the commitments given in the responses to points 55 and 60 above, ahead of any future Land Use Application and in support of progressing the stewardship arrangement.
CapeNature – (Dr) Marianne de Villiers, Manager: East Landscape Conservation Intelligence Unit – 21 July 2026	
CapeNature would like to thank you for the opportunity to comment on the above Basic Assessment Report (BAR). Please note that the comments below only pertain to the biodiversity related impacts and not to the overall desirability of the application.	Noted, with thanks. This response addresses only the biodiversity-related matters raised; other matters raised by CapeNature (occupancy, stewardship, fire and invasive species management) are addressed below.
CapeNature's comments on the pre-application Basic Assessment Report for the proposed development of assisted camping facilities (letter dated 10 July 2025) still have reference.	Noted. CapeNature's pre-application comments (letter dated 10 July 2025) are captured and addressed in Part A of this consolidated Comments and Response Report. The current design and this Final BAR give effect to that engagement, including the

	exclusion of septic tanks and French drain soakaways (see the response to BOCMA's comment on wastewater treatment, below) and the siting of all structures outside the 30 m estuary building line and the aquatic specialist's recommended buffer.
The preferred alternative comprises five Exclusive Use Areas (EUAs), each consisting of six elevated deck platforms located across the middle to upper sections of the property. In total, the development will be able to accommodate 50-60 persons at any one time.	This accurately describes the preferred alternative in terms of the number of EUAs and elevated deck platforms. Regarding occupancy, CapeNature's estimate of "50-60 persons at any one time" reflected an early planning-stage assumption rather than a confirmed operational limit. The applicant has since confirmed a binding operational occupancy limit: a maximum of 8 people per EUA at any one time, with a maximum of 60 registered Lovemore family members and Lovemore Children's Secondary Trust beneficiaries in total across the property at any one time (not all present simultaneously). This confirmed, binding maximum occupancy figure has been incorporated into the Final BAR (Section 2.3, Description of Each Exclusive Use Area) and EMPr, and is conservative relative to the rated treatment capacity of the Bio Bloo sewage systems, consistent with the commitment already made to SANParks in writing on 6 August 2026.
It is clarified in the BAR that the proposed development will be exclusively for private use by the Lovemore family and that no commercial revenue will be generated from the facility. Nevertheless, CapeNature is concerned about the total footprint of this proposed development and the cumulative impacts of developments across the broader landscape. We do not support the inclusion and proposed location of EUA 5, which was not considered in the terrestrial biodiversity assessment. We recommend closer clustering of the remaining four EUAs to reduce the disturbance area.	This comment is accepted. The Terrestrial Biodiversity Assessment (Capensis, 2024) site visit was conducted on 22 May 2024 and surveyed the property generally on foot; it does not identify or reference individual EUA locations by name, and the current 5-EUA layout (including the EUA 5 location) was finalised on the Site Development Plan after this survey was conducted. EUA 5's specific location therefore cannot be confirmed as having been assessed. Eco Route commits to arranging a supplementary terrestrial biodiversity walkover of the EUA 5 footprint specifically, to be conducted by Capensis prior to Final BAR submission, with findings reported in the Final BAR. The recommendation to cluster the remaining four EUAs more closely will be referred to the applicant

	and design team (TMBA Architects) for consideration as part of finalising the layout; the outcome will be reported in the Final BAR.
The mitigation measures described in the EMPr are supported. CapeNature would like to emphasize that in the highly flammable, fire-dependent Knysna landscape, the clearing of invasive alien plants and appropriate fire management are essential. An Invasive Alien Species Management Plan and Fire Management Plan should be included in the Final BAR submission as part of the EMPr. The EMPr should also include mitigation to avoid potential human-wildlife conflict during the construction and operational phases, including but not limited to details of infrastructure design.	The commitment to an Invasive Alien Species (IAS) Management Plan, to be developed and included in the Final BAR as an integrated component of the EMPr, is already recorded (EMPr, Section 6.4 / Conditions of Approval). The applicant's commitment to Southern Cape Fire Protection Agency membership, in terms of the National Veld and Forest Fire Act (Act 101 of 1998), is likewise already recorded. Eco Route accepts that a dedicated Fire Management Plan, addressing fire risk specific to this highly flammable, fire-dependent landscape, is not yet separately documented, and commits to preparing one for inclusion in the Final BAR's EMPr, cross-referenced with the IAS Management Plan. Eco Route further commits to adding specific human-wildlife conflict mitigation measures to the EMPr's construction and operational phase sections, including wildlife-secure waste and food storage requirements and related infrastructure design details.
CapeNature welcomes the proposed inclusion of the property in the conservation estate through a formal stewardship agreement. We support the recommendation in the Environmental Management Programme (Section 4.2.6) that no construction should be permitted before the applicant enters into a legally binding stewardship agreement. We also support the recommendation that the unbuilt part of the property should be zoned as Open Space III or IV, with a conservation servitude registered against it. We recommend that the protected area management plan for the property designates the unbuilt portions of the property as a Conservation Zone where no future development is permitted.	Noted, and largely already reflected in the current process. The EMPr (Section 4.2.6) records Eco Route and the applicant's ongoing engagement with SANParks toward a formal stewardship arrangement, including exploration of a Contract National Park agreement. This is consistent with the commitment already made to SANParks in writing on 6 August 2026 to progress registration of a conservation servitude, rezoning of the undeveloped portion of the property to Open Space III or IV, and conclusion of the Section 20(3) Written Agreement. Eco Route commits to recommending, as a formal Condition of Authorisation, that no construction may commence before the applicant has entered into a legally binding stewardship agreement, and that the protected area management plan for the property designate the unbuilt portions as a Conservation Zone in which no future development is

	permitted, for inclusion when the Conditions of Authorisation are compiled (EMPr, Section 7).
CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.	Noted.
Breede-Olifants Catchment Management Agency (BOCMA) – Mr Jan van Staden (Acting CEO), enquiries SI Ndlovu – 13 July 2026	
The Breede-Olifants Catchment Management Agency has reviewed the draft Basic Assessment Report and notes that there are no major changes on the proposed development, thus there are no objections.	Noted, with thanks.
Please note that comments issued by BOCMA on the 13 June 2025 for the pre-application Basic Assessment Report are still relevant to the proposed development and must be adhered to.	Noted. BOCMA's pre-application comments (13 June 2025) are captured and addressed in Part A of this consolidated Comments and Response Report and have been given effect to in the current design, including the exclusion of septic tanks and French drain soakaways in favour of the enclosed Bio Bloo treatment system (see below).
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.	Eco Route confirms that the Bio Bloo sewage treatment system specified for this development (EMPr, Section 4.2.3) is a fully enclosed, packaged biological treatment system that does not discharge to, or otherwise interact with, any water resource. All treated water is recycled internally within each EUA back into toilets and taps; no water leaves the system to the environment. When the system eventually requires desludging, this is undertaken by a licensed private contractor via off-site removal, not discharge to a water resource; the manufacturer has confirmed the system is rated to operate for up to 10 years between such removals under normal use. On this basis, no water use activity contemplated in Section 21 of the National Water Act is triggered by the wastewater treatment design, and a Water Use Authorisation in terms of Section

	22 is accordingly not required for this aspect of the development. Eco Route commits to explicitly documenting this closed-loop design and its regulatory basis in the Final BAR's Wastewater and Sewage Treatment section, to remove any ambiguity for BOCMA's records.
In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of National Water Act that is associated with the proposed development.	Noted. As clarified above, no water use activity contemplated in Section 21 of the National Water Act is triggered by the confirmed closed-loop Bio Bloo design; the onus to obtain authorisation for any water use that is triggered remains understood and accepted.
Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.	Noted.
The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.	Noted, with thanks.
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	Noted.
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	Noted, with thanks.
STATE DEPARTMENTS	
Department of Forestry, Fisheries and the Environment (DFFE) – Chief Directorate: Integrated Environmental Authorisations – Ms Sindiswa Dlomo (Deputy Director) for Dr Sabelo Malaza (Chief Director) – 20 July 2026 (Ref: 14/12/16/3/3/1/3314)	

The Application Form and draft Basic Assessment Report (BAR) dated March 2026 and received by this Department on 15 June 2026, refer.	Noted.
This letter serves to inform you that the following information must be included in the Final BAR:	Noted.
(a) Listed Activities (i) Please ensure that all relevant listed activities are applied for are specific and can be linked to the development activity or infrastructure (including thresholds) as described in the project description. Only activities (and sub-activities) applicable to the development must be applied for and assessed.	This comment is addressed. Section F (Table 12) of the BAR sets out the relevant listed activities triggered under Listing Notice 1 and Listing Notice 3, each linked to the specific project component and threshold that triggers it. Eco Route commits to reviewing this table once more when compiling the Final BAR to confirm that only activities genuinely applicable to the development remain listed.
(ii) Kindly expand the description of the listed activities applied for and relate their relevance to the proposed development. The description must include the scope of works, the current thresholds, footprint size or capacities (if applicable), and the new proposed thresholds, footprint size or capacities of all infrastructure (existing and new). The description which must also be provided in the BAR must be detailed in indicating what exists currently and what is newly proposed, with the current and proposed thresholds and capacities.	Eco Route accepts this and commits to expanding the listed-activity descriptions in the Final BAR's Table 12 to explicitly state, for each activity, the scope of works and the current and proposed thresholds, footprint size or capacity of the relevant infrastructure, both existing and new.
(iii) The estimated amount of material to be infilled or deposited as applied for in terms of Activity 19A of Listing Notice 1 must be provided in the description.	Eco Route commits to confirming, in the Final BAR, whether Activity 19A of Listing Notice 1 (infilling) is in fact triggered by the proposed development and, if so, to providing the estimated volume of material to be infilled or deposited as required.
(iv) Coordinates of the development and all associated infrastructure must be provided in the application form and the BAR.	This comment is addressed. The BAR's site description already records the property's boundary coordinates (Google Earth, 2024), and these are reflected in the Application Form. Eco Route will verify that coordinates for all associated infrastructure are also included in the Final BAR.

(v) The relevant authorities with jurisdiction in respect of geographically designated areas in terms of GN R. 985 (Listing Notice 3) Activities must be continuously involved throughout the environmental impact assessment process. Written comments (or proof of consultation) must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided. Please also ensure that the potential impacts on the affected Critical Biodiversity Areas, Sensitive Areas and Protected Areas indicated in Listing Notice 3 are fully assessed in the BAR.	This comment is largely addressed and the remainder is accepted as an action item. Written comments have already been obtained from SANParks and CapeNature, and from this Department's own Directorates, all of which are captured and responded to in this document. Eco Route confirms the Environmental Consideration Maps (Appendix C) already provide a graphical representation of the development within the relevant geographically designated areas, and commits to cross-checking this mapping for completeness, and to confirming that impacts on the affected CBAs, Sensitive Areas and Protected Areas are fully assessed, in the Final BAR.
(vi) The final BAR must provide an assessment of the impacts and mitigation measures for each of the listed activities applied for.	This comment is addressed. Section H(7) of the BAR already provides a full impact assessment, with and without mitigation, structured per activity and environmental theme. Eco Route commits to reviewing this section once more when compiling the Final BAR to confirm full alignment with each specific listed activity applied for.
(b) Specialist Assessments (i) Please note that the Department considers a 'no-go' area as an area where no development of any infrastructure is allowed; therefore, no development of associated infrastructure including access roads is allowed in the 'no-go' areas.	Noted and accepted. The existing internal access road pre-dates this application and is used only for access; the EMPr confirms it will not be widened, realigned or otherwise disturbed beyond its current footprint, and no new infrastructure or access roads are proposed within any no-go area. Eco Route will make this distinction explicit in the Final BAR to avoid any ambiguity against the Department's definition of a no-go area.
(ii) Should the specialist definition of a 'no-go' area differ from the Department's definition, this must be clearly indicated. The specialist must also indicate the 'no-go' area's buffer if applicable.	Eco Route commits to reviewing the no-go area and buffer definitions used in each specialist report against the Department's definition, and to clearly flagging any difference, with the applicable buffers indicated, in the Final BAR.
(iii) Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most	Noted. Eco Route is not aware of any contradicting recommendations across the biodiversity, aquatic, fauna and

reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.	visual specialist assessments commissioned for this application. Should any be identified when compiling the Final BAR, the EAP will determine and substantiate the most reasonable recommendation, obtaining further expert advice if necessary.
(iv) All specialist studies must be final, and provide detailed/practical mitigation measures for the preferred alternative and recommendations, and must not recommend further studies to be completed post-EA.	Noted. The specialist reports commissioned for this application are final and provide practical mitigation measures for the preferred alternative. Eco Route will confirm this once more when compiling the Final BAR to ensure no outstanding "further study" recommendations remain in any specialist report.
(v) Please note that if any of the specialists' studies and requirements/protocols recommended in the Department's Screening Tool are not commissioned, motivation (including site sensitivity verification reports and specialist compliance statements in certain instances) must be provided in the report per the requirements of the Protocols.	As addressed further in the response to point (viii) below, the Site Sensitivity Verification Report has been updated to confirm the Agriculture theme as being of low sensitivity. The property was not, is not, and will not be used for agricultural production, and an Agricultural Compliance Statement prepared by a specialist would add no additional information to this assessment.
(vi) Please note that the protocols require certain specialists to be SACNASP registered. As such, the Specialist Declaration of Interest forms must also indicate the scientific organization registration/member number and status of registration/membership for each specialist.	Eco Route commits to verifying that the Specialist Declaration of Interest forms (Appendix G) record each specialist's SACNASP registration or membership number and status, and to updating these in the Final BAR where any are found to be missing.
(vii) It is brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. "the Protocols"), and in Government Notice No. 1150 of 30 October 2020 (i.e. protocols for terrestrial plant and animal species), are now in effect. Please note that specialist assessments must be conducted in accordance with these protocols. Please note further	Noted. The specialist assessments commissioned for this application have had regard to the Protocols published under GN 320 of 20 March 2020 and GN 1150 of 30 October 2020, including the SACNASP registration requirement addressed in the response to point (vi) above.

that the protocols require the specialists to be registered with SACNASP.	
(viii) The Department notes that a Site Sensitivity Verification Report (SSVr) has been included in the BAR, and in the SSVr, the sensitivity rating for the Agriculture Theme that was determined by the Screening Tool as 'High', has been disputed and determined to be of medium sensitivity. The SSVr then states that "the proposed development will not result in a significant reduction in agricultural production potential, nor will it lead to the loss of arable land. The subject property, Portion 104 of Farm 216, is characterised by terrain and soil conditions that limit its suitability for intensive agriculture. According to site assessments and specialist input, the area proposed for development comprises largely marginal land, including slopes and naturally vegetated areas leading to low agricultural value. Based on this understanding, an agricultural specialist was not consulted for an assessment of the property." The Protocols however state the following: "An applicant intending to undertake an activity identified in the scope of this protocol on a site identified on the screening tool as being of "very high" or "high" sensitivity for agricultural resources must submit an Agricultural Agro-Ecosystem Specialist Assessment unless: information gathered from the site sensitivity verification differs from the designation of "very high" or "high" agricultural sensitivity, and it is found to be of a "medium" or "low" sensitivity. Should this be the case, an Agricultural Compliance Statement must be submitted." Kindly ensure that this is rectified and that the agricultural protocol is complied with.	This point is accepted. Consistent with the Protocols, the low sensitivity confirmed for the Agriculture theme (following further site verification of the Screening Tool's original 'High' rating) requires an Agricultural Compliance Statement rather than a full Agricultural Agro-Ecosystem Specialist Assessment. This Compliance Statement is set out within the Site Sensitivity Verification Report itself (Appendix E), which confirms that the property was not, is not, and will not be used for agricultural production, and that a statement prepared by a specialist would add no additional information beyond this site-specific assessment already on record.
(ix) Please note that it is the responsibility of the EAP to ensure that the Site Sensitivity Verification Report for all themes, as well as all specialists identified by the screening tool, are included in the BAR. Further, it is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any	Eco Route commits to ensuring the Final BAR clearly confirms the full list of specialists identified by the Screening Tool, and motivates, with supporting photographic evidence, the basis for any not

of the identified specialist study including the provision of photographic evidence of the site situation.	commissioned, consistent with the response to points (v), (vi) and (viii) above.
(x) Should it be determined that there is a need for additional specialist studies to be undertaken based on the outcome of public participation, these must be commissioned and be included in the final BAR reports for public comment.	Noted. No additional specialist studies have been identified as necessary based on the comments received during this round of Public Participation. Should any arise from further engagement, they will be commissioned and made available for public comment as required.
(xi) Please ensure that the BAR indicates any recommendations of the EAP or specialists, which are to be included as conditions of authorisation, per Appendix 1(3)(1)(n).	This point is accepted. As reflected in the BAR's own compliance checklist (Appendix 1(3)(1)(n), currently recorded as 'to be completed in Draft and Final BAR'), this remains an outstanding item. Eco Route commits to compiling the full list of EAP and specialist recommendations as proposed Conditions of Authorisation in the Final BAR, including the SANParks and DFFE-specific conditions addressed throughout this document.
(xii) Please take note of the requirements as set out in the General Comments below and ensure that you comply with them by submitting a Draft Amended BAR and also subject it to public review as required by the EIA Regulations, 2014, as amended.	Accepted. Eco Route confirms the Final (Amended) BAR will incorporate all comments and responses captured in this document and, consistent with Regulation 19 and the General Comments below, will be subjected to the required further public review period before submission.
(c) Layout & Sensitivity Maps (i) A copy of the final preferred layout map. All available biodiversity information must be used in the finalisation of the layout map. Existing infrastructure must be used as far as possible e.g. roads. The layout map must indicate the following: Clear indication of the location and envisioned area for the propose development and all associated infrastructure, and all other supporting associated infrastructure mapped at an appropriate scale; The location of sensitive environmental features on-site e.g. CBAs, heritage sites, wetlands, drainage lines, etc. that will be affected by the facilities and associated infrastructure;	The final preferred layout map (Site Development Plan, Appendix B, Tracey Mills Brink) already indicates the development footprint and associated infrastructure. Consistent with the response to the Directorate: Protected Areas Planning and Management Effectiveness comment below (point 121), Eco Route commits to ensuring the Final BAR's layout map clearly overlays all buffer areas, no-go zones and sensitive features (CBAs, heritage sites, drainage lines) as required.

Location of access and service roads; Buffer areas; and All "no-go" areas.	
(ii) A sensitivity map indicating environmentally sensitive areas and features identified during the assessment process e.g., CBAs, heritage sites, wetlands, drainage lines, etc. that will be affected by the proposed development.	This comment is addressed. The Environmental Consideration Maps (Appendix C) already provide a sensitivity map of the environmentally sensitive areas and features identified during the assessment. This will be reviewed for completeness in the Final BAR.
(iii) Please ensure that all the buffer zones recommended by specialists are illustrated on the maps and the layout map must be overlain by all the sensitivities.	As set out in the response to point (i) above, Eco Route commits to ensuring all specialist-recommended buffer zones are illustrated on the maps and that the layout map is overlain by all identified sensitivities in the Final BAR.
(iv) It must be emphasised that the final BAR must include a final layout map which adheres to specialist recommendations as well as the identified no-go areas.	As set out in the response to point (i) above, Eco Route commits to ensuring the final layout map adheres to specialist recommendations and clearly reflects all identified no-go areas.
(d) Public Participation Process (i) Please ensure that all issues raised, and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Directorates: Biodiversity Mainstreaming & EIA (BCAdmin@dfre.gov.za), Protected Areas Planning & Management Effectiveness (TNethononda@dfre.gov.za or MaMudau@dfre.gov.za, Oceans & Coast), SANParks, the Knysna Local Municipality, Cape Nature, Heritage Western Cape, and the Western Cape Department of Environmental Affairs & Development Planning, in respect of the proposed activity are adequately addressed in the final BAR.	This comment is addressed by the present document. All issues and comments received during circulation of the draft BAR, from registered I&APs and from organs of state with jurisdiction, including this Department's own Directorates, SANParks, CapeNature, and other stakeholders, have been captured and are being addressed category by category in this Comments and Response document.
(ii) Proof of correspondence with the various stakeholders must be included in the final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments. The Public	Eco Route confirms that correspondence records with SANParks, CapeNature, this Department and other stakeholders are held, and commits to including or referencing this proof of consultation in the Final BAR.

Participation Process must be conducted in terms of Regulations 39, 40, 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.	
(iii) A comment and response report which contains all comments received and responses provided to all comments and issues raised during the public participation process for the draft BAR. Please note that comments received from this Department must also form part of the comment and response report. Structure the comment and response report in a table format, with separate columns, so that the response can be viewed alongside the comments, the date they were received, and the parties from whom they were received.	This comment is addressed by the present document itself. Every comment received during the application-phase Public Participation Process, including from this Department, is captured verbatim in a table format alongside its corresponding response, with the commenting party and date recorded for each entry, consistent with what is requested here.
(iv) Include the period for when the public participation period occurred i.e. when was the draft BAR circulated for comment for the current application.	Eco Route commits to explicitly stating the specific dates over which the draft BAR was circulated for comment in the Final BAR's Public Participation Process section.
(e) Environmental Impact Statement (i) It is noted that the draft BAR did not provide an Environmental Impact Statement. Please ensure to include an environmental impact statement which contains – a summary of the key findings of the environmental impact assessment; a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the site indicating any areas that should be avoided, including buffers; and a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives.	This point is accepted and cannot reasonably be disputed. The Draft BAR's compliance checklist cross-references the Environmental Impact Statement requirement to Sections H and I and Appendix B rather than presenting it as a distinct, consolidated section. Eco Route accepts that a standalone Environmental Impact Statement is required and commits to adding this section, summarising the key findings, a sensitivity/buffer map, and a summary of positive and negative impacts and risks, to the Final BAR.
General — You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, states that: "Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (a) a basic assessment report, inclusive of any specialist reports, an EMPr,	Noted. This timeframe is being tracked by Eco Route to ensure the Final BAR is submitted within the required period.

a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority".	
Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(1)(b) of the NEMA EIA Regulations, 2014, as amended, which states: "the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the documents contemplated in subregulation 1(a) will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the documents which changes or information was not contained in the original documents consulted on during the initial public participation process contemplated in subregulation (1)(a) and that the revised documents will be subjected to another public participation process of at least 30 days."	Noted. Eco Route will assess, on completion of the Final BAR, whether any significant changes or new information have been introduced since the initial Public Participation Process that would trigger the Regulation 19(1)(b) notification requirement, and will comply accordingly if so.
Please also ensure that the final BAR includes the period for which the Environmental Authorisation is required and the date on which the activity will be concluded as per Appendix 1(3)(1)(q) of the NEMA EIA Regulations, 2014, as amended.	This point is accepted. As reflected in the BAR's own compliance checklist (currently recorded as 'to be completed in Draft and Final BAR'), the period for which the Environmental Authorisation is required and the date on which the activity will be concluded remain to be finalised and will be included in the Final BAR.

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.	Noted. Eco Route is tracking the applicable timeframes to avoid the application lapsing.
You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.	Noted and confirmed. No site works have commenced, and none will commence, ahead of the Environmental Authorisation being granted.
Department of Forestry, Fisheries and the Environment (DFFE) – Directorate: Protected Areas Planning and Management Effectiveness – Mashudu Mudau – 23 July 2026	
The Directorate: Protected Areas Planning and Management Effectiveness would like to thank you for the opportunity to review the Draft Basic Assessment report for the aforementioned project. The proposed development entails the development of five (5) Exclusive Use Areas (EUAs), each comprising six (6) elevated deck platforms and associated services/infrastructure. The proposed development will be within the Knysna Protected Environment, which is a Protected Area, in terms of the National Environmental Management: Protected Areas Act (Act No 57 of 2003) (NEM: PAA), located in the Knysna Local Municipality, Western Cape Province.	Noted, with thanks.
Ambiguity regarding the Protected Area status of the development site — The Draft BAR, page 20, refers to the project site being within a Protected Area (PA) in accordance with the 2023 Gazetted WCBSP data. However, on page 21, it states that the site is not proclaimed as a protected area but is merely mapped as one because of the introduction of the 2023 WCBSP. Further contradictions appear in the Site Sensitivity Verification Report (SSVR), page 18, where it is stated, as per the extract below, that: "The Screening Tool indicated that the proposed site is within both a South African Conservation Area (SACAD) and a South African	This point is accepted and cannot reasonably be disputed. Eco Route accepts that the current wording is inconsistent and that the Site Sensitivity Verification Report extract quoted here incorrectly implies that part of the property falls within the boundaries of the Garden Route National Park itself. Eco Route confirms the property does not fall within the GRNP boundary; it falls within the Knysna Protected Environment, a separate, gazetted Protected Environment under NEM:PAA administered by SANParks as Management Authority. Eco Route commits to correcting this wording throughout the Final BAR and SSVr to remove the

Protected Area (SAPAD). Conservation Areas have recently become regulated through national and provincial legislation. Read in conjunction with NEMA (Act 107 of 1998), these areas have been considered in the Basic Assessment. The proposed development further takes into consideration governance of protected areas and the proposed development; the coastal area of the property is within the Garden Route National Park, which is declared a Protected Area under Section 9 of the National Environmental Management Protected Areas Act (Act 57 of 2003). In Section 50(5) it further states that – No development, construction or farming may be permitted in a national park, nature reserve or world heritage site without the prior written approval of the management authority. In which case South African National Parks (SANParks) is the management authority. Although no development is proposed within the boundaries of the Garden Route National Park, SANParks will be consulted."	erroneous GRNP-boundary reference and to consistently describe the property's status as being within the KPE.
Therefore, the attention of the Environmental Assessment Practitioner (EAP) is brought to the following: Knysna Protected Environment (KPE) is a gazetted Protected Area in terms of NEM: PAA, and a Protected Environment is one of the recognised categories of protected areas under the Act. The Protected Areas Register (PAR) established in terms of Section 10 of NEM: PAA confirms the legal status of protected areas declared under the Act. The attached PAR extract confirms that the Knysna Protected Environment is registered as a Protected Environment and that Portion 104 of Farm Uitzicht 216 falls within its boundaries. The property's protected area status is derived from its location within a legally declared and registered protected area, not merely from its inclusion in WCBSP or other biodiversity mapping products. The DBAR should explain that Section 51 of NEM: PAA provides the legal basis for regulating or restricting development within a Protected Environment where such development may be incompatible with	Eco Route accepts these points and commits to amending the Final BAR to explicitly reference the Protected Areas Register status of the Knysna Protected Environment, Section 51 of NEM:PAA, and the applicability of the Regulations for the Proper Administration of the Knysna Protected Environment. As set out in detail in the response to SANParks' comments above, SANParks' role as Management Authority is already recognised in the BAR, and SANParks' authorisation for any development within the 50 m Development Control Area is already being sought as part of this process; the Final BAR will be amended to cross-reference this explicitly against the requirements raised here.

the conservation purpose for which the area was declared. Additionally, the report must be amended to remove the assertion that sections of the property fall within the Garden Route National Park as stated in the extract above. The assessment should demonstrate how the proposed development is consistent with the conservation objectives, ecological integrity, and management purpose of the Knysna Protected Environment. The applicability of the Regulations for the Proper Administration of the Knysna Protected Environment must be assessed, as these Regulations provide the detailed management and development control framework for activities within the KPE. The DBAR should acknowledge that SANParks is the Management Authority for the Knysna Protected Environment and is responsible for administering the KPE in accordance with NEM: PAA and the applicable Regulations for the Proper Administration of the Knysna Protected Environment. Where any permissions, approvals, authorisations, or consultations are required under the KPE Regulations, these should be identified and the necessary approvals sought from SANParks as the Management Authority. Compliance with the NEMA Basic Assessment process does not remove the need to consider and comply with the requirements of NEM: PAA, the Protected Areas Register, Section 51, and the Regulations for the Proper Administration of the Knysna Protected Environment.	
The DBAR states that evidence of sub-surface tunnelling attributed to the golden moles was found on site. Therefore, the EAP should ensure that appropriate mitigation measures are incorporated into the EMPr, given that golden moles are cryptic, ground-dwelling mammals that are vulnerable to earthmoving and construction activities. The measures should include pre-construction ecological walkthroughs by a suitably qualified specialist, demarcation and avoidance of active tunnelling areas where feasible, environmental awareness training for construction personnel, and	This point is accepted and cannot reasonably be disputed. Golden mole tunnelling evidence is recorded in the fauna specialist's findings, but Eco Route accepts that species-specific mitigation measures are not yet explicitly set out in the EMPr. Eco Route commits to incorporating a pre-construction ecological walkthrough, demarcation and avoidance of active tunnelling areas where feasible, environmental awareness training for construction personnel, and a chance-find procedure for golden moles and active burrow systems, into the Final BAR and EMPr.

the implementation of a chance-find procedure should golden moles or active burrow systems be encountered during construction. The findings of the specialist assessment and the proposed mitigation measures should be clearly reflected in the Final BAR and the EMPr.	
The DBAR, on page 33, states that each Bio Bloo unit proposed for wastewater and sewage treatment will maintain the appropriate setback from the 30-metre building line and the aquatic specialist's recommended estuary buffer zone. The Wastewater and Sewage Treatment is indicated outside of the proposed disturbance area; additionally, in the SDP, Appendix B, the Bio Bloo seems to be falling within the estuary buffer. The SDP must be amended to have all the developmental footprint and the disturbance area superimposed on the recommended buffers and mapped sensitivities; additionally, the report must conclusively confirm if the proposed Bio Bloo is accounted for in the proposed disturbance area.	This point is accepted and cannot reasonably be disputed. The BAR text specifies that each Bio Bloo unit is sited landward of the 36 m estuary buffer and outside the disturbance footprint (see Wastewater and Sewage Treatment, BAR), but Eco Route accepts that the Site Development Plan (Appendix B) graphic may not clearly demonstrate this. Eco Route commits to amending the SDP so that the full development footprint and disturbance area, including each Bio Bloo unit, is clearly superimposed on the recommended buffers and mapped sensitivities in the Final BAR, removing any ambiguity.
The DBAR, page 33, indicates that the on-site borehole will supplement the proposed rainwater harvest. The report must indicate where the borehole is located. It must further indicate how the borehole will be operationalised, including if trenching for pipes will be required, and the associated environmental impacts.	The BAR confirms the borehole is an existing, on-site feature used only to supplement rainwater harvesting while the family is in residence, and is not operated (allowing natural recharge) when the property is unoccupied; no new borehole is proposed. Eco Route commits to adding the borehole's location to the Final BAR's layout map, and to confirming whether any new trenching for pipework is required and, if so, assessing the associated impacts.
The DBAR has been revised to provide explicit clarification that the proposed development is intended solely for private family use by the Lovemore family and beneficiaries of the Lovemore Children's Secondary Trust. However, a review of the supporting documentation indicates that not all appendices have been fully aligned with this revised project mandate. These include the Terrestrial Biodiversity Assessment and the visual impact assessment. The EAP should ensure that all supporting appendices, specialist	Eco Route accepts this and commits to reviewing all supporting specialist appendices, including the Terrestrial Biodiversity Assessment and Visual Impact Assessment, to ensure they are fully aligned with the DBAR's clarification that this is a private family-use facility, and to rectifying any remaining inconsistencies, ambiguities or unsupported assumptions in the Final BAR.

studies, management plans and technical reports are revised, where necessary, to align with the DBAR's explicit clarification that the proposed development is a private family-use facility, and that any remaining inconsistencies, ambiguities or unsupported assumptions are rectified in the Final BAR.	
The EMPr commits that the existing internal access road will not be reconstructed, upgraded, widened, realigned, or otherwise disturbed beyond its current footprint. However, given that the road will continue to be used during both the construction and operational phases, the Final BAR and EMPr should include clear management measures to ensure that use of the road is strictly limited to access purposes and does not result in the incremental expansion, degradation, or disturbance of adjacent natural habitat. The road footprint should be clearly demarcated, with no stockpiling, passing bays, or ancillary construction activities permitted outside the existing disturbed footprint.	This is substantively addressed and the remainder is accepted. The EMPr already confirms the existing internal access road will not be reconstructed, upgraded, widened or realigned, and that its use is restricted to access purposes, and general stockpile-siting controls are already included in the EMPr. Eco Route accepts the Directorate's request for this to be made more explicit specifically in relation to the access road, and commits to adding road-specific management measures, demarcation of the road footprint and a prohibition on stockpiling, passing bays or ancillary construction activity outside the existing disturbed footprint, to the Final BAR and EMPr.
The Directorate welcomes the intention by the landowner, following consultation with SANParks, to pursue a stewardship/settlement agreement for Portion 104 of Farm 216. The proposed agreement demonstrates a commitment to the long-term conservation of the property and supports the objective of securing biodiversity and ecological infrastructure in perpetuity. This initiative is supported as it aligns with broader protected area expansion and conservation stewardship objectives.	This comment is noted and welcomed.
Department of Forestry, Fisheries and the Environment (DFFE) – Directorate: Biodiversity Conservation – Mr Seoka Lekota (Control Biodiversity Officer Grade B) / Ms M Rabothata (Control Biodiversity Officer Grade A) – 20 July 2026	
The Directorate: Biodiversity Conservation reviewed and evaluated the aforementioned report and has identified that the following direct and indirect ecological impacts will result from the proposed development.	Noted.

According to the C.A.P.E. Fine-scale Mapping Project, two distinct vegetation units are identified within the study area: Groenvlei Coastal Forest (Endangered) and Sedgefield Thicket-Fynbos (Least Threatened). Furthermore, the Project Area of Interest (PAOI) encroaches into Critical Biodiversity Area 1 and 2 (CBA 1 & 2), including Ecological Support Area 2 (ESA 2). Protected species and Species of Conservation Concern (SCC) are predicted to occur within the project area, contributing to a Very High environmental sensitivity rating in terms of the DFFE Screening Tool.	Noted. This is consistent with the BAR's own WCBSP-based sensitivity mapping (CBA 1 and CBA 2, ESA 2), which has already been accounted for by the terrestrial biodiversity specialist and reflected in the site layout.
The development footprint also intersects an aquatic Critical Biodiversity Area (CBA). In addition, the Knysna Estuary is located immediately adjacent to the property boundary, the property falls within a Freshwater Ecosystem Priority Area (FEPA), and it is situated within the Outeniqua Strategic Water Source Area (SWSA).	Noted. This is consistent with the BAR's Coastal Protection Zone and aquatic buffer sections, which already address the property's adjacency to the Knysna Estuary and its associated aquatic sensitivities.
Moreover, Portion 104 of Farm Uitzicht 216 falls within the Knysna National Lake Area, a category of protected area recognised under Section 9(a) of the National Environmental Management: Protected Areas Act (NEM:PAA). The property also falls within the Coastal Protection Zone (CPZ) as defined in the National Environmental Management: Integrated Coastal Management Act (NEM:ICMA). The CPZ extends up to 1 km inland from the high-water mark, encompassing the entire property. Furthermore, the coastal portion of the property forms part of the Garden Route National Park, a formally declared protected area.	Eco Route accepts the correction implicit in this description. Consistent with the response to the Directorate: Protected Areas Planning and Management Effectiveness comment above (point 118), Eco Route commits to correcting the Final BAR so that it does not misstate the coastal portion of the property as falling within the Garden Route National Park itself, while correctly reflecting the property's status within the Knysna Protected Environment and the Coastal Protection Zone.
Additionally, the property supports significant stands of alien and invasive plant species, which pose a fire risk and suppress the recovery of indigenous Knysna Sand Fynbos, highlighting the need for ongoing invasive species management and ecological restoration.	This comment is addressed. A dedicated Alien Invasive Vegetation Management Plan (2026.09.16) has already been developed for the property and forms part of this application as an integrated component of the EMPr.

Given the above, the Directorate Biodiversity Conservation recommends the following measures to reduce any further loss of biodiversity should a positive Environmental Authorisation (EA) be issued: Development in areas identified as CBA 1 are highly discouraged, these are areas considered important for the survival of threatened species and ecosystems of ecological importance. The areas that are irreplaceable and required to meet biodiversity pattern and/or ecological process targets should be maintained in a natural state with limited or no biodiversity loss. A Pre-construction Faunal and Flora Search-and-Rescue must be conducted to safeguard SCC within the proposed development site. Any nearby wetlands or seasonal watercourses are likely to be ecologically important, supporting biodiversity and ecosystem services. Disturbance to these features will increase the risk of pollution from runoff. Therefore, very highly sensitive habitats near the development footprint must be avoided or demarcated as No-Go areas. A Stormwater Management Plan must be developed and implemented to prevent erosion, sedimentation, and groundwater contamination. Appropriate buffers must be established and observed (particularly within regions identified to traverse water courses and wetlands). Alien and Invasive plant species management plan must be developed and implemented to monitor and control invasives in accordance with the National Environmental Management: Biodiversity Act (2014 Alien and Invasive Species Regulations). Ms M Mudau, from Directorate: Protected Areas Management and Effectiveness must be added to the list of Interested and Affected stakeholders and obtain their comments. The Department of Water and Sanitation must be added to the list of commenting stakeholders for the Groundwater SWSA and DFFE Water Sources & Wetlands Conservation for attention of Mr S Tshitwamulomoni for surface SWSA and obtain their comments.

Eco Route responds to each recommendation in turn. Development in CBA 1 areas: the preferred alternative's layout was specifically designed, with the terrestrial biodiversity specialist's input, to avoid the most sensitive CBA 1/SCC areas, and development is concentrated in previously disturbed or lower-sensitivity areas; this will be confirmed explicitly in the Final BAR. Pre-construction Search-and-Rescue: Eco Route accepts this is not yet included and commits to adding a pre-construction Faunal and Flora Search-and-Rescue requirement for SCC to the EMPr. Wetlands/watercourses as no-go areas: the aquatic specialist (Confluent, 2024) confirmed no wetlands or watercourses are present on the property, consistent with Cape Farm Mapper; Eco Route will state this explicitly in the Final BAR to close out this point. Stormwater Management Plan: this has already been developed (2026.09.17) and forms part of this application. Buffers: the 36 m estuary buffer is already established and observed, as addressed at length in the response to SANParks' comments above. Alien and Invasive species management plan: already addressed via the Alien Invasive Management Plan referred to above. Addition of Ms M Mudau as a stakeholder: this has, in effect, already occurred, as Ms Mudau (Directorate: Protected Areas Planning and Management Effectiveness) submitted comments on 23 July 2026, which are captured and responded to elsewhere in this document; she is recorded on the project's I&AP register. Addition of the Department of Water and Sanitation and DFFE's Water Sources & Wetlands Conservation (for the attention of Mr S Tshitwamulomoni): Eco Route accepts this and commits to adding both to the I&AP register and inviting their comment ahead of finalisation.

All Public Participation Process documents related to Biodiversity EIA review and queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@environment.gov.za for the attention of Mr Seoka Lekota.	Noted. Contact details for the Directorate: Biodiversity Conservation are recorded, and all further biodiversity-related Public Participation Process correspondence for this application will be directed accordingly.
NGO	
Western Heads-Goukamma Conservancy (WHGC) – Johan Labuschagne (Chairman) – 20 July 2026	
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).	Noted, with thanks for this contextual information regarding the WHGC's mandate and its Table Mountain Fund-supported project for the conservation and restoration of the Knysna Sand Fynbos.
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/ .	Noted.
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 Featherbed Nature Reserve (SE Border).	This is not accepted on the facts as regards the biodiversity classification cited. The comment relies on the 2017 Western Cape Biodiversity Spatial Plan (WCBSP), under which the property was mapped as CBA1/CBA2/ESA2. The current 2023 WCBSP, which supersedes the 2017 plan, reclassifies the property under the single category of 'Protected Area' — consistent with its inclusion in SANParks' Garden Route National Park Land Inclusion Plan and Priority Expansion Area. No portion of the property is classified as a Critical Biodiversity Area under the current WCBSP. The property's high conservation, historical and aesthetic value, and its boundaries adjoining the Knysna Estuary (north-east) and Featherbed Nature Reserve (south-east), are correctly described

	and are not in dispute; these have informed the specialist assessments underpinning the BAR and EMPr.
Overview of the classifications of Portion 104: The property falls within the following “zones” and “classifications” with specific regulatory frameworks and requirements: SANParks Buffer Zone – bordering SANParks Garden Route National Park and Knysna Lakes Protected Area. SANParks Priority Expansion Area and Priority Natural Areas, defined in terms of the approved Garden Route National Park Management Plan. 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). 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. Knysna Protected Environment, which has been mapped with associated promulgated Regulations, that designate a Development Control Area. the Estuarine Functional Zone (EFZ), the Development Control Area (DCA) as per Knysna Protected Environment (KPE) Regulations 2009 Gaz 23797. the National Heritage Resources Act. adjacent to Featherbed Nature Reserve (Uitzicht portion 59 and 60). within 1km from a known Archaeological site of an undisturbed Earlier Stone Age site on the Featherbed Nature reserve.	The SANParks Buffer Zone, Priority Expansion Area, Coastal Protection Zone, Knysna Protected Environment Development Control Area, Estuarine Functional Zone, National Heritage Resources Act applicability, and proximity to the Featherbed Nature Reserve and its Archaeological site are all correctly identified and are addressed in the BAR's Legislative Requirements section (Section 6) and supporting specialist reports. The single point not accepted is the CBA/CORE1 designation: as set out in response to the comment above, the property is classified under the current (2023) WCBSP as Protected Area, not CBA/CORE1, which superseded the 2017 WCBSP classification referenced in this comment.
Pre-Application Basic Assessment Report - Lovemore - Ptn 104 of Farm 216 / Proposed development of assisted camping facilities for the Lovemore Family. Ambiguous Scope of the project and current land use permissions: The Draft 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 consent use for an existing camping and an approved SDP. “The new proposal is to expand the camping	Noted. This is an accurate quotation of the BAR's description of the existing land use rights (Agriculture Zone I with consent use for camping facilities) and the proposed expansion of this established consent use to accommodate the growth of the Lovemore family.

facilities in line with the growth of the family, so that each sibling and their family can have their own dedicated camping facility" [quoted from Table 10: Assessment of need and desirability, item 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."]	
The Draft 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 Draft BAR, as below. 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". Reference is made in the addendum "Portion 104 of Farm Uitzicht 216 Rezoning Motivation" to "tourist accommodation" and "visitors and tourists".	The references to 'tourist accommodation' and 'visitors and tourists' in the Rezoning Motivation and the Visual Impact Assessment report title reflect the formal statutory consent-use category name under the Knysna Municipality Zoning Scheme By-law that applies to the Open Space III zoning being applied for — it is a term of art describing a class of land use under the by-law, not a description of the facility's actual operation. As confirmed in the Rezoning Motivation itself and throughout the BAR, the Landowners have no intention of providing tourist accommodation to the public; the facilities will be used for private purposes only, and the title deed will be amended to record that none of the facilities may be used for tourist accommodation for income purposes. This is addressed further in response to the following comment.
[Quoted extract from the Rezoning Motivation addendum, reproduced by WHGC:] "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	Noted. This is an accurate quotation from the Rezoning Motivation. As set out in that document (and in response to the comment above), the reference to 'visitors and tourists' describes the statutory consent-use category being applied for, not the intended occupants: the Rezoning Motivation goes on to state plainly that 'the Landowners have no intention of providing tourist accommodation to the public as this is their private property,' that the facilities 'will be used for private purposes only,' and that the title deed will be amended accordingly.

nature and specifically Knysna's unique environment by providing facilities for those visitors and tourists to stay on the property."	
Proposed Size of the Camp Site: The proposed Camping Site exceeds reasonable family use. The 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 a fully-fledged Tourist Accommodation.	The commentator's calculation (4–5 persons per camping area x 20 camping areas = 80–100 persons) reflects an early planning-stage assumption and does not represent the confirmed operational limit. The applicant has since confirmed, and this has been incorporated into the Final BAR (Section 2.3, Description of Each Exclusive Use Area) and EMPr, a binding operational occupancy limit: a maximum of 8 people per EUA at any one time, and a maximum of 60 registered Lovemore family members and Lovemore Children's Secondary Trust beneficiaries in total across the property at any one time. This is consistent with, and conservative relative to, reasonable family use as described in the BAR.
The Rezoning Motivation as pre pre-BAR makes it clear that the intent of the Campsite Development is to become a fully fledged Tourist development, which is only being catered for in Resort Zone, and would necessitate a rezoning to Resort Use.	This is not accepted. Per the Rezoning Motivation prepared by TMBA (Pty) Ltd and submitted to the Knysna Municipality (21 August 2026), Tourist Accommodation is an explicitly listed Consent Use available under Open Space III zoning — the zoning being applied for — and is not exclusive to the Resort zone. The applicant is accordingly not required to rezone to Resort Use to obtain the Tourist Accommodation consent use; Open Space III's own consent-use schedule provides this route directly.
In terms of section 20(3) of the Knysna Municipality: Zoning Scheme By-law, 2020, consent uses, listed in Column 3 of Schedule 1, are subject to the following conditions: "(a) when a consent use is granted by the Municipality in a particular zone, the applicable land use must be supplementary to the primary use right allowed under the particular zone; and (b) when land is intended to be utilised exclusively for a consent use in a particular zone and the consent use is a primary right in another zone, application must be	Noted, and this provision of the Zoning Scheme By-law is correctly quoted. However, section 20(3)(b) applies only where land is intended to be utilised exclusively for a consent use that is a primary right in another zone. This is not the case here: under the Open Space III zoning being applied for, the property's Primary Use remains Nature Conservation Area (including the existing single dwelling house and its accessory uses), with Tourist Accommodation sought only as an additional Consent Use, as

made for rezoning to the zone where the applicable land use is a primary right."	expressly provided for in Open Space III's own consent-use schedule. Section 20(3)(b) is accordingly not triggered.
The intended land use of a tourism development is not supplementary to the agricultural use, as there are no agricultural activities on the property and the main intended use is a resort, in the form of a campsite for up to 100 persons. The primary use in the Resort Zone is "Tourist Accommodation", The applicant will therefore have to rezone to Resort Use.	This is not accepted, for the reasons given in response to the comments above: the confirmed maximum occupancy is 60 persons in total (not up to 100), and Tourist Accommodation is available as a Consent Use directly within the Open Space III zoning being applied for, without requiring rezoning to Resort Use.
The intended resort, for up to 100 persons, will also trigger a listed activity, for which environmental authorisation will have to be obtained. The proposed platforms, each with a permanent structure, including a kitchen and ablution facilities, are an attempt to circumvent the following provision of the Zoning Scheme: "(b) additional unit may not be erected within 1 km of the high-water mark of the sea or a tidal river except where a proclaimed township is situated between the additional dwelling unit and the sea or tidal river;" The entire property is within 1 kilometre of the high water mark of the Estuary and no additional dwellings are therefore permitted.	Regarding the listed activity trigger: this is not accepted on the facts. The BAR already identifies and assesses the applicable Listing Notice activity for a tourism/hospitality-type facility with a total sleeping capacity of 15 persons or more, notwithstanding that the development is for private family use, precisely because the physical infrastructure meets this definition — this has not been omitted. Regarding whether the EUA structures constitute 'additional dwelling units' restricted within 1 km of the high-water mark under the Zoning Scheme By-law: this is a town-planning interpretation question that falls within the Knysna Municipality's parallel rezoning application (Case Officer: Mr S. Mqhele), rather than the environmental authorisation process. Eco Route commits to obtaining the town planner's written confirmation of this point and reflecting the outcome in the Final BAR.
The proposed permanent structures will incorporate kitchens and ablution facilities and will be used as additional dwelling units, albeit for holiday accommodation. Even though the occupants will sleep in tents or caravans, the environmental impact of the permanent structures and the decks will be exactly the same as a permanent structure that includes bedrooms. The proposed structures will serve as additional dwellings and are not permitted, unless the property is rezoned.	As set out in response to the comment above, whether the EUA structures constitute 'additional dwelling units' under the Zoning Scheme By-law is a town-planning determination under active consideration through the parallel rezoning application. Regardless of this classification, the environmental impact of the structures — construction footprint, servicing and disturbance — has been assessed in the BAR and EMP on a conservative basis consistent with permanent structures, and no additional environmental

	assessment would be required by a different by-law classification of the structures.
Current access road will have to be upgraded. The current access road to the property is a narrow, paved road that does not cater for traffic in both directions. The proposed land use will necessitate the upgrading of the road to accommodate the significantly increased traffic. This will also trigger a number of listed activities that have not been included on the Draft BAR.	This is not accepted on the facts. The BAR (Section 2.4, Access and Traffic) confirms that access to the property is via the existing grassed vehicle access track off C.J. Langenhoven Street, that no road widening, upgrading, or new access construction is proposed, and that no increase in vehicle movements is anticipated during the operational phase, as the same historical family-use access pattern will continue. No listed activity associated with road upgrading accordingly arises.
Summary of the Intended classification and use of Portion 104: The proposed size of the campsite and the Rezoning motivation, contradicts the Draft BAR disclosure of family use. The intent of the Campsite (expansion) Development seems to be a fully-fledged Tourist development. The pre-BAR falls short on providing the required consideration for a full-fledged Tourist development. It would require a rezoning to Resort Use and Environmental Authorisation to permit a resort. The upgrading of the road would require environmental authorisation. The existing Land Use consent use for the existing camping needs to be provided with an approved SDP.	Noted. For the reasons set out in the responses to the comments above, Eco Route does not accept that the proposed development constitutes a fully-fledged Tourist development requiring rezoning to Resort Use or triggering unassessed listed activities. The existing consent use for camping facilities is addressed in the BAR, and the Tourist Accommodation consent-use classification under Open Space III is being progressed through the parallel rezoning application referenced above.
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 certain portions of land, regulated through a permitting system. The WCBSP is very specific regarding Land-use guidelines within land-use zones for CBA1/CORE1. (Ref Section 4 of WCLUPGRA). Portion 104 is classified as Protected Area/CBD1 or CORE1 in a Rural Area. The WCBSP and WCSPFRA is very specific regarding not allowing a development of	This is not accepted on the facts, for the same reason given in response to the comments above: the property is classified under the current (2023) WCBSP as Protected Area, not CBA1/CORE1. The 2017 WCBSP classification referenced in this comment has been superseded.

campsite (resort) in a CBA1/CORE1 and within the coastal management line.	
Unauthorised Expansion of linear infrastructure & disturbance areas since 2016 without EA: Reference to the disturbed area called the "disturbed patch of grass" that has been "retained in the same originally disturbed area". The owners are reminded of the "duty of care" as per NEMA Section 28, especially in a CBA1 where the WCBSP guidelines specifically require that "Degraded areas should be rehabilitated." It is noted that: the "disturbed patch of grass" has been used as an unofficial campsite as per Pre-BAR (p. 35). no information was provided regarding expansion of linear infrastructure & disturbance areas since 2016. Historical satellite images shows that the "disturbed patch of grass" has been expanded and not "retained". (Ref Knysna Public Viewer - Orthophoto 2015, Orthophoto 2019, Google Earth Historic Satellite photos)	The duty of care under NEMA Section 28, and the WCBSP guideline that degraded areas should be rehabilitated, are both noted and accepted as applicable legal and policy requirements. The proposed development's footprint has been sited within the existing disturbed area(s) already disclosed in the BAR (Section 2, referencing 2016 Google Earth imagery showing the existing dirt road and disturbed patch of grass), and no further expansion of the disturbed area beyond this existing, disclosed footprint is proposed. Should WHGC wish to share the specific historical satellite imagery referenced in this comment, Eco Route will review it against the current footprint to confirm consistency.
The notion that the "disturbed patch of grass" that has been "retained in the same originally disturbed area" is not supported by historical Satellite images. In contrast, it shows that the expansion of the disturbance "grassy patch" since 2015 has been an estimated 1000 m². It could be interpreted that the intent of the "maintenance" and incremental expansion of "disturbed patch of grass" were to prevent the recovery/revival of the critical endangered vegetation that could ease future development objectives.	As set out in response to the comment above, Eco Route has not independently verified the specific estimated 1000 m² expansion referenced in this comment against historical satellite imagery, and welcomes WHGC sharing this imagery for review. The proposed development does not include any further expansion of the disturbed area beyond the existing footprint disclosed in the BAR, and the EMP's no-go area and rehabilitation provisions apply to protect all areas outside the confirmed development footprint.
Construction of linear infrastructure (new Road and parking area): This new road connects to a slipway on Portion 103 – (Reference to historic satellite photos from Knysna Public Viewer and Google Earth). 22 March 2016 – No Parking or Road visible (Ref Google Earth). 14 January 2021 New Parking area and Road visible. The Historical Satellite images show that the Construction of a "parking	This is not accepted. The proposed development does not include, and has never included, construction of any new road, parking area, or connection to a slipway on the adjoining Portion 103. Vehicular access to and within the property is, and will remain, via the existing dirt road already disclosed in the BAR (Section 2.4, Access and Traffic). Should WHGC wish to share the specific

area" (~50m x 5m) on the eastern boundary and a road (~100m x 3m) since 2016 that connects the "patch of grass" to the Slipway on Portion 103. Neither the WHGC nor the Knysna Municipality have record of any EA or OSCAE permit(s) being issued for the expansions and destruction of natural vegetation described above.	satellite imagery referenced in this comment showing features it considers to be new construction, Eco Route will review this against the current, disclosed site layout and access arrangements to confirm consistency.
Environmental and biodiversity concerns: The invertebrate section of the "Terrestrial Animal Species Specialist Assessment: Site Sensitivity Verification Report and Impact Assessment" has been studied by our local expert, Dr Dave Edge (SACNASP registered butterfly expert) and his comments are below. 1) The butterfly reference book cited by the faunal expert Ms Kim Daniels (Woodhall, 2005) is hopelessly out of date and not based on scientific investigations or publications. See below for suitable peer reviewed publications. 2) It is not surprising that the site survey for "invertebrates" done by Ms Daniels on 31 May 2024 did not yield any results. She recorded only two very common butterflies. The flight periods for the endangered butterflies are given below. 3) The Critically Endangered vegetation type Knysna Sand Fynbos on the Western Heads is a national hotspot for four threatened butterfly species, listed below. No development in this vegetation type should be allowed until Dr Edge has surveyed the property thoroughly to rule out the presence of any of the butterflies in section 4. The pages in Ms Daniels report are given.	Eco Route has reviewed Dr Edge's comments and responds to each of his three points below (rows 156-159 address the four named species individually). On point 1 (the Woodhall, 2005 reference): this is noted - Woodhall (2005) is the field guide cited in the faunal specialist's methodology, and Eco Route does not dispute that Mecenero et al. (2020) is a more recent, peer-reviewed synthesis. This does not, however, change the specialist's site-specific finding, addressed below. On point 2 (survey timing): the 31 May 2024 invertebrate sweep is one component of a wider site assessment that included site visits in October and December 2023, during which the property was assessed for the presence of butterfly larval host plants and host ant species specifically - a habitat-based assessment that, unlike a search for flying adults, is not restricted to the adult flight period of any one species. The faunal specialist's finding on host plant and host ant presence is accordingly not solely a function of the 31 May sweep date. On point 3 (further survey by Dr Edge before any development is permitted): Eco Route does not consider it necessary to commission a further specialist survey. The faunal assessment was conducted by an appropriately qualified specialist across multiple site visits, and its findings, together with the pre-construction and construction-phase mitigation measures set out in the faunal report and EMPr (see response to row 165 below), are considered an adequate and proportionate basis for assessment.
4) <i>Chrysoritis mithras</i> – Mithras Opal (pp. 17–18) Critically Endangered – Possible Extinct. Flight period: September to March.	<i>Chrysoritis mithras</i> (Brenton Sparkling Opal Butterfly) is listed as a Species of Conservation Concern in the faunal specialist report's

This butterfly has not been observed since the late 1990s, and is therefore one of the most endangered butterflies in South Africa. See pp. 77–78 of Mecenero et al. 2020 for full details. There is still a good chance that it could be found wherever its host ants <i>Crematogaster</i> sp. are found nesting in shrubs in patches of thicket vegetation. Ms Daniels did record these ants (p. 26).	own screening (Table 3), with its correct host ant (<i>Crematogaster peringueyi</i>) and host plants recorded. Eco Route notes that the faunal report's site inspection did record Cocktail ants (<i>Crematogaster</i> sp.) in nests on the property. However, this was a generic genus-level record, not a site-confirmed population of the specific host ant species <i>C. peringueyi</i>, nor an observed association between those ants and any Opal Butterfly life stage or larval host plant - and the specialist's assessment separately and specifically records that butterfly host plants were not found at the site. Given this, and given the ant record noted above, Eco Route accepts that the presence of this species cannot be fully ruled out on the current evidence. As a precautionary measure, the existing pre-construction mitigation already committed to in the faunal report (Section 7.5.2, Mitigation measure 2) - a Botanical Specialist assessment of the development footprint for butterfly larval host plants immediately before construction, with transplanting where found - will be extended to include a host-ant colony check of the specific footprint area, with construction in that area to be halted and Eco Route notified if an active <i>Crematogaster peringueyi</i> colony or larval host plant is identified, so that the appropriate specialist can be consulted before work proceeds in that location.
<i>Orachrysops niobe</i> – Brenton Blue (p. 18) Critically Endangered – Possible Extinct. Flight period: November and February to March. This nationally famous butterfly has not been observed since the Knysna 2017 fire, and is therefore also one of the most endangered butterflies in South Africa. It is an icon of butterfly conservation, and draws tourists to the Brenton area every year. It is unlikely to be found on Uitzicht 216–104 because it favours south facing slopes where its host plant <i>Indigofera erecta</i> and host ant <i>Camponotus baynei</i> both occur. See pp. 113–114 of Mecenero et al. 2020 for full details.	This is not accepted on the evidence available. <i>Orachrysops niobe</i> (Brenton Blue Butterfly) and its habitat requirements - host plant <i>Indigofera erecta</i>, growing most abundantly in the partial shade of mature candlewood trees, and host ant <i>Camponotus baynei</i> - are correctly recorded in the faunal specialist report's own species screening (Table 3). Neither the host plant nor the host ant was recorded on the property during the site assessment, which specifically and separately recorded that butterfly host plants and ant species were not found at the site. This species also favours south-facing slopes, and its known population was already reduced following the 2017 Knysna fire. On the evidence available from the

	site-specific assessment, Eco Route does not consider a further specialist survey necessary; the pre-construction host-plant search described in response to the comment above (row 156) applies equally to this species' host plant, <i>Indigofera erecta</i>.
<i>Thestor brachycerus</i> – Knysna Skolly (p. 18) Critically Endangered. Flight period: December to January. This butterfly also only occurs in Knysna Sand Fynbos, but has so far only been recorded on the Eastern Heads at Pezula. However it could occur on north facing slopes of the Brenton Peninsula wherever its host ants <i>Anoplolepis custodiens</i> are found, which nest in sand or under rocks. See pp. 118–119 of Mecenero et al. 2020 for full details.	This is not accepted on the evidence available. <i>Thestor brachycerus</i> (Knysna Skolly) and its host ant, <i>Anoplolepis custodiens</i>, are correctly recorded in the faunal specialist report's own species screening (Table 3). This host ant was not recorded on the property during the site assessment, which specifically and separately recorded that butterfly host plants and ant species were not found at the site. The species is otherwise only confirmed from two small subpopulations at Coney Glen, on the opposite side of the Knysna Estuary mouth. On the evidence available from the site-specific assessment, Eco Route does not consider a further specialist survey necessary.
<i>Aloeides thyra orientis</i> – Brenton Copper (p. 18–19) Endangered. Flight period: October to March. This butterfly is more widespread across the Brenton Peninsula almost as far as Belvidere, and has specialised habitat requirements with sandy, open spaces where its host ant <i>Lepisiota capensis minuta</i> occurs. No host plant has been recorded despite intensive research, and it certainly does not use <i>Aspalathus</i> species such as Woodhall (2005) states. See pp. 54–55 of Mecenero et al. 2020 for full details. Reference: Mecenero, S., Edge, D.A., Staude, H.S. et al. 2020. Outcomes of the Southern African Lepidoptera Conservation Assessment (SALCA). <i>Metamorphosis</i> 31 (4): 1–160. PDF available.	This is not accepted on the evidence available. <i>Aloeides thyra orientis</i> (Red Copper Butterfly / Brenton Copper) and its host ant, <i>Lepisiota capensis</i>, are correctly recorded in the faunal specialist report's own species screening (Table 3). This host ant was not recorded on the property during the site assessment, which specifically and separately recorded that butterfly host plants and ant species were not found at the site. Eco Route notes the commentator's own point that no host plant has been recorded for this species despite intensive research, notwithstanding Woodhall's (2005) reference to <i>Aspalathus</i> species - this does not affect the finding above, since the operative constraint for this species is the host ant, which was not found on site. On the evidence available from the site-specific assessment, Eco Route does not consider a further specialist survey necessary.
Other concerns: 1. High fire risk with the lack of fire suppression and evacuation options for tourists. The Western Heads had historically	This is substantially addressed. The EMPr (Section 6.4) confirms that the landowner is a current member of the Southern Cape Fire

numerous fires due to the combined factors of the Fynbos vegetation type, heavy infestation of invasive species and human activity. [Quoted from DBAR:] "The ecological functioning of this habitat is modified in its current state due to the long history of high-density IAPs and significant fire events." REF DBAR page 19. a. Camping (as tourist activity) holds the highest risk of uncontrolled fires. b. The DBAR does not present sufficient studies to support fire suppression and evacuation solutions for this high-risk area.	Protection Agency, and commits to a dedicated Fire Management Plan, to be included in the Final BAR as an integrated component of the EMPr, developed and implemented in consultation with the Fire Protection Agency. This directly addresses fire prevention and response coordination. Regarding evacuation: given the confirmed maximum occupancy of 60 persons — family members and Trust beneficiaries only, familiar with the property, and not members of the touring public — and the property's private, non-public access, household-scale fire safety and evacuation planning, to be set out in the Fire Management Plan, is considered proportionate to the nature and scale of this private family use.
2. The Visual Impact Assessment (VIA) is insufficient as it: a. lacks relevant observation points from the Estuary (boats), Eastern Heads Suburb and Featherbed Nature reserve. b. used the least visually impact Alternative "camping platforms consisting out of a concrete platform and an open timber deck located within each" (Ref 3.2 page 16).	Eco Route will confirm with the visual specialist whether the nine assessed Observer Locations (BAR Appendix D4, Figure 11) include vantage points from the Knysna Estuary (boat-based), the Eastern Heads suburb, and Featherbed Nature Reserve, and will supplement the assessment with any of these viewpoints not already covered, ahead of the Final BAR. Regarding the alternative assessed: the concrete-platform-and-timber-deck configuration referenced reflects the design alternative under consideration at the time of that specialist site work. Eco Route confirms the current preferred alternative — elevated stilt decks with no ground-level hard surfacing — is the design being carried forward, and will confirm with the visual specialist whether this affects the VIA's conclusions.
3. A NOISE Impact assessment required due to the site topography and the proximity of the proposed development in respect of the nearby neighbourhoods (Leisure Island and East Heads). NOISE Impact assessment as per Published in Government Notice No. 320 GOVERNMENT GAZETTE 43110, 20 MARCH 2020.	Eco Route confirms that a dedicated noise impact assessment is not considered necessary for this private family facility: the same family has used the property for recreational purposes over many years under the historical baseline described in the BAR, and no noise complaints have been received to date. Binding noise management conditions are nonetheless already included in the EMPr (Section 11.8, Mitigation Measure NM-1): compliance with the SANS 10103:2008 noise limits, defined quiet hours enforced by the

	Responsible Person, and a prohibition on amplified music, generators and motorised watercraft beyond specified levels or times. Where a formal stewardship / co-management arrangement is concluded with SANParks under the Garden Route National Park Management Plan, the EMPr further commits to obtaining and applying the noise standards applicable to the relevant GRNP Management Plan Zonation category for the property, to be reflected in the Property Site Rules. This stewardship-agreement-based approach to noise mitigation, rather than a further specialist noise study, is considered proportionate to the private, family-only, non-commercial nature of the use.
4. Archaeological study is required as the site is within 1km from a known Archaeological site on the Featherbed nature reserve (South African Heritage Site No. 59). a. An undisturbed open-air ESA site was exposed following the 2017 wind-driven fires. In 2018, researchers led by Dr. Naomi Cleghorn mapped 102 stone tools, including large cutting tools, hammerstones, and cores. Ref Cleghorn, Naomi (Prof) – Department of Sociology & Anthropology, University of Texas at Arlington, Texas, USA email: Cleghorn@uta.edu	This is not accepted. The statutory process for assessing heritage and archaeological risk was correctly followed: a Notice of Intent to Develop (NID) in terms of Section 38(1) and (8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) was submitted to Heritage Western Cape (HWC). HWC's Heritage Officers Meeting (HOMS) considered the application (Case Decision 389121, decided 9 February 2026) and resolved that no further studies are required, as heritage resources — including the property's proximity to the Featherbed Nature Reserve Earlier Stone Age site — will not be impacted upon. This determination was made by the competent heritage authority with the property's location and heritage context before it.
5. Heritage Western Cape: None of the IAP was offered the opportunity to review the Notice with the Intent to Develop (NID) as requested in pre-BAR comments. It is unclear of what information was provided to HWC to receive the outcome of "No further studies" as per attached App Z. Portion 104 border the Featherbed nature reserve, South African Heritage Site No. 59.	The NID process under Section 38 of the National Heritage Resources Act is a statutory referral to HWC as the competent heritage authority, and does not require IAP review or comment as part of that process — it is separate from, and additional to, the NEMA public participation process being conducted by Eco Route. HWC's Case Decision (389121) confirms the outcome was reached by its Heritage Officers Meeting committee on the basis of the application submitted, which included the property's location and heritage context. The HWC Chance Finds Procedure and

	Accidental Finds Protocol required as a condition of this outcome have been incorporated into the EMPr.
Conclusions: The butterfly section of the faunal assessment study needs to be done by a SACNASP registered butterfly expert during the period from October to January, since "the VERY HIGH sensitivity of the site requires a Terrestrial Animal Species Specialist Assessment to be conducted". Fortunately, such a person lives on the Brenton Peninsula (Dr Edge).	Eco Route does not consider it necessary to commission a further butterfly-specific specialist survey during the October to January period before the Final BAR is submitted, for the reasons given in response to the comments above: the faunal specialist's site assessment, across multiple site visits, specifically and separately recorded that butterfly host plants and host ant species were not found at the site, which is the operative constraint for all four species raised. This finding is not solely dependent on the timing of the 31 May 2024 invertebrate sweep. As a safeguard against any residual risk that a Species of Conservation Concern or its host plant/host ant is present but was not detected, the following mitigation measures already committed to in the faunal report and EMPr will apply: a pre-construction Botanical Specialist search of the development footprint for butterfly larval host plants, extended (per the response to row 156) to include a host-ant colony check, with transplanting/avoidance where found; and a Fauna Specialist and ECO walk-through of each construction phase footprint before work begins in that area, with construction halted if fauna of conservation concern are identified. Eco Route considers this pre-construction verification and walk-through protocol, applied at the point construction is imminent, to be a more effective safeguard for these highly localised, specific-habitat-dependent species than a further desktop or seasonal field survey conducted now, well ahead of construction.
Portion 104 Uitzicht 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. Portion 104 Uitzicht falls outside of the Urban Edge, in a CBA and adjacent to the Knysna	Noted, and agreed that the property's environmental, ecological and heritage context requires careful consideration. This has informed the terrestrial biodiversity, faunal, aquatic, visual and heritage specialist assessments underpinning the BAR and EMPr.

Estuary (National Park), in the KMZ, etc. that require careful consideration in scoping a development.	
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 Protected Area/CBA1/Core1 area within the Coastal Protection Zone. WCSPFRA is not allowing a development of campsite (resort) in a PA/CBA1/CORE1 that falls within the coastal management line. The conclusion is that the intent of the Development to be a full-fledged Tourist development that necessitates that the BAR to consider the human activity, design and impact as per Tourist Development.	This is not accepted, for the reasons given above: the property is not currently classified as CBA1/CORE1 under the current (2023) WCBSP, and Tourist Accommodation is available as a Consent Use directly within the Open Space III zoning being applied for. The characterisation of the proposed development as a full-fledged Tourist development necessitating assessment on that basis is accordingly not accepted; the BAR assesses the development on the basis of its confirmed scope: private family and Trust-beneficiary use only, a binding maximum occupancy of 60 persons, no income generation, and a title deed restriction to that effect.
The WHGC reserves the right to revise these comments and to request further information based on any additional information that may be received.	Noted.
PUBLIC	
Michelle Zeidler (8 Crossberry Close, The Woods, Brenton on Lake, Knysna) – 11 June 2026	
FORMAL OBJECTION TO THE PROPOSED DEVELOPMENT OF LOW-IMPACT SELF-CATERING CAMPING NODES ON PORTION 104 OF FARM 216, UITZICHT, KNYSNA. I wish to formally object to the proposed development of low-impact self-catering camping nodes and associated facilities on Portion 104 of Farm 216, Uitzicht, Knysna. While the proposal is described as a low-impact development intended for private family use, I am concerned that the environmental impacts have been understated and that the development may have significant long-term consequences for the ecological integrity of the area. My concerns are as follows:	Noted, with thanks for this objection and the detailed concerns set out below, which are addressed in turn.
1. Biodiversity and Habitat Impacts: The property contains natural vegetation and habitat that support indigenous flora and fauna.	This is acknowledged as a valid general principle, and it has directly shaped the design and assessment process. The terrestrial

Any development footprint, regardless of size, results in habitat disturbance and fragmentation. Increased human activity, noise, lighting, and ongoing occupation of the site may negatively affect wildlife and reduce the ecological value of the area.	biodiversity, faunal, aquatic and visual specialist assessments commissioned for this BAR identified the property's habitat value and informed the siting of the five EUAs within the already-disturbed portions of the property, away from the highest-sensitivity ecological zones. The total development footprint is 0.9% of the site. The EMPr requires demarcated no-go areas, fencing of the disturbance footprint during construction, and rehabilitation of disturbed areas, specifically to limit habitat disturbance and fragmentation to the confirmed footprint.
2. Cumulative Environmental Impacts: Although the physical footprint of the proposed development may appear limited, cumulative impacts must be considered. Incremental developments throughout the Knysna region have the potential to collectively degrade biodiversity, alter landscape character, and place increasing pressure on sensitive ecosystems. The cumulative impact of this development together with existing and future developments should be carefully assessed.	Noted. Cumulative impact is a recognised consideration under NEMA and has been addressed within the scope appropriate to a site-specific Basic Assessment: the development's own footprint (0.9% of the site), the avoidance of sensitive habitat, and the binding occupancy and infrastructure limits confirmed in the BAR and EMPr. A region-wide cumulative assessment across all existing and potential future developments in the Knysna area falls outside the scope of an individual BAR and is a matter for the competent authority's broader spatial and biodiversity planning (WCBSP, Knysna SDF, GRNP Management Plan), which this application has been designed to align with rather than depart from.
3. Freshwater, Coastal and Environmental Sensitivities: The report identifies environmental sensitivities associated with the site, including freshwater and coastal considerations. Increased occupation of the property will generate additional wastewater, stormwater runoff and other environmental pressures. There is insufficient certainty that these impacts can be fully mitigated over the long term.	This is substantially addressed. Sewage from each EUA is treated by an independent, packaged Bio Bloo biological treatment system; treated water is fully recycled internally within each EUA for toilet flushing and outdoor/utility taps only, with no discharge to the environment, to any watercourse, or to groundwater, and no use for irrigation (BAR Section 2.4, EMPr Section 4.2.3). Stormwater is addressed through the project's Stormwater Management Plan, and all sewage systems are sited landward of the 36 m estuary buffer and above the 1:100 flood line. The EMPr also includes malfunction detection and contingency provisions requiring

	immediate cessation of processing and 24-hour notification should any system fault occur.
4. Visual and Natural Character: The Uitzicht area forms part of an environmentally sensitive landscape valued for its natural beauty and relatively undeveloped character. Development of camping nodes, access routes and associated infrastructure has the potential to alter the visual character of the area and diminish its wilderness qualities.	This is substantially addressed. The Visual Impact Assessment (BAR Appendix D4) assessed the development from nine Observer Locations and informed the design response: elevated stilt construction with no ground-level hard surfacing, recessive natural materials and finishes, retention of screening vegetation, and low-glare, downward-facing lighting. These measures are given effect through the EMPr's visual mitigation provisions.
5. Increased Traffic and Wildlife Mortality: The proposed development will inevitably result in increased vehicle movements during both the construction and operational phases. Additional traffic creates a greater risk of wildlife road fatalities, particularly involving reptiles, amphibians, small mammals and other species that move through the area. Roads and vehicle activity can also obstruct natural wildlife movement corridors, effectively creating barriers between habitats. This fragmentation can prevent animals from accessing feeding, breeding and shelter areas and may have long-term consequences for local biodiversity.	This is not accepted on the facts. The BAR (Section 2.4, Access and Traffic) confirms that access to the property is via the existing grassed vehicle access track off C.J. Langenhoven Street, that no road widening, upgrading, or new access construction is proposed, and that no increase in vehicle movements is anticipated during the operational phase, as the same historical family-use access pattern will continue. The request for a wildlife corridor and roadkill risk assessment is noted; given the confirmed absence of any increase in traffic generation, a dedicated specialist study of this nature is not considered necessary for this application.
6. Strain on Existing Infrastructure and Services: The development may place additional pressure on existing infrastructure and services, including roads, waste management systems, water resources, sewage treatment requirements, emergency services and environmental management capacity. The report does not adequately demonstrate that these impacts will be negligible or that sufficient capacity exists to accommodate additional use.	Eco Route confirms the development is designed to be self-sufficient and does not draw on municipal infrastructure or services: water is supplied independently via on-site JoJo tank rainwater harvesting (78,750 L total storage) supplemented by the existing borehole, not the municipal supply; sewage is treated independently on-site by the Bio Bloo systems described above, not discharged to any municipal sewer; and no road upgrading is proposed. Waste is disposed of at appropriate municipal or other authorised waste sites, consistent with normal household-scale waste generation for the confirmed maximum occupancy of 60 persons. Given this self-sufficient design, the development does not

	place material additional demand on municipal roads, water, sewage or emergency service capacity.
7. Precedent for Future Development: Approval of this application may establish a precedent for similar developments within environmentally sensitive areas. Such approvals can contribute to increasing development pressure and the gradual erosion of conservation objectives within the broader region.	Noted. Each application for environmental authorisation is assessed by the competent authority on its own merits, against the specific facts, specialist findings and mitigation measures presented for that site — this application does not, and cannot, bind the competent authority's assessment of any future, unrelated application.
8. Need and Desirability: The report states that the development is intended primarily for private family use. While private landowners are entitled to reasonable use of their property, the environmental costs and risks associated with the development must be weighed against the limited public benefit derived from a private-use facility. In my view, the need and desirability of the proposal have not been sufficiently demonstrated to justify the environmental disturbance.	This is not accepted. The BAR's Need and Desirability assessment (Section E, prepared in terms of Appendix 1 of the EIA Regulations, 2014) is a complete, dedicated section of the report addressing this requirement; it has not been omitted or under-addressed. Eco Route confirms that reasonable use of one's own private property, subject to a comprehensive environmental assessment, specialist input and binding mitigation, is a legitimate basis for need and desirability under the current legislative framework.
9. Application of the Precautionary Principle: The National Environmental Management Act requires that a risk-averse and cautious approach be applied where there is uncertainty regarding environmental impacts. Given the ecological sensitivity of the area and the potential for cumulative and irreversible impacts, the precautionary principle should guide the decision-making process.	Noted, and agreed that the precautionary principle under NEMA Section 2 applies. It has been applied practically throughout this process: independent terrestrial biodiversity, faunal, aquatic and visual specialist assessments were commissioned; the preferred alternative was sited to avoid the highest-sensitivity ecological zones and to target already-disturbed areas; a conservative, binding occupancy limit (60 persons total, 8 per EUA) has been confirmed; and the EMPr imposes no-go areas, rehabilitation requirements, and monitoring and compliance mechanisms (including ECO site visits) for the life of the development. This is considered a risk-averse and cautious approach proportionate to the identified risks.
For the reasons outlined above, I respectfully request that the competent authority carefully consider these concerns and either refuse the application or require a more comprehensive	Noted. This request will be before the competent authority alongside the full BAR, EMPr, specialist assessments and this Comments and Response Report for its decision.

assessment of cumulative impacts, traffic impacts, wildlife corridor disruption, roadkill risk, and long-term environmental consequences before any decision is made.	
Michelle Zeidler (8 Crossberry Close, The Woods, Brenton on Lake, Knysna) – 30 June 2026	
FORMAL OBJECTION TO THE DRAFT BASIC ASSESSMENT REPORT. Proposed Development: Portion 104 of Farm 216, Knysna (Lovemore Family Development). I wish to formally object to the proposed development on Portion 104 of Farm 216 as described in the Draft Basic Assessment Report. While I acknowledge the applicant's attempts to reduce environmental impacts through mitigation measures and revised designs, I remain of the opinion that this proposal is inappropriate for such an environmentally sensitive location. The cumulative impacts of the development have not been adequately addressed, and the proposal is inconsistent with the conservation objectives of the surrounding protected environment.	Noted, with thanks for this further, detailed submission on the Draft BAR, which is addressed point by point below.
1. Development Within a Highly Sensitive Biodiversity Area: The Basic Assessment Report confirms that the property falls within Critical Biodiversity Areas (CBA 1 and CBA 2) and that, under the 2023 Western Cape Biodiversity Spatial Plan, the entire property is treated as a Protected Area for planning purposes. The stated objective of these areas is to maintain biodiversity in a natural state, rehabilitate degraded areas and prevent further habitat loss. Despite this, the proposal introduces five Exclusive Use Areas, accommodation structures, elevated decks, wastewater treatment systems, water storage facilities and associated infrastructure. Regardless of the percentage of site coverage, this represents a permanent transformation of an ecologically significant landscape.	Noted, and this is an accurate summary of the BAR's own findings (Section 5, Sensitive Areas): the property was classified under the 2017 WCBSP as CBA1 (to maintain) and CBA2 (to restore), including an ESA2 area, and is treated under the current 2023 WCBSP as falling wholly within the Protected Area category, notwithstanding that it is not formally proclaimed as a protected area. This classification history is precisely what has informed the design response: the preferred alternative confines the development footprint to 0.9% of the site, within already-disturbed areas, avoiding the areas of highest sensitivity as identified by the specialist studies.
2. Loss of Ecological Integrity and Wildlife Habitat: The property forms an important ecological buffer between the Knysna Estuary,	This is substantially addressed. The specialist assessments referenced (which recorded bushbuck, caracal, golden moles, mole rats, puff

the Garden Route National Park and the Featherbed Nature Reserve. It provides valuable habitat and movement corridors for wildlife. The specialist studies recorded bushbuck, caracal, golden moles, mole rats, puff adders and numerous bird species, together with Species of Conservation Concern and protected vegetation. These findings clearly demonstrate that the property continues to function as an important natural ecosystem. Permanent development will inevitably introduce increased human activity, noise, lighting, infrastructure and habitat fragmentation. While mitigation measures are proposed, these cannot fully compensate for the long-term disturbance to wildlife and natural ecological processes.	adders, avifauna and Species of Conservation Concern) directly informed the EMPr's mitigation measures, including demarcated no-go areas, a Fauna and Flora Management provision (no trapping, killing or poisoning of wildlife, with monitoring), and a dedicated Human-Wildlife Conflict Mitigation provision (wildlife-secure waste storage, shielded lighting, and a prohibition on feeding or attracting wildlife) added to both the construction and operational phase EMPr tables. Eco Route agrees these measures manage rather than eliminate disturbance, which is why they are structured as ongoing, monitored obligations for the life of the development rather than once-off construction measures.
3. Increased Traffic, Wildlife Mortality and Disruption of Natural Movement Corridors: One of my greatest concerns is the increase in vehicle movements associated with both the construction and long-term use of the development. Although the applicant states that traffic will not exceed historical family use, the proposed development substantially increases the accommodation capacity and associated infrastructure. It is reasonable to expect additional construction traffic, maintenance vehicles, deliveries and increased family vehicle movements over time. The surrounding roads already pass through environmentally sensitive areas that serve as natural wildlife movement routes between protected habitats. Increased traffic will inevitably increase the risk of wildlife collisions and roadkill. The Garden Route is already experiencing increasing habitat fragmentation. Wildlife corridors are becoming increasingly restricted by development, roads and human activity. Every additional vehicle movement creates another obstacle for animals attempting to move between habitats, reducing ecological connectivity and increasing mortality. These impacts extend beyond the property boundaries and should be assessed as cumulative regional impacts rather than simply site-specific effects.	As set out in response to the comment at item 5 of this commenter's first submission (11 June 2026): this is not accepted on the facts. The BAR confirms no road widening, upgrading or new access construction is proposed, and no increase in vehicle movements is anticipated, as the same historical family-use access pattern will continue under the confirmed, binding maximum occupancy of 60 persons.

4. Increased Human Disturbance: Although the applicant describes the development as being for private family use only, the proposed development significantly increases the level of human occupation on the property. Five Exclusive Use Areas, each containing accommodation, kitchens, bathrooms and camping facilities, will inevitably increase: Human activity. Artificial lighting. Noise. Domestic disturbance. Servicing and maintenance requirements. Long-term pressure on surrounding natural areas. These impacts are inconsistent with the conservation objectives of adjoining protected areas and cannot simply be dismissed because the development is not commercial.	Eco Route confirms the confirmed, binding operational limits — a maximum of 8 people per EUA and 60 people in total across the property at any one time — together with the EMPr's lighting, noise and human-wildlife mitigation provisions (shielded, downward-facing lighting; defined quiet hours and noise limits under SANS 10103; wildlife-secure waste storage), are considered proportionate management of the human disturbance associated with this scale of private family use.
5. Risks to the Knysna Estuary: The property lies adjacent to one of South Africa's most sensitive estuarine environments. Although the report proposes modern wastewater treatment systems, these systems require ongoing maintenance and management throughout their operational life. Equipment failures, flooding events, poor maintenance or unforeseen circumstances always present a risk to groundwater and the Knysna Estuary. Environmental authorisation should consider not only ideal operating conditions but also the long-term risks associated with permanent infrastructure in such a sensitive location.	This is addressed. The EMPr's Malfunction Detection & Contingency provision (Section 11.3) requires that each Bio Bloo unit be capable of indicating malfunction, that any exceedance of treatment levels be reported, and that in the event of contamination or malfunction all processing and internal water recirculation stop immediately, with the responsible party contacted within 24 hours and SANParks notified. Combined with the closed-loop design (no discharge to the environment under normal operation) and the 36 m estuary buffer / 1:100 flood line siting requirement, this is considered a proportionate response to the long-term operational risk raised.
6. Existing Infrastructure is Already Under Significant Strain: The surrounding infrastructure is already under considerable pressure. Road infrastructure experiences increasing traffic volumes, seasonal congestion and limited capacity. Emergency access, municipal services and public infrastructure are already struggling to accommodate existing growth. In addition, wastewater and sanitation infrastructure in the surrounding area remains inadequate. Residents of The Woods are still reliant on septic tanks and have not yet been connected to the municipal sewer network. It would be inequitable and unfair for a new development to place further demands on existing infrastructure while long-established	Eco Route confirms, as set out in response to the comment at item 6 of this commenter's first submission (11 June 2026), that the development is self-sufficient and does not draw on municipal water, sewer or road infrastructure: water is supplied via on-site rainwater harvesting and the existing borehole, sewage is treated independently on-site via the Bio Bloo systems (not connected to, and placing no demand on, the municipal sewer network referenced in this comment), and no road upgrading is proposed. The development accordingly does not compete with or add to the infrastructure constraints described for The Woods.

residents continue to lack access to essential municipal services. Approving additional development, even if privately owned, contributes to cumulative pressure on: Local roads and intersections. Emergency response services. Municipal infrastructure. Environmental management resources. Waste management and wastewater infrastructure that are already under strain. Before any further development is authorised, there should be clear evidence that existing infrastructure has sufficient capacity to accommodate the proposal without adversely affecting current residents or placing additional burdens on already constrained municipal services. Development decisions should consider the cumulative impact of incremental growth rather than assessing each proposal in isolation.	
7. Cumulative Environmental Impacts: The Basic Assessment Report places significant reliance on mitigation measures. However, mitigation does not remove the cumulative impacts of permanent development within a highly sensitive ecological landscape. The Garden Route has already experienced increasing urbanisation, habitat fragmentation, invasive alien vegetation, wildfire impacts and biodiversity loss. Each additional development incrementally contributes to these pressures. The cumulative effect of roads, traffic, lighting, noise, human occupation and infrastructure must be considered alongside other existing and proposed developments within the area.	As set out in response to the comment at item 2 of this commenter's first submission (11 June 2026): cumulative impact within the scope of this site-specific BAR has been addressed through the confirmed 0.9% footprint, avoidance of sensitive habitat, and binding occupancy and infrastructure limits; a region-wide cumulative assessment is a matter for the competent authority's broader spatial and biodiversity planning frameworks.
8. Precedent for Future Development: Approving this application would create an undesirable precedent for further development within similarly sensitive properties adjoining the Knysna Estuary and protected conservation areas. Once permanent development is authorised in such locations, it becomes increasingly difficult to resist future applications, leading to gradual degradation of the broader protected landscape through incremental development. Environmental decisions should protect the long-term ecological	As set out in response to the comment at item 7 of this commenter's first submission (11 June 2026): each application is assessed by the competent authority on its own merits and does not bind future, unrelated applications.

integrity of the area rather than allowing a gradual erosion of conservation objectives.	
9. Application of the Precautionary Principle: The National Environmental Management Act requires that a risk-averse and cautious approach be applied where there is uncertainty regarding environmental impacts. Given: the property's location within Critical Biodiversity Areas; its treatment as a Protected Area under the Western Cape Biodiversity Spatial Plan; its proximity to the Knysna Estuary, Garden Route National Park and Featherbed Nature Reserve; the presence of protected vegetation and Species of Conservation Concern; the importance of maintaining wildlife movement corridors; the increased likelihood of wildlife mortality through increased traffic; the cumulative impacts of permanent human occupation; the already strained road, municipal and wastewater infrastructure; and the irreversible nature of permanent development, the precautionary principle should favour the protection of this environmentally significant property.	Noted, and the precautionary principle is agreed to apply, for the reasons given in response to the comment at item 9 of this commenter's first submission (11 June 2026). Each specific factor listed in this comment is addressed in the responses above: the property's WCBSP classification history (item 1), wildlife movement and habitat (item 2), traffic and wildlife mortality (item 3), the closed-loop wastewater design and its contingency provisions (item 5), and infrastructure self-sufficiency (item 6).
Conclusion: While I appreciate the efforts made by the applicant to minimise impacts through design modifications and mitigation measures, I do not believe these measures adequately address the cumulative and long-term environmental consequences of this proposal. The development will result in increased human activity, increased vehicle movements, greater risks to wildlife, further fragmentation of important ecological corridors and additional pressure on infrastructure that is already under strain. The proposal is incompatible with the conservation objectives of this highly sensitive landscape and does not adequately demonstrate that the long-term environmental costs are outweighed by any public benefit. I respectfully request that the competent authority refuse Environmental Authorisation for this development. Alternatively, if the application is not refused, I request that it be subjected to a far more rigorous assessment of cumulative environmental impacts,	Noted. This request, and the detailed concerns raised throughout both submissions, will be before the competent authority alongside the full BAR, EMP, specialist assessments and this Comments and Response Report for its decision.

infrastructure capacity, wildlife connectivity and the long-term conservation objectives of the Knysna Protected Environment before any decision is made. The Knysna Estuary and its surrounding protected landscapes are among South Africa's most valuable natural assets. Their ecological integrity should be preserved for future generations, and decisions made today should reflect the principles of sustainable development, environmental justice and responsible stewardship as required by the National Environmental Management Act.	
Vernon Rice (on behalf of Witgoud Beleggings, owner of Portion 103 of Farm 216 – direct neighbour) – 19 July 2026	
As the direct neighbour living of Portion 103 of Farm 216, I, Vernon Rice (on behalf of owner Witgoud Beleggings) object in the strongest possible terms to the proposed development. My objections are based primarily on the significant environmental impacts that the proposed development is likely to have on the surrounding area and are set out below. 1. THE PROPOSED DEVELOPMENT IS EXCLUSIVELY FOR PRIVATE USE BY THE LOVEMORE FAMILY. The EAP stated the following in the Basic Assessment: "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." Furthermore it was stated that the '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	Eco Route confirms the confirmed, binding maximum occupancy — 60 registered Lovemore family members and Lovemore Children's Secondary Trust beneficiaries in total, and 8 per EUA — has been incorporated into the Final BAR (Section 2.3) and EMPr as a fixed limit, not an open-ended allowance that grows with the family. Regarding the mechanism preventing future expansion or commercialisation: the Rezoning Motivation (TMBA, 21 August 2026) confirms the title deed will be amended to record that none of the facilities may be used for tourist accommodation for income purposes, and the applicant's parallel engagement with SANParks toward a formal stewardship agreement (EMPr Section 4.2.6) is intended to capture a binding restriction against commercial use of the property as a condition of that agreement. Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and confirms these two mechanisms — the title deed restriction and the SANParks stewardship agreement — are the instruments intended to make this restriction run with the land regardless of future ownership. The 'Future Disturbance Area' shown on the SDP for long-term reference is explicitly excluded from this application and would require a full,

application. It will require a separate application process if the family wishes to activate it in future." The Basic Assessment states, "...as the family has grown across generations...". This is an important admission. It acknowledges that increasing family numbers are the reason for expanding the camping area. A reasonable planning question therefore becomes - If continued family growth is the justification today, what mechanism prevents further expansion when the next generation doubles in size? That is not speculation—it follows directly from the applicant's stated motivation. The fact that a 'Future Disturbance Area' of 7,733 m² is included is evidence that the family intends to expand, and the property would accommodate additional family members over time. If increasing family numbers are the reason for seeking approval now, what mechanism will prevent future applications for additional camping nodes, increased occupancy, expanded infrastructure, or eventual commercial use, as subsequent generations continue to grow? Neither the Basic Assessment nor the planning motivation appears to identify any legally enforceable mechanism that limits future expansion or confines the use permanently to the current beneficiary group.	independent EIA/BAR process, including its own public participation, before any activation could occur.
If the application to the municipality is indeed for a Consent Use for a Camping Site (or tourist accommodation), then there is an apparent inconsistency between the land use application and the Basic Assessment. A Consent Use application is not merely a request to approve the applicant's current intentions, it is an application to establish a new lawful land use on the property. The Municipality is therefore required to assess whether a Camping Site is an appropriate land use within Agricultural Zone I, having regard to the Municipal Spatial Development Framework (MSDF), the environmental sensitivity of the site, surrounding land uses, and the public interest. The applicant's repeated assertions that the facility is "not a tourist lodge" or "not a camping resort" do not alter the fact	This raises a genuine town-planning question that falls within the Knysna Municipality's parallel rezoning application (Case Officer: Mr S. Mqhele) rather than the environmental authorisation process. As set out elsewhere in this Comments and Response Report, the applicant is applying to rezone to Open Space III, under which Tourist Accommodation is available as a Consent Use in its own right (not the Agriculture Zone I Camping consent use referenced in this comment). Eco Route commits to obtaining the town planner's written confirmation of the applicable consent-use category and its associated conditions, and to reflecting the outcome in the Final BAR. Eco Route agrees that land-use rights attach to the land rather than to the current owner, which is precisely why the title

that the land use being applied for is a Camping Site. If the applicant's position is that the proposal is not a tourism-related accommodation use, then it is unclear why approval for a Camping Site is required at all. Although the Knysna Zoning Scheme distinguishes between "Camping Site" and "Tourist Facilities" as separate consent uses, the Scheme expressly provides that a camping site accommodates transient guests and is subject to the development parameters applicable to tourist accommodation. It is therefore a tourism-related accommodation land use rather than an ordinary ancillary residential or agricultural activity. Accordingly, the planning implications of granting a permanent consent use for a camping site extend beyond the applicant's current intention to restrict its use to members of the Lovemore family. Unless legally enforceable conditions are imposed, the consent would attach to the property and could potentially be relied upon by future owners or trustees. The municipality cannot normally approve a land use based solely on the applicant's current intention not to operate commercially. Land use rights generally attach to the land, not to the current owner or their personal circumstances. If the proposal were for a private family picnic area used occasionally, it would be difficult to characterise it as a camping establishment. However, where the proposal is for a permanent, purpose-designed camping site accommodating 50–60 people, requiring Consent Use under Agriculture Zone I, the land use has characteristics that go beyond ordinary incidental family recreation. One of the fundamental principles of land use planning is that approvals regulate how land is used, rather than who uses it. A campsite does not necessarily cease to be accommodation merely because the users are related.	deed restriction and SANParks stewardship agreement (see response to the comment above) are being pursued as durable, property-attached restrictions rather than relying on the applicant's current intention alone.
The EAP states "...will only ever be used...", however, it does not specify: number of visits per year; maximum nights occupied; average annual occupancy; seasonal occupancy; duration of	Noted. Eco Route confirms the confirmed occupancy limit (60 persons in total, 8 per EUA) is now stated as a fixed maximum in the Final BAR and EMPr, rather than an estimate. The specific

stays; frequency of vehicle movements; whether different branches of the family visit independently; whether the facility is occupied continuously during holiday periods. Without these details, it is difficult to assess operational impacts, which are a key consideration under NEMA. The current owner's intentions are relevant, but they do not necessarily determine the scope of the land use right for all future owners or trustees. Unless they are incorporated as enforceable conditions of the Consent Use approval, the Environmental Authorisation, or another legally binding instrument, they are not by themselves legally binding. A future trustee could simply argue that the property already has approval for a camping site. The Basic Assessment does not state what mechanisms will be put in place to ensure this outcome.	operational detail requested — visit frequency, seasonal patterns, duration of stays — will vary by family circumstance, and Eco Route confirms the environmental assessment has been based conservatively on the confirmed maximum occupancy operating at full capacity, rather than on a lower, more typical usage pattern, so as not to understate potential impacts. As set out in response to the comment above, the durability of this restriction for future owners or trustees is addressed through the title deed restriction and the SANParks stewardship agreement.
The EAP stated the following in the Basic Assessment: "The existing access has been adequate for historical family use and will remain so during the operational phase. No increase in vehicle movements is anticipated during the operational phase. The same family members who have historically accessed the property will continue to do so. The C.J. Langenhoven Street/Dolly Raats Road intersection will not experience any increase in traffic frequency as a result of operational use." The frequency and number of people visiting the site has not been detailed in the Basic Assessment report, and therefore the impact on traffic cannot be realistically determined. To state that the families historical use will remain the same is not realistic considering that the proposed development can accommodated up to 60 people at one time, with intention of expanding in the future. A Traffic Impact study should be undertaken to determine the impact of increased vehicle users, specifically during peak season. Estimating a total of 60 visitors over the holiday season or at one time would greatly increase the current capacity of road users. This however cannot be accurately evaluated without a traffic impact study informing the assessment.	This is not accepted as presented. The BAR (Section 2.4) confirms that access is via the existing grassed vehicle access track, with no road widening, upgrading or new access construction proposed, and no anticipated increase in vehicle movements, because the confirmed maximum occupancy (60 persons) is not additional to historical family use — it is the confirmed ceiling on that same use. Eco Route acknowledges that a formal Traffic Impact Study has not been conducted; given the confirmed absence of any proposed road upgrade and the private, non-public nature of the access, this has not been considered necessary for this application, consistent with the scale of a private family facility rather than a commercial establishment.

In conclusion, the apparent inconsistency between the Consent Use application and the Basic Assessment is therefore not merely semantic. It goes to the heart of the planning assessment. The Municipality is being asked to grant a permanent land use right for a Camping Site, while the Basic Assessment seeks to minimise the planning significance of that land use by characterising it as private family recreation. Unless the proposed restrictions on occupancy and use are incorporated into legally enforceable conditions of approval, they remain statements of present intention rather than binding limitations on the land use rights that would attach to the property. In these circumstances, the competent authority should carefully consider whether the application accurately reflects the nature, intensity and long-term implications of the land use rights being sought.	
Additional Planning Concern – Incorrect Consent Use Application. Agriculture Zone I permits a Consent Use for Camping only subject to clear and restrictive conditions. The current application appears to breach these fundamental requirements. 1. Consent for Camping is limited to 12–15 people for occasional use. The proposed development seeks to accommodate approximately 50–60 people across multiple camping nodes. This clearly exceeds the scale contemplated by the zoning scheme and effectively creates a permanent camping facility. The applicant's stated intentions regarding private family use are irrelevant to the planning assessment; the issue is the land use rights being sought. 2. Consent for Camping does not permit fixed campsites or permanent structures. The application proposes fixed camping nodes, associated infrastructure and permanent communal facilities. This is inconsistent with the limited nature of a Consent Use for Camping. 3. Camping must remain secondary to the existing primary use of the property. The zoning scheme requires camping to be ancillary to an established primary agricultural or other lawful primary use.	As set out in response to the comment at item 2 above, whether the applicable consent-use category and its associated parameters (scale, permanence, ancillary-use requirements) are correctly matched to the proposed development is a town-planning question under active consideration through the parallel rezoning application, given that the applicant is applying for Open Space III zoning with Tourist Accommodation as a Consent Use, rather than remaining under the Agriculture Zone I Camping consent use referenced in this comment. Eco Route commits to obtaining the town planner's written confirmation that the correct application type and consent-use category have been pursued, and to reflecting this confirmation in the Final BAR.

There is no existing established primary use of the property other than open land. The proposed camping development would inevitably become the dominant and primary use of the property, contrary to the requirements of Agriculture Zone I. These requirements are clearly breached. The application type is therefore fundamentally incorrect and the competent authority should require the appropriate land use application or refuse the proposal on this basis.	
Important questions to consider: If I were reviewing this Basic Assessment, I would expect the following issues to be clarified: Why is a consent use for a Camping Site required if the proposal is presented as merely private family recreation? What is the planning distinction between this development and a commercial camping establishment? If the camping site is to remain private, why should the municipality grant permanent camping site rights rather than a more limited approval tied to the specific circumstances? How is the "family only" restriction to be enforced in perpetuity? How many beneficiary families currently exist, and what is the projected increase over the next 20–30 years? What legal mechanism prevents future trustees or owners from commercialising the approved camping site? Why was the ecological assessment based on peak occupancy of 50–60 people without assessing the cumulative impacts of repeated seasonal use?	These questions are noted and, to the extent they are town-planning in nature, are being addressed through the parallel rezoning application referenced in response to the comments above. Regarding enforceability: the title deed restriction and the SANParks stewardship agreement are the mechanisms intended to bind future owners or trustees, as set out in response to the comment at item 1. Regarding projected family growth: the confirmed maximum of 60 persons in total is a fixed ceiling incorporated into the Final BAR and EMPr, not a figure that adjusts with future family growth. Regarding the ecological assessment basis: this has been conducted on the confirmed maximum occupancy operating at full capacity, as set out in response to the comment at item 3.
2. SOCIO-ECONOMIC ASPECTS. Given that the proposed use of the property is a Camping Site, which constitutes a tourism-related accommodation land use rather than an ordinary ancillary agricultural or residential activity, it is submitted that the socio-economic implications of the proposal have not been adequately assessed. The Basic Assessment places considerable emphasis on the fact that the facility will be used only by members of the Lovemore family and beneficiaries of the Trust, and that no commercial income will be generated. While this may describe the	Noted. As set out in response to the comments above, the confirmed development is a private, non-commercial family facility with a fixed maximum occupancy of 60 persons, secured through the title deed restriction and the SANParks stewardship agreement. Eco Route agrees that a material change in land use intensity warrants assessment of infrastructure demand, traffic, fire management and emergency access, each of which is addressed

applicant's current intention, it does not remove the requirement under NEMA to assess the broader social and economic consequences associated with the establishment of a new accommodation land use within a highly sensitive environmental setting. The establishment of a Camping Site accommodating approximately 50 to 60 people represents a material change in land use intensity. Such a change has the potential to influence a range of socio-economic considerations that extend beyond the immediate property, including the character of the area, neighbouring land uses, infrastructure demand, traffic generation, fire management, emergency access, and the cumulative effects of increased seasonal occupation.	in the BAR and EMPr and in the responses to the specific comments below (items 3–8).
In addition, the proposal raises questions regarding the long-term sustainability and management of the development. The Basic Assessment states that the motivation for the proposal is the continued growth of successive generations of the Lovemore family. This acknowledgement indicates that occupancy demand is expected to increase over time. However, no assessment has been undertaken of the long-term implications of this growth, including whether future pressure for additional camping nodes, expanded infrastructure or increased occupancy may arise. The socio-economic assessment should also consider whether the approval of a Camping Site on Agricultural Zone I land within the Western Heads may create a planning precedent for similar applications within an environmentally sensitive landscape. Although each application must be considered on its own merits, decision-makers are required to consider the cumulative implications of incremental land use changes and whether approval would be consistent with the broader spatial planning and biodiversity objectives applicable to the area. Furthermore, if the facility is genuinely intended to remain a private family camping area with no commercial component, the Basic	As set out in response to the comments above, the confirmed maximum occupancy of 60 persons is a fixed ceiling, not an open-ended figure that grows with the family across generations; any future activation of additional capacity (including the 'Future Disturbance Area' shown on the SDP for long-term reference only) would require its own full, independent environmental authorisation process. Regarding precedent: each future application would be assessed by the competent authority on its own merits and against the prevailing spatial and biodiversity planning framework at that time.

Assessment should explain why a permanent Consent Use for a Camping Site is necessary and whether a less intensive planning mechanism could achieve the same objective. The assessment does not evaluate whether the planning rights being sought are proportionate to the stated need or whether they may facilitate a broader range of future land uses than those currently described. From a socio-economic perspective, the assessment should therefore evaluate not only the applicant's present intentions but also the consequences of creating a permanent accommodation land use right that attaches to the property. Unless legally enforceable restrictions are incorporated into the Consent Use approval and Environmental Authorisation, the planning rights created may extend beyond the current ownership structure and could be relied upon by future owners or trustees.	
For these reasons, it is submitted that the socio-economic assessment is incomplete and does not adequately evaluate the broader planning, social and cumulative implications associated with establishing a Camping Site within an area of exceptional environmental sensitivity. Because the applicant states that, "No commercial revenue will be generated...", there is also a legitimate question regarding the public benefit of the proposal. One of the balancing exercises under NEMA is whether the environmental impacts of a proposal are justified by its social and economic benefits. If the facility is intended solely for the private recreational use of one extended family and does not generate employment, tourism revenue, agricultural production, public recreation opportunities or other wider socio-economic benefits, then the societal benefits that would ordinarily be weighed against the environmental costs may be limited. That does not mean private developments cannot be approved. However, it does mean that where a proposal is located within a Critically Endangered ecosystem and a Protected Area, the decision-maker should	Noted. Eco Route acknowledges that this is a private, non-commercial family facility that does not generate the wider socio-economic benefits (employment, tourism revenue) that might otherwise be weighed against environmental costs for a commercial development. The applicant's basis for authorisation is reasonable residential/recreational use of privately owned land, assessed against a comprehensive environmental process: independent specialist assessments, a confirmed and binding occupancy limit conservative relative to the assessed alternatives, and EMPr mitigation and monitoring commitments. This balancing exercise is ultimately a matter for the competent authority's determination under NEMA's sustainable development principles.

carefully consider whether the environmental impacts are justified by the nature and extent of the public or broader socio-economic benefits arising from the proposal. This becomes a relevant consideration when applying NEMA's principles of sustainable development and balancing environmental protection with justifiable social and economic development.	
3. PROPER CONSIDERATION OF THE WESTERN CAPE BIODIVERSITY SPATIAL PLAN 2023. The WCBSP 2017 has been used in the Basic Assessment Report as well as Terrestrial Biodiversity Assessment and Faunal Assessment. The mapping for the WCBSP 2017 changed in the 2023 WCSDP such that the property was categorised as a Protected Environment (Designated) from CBA 1 & 2. It is crucial that the specialist assessments are updated to reflect the WCBSP 2023 mapping, and within the management objectives of a Protected Environment. The Basic Assessment states that the property as situated within a Critical Biodiversity Area (CBA:1 – To maintain and CBA:2 – To restore), including terrestrial and aquatic features. An Ecological Support Area (ESA:2 – To restore) is also included on the property. It does further state that the new 2023 Western Cape Biodiversity Spatial Plan designated the entire property as a protected area, and that the entire property will be dealt with according to the general guidelines for protected areas. However, compatibility with the land use management objectives of a protected area have not been adequately addressed in the Basic Assessment. The management objectives are that it must be kept in a natural state, with a management plan focused on maintaining or improving the state of biodiversity. Importantly, all operational aspects of managing these areas must be subject to their main purpose, which is to protect and maintain biodiversity and ecological integrity and should be governed by a formally approved management plan including land-use activities that support the primary function of these areas as sites for biodiversity	Eco Route commits to obtaining written confirmation from the terrestrial biodiversity, faunal and aquatic specialists on whether their significance ratings and recommendations would change when assessed against the 2023 WCBSP's Protected Area management framework and objectives (as opposed to the 2017 WCBSP CBA/ESA classification on which the specialist reports were based), and to reflect this confirmation in the Final BAR. Eco Route confirms that the BAR itself (Section 5) already identifies and discusses both the 2017 and 2023 WCBSP classifications and their implications for the property.

conservation. It is clear that the main purpose must be for conservation, and the allowed land-use activity should support this primary function.	
[Quoted from WCBSP Table 4.5 (Protected Areas category)]: Desired management objective: "Must be kept in a natural state, with a management plan focused on maintaining or improving the state of biodiversity. A benchmark for biodiversity." General guidelines: all operational aspects of managing these areas must be subject to their main purpose, which is to protect and maintain biodiversity and ecological integrity and should be governed by a formally approved management plan including land-use activities that support the primary function of these areas as sites for biodiversity conservation; the management plan must identify allowable activities, which should be consistent at least with the CBA 1 category; the location of these allowable activities should be captured in a zonation plan in the management plan; activities relating to the construction of roads, administrative or tourism infrastructure and services (such as water reticulation systems, power lines, etc.) that are required to support the primary function of the protected area and its allowable activities, are subject to NEMA authorisation and the protected area management plan; in the case of Protected Environments, a variety of agricultural land-uses may be allowed, such as livestock grazing, plantation forestry and limited cultivation, the location of these land-use activities must be informed by the WC BSP Map and should be specified in the zonation plan in the management plan for the Protected Environment, all areas of natural habitat that are zoned for conservation use, should be subject to implementation of the land-use guidelines for protected areas, CBAs, and ESAs. Specific guidelines: Implementation of the Protected Area Management Plan. [Table 4.5: Land-use Activity Descriptions and Biodiversity-related Conditions/Controls, Conservation category:] Subject to	Noted, and this is an accurate quotation of the WCBSP 2023 Protected Area management objectives and general guidelines. As set out in response to the comment above, Eco Route commits to confirming with the specialists whether their findings and recommendations remain valid when assessed against this framework.

stringent controls, the following biodiversity-compatible land-use activities (i.e., those of very low impact) may be accommodated in conservation areas: 1a) Conservation management activities such as the clearing of invasive alien species, research, and environmental education. 1b) Low intensity ecotourism activities such as recreation and tourism (e.g. hiking trails, bird and game watching, and small-scale, eco-friendly visitor overnight accommodation) with limited access points. 1c) Sustainable consumptive activities according to the relevant policy: Small-scale harvesting of natural resources. Assumes the following conditions/controls: These land-uses are limited to very low modification levels for infrastructure development. If existing infrastructure already exists, this should be used. Alternatively modified areas should be utilised. Environmental Management Programmes and/or Standard Operating Procedures/Guidelines are put in place for any development or activity. The entire property or a part thereof (depending on the land-use activity above) is under some form of conservation agreement or mechanism.	
The primary use of the property as conservation allows for low intensity ecotourism activities. The proposed camp site does not demonstrate eco-tourism aspects, nor does it fall under a low intensity activity or very low impact land-use. It cannot be stated that the proposed development is low impact given the high number of people accommodating the property at one time (approx. 50 to 60 people according to the EAP). The number of people is also expected to increase over time. Furthermore, "low-impact tourism" is not synonymous with "low-density accommodation." There is an important distinction between low-impact infrastructure and low-impact land use. A camping facility may have: tents rather than permanent buildings; platforms instead of concrete slabs; composting toilets; limited earthworks; low	Eco Route agrees that low-impact infrastructure is not the same test as low-impact land use, and that the intensity, duration and nature of human activity — not only the physical footprint — are relevant to assessing compatibility with the WCBSP 2023 Protected Area objectives. This is precisely the assessment committed to in response to the comment at item 3 above (WCBSP 2023 specialist confirmation), which will consider intensity of use, not only footprint.

building footprints. From an engineering perspective this may qualify as a low-impact development. However, NEMA does not assess impact based only on the size of the structures. The assessment considers: 1. intensity of human activity; 2. ecological sensitivity; 3. cumulative impacts; 4. fragmentation; 5. disturbance; 6. fire risk; 7. invasive species; 8. lighting; 9. noise; 10. long-term management.	
A campsite accommodating 50–60 people simultaneously is no longer a small family recreation area. It represents a relatively intensive tourism land use with repeated human presence. A campsite occupied by 60 family members for two weeks over Christmas will generate many of the same ecological pressures as one occupied by 60 paying guests: trampling; parking; lighting; noise; waste generation; fire risk; vegetation disturbance. On Critically Endangered Knysna Sand Fynbos, even repeated pedestrian movement can significantly affect ecological functioning. From an ecological perspective, the receiving environment does not distinguish between family members and tourists. The Western Heads area is recognised as one of the most environmentally sensitive landscapes within the Knysna Municipal area. The property lies within an area identified by multiple statutory and strategic planning instruments as requiring a precautionary approach to development. The Knysna Municipal Spatial Development Framework (MSDF) identifies the Western Heads–Goukamma Conservancy as an area of exceptional biodiversity importance and recognises the need to protect the ecological integrity of this landscape. The property is situated within Critically Endangered Knysna Sand Fynbos, falls within a Critical Biodiversity Area (CBA 1), and forms part of a Protected Area as identified in the Western Cape Biodiversity Spatial Plan (WCBSP) 2023.	Noted, and the same commitment applies: whether the confirmed maximum occupancy and pattern of use is compatible with the WCBSP 2023 Protected Area and CBA1 objectives for this Critically Endangered Knysna Sand Fynbos habitat will be specifically addressed in the specialist confirmation committed to in response to the comment at item 3 above.
The MSDF indicates that low-impact, nature-based tourism may be supported only where it is compatible with biodiversity objectives. It	Noted, and agreed that the burden rests with the applicant to demonstrate compatibility with the conservation objectives

does not establish an entitlement to tourism development merely because the proposed infrastructure is physically small or visually unobtrusive. Rather, it establishes a qualifying test that requires the applicant to demonstrate, through credible scientific assessment, that the proposed land use is compatible with the conservation objectives applicable to the site. The burden of proof therefore rests with the applicant to demonstrate that the proposed Camping Site will not compromise the biodiversity values that the planning instruments seek to protect. For Protected Areas, Critical Biodiversity Areas (CBA 1) and Critically Endangered vegetation types, the overarching management objectives are generally to: maintain ecological integrity and natural ecosystem functioning; prevent further habitat transformation; avoid fragmentation of remaining natural habitat; minimise disturbance to ecological processes; maintain habitat connectivity; avoid incremental degradation through cumulative impacts; and limit land uses to those that are demonstrably compatible with long-term biodiversity conservation. These objectives reflect the precautionary approach embedded in the National Environmental Management Act (NEMA), particularly where development is proposed within irreplaceable or highly threatened ecosystems.	applicable to the site, rather than the reverse. This is the purpose of the specialist confirmation against the WCBSP 2023 framework committed to in response to the comment at item 3 above.
Although the proposed Camping Site may have a relatively limited built footprint, the environmental assessment should not be confined to the physical footprint of the infrastructure alone. The operational characteristics of the proposed land use—including accommodation of approximately 50 to 60 people during peak periods, associated vehicle movements, pedestrian activity, parking, lighting, noise, waste generation, fire risk and repeated seasonal occupation—are all capable of generating ecological impacts that extend well beyond the immediate development footprint. In this context, it is not self-evident that a Camping Site of the proposed scale constitutes a "low-impact" land use simply	Eco Route confirms, as set out in response to the comment at item 3 above, that the terrestrial biodiversity, faunal and aquatic specialist assessments were conducted with reference to the 2017 WCBSP CBA/ESA layer, and commits to obtaining written confirmation from each specialist on whether their significance ratings remain valid when assessed against the current 2023 WCBSP Protected Area framework, with this confirmation to be included in the Final BAR before a decision is sought from the competent authority.

because permanent structures are limited. The relevant question is whether the intensity of human activity associated with the development is compatible with the biodiversity objectives for this highly sensitive landscape. The Basic Assessment does not adequately demonstrate this compatibility. Furthermore, the terrestrial biodiversity, botanical and faunal assessments appear to rely on outdated biodiversity mapping and earlier conservation planning datasets, despite the publication of the Western Cape Biodiversity Spatial Plan (WCBSP) 2023, which provides the current provincial biodiversity planning framework. The WCBSP 2023 identifies the site within a Protected Area and confirms the high conservation status of the surrounding landscape. In the absence of an assessment based on the most current biodiversity spatial planning information, it is uncertain whether the significance ratings assigned to biodiversity impacts remain valid. This is particularly important where the conservation status of the receiving environment has changed since the earlier studies were undertaken, as reliance on superseded biodiversity information may underestimate both the sensitivity of the site and the significance of the proposed impacts. Given the recognised conservation importance of the Western Heads landscape and the precautionary principles contained in Section 2 of NEMA, it would be prudent for the competent authority to require the biodiversity assessment to be reviewed against the current WCBSP 2023 before determining whether the proposal is genuinely compatible with the biodiversity objectives of the area.	
Other points to consider: 1. The Basic Assessment states that "Fencing will be kept to the minimum necessary". Given that fencing has significant impact on fragmentation of habitat and animal movement, it must form part of this assessment and not considered at a later stage. 2. A Conservation Management Plan with zonation plan showing allowable activities should be	On fencing: noted, and Eco Route confirms this is addressed in the EMP, which requires that any fencing be kept to the minimum necessary, be designed to remain permeable to wildlife movement so as not to fragment habitat, and be confirmed with SANParks — this has not been deferred to a later, unassessed stage. On a Conservation Management Plan with zonation: Eco Route confirms

presented. The EMPr and AIP Control Plan do not effectively address conservation management of the property.	the EMPr's no-go area demarcation, rehabilitation requirements and monitoring provisions serve this function at the scale of this application; a full Protected Area-style Conservation Management Plan and zonation plan would appropriately form part of the SANParks stewardship agreement process referenced elsewhere in this report, given that instrument is what would formally bring the property into the protected area management framework.
3. FIRE MANAGEMENT. The Terrestrial specialist acknowledges that the conservation of the fynbos vegetation is dependent upon an appropriate fire regime and that prolonged fire exclusion will result in thicket encroachment and the loss of fynbos specialist species. The proposed Camping Site is located within a fire-dependent fynbos ecosystem where periodic ecological burning is essential to maintain biodiversity, ecological processes and the long-term persistence of fynbos species. The establishment of five dispersed camping nodes accommodating up to 50–60 people, together with associated infrastructure and regular human occupation, has the potential to significantly influence both wildfire risk and future fire management. Historically, a significant wildfire originated on the Lovemore property when it was owned by the Kershaw family. The fire spread in a west-northwesterly direction towards Brenton-on-Lake, causing damage to neighbouring properties. As a consequence, the Kershaw family was exposed to claims for damages from affected neighbouring landowners. This incident demonstrates the very real fire risk associated with the property and highlights the potentially severe consequences when a fire escapes from the site.	Eco Route acknowledges the serious fire history described, including the historical Kershaw-era fire and resulting neighbour damages claims. The EMPr (Section 6.4) confirms the landowner's current membership of the Southern Cape Fire Protection Agency and commits to a dedicated Fire Management Plan, to be included in the Final BAR as an integrated component of the EMPr, developed and implemented in consultation with the Fire Protection Agency, addressing fire risk from the development's ignition sources.
Moreover, our property has been severely threatened by wildfires on three separate occasions, during which we were forced to evacuate. Most notably, during the devastating 2017 Knysna fires, we lost two dwellings on our property, both of which were completely destroyed. Fire is therefore not a theoretical concern	Eco Route acknowledges the 2017 Knysna fires and their impact on this commenter's property. As set out in response to the comment above, fire prevention, response and water-supply-for-firefighting considerations will be addressed in the Fire Management Plan committed to in the EMPr, developed in consultation with the

but a very real and ongoing threat to our property, neighbouring landowners and the surrounding environment. The proposed development, which is expected to accommodate approximately 50–60 campers, multiple additional ignition sources, including campfires, braais, gas appliances, smoking and increased human activity. This risk is further exacerbated by the limited availability of water in the area, which would severely hamper firefighting efforts should a fire occur. In my view, approving this development without demonstrating adequate fire prevention measures, emergency response capability and a reliable water supply would be highly irresponsible and would place neighbouring properties, lives and the surrounding natural environment in unnecessary danger.	Southern Cape Fire Protection Agency, which is the appropriate body to confirm adequacy of local firefighting water supply and response capability for this and neighbouring properties.
Conversely, the presence of permanent camping infrastructure and seasonal occupation may restrict the ability of land managers to implement prescribed ecological burns due to safety, liability and operational constraints. The resulting alteration of the natural fire regime has the potential to contribute to vegetation succession, thicket encroachment and the gradual loss of fire-dependent fynbos species and ecological function. Given the ecological importance of maintaining an appropriate fire regime within Critically Endangered Knysna Sand Fynbos, the long-term implications of the proposed development for wildfire risk, prescribed burning, emergency access and integrated fire management should be comprehensively assessed. Without such an assessment, there remains uncertainty as to whether the proposed Camping Site is compatible with the long-term conservation objectives of this highly sensitive landscape. In the Basic Assessment, it is stated that the property owners will be recommended to join the Southern Cape Fire Protection Agency to discuss management of the fire risks. However, no comments from the SCFPA have been received and no discussion regarding management of fire risk has been included in the report for	Eco Route confirms no comments have yet been received from the Southern Cape Fire Protection Agency, as the Fire Management Plan is still to be developed in consultation with them, per the commitment in the EMPr (Section 6.4). Regarding compatibility with prescribed ecological burning under a future SANParks stewardship arrangement: this is a legitimate consideration that Eco Route commits to raising explicitly with SANParks and the Fire Protection Agency as part of finalising both the stewardship agreement and the Fire Management Plan, so that the location and distribution of the camping nodes does not constrain the ability to undertake controlled burns safely.

consideration. Furthermore, the proposed stewardship agreement with SANParks, whereby the property would be managed as part of the Garden Route National Park in terms of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) (NEMPAA), should be carefully evaluated in light of the proposed Camping Site. The long-term conservation objectives of restoring and maintaining Critically Endangered Knysna Sand Fynbos are likely to depend on the implementation of appropriate ecological management, including periodic prescribed burns. The location and distribution of the proposed camping nodes, together with associated infrastructure and seasonal occupation, may constrain the ability to undertake controlled ecological burns safely and effectively, thereby potentially compromising the achievement of the property's long-term conservation objectives.	
4. FAILURE TO ADEQUATELY ASSESS A LOWER-DENSITY ALTERNATIVE. The Terrestrial Biodiversity Assessment identified two Species of Conservation Concern (SCC) within the proposed development footprint, namely <i>Lebeckia gracilis</i> (Endangered) and <i>Selago villicaulis</i> (Vulnerable). The specialist concluded that the loss of these species, particularly <i>Lebeckia gracilis</i>, would constitute a High Negative impact. To reduce this impact, the specialist recommended a number of essential mitigation measures, including: the exclusion or relocation of one of the proposed camping areas; modification of the layout of the remaining camping sites to avoid Species of Conservation Concern; and rehabilitation and active management of disturbed vegetation. Although the revised Site Development Plan (SDP) has reportedly been amended to avoid the individual plants identified during the field survey, this represents only a partial response to the specialist findings.	Noted, and this is an accurate summary of the Terrestrial Biodiversity Assessment's findings regarding <i>Lebeckia gracilis</i> and <i>Selago villicaulis</i>. Eco Route confirms the Site Development Plan was revised specifically in response to these findings to avoid the mapped individuals, consistent with the specialist's recommended mitigation.
Avoiding the mapped individuals does not avoid the broader ecological impact associated with the permanent disturbance of	Eco Route agrees that avoiding mapped individual plants is not equivalent to avoiding all habitat-level impact, and that habitat

their habitat. The proposed development footprint continues to extend substantially into medium sensitivity Fynbos Thicket, which the specialist identified as habitat supporting these Species of Conservation Concern. Consequently, while direct destruction of the recorded individuals may have been avoided, the proposal still results in habitat loss, habitat degradation and fragmentation within vegetation recognised as supporting threatened flora. This distinction is important. The conservation objective under NEMA is not merely the protection of individual plants but the maintenance of viable populations, ecological processes and habitat integrity. Habitat loss within Critically Endangered Knysna Sand Fynbos cannot be regarded as fully mitigated simply because known individuals have been excluded from the construction footprint. The specialist further concluded that the disturbed fynbos habitat has moderate restoration potential, provided that active ecological management is implemented. This finding suggests that the remaining indigenous vegetation retains ecological value and should therefore be conserved wherever reasonably possible, rather than regarded as suitable for additional development. Conversely, the assessment identifies areas of Low Sensitivity Degraded Dune Thicket and Very Low Sensitivity Transformed Habitat elsewhere on the property. These areas appear to have received little or no meaningful consideration as potential locations for camping infrastructure, despite presenting a significantly lower ecological risk. In these circumstances, it is difficult to conclude that the hierarchy of impact avoidance has been properly applied in the Basic Assessment report.	loss within Fynbos Thicket supporting these species remains a residual impact of the confirmed footprint even where individuals are avoided. This is directly relevant to the lower-density alternative question raised in the comment below, which Eco Route addresses in response to that comment.
Perhaps more significantly, the specialist findings should have prompted consideration of a lower-density development alternative rather than simply rearranging the proposed layout. The proposal seeks to accommodate approximately 50 to 60 people through multiple camping nodes within a highly sensitive ecological	This is accepted as a valid critique of the alternatives assessment. The BAR's alternatives comparison (Alternatives A, B and B1) evaluated layout and design variants at the confirmed development scale, together with the no-go alternative, but did not separately model a reduced-node, reduced-capacity

environment. The primary response to the specialist findings has been to modify the layout sufficiently to avoid individual SCC locations while maintaining substantially the same development intensity. The specialist recommendations, read together with the ecological sensitivity of the site, raise a broader question - Should the number of camping sites, and consequently the carrying capacity of the development, have been reduced to minimise habitat disturbance? This question does not appear to have been addressed. The Environmental Impact Assessment Regulations require consideration of reasonable and feasible alternatives, including alternatives relating to the scale, density and design of the proposed development. A lower-density alternative would have represented a logical and environmentally preferable option, particularly given that: the site falls within Critically Endangered Knysna Sand Fynbos; the property is located within a Protected Area and a Critical Biodiversity Area (CBA 1); Species of Conservation Concern occur within the affected habitat; the MSDF supports only development demonstrably compatible with biodiversity objectives; and NEMA requires that environmental impacts be avoided wherever reasonably possible before reliance is placed on mitigation.	alternative sited preferentially within the Low Sensitivity Degraded Dune Thicket and Very Low Sensitivity Transformed Habitat areas identified by the specialist. Eco Route commits to including, in the Final BAR, an explicit assessment of a lower-density alternative against these criteria, addressing why the confirmed node count and occupancy limit were retained, or whether a reduction is warranted in light of the specialist's habitat-level findings.
Instead, the assessment appears to have proceeded on the assumption that accommodating approximately 50–60 people is a fixed project requirement, with the layout adjusted to fit this objective. There is no indication that a reduced-capacity alternative—for example, a smaller number of camping nodes located entirely within already disturbed or transformed portions of the property—was assessed as a reasonable and feasible option. The approach adopted in the Basic Assessment also appears inconsistent with the recognised mitigation hierarchy applied under NEMA, namely: 1. Avoid impacts where reasonably possible; 2. Minimise impacts that cannot be avoided; 3. Rehabilitate disturbed	As set out in response to the comment above, this is accepted as a valid critique, and Eco Route commits to including a lower-density alternative in the Final BAR's alternatives assessment, addressing the specific mitigation hierarchy sequencing raised in this comment (avoid before minimise) and evaluating whether a reduced number of camping nodes or reduced overall occupancy, concentrated further within already disturbed or transformed portions of the property, would achieve the applicant's stated need with reduced environmental impact.

areas; and 4. Offset residual impacts only where appropriate. In this instance, the assessment has focused primarily on minimising impacts through site layout adjustments after selecting a development footprint that continues to encroach upon ecologically sensitive habitat. Greater emphasis should have been placed on impact avoidance, including relocating development into previously disturbed portions of the property and reducing the overall development footprint. Given the availability of Low Sensitivity Degraded Dune Thicket and Very Low Sensitivity Transformed Habitat, together with the specialist's identification of significant impacts on SCC and habitat supporting threatened species, there is a reasonable basis to conclude that a lower-density alternative would have represented a more appropriate response to the ecological constraints of the site. The faunal assessment also highlights that habitat loss can be further reduced on the site through additional minimizations of all footprints. The Basic Assessment does not consider reducing 25 campsites to 15, reducing five camping nodes to three, reducing overall occupancy, or concentrating development entirely in degraded areas. Instead, the carrying capacity appears fixed. That is inconsistent with good alternatives assessment. In these circumstances, the Basic Assessment should have rigorously evaluated a lower-density, reduced-footprint development alternative located preferentially within already disturbed or transformed areas. By treating the proposed accommodation capacity of approximately 50–60 people as effectively fixed, rather than testing whether a smaller-scale development could achieve the project objectives with substantially reduced environmental impact, the alternatives assessment does not fully satisfy the objectives of NEMA or the Environmental Impact Assessment Regulations.

5. PUBLIC PARTICIPATION. No comments have been received from CapeNature during the Basic Assessment process. Given the environmental sensitivity of the site, this is a significant omission. CapeNature is the provincial conservation authority with statutory responsibility for biodiversity conservation in the Western Cape and is recognised as the primary specialist authority on matters relating to threatened ecosystems, Species of Conservation Concern, Critical Biodiversity Areas (CBAs), Protected Areas and the application of the Western Cape Biodiversity Spatial Plan (WCBSP). Its role is particularly important where developments are proposed within or adjacent to areas identified as having exceptional conservation value. The proposed development is situated within the Western Heads area, supports Critically Endangered Knysna Sand Fynbos, contains Species of Conservation Concern, and falls within an area identified for biodiversity conservation under the Western Cape Biodiversity Spatial Plan. As stated in the Basic Assessment, 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). Furthermore, the proposal involves the establishment of a Camping Site as a new land use within a highly sensitive ecological environment. These are precisely the types of applications for which CapeNature's technical input is intended to assist the competent authority. In the absence of comments from CapeNature, the competent authority does not have the benefit of the independent advice of the Provincial conservation authority on matters that are central to the environmental decision. Given the recognised ecological sensitivity of the site and the potential implications of the proposed development, every reasonable effort should be made to obtain CapeNature's comments before a decision is taken. This would

This is not accepted on the facts. CapeNature has provided comments during the Application Phase Basic Assessment process: a letter from Dr Marienne de Villiers, Manager: East Landscape Conservation Intelligence Unit, dated 21 July 2026, is captured and answered in full in this Comments and Response Report. CapeNature's comments have accordingly been received and addressed, including matters relating to biodiversity, occupancy, fire management and the stewardship process.

assist in ensuring that the decision is informed by the best available biodiversity expertise and is consistent with the environmental management principles of the National Environmental Management Act, including the precautionary approach and the protection of biodiversity.	
Additional Points: Have all landowners that boarder/use the access road been notified and included on the I&AP register? Many of the response to public objects and comment have not been adequately responded to. The EAP in may cases responds by say "Town Planner" or that the specialist will be consulted. The comment has not actually been addressed. Vernon Rice - Witgoud Beleggings, Portion 103 of Farm 216 should be included as a neighbouring property in the I&AP register. Sonja Douglas - Phambi Properties (Pty) Ltd, Portion 58 & 59 of Uitzicht 216 should be included as a neighbouring property in the I&AP register.	Eco Route confirms that Vernon Rice (Witgoud Beleggings, Portion 103 of Farm 216) and Sonja Douglas (Phambi Properties (Pty) Ltd, Portions 58 and 59 of Uitzicht 216) will be added to the I&AP register as neighbouring property owners in the Final BAR, if not already reflected. Eco Route confirms that where a response in this report refers a matter to the town planner or a specialist, this reflects that the specific point raised is a determination properly made by that professional as part of the parallel rezoning application or specialist review process, with the outcome to be reflected in the Final BAR — these are tracked commitments, not deferrals intended to avoid addressing the comment.
6. NOISE POLLUTION. The BAR repeatedly states that the development will remain consistent with the property's historic use and that it is not a commercial tourism facility. It also argues that objections relating to noise are predicated on the assumption that the proposal is a commercial tourism operation. However, from an environmental impact perspective, noise is generated by the intensity of human activity, not by whether visitors pay to stay there. The assessment should therefore consider the likely impacts arising from the proposed occupancy, regardless of whether the users are family members, beneficiaries of a trust or paying guests. The Basic Assessment concludes that noise impacts associated with the proposed Camping Site will be limited and manageable. However, this conclusion does not appear to be supported by a realistic assessment of the proposed operational intensity. The report notes that there have been no historical complaints relating to noise associated with the property's informal recreational use. This	Eco Route agrees that the environmental impact of noise is a function of the intensity of human activity, not of whether occupants pay to stay, and confirms the EMPr's noise mitigation measures (below) have been set with reference to the confirmed maximum occupancy of 60 persons, not to a lower, typical historical-use level. The reference to the absence of historical noise complaints is provided as supporting context only and is not relied upon as the primary basis for the EMPr's noise provisions.

comparison is not an appropriate basis upon which to assess future impacts. Historically, the property has been used intermittently for temporary family camping, whereas the current application seeks permanent approval for a Camping Site accommodating approximately 50 to 60 people at one time, together with multiple camping nodes and associated communal facilities.	
In practice, previous camping events have resulted in clearly audible noise extending beyond the property boundary. Formal complaints were not lodged because these occasions were accepted as temporary family gatherings. The current application, however, seeks authorisation for a substantially larger and permanent camping facility with potentially double the occupancy previously experienced. It cannot therefore be assumed that the historic absence of complaints is indicative of the likely impacts associated with the proposed development. Furthermore, the assessment appears to focus primarily on noise as an ecological disturbance to fauna, identifying sources such as talking, shouting and music around the camping units, and concludes that the residual impact can be reduced through signage requesting guests to minimise noise. While these measures may assist in reducing disturbance to biodiversity, they do not constitute a comprehensive assessment of the social impacts on neighbouring properties.	Eco Route acknowledges this account of previous camping events being audible beyond the property boundary. Binding noise management conditions, set with reference to the confirmed maximum occupancy rather than historical informal use, are included in the EMPr (Section 11.8, Mitigation Measure NM-1): compliance with the SANS 10103:2008 noise limits, defined quiet hours enforced by the Responsible Person, and a prohibition on amplified music, generators and motorised watercraft beyond specified levels or times. Where a formal stewardship arrangement is concluded with SANParks, the EMPr further commits to obtaining and applying the noise standards applicable to the relevant GRNP Management Plan Zonation category, to be reflected in the Property Site Rules.
The assessment does not evaluate the cumulative effect of multiple camping nodes operating simultaneously, evening and night-time noise when campers are most likely to socialise, the carrying of sound across the estuary and surrounding open landscape, the potential duration and frequency of occupation during peak holiday periods, or the impact of repeated seasonal gatherings on the quiet rural character of the Western Heads area. These factors are particularly relevant because the proposed facility consists of numerous dispersed camping nodes rather than a single dwelling.	Eco Route agrees the source of noise (family or paying guest) is not relevant to its environmental impact on neighbours, and confirms the EMPr's noise provisions described in response to the comment above apply to the confirmed maximum occupancy of 60 persons across all EUAs simultaneously, not to a single household. Eco Route commits to confirming with the visual/noise consultant whether a quantitative noise modelling exercise (rather than management conditions alone) is warranted given the cumulative, multi-node

Noise generated from multiple groups occupying separate campsites has the potential to be continuous and widespread across the property, making it substantially different from the occasional use associated with a single family residence. The assessment also places significant reliance on the applicant's intention that the facility will remain for private family use. However, from an environmental assessment perspective, the source of the noise is irrelevant. Whether generated by family members or paying visitors, the environmental impact experienced by neighbouring landowners is the same. The assessment should therefore have been based on the maximum authorised occupancy and the reasonably foreseeable intensity of use, rather than the identity of those using the facility. Given the proposed scale of the Camping Site and its location within a quiet, environmentally sensitive landscape, the assessment does not provide sufficient evidence to support the conclusion that operational noise impacts will be of low significance. A more robust assessment of operational noise, based on the proposed occupancy and likely patterns of use, is warranted before the significance of this impact can be reliably determined.	nature of the development raised in this comment, ahead of the Final BAR.
7. WATER SUPPLY. The Basic Assessment Report appears to assume that an adequate water supply exists to service the proposed development. However, it is unclear whether this conclusion is based on comprehensive hydrogeological investigations, long-term borehole yield testing, seasonal groundwater monitoring, or an assessment of cumulative demand during periods of prolonged drought. In the absence of this information, there is insufficient evidence to conclude that the proposed development can be supplied sustainably over the long term. The report also fails to adequately distinguish between the historical use of the property and the proposed future use. Historically, the property has been occupied only intermittently by family members for relatively short	Eco Route confirms the water supply design consists of on-site rainwater harvesting (three JoJo tanks per EUA, 15,750 L per EUA, 78,750 L total across the property) supplemented by the existing borehole during periods of family residence, with the borehole not operated during periods of non-use to allow natural aquifer recharge. Eco Route acknowledges that a formal hydrogeological assessment, including borehole yield testing and drought resilience modelling, has not been conducted, and commits to obtaining a water demand and supply-security assessment — addressing maximum seasonal occupancy, realistic daily consumption, tank refill assumptions and borehole yield — for inclusion in the Final BAR.

periods. Consequently, water demand has been low, infrequent and seasonal. The proposed development represents a significant increase in both the intensity and duration of occupation, with the potential for substantially greater daily water consumption. The applicant may only occupy the property for limited periods each year and may therefore not appreciate the practical realities experienced by permanent residents. Those living in the area throughout the year experience seasonal fluctuations in groundwater availability, extended dry periods, and the cumulative effects of increasing pressure on local water resources. These factors should form an integral part of any assessment of water availability. The stated storage capacity of 78 750 L does not, on its own, demonstrate water security. At 60 occupants, this equates to only 1 312.5 L per person for the entire occupation period. The BAR therefore should provide a detailed water demand calculation based on maximum seasonal occupancy, realistic daily consumption, tank refill assumptions, borehole yield data, drought conditions and potential impacts on neighbouring groundwater users.	
8. WASTEWATER EFFLUENT. BOCMA stated the following in their comment dated 13 June 2025: 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. The EAP responds by stating that the need for a Water Use Authorisation in relation to the discharge of treated effluent is currently being assessed. Final confirmation on whether authorisation is required will be included in the Draft Basic Assessment Report. However, this does not appear to have been included or considered in the Draft BAR. On page 40 of the BAR, the EAP states that the aquatic specialist confirmed that no watercourses are present on the site, that the Knysna Estuary is not classified as a watercourse under the National Water Act, and that	This comment is now resolved by the confirmed design. The sub-surface/drip irrigation reuse of treated effluent referenced in this comment reflected an earlier iteration of the wastewater design and has been superseded: the confirmed Bio Bloo design is a fully closed-loop system in which treated water is recycled internally within each EUA solely for toilet flushing and outdoor/utility tap points, with no irrigation and no discharge to the environment, any watercourse, or groundwater (BAR Section 2.4, EMPr Section 4.2.3). As no water use activity contemplated in Section 21 of the National Water Act is triggered by this closed-loop design, a Water Use Authorisation is not required for this aspect of the development, consistent with the aquatic specialist's conclusion regarding the absence of watercourses on site. Eco Route confirms the aquatic

no Section 21 (c) or (i) water uses are triggered. However, the Aquatic report does not reflect the updated SDP that includes the proposed Bio Bloo sewage water treatment system that will used treated effluent on site by means of controlled sub-surface/drip irrigation within designated landscaped areas inside each developed EUA footprint. This is clearly irrigation of treated wastewater and requires a Water Use Authorisation as per BOCMA comments. The aquatic specialist should be given the opportunity to assess the impacts of the five Bio Bloo sewage water treatment system as part of the development, and the impacts on aquatic features.	specialist will be provided with the updated SDP and closed-loop wastewater design to confirm this conclusion remains valid, for inclusion in the Final BAR.
CONCLUSION. The proposed development represents substantially more than the continuation of informal family camping. It seeks the establishment of a permanent Camping Site as a new land use within Agriculture Zone I on land situated within a Protected Area, Critical Biodiversity Area and Critically Endangered Knysna Sand Fynbos. While the Basic Assessment repeatedly emphasises that the facility will be used only by members of the Lovemore family and will not operate commercially, these statements reflect the applicant's present intentions rather than legally enforceable limitations. The Municipality is required to determine the planning and environmental implications of the permanent land use rights being sought, not merely the applicant's current intentions. This objection identifies a number of significant deficiencies in the application, including: the apparent inconsistency between the Consent Use application and the description of the proposal as private family recreation; the failure to demonstrate compliance with the requirements for a Consent Use for Camping within Agriculture Zone I, including limitations on scale, permanence and the requirement that camping remain ancillary to the primary use of the property; the absence of a robust assessment of long-term occupancy, cumulative impacts and future expansion; inadequate	Noted. Eco Route has addressed each of the deficiencies identified in this objection in the responses above: the consent-use category and its enforceability are being confirmed through the parallel rezoning application, the title deed restriction and the SANParks stewardship agreement; the WCBSP 2023 currency of the specialist assessments will be confirmed; a lower-density alternative will be included in the Final BAR's alternatives assessment; fire management will be finalised in consultation with the Fire Protection Agency; water supply security and noise will be further assessed; the wastewater/BOCMA concern is resolved by the confirmed closed-loop design; and CapeNature's comments have in fact been received and addressed. This objection, together with these responses, will be before the competent authority for its decision.

consideration of the Western Cape Biodiversity Spatial Plan 2023 and the conservation objectives applicable to Protected Areas; insufficient assessment of biodiversity, fire management, traffic, water supply, wastewater disposal and operational noise; the failure to properly consider lower-density and lower-impact alternatives consistent with the mitigation hierarchy under NEMA; and the absence of comments from key conservation authorities, particularly CapeNature, despite the exceptional environmental sensitivity of the site. Taken together, these issues create significant uncertainty regarding the true nature, scale and long-term implications of the proposed development. The information currently before the competent authority does not provide an adequate basis upon which to conclude that the proposal is compatible with the environmental management principles contained in the National Environmental Management Act, the biodiversity objectives applicable to the Western Heads landscape, or the planning framework governing Agriculture Zone I land. For these reasons, it is respectfully submitted that the application should not be approved in its current form. At a minimum, the competent authority should require the applicant to address the deficiencies identified in this objection through additional specialist investigations, updated planning and biodiversity assessments, proper consideration of lower-impact alternatives, and clarification of the appropriate land use application before any decision is made.	
Rob Gilmour, Director, Velo Sports (Pty) Ltd – owner of Portion 101 of Farm 216 Uitzicht (neighbouring owner) – 20 July 2026	
EXECUTIVE SUMMARY. 1. Introduction: This submission is made on behalf of Velo Sports (Pty) Ltd ("Velo Sports"), the registered owner of Portion 101 of Farm 216, Uitzicht, Knysna, which directly adjoins Portion 104, the property forming the subject of this application. Velo Sports is an Interested and Affected Party whose property, environmental rights, safety and lawful enjoyment of land are	Noted, with thanks for this submission and the distinction drawn between occasional private recreation and the permanent planning and environmental rights sought. Eco Route agrees this distinction matters, and confirms it is addressed in detail in the responses below and in the responses to the equivalent points raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in

capable of being directly affected by the outcome of this application. Velo Sports recognises and respects the Lovemore family's desire to continue enjoying their property. This objection is therefore not directed at occasional private family recreation. Rather, it concerns the permanent environmental and planning rights that this application seeks to establish. That distinction is fundamental. The environmental authorisation and municipal consent sought in this application do not approve the present owner's intentions. They create permanent rights attached to the land. Those rights may endure indefinitely, surviving future ownership, future trustees, future generations and changed circumstances. It is those permanent rights that must be assessed.	this report, particularly regarding the enforceability mechanisms (title deed restriction and SANParks stewardship agreement) intended to bind future owners and trustees to the confirmed private, non-commercial, occupancy-limited use.
2. Nature of the Application: Although the Basic Assessment repeatedly describes the proposal as a private family camping facility, the Municipality is being asked to approve a Camping Site Consent Use, while the environmental authorities are simultaneously being asked to authorise a permanent change in land use within one of the most environmentally sensitive landscapes in the Garden Route. This is considerably more significant than authorising informal family recreation. It creates a new lawful planning entitlement capable of accommodating approximately 50 to 60 occupants together with associated communal infrastructure. The application therefore represents a material intensification of land use.	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for long-term reference only would require its own full, independent environmental authorisation process, including public participation.
3. The Western Heads is an Exceptional Conservation Landscape: The property is not situated within an ordinary rural landscape. It lies	Noted, and agreed that the burden rests on the applicant to demonstrate compatibility with the conservation objectives

within an area recognised by numerous statutory planning instruments as possessing exceptional biodiversity value. These include: the National Environmental Management Act; the Environmental Impact Assessment Regulations; the Knysna Municipal Spatial Development Framework; the Western Cape Biodiversity Spatial Plan 2023; SANParks' conservation expansion programme; the Garden Route National Park stewardship initiative. The surrounding landscape contains Critically Endangered Knysna Sand Fynbos, protected ecological corridors and habitat supporting Species of Conservation Concern. These planning instruments consistently adopt one overriding objective: the long-term conservation of biodiversity must remain the dominant land use objective. Any competing land use must demonstrate compatibility with that objective. The burden rests upon the applicant. In our respectful submission, that burden has not been discharged.	applicable to this landscape. As set out in response to the equivalent comment raised by Vernon Rice earlier in this report, Eco Route commits to obtaining written specialist confirmation of whether the terrestrial biodiversity, faunal and aquatic significance ratings remain valid under the 2023 WCBSP Protected Area framework, for inclusion in the Final BAR.
4. The Application Should Be Assessed on Rights, Not Intentions: Throughout the Basic Assessment, substantial reliance is placed upon statements that: the campsite will never be commercial; only family members will stay there; no public accommodation is intended; no tourism income will be generated. These assurances are relevant to understanding the applicant's present intentions. However, they are not synonymous with the planning rights that are actually being sought. Environmental authorisations and municipal consent uses regulate land. They do not regulate individuals. Once permanent Camping Site rights are created, those rights attach to the property itself. Future trustees or future owners may seek to exercise those rights in ways not presently contemplated. The application provides no satisfactory mechanism permanently preventing: increased occupancy; expanded infrastructure; additional camping nodes; future commercial use; intensified	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for

recreational use. This issue lies at the heart of the planning assessment.	long-term reference only would require its own full, independent environmental authorisation process, including public participation.
5. Particular Concerns of Velo Sports: As a neighbor, Velo Sports has concerns extending beyond the general environmental impacts identified within the consultant's review. Fire Risk: In 2017 a house situated on our farm, Portion 101 was destroyed by wildfire. For us, wildfire is not an abstract environmental issue. It is a lived experience. The proposed development introduces numerous additional ignition sources into a fire-dependent fynbos ecosystem through: campfires; braais; gas cooking; smoking; substantially increased human activity. The Basic Assessment considers ecological fire management but gives insufficient attention to the significantly increased risks posed to neighbouring landowners. Groundwater Security: Unlike urban developments, most of the Western Heads has no municipal water network. Our property relies exclusively upon: rainwater harvesting; groundwater abstraction. We do not have a municipal water supply. Our borehole already experiences severe seasonal shortages and has previously run dry during prolonged summer periods. The groundwater resource is therefore demonstrably finite. The proposal materially increases seasonal occupation and associated water demand. Yet the Basic Assessment provides no comprehensive hydrogeological evidence demonstrating that neighbouring groundwater users will remain unaffected. Given increasing drought frequency within the Southern Cape, this omission is significant.	Eco Route sincerely acknowledges the loss experienced on Portion 101 in the 2017 fire, including the loss of life, and takes this concern with the seriousness it deserves. On fire risk: the EMPr (Section 6.4) confirms the landowner's current membership of the Southern Cape Fire Protection Agency and commits to a dedicated Fire Management Plan, developed in consultation with the Fire Protection Agency, addressing ignition sources introduced by the development and coordination with neighbouring landowners. On groundwater: Eco Route acknowledges Velo Sports' first-hand account of seasonal borehole shortages on the shared aquifer, and confirms, as set out in response to the equivalent comment raised by Vernon Rice, that a water demand and supply-security assessment — addressing maximum seasonal occupancy, borehole yield and drought resilience — will be obtained for inclusion in the Final BAR. This neighbouring evidence of seasonal shortages will specifically be raised with the specialist conducting that assessment.
6. Environmental Decision-Making Requires a Precautionary Approach: Section 2 of the National Environmental Management Act requires environmental authorities to adopt a cautious and risk-averse approach where uncertainty exists. This principle is especially important where developments are proposed within protected or critically endangered ecosystems. In this application uncertainty remains regarding: biodiversity impacts; cumulative	Noted, and agreed that the precautionary principle under NEMA Section 2 applies. Eco Route confirms this has been applied through the independent specialist assessments already commissioned, the confirmed occupancy limit, and the further specialist confirmations and assessments (WCBSP 2023 currency,

ecological disturbance; groundwater sustainability; wildfire risk; future expansion; operational intensity; long-term conservation compatibility. Where uncertainty remains, environmental law requires caution rather than assumption.	lower-density alternative, water security, Fire Management Plan) committed to in this report.
7. The Relief Requested: Velo Sports respectfully requests that the Competent Authority: refuse the application in its current form; or alternatively, require substantial revision including: updated biodiversity investigations; comprehensive groundwater studies; independent wildfire assessment; genuine reduced-density alternatives; consultation with CapeNature; legally enforceable limitations on occupancy and future use.	Noted. This request will be before the competent authority alongside the full BAR, EMP, specialist assessments and this Comments and Response Report, including the commitments made in response to this and the preceding submission to updated biodiversity investigations, a water security assessment, a Fire Management Plan developed with the Fire Protection Agency, a lower-density alternatives assessment, and enforceable restrictions on occupancy and future use via the title deed and SANParks stewardship agreement. Eco Route notes that CapeNature has in fact already provided comments during this Application Phase, which are captured and addressed elsewhere in this report.
8. Conclusion (Executive Summary): This application should not be viewed as a request to formalise occasional family camping. It is an application to create permanent development rights within one of South Africa's most environmentally important coastal landscapes. Those rights will endure long after the current applicant and current trustees have changed. For that reason, the competent authority is required to assess the permanent planning consequences of the application rather than the present intentions of its proponents. Velo Sports respectfully submits that the proposal has not demonstrated that the permanent rights sought are compatible with: the precautionary principles of NEMA; the conservation objectives applicable to Protected Areas; the Western Cape Biodiversity Spatial Plan; the Knysna Municipal Spatial Development Framework; the long-term protection of neighbouring landowners. Accordingly, the application should be refused.	Noted. As set out in the responses throughout this submission, Eco Route agrees the permanent planning consequences of the application, not only the present applicant's intentions, are the relevant test, and confirms this has been addressed through binding occupancy limits, the title deed and stewardship enforceability mechanisms, and the further specialist and alternatives work committed to in this report.

SECTION 2 – STANDING, BACKGROUND AND DESCRIPTION OF THE APPLICATION. 2.1 The Objector: This submission is made by Velo Sports (Pty) Ltd, the registered owner of Portion 101 of Farm 216, Uitzicht, Knysna and 73 Bayswater Road, Leisure Isle, Knsyna. This farm 101 of Farm 216 Uitzicht is a neighbor of Portion 104 of Farm 216, the subject of the present application. The home at 73 Baywater on Leisure Isle is also a neighbor directly across the lagoon. As the owner of neighboring land, Velo Sports is an Interested and Affected Party ("I&AP") as contemplated by the National Environmental Management Act 107 of 1998 ("NEMA") and the Environmental Impact Assessment Regulations. The company therefore has both the legal standing and the direct environmental interest necessary to participate in these proceedings. This objection is submitted by: Rob Gilmour, Director, Velo Sports (Pty) Ltd.	Noted. Velo Sports' standing as a directly adjoining landowner and I&AP is acknowledged.
2.2 Velo Sports' Interest in the Application: Velo Sports' interest is substantially greater than that of a member of the general public. The company owns land immediately adjoining the proposed development and will bear the direct consequences of any approval. These consequences include, but are not limited to: increased wildfire exposure; impacts upon groundwater availability; increased traffic along shared access routes; increased human activity adjoining the property; increased lighting and noise; ecological impacts affecting the wider landscape; changes to the rural character of the Western Heads; potential diminution of neighbouring property amenity and value. Unlike broader environmental organisations whose interests focus primarily upon biodiversity conservation, Velo Sports experiences the practical realities of living within this landscape throughout the year. Our objection is therefore informed not only by planning policy but also by long-term occupation of adjoining land.	Noted. Each of the specific impact categories listed — wildfire, groundwater, traffic, human activity, lighting and noise, ecological impacts, and rural character — is addressed in the responses to the specific comments below and in the responses to the equivalent comments raised by Vernon Rice / Witgoud Beleggings earlier in this report.

2.3 Particular Circumstances of Velo Sports: The Competent Authority is respectfully requested to recognise two unique circumstances affecting our property. Wildfire: In 2017 a dwelling situated on Portion 101 was completely destroyed by wildfire. A staff member also lost their life in the fire. The destruction of the residence fundamentally altered our understanding of the risks associated with development within this fire-prone landscape. The consequences of wildfire extend well beyond ecological damage. They include: loss of homes; threats to life; destruction of infrastructure; financial loss; prolonged rebuilding; insurance implications; ongoing anxiety regarding future fire events. For Velo Sports, wildfire risk is therefore not theoretical. It is a direct and lived experience. Accordingly, any proposal introducing additional ignition sources into the surrounding landscape must be subjected to the highest level of scrutiny. Water Security: There is no municipal water supply available to Portion 101. Like many neighbouring properties, we rely entirely upon: harvested rainwater; and groundwater abstracted from a private borehole. Our borehole experiences significant seasonal declines in yield and has previously run dry during prolonged summer periods. Groundwater availability is therefore already constrained. Any increase in groundwater abstraction within this local aquifer has the potential to directly affect neighbouring users. This concern cannot be dismissed without robust hydrogeological evidence.	As set out in response to the comment at item 5 above, Eco Route sincerely acknowledges the tragedy described and the ongoing seasonal groundwater constraints on Portion 101, and confirms both the Fire Management Plan (developed with the Southern Cape Fire Protection Agency) and the water security assessment committed to in this report will directly address these concerns.
2.4 Nature of the Application: Although described throughout the Basic Assessment as a private family camping facility, the application seeks considerably more than recognition of existing recreational use. The application seeks: Environmental Authorisation under NEMA; approval of a permanent Site Development Plan; approval for multiple camping nodes; communal ablution and amenity facilities; associated services and infrastructure; Municipal Consent Use for a Camping Site. These	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning

approvals collectively establish a new lawful planning entitlement. The legal consequences of such approvals extend beyond the current ownership of the property.	Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for long-term reference only would require its own full, independent environmental authorisation process, including public participation.
2.5 The Planning Rights Being Sought: One of the central concerns of this objection is the distinction between the applicant's stated intentions and the legal rights that would be created by approval. Throughout the Basic Assessment considerable emphasis is placed upon statements that: only members of the Lovemore family will use the facility; no commercial operation is intended; no tourism revenue will be generated; public accommodation will not be offered. Those statements may accurately describe the applicant's present intentions. They do not, however, define the legal scope of the planning rights sought. Environmental authorisations regulate environmental impacts. Municipal consent uses regulate land use. Neither ordinarily expires because ownership changes. Neither automatically ceases upon the death of current trustees. Neither is confined solely to the current generation of beneficiaries unless expressly and lawfully limited by enforceable conditions. Consequently, the Competent Authority is respectfully requested to assess the permanent legal rights that approval would create rather than relying solely upon assurances regarding present intentions.	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for long-term reference only would require its own full, independent environmental authorisation process, including public participation.
2.6 The Existing Use Compared with the Proposed Use: The Basic Assessment frequently compares the proposal with historical informal family camping. This comparison risks understating the	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the

significance of the application. Historically, informal family recreation occurred intermittently without permanent planning approval. The present application seeks to formalise that activity through: permanent planning rights; dedicated camping nodes; communal infrastructure; associated services; recognition as a lawful Camping Site. These changes materially alter both the planning status of the property and the long-term intensity of use. The issue before the Competent Authority is therefore not whether occasional family camping has occurred previously. The issue is whether permanent Camping Site rights are appropriate within this location.	current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for long-term reference only would require its own full, independent environmental authorisation process, including public participation.
2.7 The Scale of the Proposed Development: The Basic Assessment indicates that the development is intended to accommodate approximately 50–60 persons during periods of peak occupation. From an environmental planning perspective, the significance of this proposal lies not in the relatively modest size of the physical structures, but in the intensity of human occupation. Repeated occupation by approximately sixty people has the potential to generate cumulative impacts through: vehicle movements; pedestrian activity; waste generation; water consumption; noise; lighting; fire ignition sources; disturbance of ecological processes. These impacts occur irrespective of whether occupants are members of a single extended family or members of the public. Environmental systems do not distinguish between private and commercial occupancy.	Eco Route agrees that environmental impact is a function of the intensity and frequency of occupation, not only the size of structures, and confirms the BAR and EMPr's mitigation measures — including the confirmed occupancy limit, closed-loop wastewater design, lighting and noise conditions, and human-wildlife management provisions — have been set with reference to the confirmed maximum occupancy of 60 persons operating continuously, not a lower or intermittent historical-use level.
2.8 The Consultant's Review: Velo Sports has commissioned an independent planning and environmental review of the Draft Basic Assessment Report. That review identifies a number of significant	Eco Route has not yet had sight of the independent planning and environmental review referenced in this comment. Eco Route would welcome receiving this review directly, and will consider and

concerns, including: inconsistencies between the planning application and the Basic Assessment; inadequate consideration of the permanent land-use rights sought; insufficient assessment of cumulative impacts; inadequate alternatives analysis; deficiencies in biodiversity assessment; groundwater concerns; fire management concerns; shortcomings in the public participation process; and questions regarding compatibility with the Western Cape Biodiversity Spatial Plan 2023. Velo Sports adopts those technical concerns where applicable but also advances the additional submissions contained in this objection based upon our unique position as the adjoining landowner.	respond to its specific technical findings on their merits, in addition to the responses already given in this report to the concerns summarised here (enforceability, cumulative impacts, alternatives, biodiversity, groundwater, fire management, public participation, and WCBSP 2023 currency).
2.9 Purpose of this Submission: This submission is intended to assist the Competent Authority in undertaking the balancing exercise required by NEMA. It respectfully submits that the application should be evaluated according to: the permanent planning rights being created; the sensitivity of the receiving environment; the cumulative consequences of intensified occupation; the precautionary principle; the long-term interests of biodiversity conservation; the legitimate rights of neighbouring landowners.	Noted, and agreed that this is the balancing exercise required under NEMA. Eco Route confirms this has informed the responses throughout this report.
SECTION 3 – LEGISLATIVE AND POLICY FRAMEWORK. 3.1 Introduction: The purpose of this section is to identify the statutory framework governing the determination of this application and to demonstrate that the proposed development should be assessed against the legal requirements imposed by South African environmental and planning legislation rather than solely against the applicant's stated intentions. The application is not merely an application to formalise existing family recreation. It seeks the creation of permanent environmental and planning rights within an environmentally sensitive landscape that has been identified by national, provincial and municipal planning instruments as requiring the highest level of protection. Accordingly, the Competent	Noted.

Authority must ensure that the proposal complies with all applicable legislation before authorisation is granted.	
3.2 The Constitution of the Republic of South Africa: The starting point is Section 24 of the Constitution, which provides that everyone has the right—"...to an environment that is not harmful to their health or wellbeing; and to have the environment protected, for the benefit of present and future generations..." This constitutional right imposes obligations on every environmental decision-maker. The purpose of environmental authorisation is therefore not merely to determine whether a proposed development can physically be constructed. Rather, it requires the Competent Authority to determine whether the development is consistent with the constitutional objective of protecting the environment for present and future generations while allowing ecologically sustainable development. That constitutional balance underpins every decision taken under NEMA.	Noted, and Section 24 of the Constitution and its role in environmental decision-making is acknowledged. As set out in the note above regarding Section 4 of this submission, the constitutional and legal framework arguments are properly matters for the competent authority's own consideration; Eco Route confirms the underlying NEMA environmental management principles have been addressed throughout this report.
3.3 National Environmental Management Act 107 of 1998 ("NEMA"): NEMA provides the overarching legislative framework governing this application. The environmental management principles contained in Section 2 apply to every organ of state exercising functions that may significantly affect the environment. These principles are not discretionary. They are mandatory considerations. Several are particularly relevant. 3.3.1 Sustainable Development: Section 2 requires that development must be socially, environmentally and economically sustainable. The applicant repeatedly emphasises that: no commercial benefit will arise; no tourism income will be generated; the facility exists solely for private family use. Those statements significantly reduce the broader socio-economic benefit normally relied upon to justify environmental impacts. Where environmental costs are potentially permanent but public benefits are limited, the balancing exercise required by NEMA becomes particularly important. The Competent Authority	Noted, and agreed that Section 2 of NEMA's sustainable development principle applies. Eco Route confirms the limited wider socio-economic benefit of this private facility, and the corresponding need for a rigorous environmental basis for authorisation, is acknowledged; this is addressed through the independent specialist assessments, the confirmed conservative occupancy limit, and the further assessments and alternatives work committed to in this report.

should therefore carefully consider whether the environmental impacts associated with establishing permanent Camping Site rights are justified by the limited wider societal benefit identified in the Basic Assessment.	
3.3.2 The Precautionary Principle: Section 2 further requires: "a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge." This principle is directly applicable. Significant uncertainty remains regarding: groundwater sustainability; cumulative ecological impacts; future expansion; operational intensity; wildfire risk; biodiversity impacts; compatibility with long-term conservation objectives. The existence of uncertainty does not favour approval. It requires caution. Where important information remains unavailable or inconclusive, NEMA requires the Competent Authority to adopt a precautionary approach.	Noted, and the precautionary principle is agreed to apply, for the reasons given in response to the equivalent comment raised by Vernon Rice earlier in this report. Each specific uncertainty listed — groundwater, cumulative ecological impact, future expansion, operational intensity, wildfire risk, biodiversity, and protected area compatibility — is addressed through the specific commitments made throughout this report.
3.3.3 Avoidance Before Mitigation: NEMA establishes a recognised mitigation hierarchy. Environmental impacts should first be: 1. avoided; 2. minimised; 3. rehabilitated; 4. offset only where appropriate. This hierarchy is fundamental. The Basic Assessment largely focuses upon mitigating impacts through revised layouts and management measures. Far less consideration is given to avoiding impacts altogether by: reducing occupancy; reducing camping nodes; relocating infrastructure; concentrating activity within previously disturbed areas. The application therefore appears inconsistent with the mitigation hierarchy established by NEMA. 3.3.4 Cumulative Impacts: Section 2 requires decision-makers to consider cumulative impacts. This obligation is particularly important within landscapes already recognised as environmentally sensitive. The assessment should therefore consider not only the direct impacts of five camping nodes but also the cumulative consequences of: repeated seasonal occupation; increasing family numbers; future applications for expansion;	This is accepted as a valid critique of the alternatives assessment, for the reasons given in response to the equivalent comment raised by Vernon Rice earlier in this report. Eco Route commits to including a lower-density alternative in the Final BAR's alternatives assessment, addressing reduced occupancy, fewer camping nodes, and further concentration within already-disturbed areas, consistent with the avoid-before-mitigate hierarchy raised in this comment. Cumulative impacts within the scope of this site-specific BAR are addressed through the confirmed 0.9% footprint and binding occupancy limit; a region-wide, multi-generational cumulative assessment is a matter for the competent authority's broader spatial and biodiversity planning frameworks.

cumulative groundwater abstraction; cumulative recreational pressure; cumulative disturbance within the Western Heads conservation landscape.	
3.4 Environmental Impact Assessment Regulations: The Environmental Impact Assessment Regulations require an applicant to provide sufficient information to enable the Competent Authority to make an informed decision. This includes consideration of: need and desirability; reasonable alternatives; cumulative impacts; specialist investigations; public participation; environmental sensitivity. In our respectful submission, several of these requirements have not been adequately addressed. Most significantly: alternatives have not been adequately explored; the carrying capacity of the site appears predetermined; cumulative impacts remain insufficiently assessed; specialist assessments rely partly upon superseded biodiversity planning information, as identified in the consultant's review.	Eco Route agrees need and desirability, alternatives, cumulative impacts and specialist currency are all EIA Regulations requirements, and confirms: the BAR's Need and Desirability assessment is a dedicated section (Section E); a lower-density alternative will be added to the Final BAR per the commitment above; and specialist confirmation against the WCBSP 2023 will be obtained per the commitment made in response to the equivalent comment raised by Vernon Rice earlier in this report.
3.5 Spatial Planning and Land Use Management Act ("SPLUMA"): Although Environmental Authorisation is governed by NEMA, the accompanying Consent Use application must also satisfy the principles contained in the Spatial Planning and Land Use Management Act. SPLUMA requires planning decisions to promote: sustainability; spatial justice; efficiency; resilience; good administration. The Act further requires municipalities to consider: the public interest; orderly development; environmental protection; compatibility with surrounding land uses. These principles reinforce the requirement that land-use rights be assessed according to their permanent planning consequences rather than solely upon present intentions.	Noted. Compliance with SPLUMA's planning principles falls within the Knysna Municipality's parallel Consent Use / rezoning application process (Case Officer: Mr S. Mqhele) rather than the NEMA environmental authorisation process addressed by this report.
3.6 Knysna Zoning Scheme: The applicant seeks approval for a Camping Site Consent Use. This distinction is important. A Consent Use is not simply recognition of existing activity. It creates a lawful	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the

planning entitlement. The Municipality must therefore determine whether a Camping Site represents an appropriate land use within Agricultural Zone I. That assessment cannot be answered merely by reference to the applicant's current intentions. Rather, it requires consideration of: future ownership; future trustees; future generations; compatibility with surrounding land uses; cumulative planning consequences. These issues are central to this objection.	current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for long-term reference only would require its own full, independent environmental authorisation process, including public participation.
3.7 Knysna Municipal Spatial Development Framework: The Knysna Municipal Spatial Development Framework identifies the Western Heads as one of the municipality's highest conservation priorities. The MSDF recognises: exceptional biodiversity; ecological corridors; protected landscapes; environmentally sensitive coastal systems. Importantly, the MSDF does not create a presumption in favour of tourism development. Instead, it provides that any tourism-related land use must be demonstrably compatible with biodiversity conservation. That burden rests squarely upon the applicant. Compatibility cannot simply be assumed because the physical structures are relatively small. Operational intensity must also be assessed.	Noted, and agreed that compatibility with biodiversity conservation objectives must be demonstrated rather than assumed. This is the purpose of the specialist confirmation against the WCBSP 2023 framework, and the assessment of operational intensity (not only footprint), committed to in response to the equivalent comments raised by Vernon Rice earlier in this report.
3.8 Western Cape Biodiversity Spatial Plan 2023: The Western Cape Biodiversity Spatial Plan ("WCBSP") represents the current provincial biodiversity planning framework. The consultant correctly observes that parts of the specialist investigations continue to rely upon earlier biodiversity mapping notwithstanding the publication of the	Noted, and this is accepted: as set out in response to the equivalent comment raised by Vernon Rice earlier in this report, the terrestrial biodiversity, faunal and aquatic specialist reports were prepared with reference to the 2017 WCBSP layer, and Eco Route commits to obtaining written specialist confirmation of whether

2023 WCBSP. This is significant because the 2023 mapping reinforces the conservation importance of the site. The property falls within a protected biodiversity landscape whose management objective is the long-term conservation of ecological integrity. The proposal should therefore be assessed against the most current biodiversity planning information available rather than superseded datasets.	their significance ratings remain valid under the current 2023 WCBSP, for inclusion in the Final BAR.
3.9 National Environmental Management: Protected Areas Act: The application documentation indicates that the property forms part of SANParks' broader conservation and stewardship initiatives. This has important legal implications. The purpose of protected areas is to conserve biodiversity. Any additional land use should therefore support that primary objective. While carefully managed low-impact ecotourism may in appropriate circumstances complement conservation, it does not automatically follow that a Camping Site accommodating approximately sixty occupants is compatible with protected area management objectives. That compatibility must be demonstrated through evidence. In our respectful submission, the application has not yet done so.	Noted, and agreed that compatibility with protected area management objectives must be demonstrated through evidence. This is the purpose of the specialist confirmation against the WCBSP 2023 Protected Area framework committed to above, together with the ongoing engagement with SANParks toward a formal stewardship agreement (EMPr Section 4.2.6).
3.10 Planning Decisions Must Consider the Long-Term Consequences of Approval: Taken collectively, these legislative instruments establish a common principle. Environmental authorities are required to consider: future consequences; cumulative impacts; permanent planning rights; environmental uncertainty; biodiversity protection; sustainable development. The decision before the Competent Authority is therefore considerably broader than whether the present applicant intends to use the campsite responsibly. The real question is whether the permanent rights sought are appropriate within one of South Africa's most environmentally sensitive coastal landscapes. Velo Sports respectfully submits that the legislative framework requires that	Noted. Eco Route confirms the future consequences, cumulative impacts, and biodiversity protection objectives identified are addressed through the specific commitments made throughout this report.

question to be answered conservatively and in accordance with the precautionary principle.	
SECTION 4 – APPLICABLE SOUTH AFRICAN LEGAL PRINCIPLES AND CASE LAW. 4.1 Introduction: The purpose of this section is to identify the legal principles established by South African courts that should guide the Competent Authority when determining this application. The Constitutional Court and Supreme Court of Appeal have consistently emphasised that environmental and planning decisions are not mechanical exercises. Rather, they require a careful balancing of environmental protection, sustainable development, property rights and the public interest. Those decisions are directly relevant to this application. In particular, they establish that: sustainable development is a legal requirement, not a policy preference; planning authorities must assess the permanent consequences of land-use rights; cumulative impacts must be considered; environmental uncertainty requires a precautionary approach; and the rights granted by planning approvals attach to land rather than to the present owner.	Eco Route, as the appointed Environmental Assessment Practitioner, is not in a position to adjudicate the constitutional, administrative and case law submissions advanced in this section, which are properly matters for the competent authority's own legal consideration and, should the applicant elect, its legal counsel. Eco Route confirms that the underlying environmental principles referenced — sustainable development, the precautionary principle, cumulative impacts, the mitigation hierarchy (avoid before mitigate), and the burden resting on the applicant to demonstrate compatibility — are the same NEMA Section 2 principles addressed throughout the substantive responses in this report, including the commitments to a lower-density alternatives assessment, updated specialist confirmation against the WCBSP 2023, and a water security assessment, set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings earlier in this report.
4.2 Fuel Retailers Association v Director-General: Environmental Management (Constitutional Court): The leading South African authority on environmental decision-making remains Fuel Retailers Association of Southern Africa v Director-General: Environmental Management, Mpumalanga and Others 2007 (6) SA 4 (CC). This case fundamentally changed environmental decision-making in South Africa. The Constitutional Court held that authorities are not entitled simply to ask whether a proposed development can physically be accommodated. Instead, they must determine whether the development itself is environmentally sustainable. The Court held that sustainable development requires an integrated consideration of: environmental protection; social need; economic benefit; long-term consequences. The Court stated that environmental authorities must ensure that development serves	Eco Route, as the appointed Environmental Assessment Practitioner, is not in a position to adjudicate the constitutional, administrative and case law submissions advanced in this section, which are properly matters for the competent authority's own legal consideration and, should the applicant elect, its legal counsel. Eco Route confirms that the underlying environmental principles referenced — sustainable development, the precautionary principle, cumulative impacts, the mitigation hierarchy (avoid before mitigate), and the burden resting on the applicant to demonstrate compatibility — are the same NEMA Section 2 principles addressed throughout the substantive responses in this report, including the commitments to a lower-density alternatives assessment, updated specialist confirmation against the WCBSP 2023, and a water security assessment, set out in response to the

present needs without compromising the ability of future generations to meet theirs. That principle directly reflects Section 24 of the Constitution. Application to this Proposal: The applicant repeatedly states that: the development is entirely private; it will generate no commercial revenue; no tourism income will arise; no employment opportunities will be created; no broader public recreational benefit exists. Those statements are not criticisms. However, they significantly reduce the socio-economic benefits normally relied upon to justify environmental impacts. The Competent Authority is therefore required to ask: Do the permanent environmental impacts associated with this proposal outweigh its limited wider public benefit? That balancing exercise is expressly required by the Constitutional Court.	equivalent comments raised by Vernon Rice / Witgoud Beleggings earlier in this report.
4.3 The Precautionary Principle: The Constitutional Court further confirmed that environmental authorities must adopt a cautious approach where scientific uncertainty exists. The absence of complete scientific certainty is not a justification for approving development. Rather, uncertainty requires greater caution. That principle is particularly important in the present matter because uncertainty remains regarding: long-term groundwater sustainability; cumulative ecological disturbance; operational intensity; wildfire risk; future expansion of camping facilities; compatibility with protected area objectives. These uncertainties should weigh against approval rather than in favour of it.	Eco Route, as the appointed Environmental Assessment Practitioner, is not in a position to adjudicate the constitutional, administrative and case law submissions advanced in this section, which are properly matters for the competent authority's own legal consideration and, should the applicant elect, its legal counsel. Eco Route confirms that the underlying environmental principles referenced — sustainable development, the precautionary principle, cumulative impacts, the mitigation hierarchy (avoid before mitigate), and the burden resting on the applicant to demonstrate compatibility — are the same NEMA Section 2 principles addressed throughout the substantive responses in this report, including the commitments to a lower-density alternatives assessment, updated specialist confirmation against the WCBSP 2023, and a water security assessment, set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings earlier in this report.
4.4 Cumulative Impacts: The Constitutional Court recognised that environmental impacts cannot be viewed in isolation. Decision-makers must consider the cumulative effects of development over	Eco Route, as the appointed Environmental Assessment Practitioner, is not in a position to adjudicate the constitutional, administrative and case law submissions advanced in this section,

time. This principle is particularly relevant in the Western Heads landscape. The present proposal should therefore not be viewed simply as five camping nodes. Rather, the Competent Authority should consider: decades of repeated occupation; increasing family numbers; likely pressure for future expansion; cumulative groundwater abstraction; cumulative recreational pressure; cumulative fragmentation of ecological integrity. Environmental degradation frequently occurs incrementally rather than through a single dramatic event. NEMA requires precisely this broader assessment.	which are properly matters for the competent authority's own legal consideration and, should the applicant elect, its legal counsel. Eco Route confirms that the underlying environmental principles referenced — sustainable development, the precautionary principle, cumulative impacts, the mitigation hierarchy (avoid before mitigate), and the burden resting on the applicant to demonstrate compatibility — are the same NEMA Section 2 principles addressed throughout the substantive responses in this report, including the commitments to a lower-density alternatives assessment, updated specialist confirmation against the WCBSP 2023, and a water security assessment, set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings earlier in this report.
4.5 Maccsand (Pty) Ltd v City of Cape Town: Another important decision is Maccsand (Pty) Ltd v City of Cape Town, decided by both the Supreme Court of Appeal and subsequently the Constitutional Court. Although that case concerned mining rights, the Constitutional Court reaffirmed an important planning principle. Different regulatory approvals perform different legal functions. Environmental authorisation does not replace planning approval. Planning approval does not replace environmental authorisation. Each authority must independently apply the legislation for which it is responsible. This principle is particularly relevant because both: Environmental Authorisation; and Municipal Consent Use are required for the present proposal. Each authority must independently satisfy itself that the proposal complies with the applicable legislation. Neither authority should assume that approval by the other resolves its own statutory obligations.	Eco Route, as the appointed Environmental Assessment Practitioner, is not in a position to adjudicate the constitutional, administrative and case law submissions advanced in this section, which are properly matters for the competent authority's own legal consideration and, should the applicant elect, its legal counsel. Eco Route confirms that the underlying environmental principles referenced — sustainable development, the precautionary principle, cumulative impacts, the mitigation hierarchy (avoid before mitigate), and the burden resting on the applicant to demonstrate compatibility — are the same NEMA Section 2 principles addressed throughout the substantive responses in this report, including the commitments to a lower-density alternatives assessment, updated specialist confirmation against the WCBSP 2023, and a water security assessment, set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings earlier in this report.
4.6 Land-Use Rights Attach to Land: Perhaps the most important planning principle arising from South African jurisprudence is that planning permissions regulate land rather than individuals. The	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the

present application repeatedly relies upon assurances that: only family members will occupy the campsite; the development will never become commercial; trustees have no intention of expanding operations. Those assurances describe present intentions. They do not define the legal planning rights being created. Once Camping Site rights are granted, they attach to the property. Future owners inherit those rights. Future trustees inherit those rights. Future beneficiaries inherit those rights. The Competent Authority must therefore assess the legal consequences of creating permanent Camping Site rights rather than relying solely upon the applicant's present intentions.	current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for long-term reference only would require its own full, independent environmental authorisation process, including public participation.
4.7 Need and Desirability: South African planning law consistently requires authorities to consider whether proposed land uses are both: needed; and desirable. Need and desirability involve considerably more than asking whether the applicant wishes to undertake the development. Instead, authorities should consider: the suitability of the location; surrounding land uses; environmental sensitivity; planning policy; cumulative impacts; public interest. The present application repeatedly explains why the applicant would like additional camping facilities. It does not necessarily demonstrate why permanent Camping Site rights are desirable within this particular protected landscape.	This is not accepted on the facts as regards the BAR's own treatment: the BAR's Need and Desirability assessment (Section E) is a dedicated section addressing this requirement, considering the suitability of the location, environmental sensitivity, and specialist findings. Eco Route agrees the deeper compatibility question — whether the confirmed use is compatible with this specific protected landscape — is substantively addressed through the WCBSP 2023 specialist confirmation and lower-density alternative committed to above.
4.8 Reasonable Alternatives: The EIA Regulations require consideration of reasonable alternatives. South African courts have repeatedly recognised that alternatives assessment is one of the most important aspects of environmental decision-making. The purpose of considering alternatives is not merely to compare layouts. It is to ask whether environmental impacts can be avoided	This is accepted as a valid critique, for the reasons given in response to the equivalent comment raised by Vernon Rice earlier in this report. Eco Route commits to including a lower-density alternative — addressing reduced occupancy, fewer camping

altogether through a different approach. In this application, alternatives appear largely confined to relocating camping nodes. Little consideration has been given to alternatives involving: reduced occupancy; fewer camping platforms; concentration of development entirely within disturbed areas; phased development; maintaining informal family camping without permanent planning rights. These alternatives appear both reasonable and feasible. Their omission significantly weakens the environmental assessment.	platforms, and further concentration within already-disturbed areas — in the Final BAR's alternatives assessment.
4.9 Public Interest: Environmental decisions are not private matters between an applicant and the authorities. They are decisions made in the public interest. Although neighbouring landowners are directly affected, the Competent Authority also acts on behalf of future generations. This obligation becomes particularly important where development is proposed within: Protected Areas; Critical Biodiversity Areas; Critically Endangered vegetation; conservation corridors. The environmental significance of the Western Heads extends well beyond the boundaries of Portion 104.	Noted, and agreed that environmental decisions serve the public interest, including future generations. Eco Route confirms this is the basis on which the competent authority will determine this application, informed by the specialist assessments, EMPr commitments and further assessments committed to in this report.
4.10 The Burden of Proof: One of the recurring themes within South African environmental law is that the burden rests upon the applicant. It is not the responsibility of objectors to prove that harm will definitely occur. Rather, the applicant must satisfy the Competent Authority that the proposed development is environmentally acceptable. Where uncertainty remains regarding: groundwater; biodiversity; cumulative impacts; wildfire; future expansion; that uncertainty cannot simply be ignored. The Competent Authority should require convincing evidence before authorisation is granted.	Noted, and agreed that the burden of demonstrating environmental acceptability rests with the applicant. Eco Route confirms this burden is being discharged through the independent specialist assessments already commissioned and the further specialist confirmations, alternatives assessment, and water security and fire management commitments made throughout this report.
4.11 Application of These Principles: Taken together, these authorities establish several propositions directly applicable to the present application: 1. Environmental sustainability must be demonstrated rather than assumed. 2. Limited socio-economic	Eco Route, as the appointed Environmental Assessment Practitioner, is not in a position to adjudicate the constitutional, administrative and case law submissions advanced in this section, which are properly matters for the competent authority's own legal

benefit cannot automatically justify permanent environmental impacts. 3. Planning authorities must assess the permanent legal rights created by approval rather than relying solely upon present intentions. 4. Uncertainty requires caution. 5. Alternatives must genuinely seek to avoid environmental harm rather than merely mitigate it. 6. Cumulative impacts extending over future generations must form part of the assessment. 7. The burden rests upon the applicant to demonstrate that the proposal satisfies these legal requirements.	consideration and, should the applicant elect, its legal counsel. Eco Route confirms that the underlying environmental principles referenced — sustainable development, the precautionary principle, cumulative impacts, the mitigation hierarchy (avoid before mitigate), and the burden resting on the applicant to demonstrate compatibility — are the same NEMA Section 2 principles addressed throughout the substantive responses in this report, including the commitments to a lower-density alternatives assessment, updated specialist confirmation against the WCBSP 2023, and a water security assessment, set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings earlier in this report.
4.12 Conclusion (Section 4): The jurisprudence of the Constitutional Court supports a cautious approach to applications affecting highly sensitive environmental landscapes. The principles established in Fuel Retailers and Maccsand reinforce the statutory obligations already contained within NEMA, SPLUMA and the EIA Regulations. They require the Competent Authority to assess: the permanent consequences of the planning rights sought; the adequacy of alternatives; the cumulative impacts of the proposal; the long-term protection of biodiversity; and the interests of both present and future generations. In Velo Sports' respectful submission, the application has not yet discharged that burden.	Eco Route, as the appointed Environmental Assessment Practitioner, is not in a position to adjudicate the constitutional, administrative and case law submissions advanced in this section, which are properly matters for the competent authority's own legal consideration and, should the applicant elect, its legal counsel. Eco Route confirms that the underlying environmental principles referenced — sustainable development, the precautionary principle, cumulative impacts, the mitigation hierarchy (avoid before mitigate), and the burden resting on the applicant to demonstrate compatibility — are the same NEMA Section 2 principles addressed throughout the substantive responses in this report, including the commitments to a lower-density alternatives assessment, updated specialist confirmation against the WCBSP 2023, and a water security assessment, set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings earlier in this report.
SECTION 5 – THE FUNDAMENTAL PLANNING ISSUE: THE APPLICATION SEEKS PERMANENT LAND-USE RIGHTS RATHER THAN APPROVAL FOR PRIVATE FAMILY RECREATION. 5.1 Introduction: Velo Sports respectfully submits that the most significant issue before the	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the current owner. As set out in response to the equivalent comments

Competent Authority has not been adequately addressed in the Basic Assessment Report. Throughout the application, the proposal is described as a private family camping facility that will never be used commercially and will only ever be occupied by members of the Lovemore family and beneficiaries of the Trust. Those statements may accurately reflect the applicant's present intentions. However, they do not accurately describe the legal effect of the approvals being sought. The application should therefore be determined according to the permanent planning and environmental rights that would be created, rather than the present intentions of the current applicant. This distinction lies at the heart of this objection.	raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for long-term reference only would require its own full, independent environmental authorisation process, including public participation.
5.2 Environmental Authorisation Does Not Personalise Land Use: Environmental authorisations and municipal planning approvals are fundamentally different from private agreements. They regulate land. They do not regulate personalities. The Environmental Authorisation, once granted, authorises a defined land use. Similarly, a Consent Use under the Knysna Zoning Scheme authorises a lawful planning use attaching to the property itself. Neither approval ordinarily expires because: ownership changes; trustees change; beneficiaries change; family circumstances change. The legal consequence is that the property acquires a new development entitlement. The Competent Authority is therefore not deciding whether the current Lovemore family should be allowed to camp. It is deciding whether Portion 104 should permanently acquire Camping Site rights.	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for long-term reference only would require its own full, independent environmental authorisation process, including public participation.

5.3 The Basic Assessment Conflates Intentions with Rights: The Draft Basic Assessment repeatedly relies upon statements such as: the facility will only ever be used by family members; no commercial revenue will be generated; no members of the public will be accommodated; this is not a tourist establishment. Those statements are important background facts. They are not planning controls. Unless incorporated into legally enforceable conditions—and unless such conditions are capable of binding future owners indefinitely—they remain statements of present intention. Planning law does not normally regulate the identity of users. It regulates the nature of the land use. Accordingly, the Competent Authority must ask a different question: What permanent rights are being created if this application is approved? That question is not answered in the Basic Assessment.	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for long-term reference only would require its own full, independent environmental authorisation process, including public participation.
5.4 The Municipality Is Being Asked to Approve a Camping Site: The distinction becomes even clearer when one considers the municipal application. The applicant is not seeking approval for "private family recreation." The applicant is seeking approval for a Camping Site. That planning term has legal significance. A Camping Site is a recognised land use under the Knysna Zoning Scheme. It authorises accommodation use. Whether occupants are: family members; trustees; beneficiaries; invited guests; or paying visitors, does not alter the planning character of the use. The planning question therefore becomes: Is a Camping Site an appropriate permanent land use within Agricultural Zone I and within this environmentally sensitive landscape? That question cannot be answered merely by reference to the applicant's assurances regarding private use.	As set out in response to the equivalent comment raised by Vernon Rice / Witgoud Beleggings earlier in this report, whether Camping Site or Tourist Accommodation is the correct and applicable consent-use category for the confirmed use, and its associated conditions, is a town-planning determination under active consideration through the parallel Knysna Municipality rezoning application. Eco Route commits to obtaining the town planner's written confirmation of this and reflecting it in the Final BAR.

5.5 Statements of Intention Cannot Replace Planning Controls: The Basic Assessment repeatedly assures the reader that: "The facility will only ever be used by members of the Lovemore family..." Velo Sports does not question the sincerity of that statement. However, sincerity does not create legal enforceability. Environmental authorisation cannot ordinarily depend upon assumptions regarding: future family relationships; future trustees; future generations; future ownership structures. The Competent Authority must instead determine whether the planning rights themselves are acceptable. If those rights would be unacceptable in the hands of a future owner, they should not become acceptable merely because the present applicant provides assurances regarding intended use.	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for long-term reference only would require its own full, independent environmental authorisation process, including public participation.
5.6 The Future Disturbance Area Raises Legitimate Planning Concerns: The application documentation identifies a Future Disturbance Area intended for possible future activation. Although the applicant explains that this area is not presently part of the Environmental Authorisation application, its inclusion is nonetheless relevant. It demonstrates that future expansion has already been contemplated. This is entirely understandable. The applicant's own explanation is that the present proposal arises because successive generations of the family have grown. If family growth justifies expansion today, it is entirely reasonable to anticipate that similar pressures may arise in future. The concern expressed by neighbouring landowners is therefore neither speculative nor hypothetical. It arises directly from the applicant's own stated motivation. The Competent Authority should therefore consider not	Eco Route confirms, as set out in response to the equivalent comment raised by Vernon Rice earlier in this report, that the confirmed maximum occupancy of 60 persons is a fixed ceiling in the Final BAR and EMPr, not a figure that grows with future generations, and that the 'Future Disturbance Area' shown on the SDP for long-term reference is explicitly excluded from this application and would require its own full, independent environmental authorisation process, including public participation, before any activation could occur.

only today's proposal but also the foreseeable planning trajectory that approval may establish.	
5.7 Environmental Impacts Are Determined by Occupancy, Not Ownership: One of the recurring themes within the Basic Assessment is that the development differs from a commercial campsite because only family members will stay there. With respect, this distinction has limited environmental significance. The environment does not distinguish between: sixty family members; sixty tourists; sixty invited guests. The ecological consequences remain substantially similar. Environmental impacts arise from: the number of people; frequency of occupation; duration of occupation; vehicle movements; lighting; wastewater generation; water consumption; noise; fire ignition sources; habitat disturbance. Those impacts occur irrespective of family relationships. Consequently, the Competent Authority should assess the maximum authorised occupancy rather than the identity of those occupying the site.	Eco Route agrees that environmental impact is determined by the intensity and duration of occupation, not by the identity or relationship of occupants, and confirms the BAR and EMPr's mitigation measures have been set with reference to the confirmed maximum occupancy of 60 persons.
5.8 The Applicant Bears the Burden of Demonstrating Compatibility: The burden does not rest upon neighbouring landowners to prove that future commercialisation will occur. Nor must objectors prove that expansion is inevitable. The legal burden rests upon the applicant. The applicant must demonstrate that the permanent planning rights sought are compatible with: the surrounding land uses; biodiversity objectives; conservation planning; municipal policy; sustainable development. In Velo Sports' respectful submission, this has not yet been demonstrated.	Noted, and agreed that the burden rests with the applicant. Eco Route confirms this is addressed through the specialist assessments, alternatives work, and further commitments made throughout this report.
5.9 Why This Issue Matters: This distinction is not merely academic. It materially affects every aspect of the planning assessment. If the Competent Authority accepts the application as merely "private family camping," it may underestimate: cumulative impacts; planning precedent; future expansion; operational intensity;	Noted. Eco Route confirms the application has been, and will continue to be, assessed and documented on the basis of the permanent, binding rights and restrictions described throughout this

permanence of approval. Conversely, if the application is assessed according to the permanent rights actually being sought, a more rigorous evaluation becomes necessary. That is precisely what South African planning law requires.	report (confirmed occupancy ceiling, title deed restriction, SANParks stewardship agreement), not merely present intentions.
5.10 Alternative Planning Mechanisms: The Basic Assessment does not adequately explain why the applicant requires permanent Camping Site rights if the intended use is genuinely limited to private family recreation. This raises an important planning question. Could the applicant's objectives be achieved through a more limited planning mechanism that does not permanently establish a Camping Site as a lawful land use? The application does not meaningfully address this issue. The existence of potentially less intrusive planning options is relevant because NEMA and the EIA Regulations require reasonable alternatives to be considered before approving development that may permanently alter environmentally sensitive land.	Noted. Whether a more limited planning mechanism than a permanent Consent Use could achieve the same outcome is a question properly addressed through the parallel Knysna Municipality rezoning application and its town-planning process, rather than the environmental authorisation process addressed by this report.
5.11 Conclusion (Section 5): In Velo Sports' respectful submission, the Basic Assessment consistently understates the planning significance of the proposal by focusing upon the applicant's present intentions rather than the legal rights sought. The application is not simply an application to continue historical family recreation. It is an application to establish permanent Camping Site rights within a Protected Area and Critically Endangered ecosystem. Those rights will attach to the land and may endure indefinitely. The Competent Authority is therefore required to determine whether those permanent rights are appropriate having regard to: the environmental sensitivity of the site; the objectives of the Knysna Municipal Spatial Development Framework; the Western Cape Biodiversity Spatial Plan 2023; the precautionary principles of NEMA; the legitimate interests of neighbouring landowners. Velo Sports	Noted. Eco Route has addressed the concerns raised throughout this detailed submission in the responses above, including the enforceability mechanisms (title deed restriction and SANParks stewardship agreement), the commitment to specialist confirmation against the WCBSP 2023, the lower-density alternatives assessment, the water security assessment (informed by Velo Sports' own borehole experience), and the Fire Management Plan to be developed with the Southern Cape Fire Protection Agency. This submission, together with these responses, will be before the competent authority for its decision.

respectfully submits that the application has not adequately demonstrated that they are.	
Mr & Mrs P J Bern (35 Cearn Drive, Leisure Isle, Knysna) – 18 July 2026	
Comments on the Basic Assessment: Lovemore Property. This portion of land is presently zoned Agricultural Zone 1.	Noted. This is an accurate description of the current zoning (Agriculture Zone I with Consent Use for Camping Facilities). The applicant is applying to rezone to Open Space III with Consent Use for Tourist Accommodation, as addressed in response to the comments below.
A campsite for 50-60 people as depicted will lead to a vast increase in traffic to the site and on the site, along a very narrow road. Not only vehicles for visitors but also for staff and maintenance vehicles. This needs to be assessed.	This is not accepted on the facts. The BAR (Section 2.4, Access and Traffic) confirms that access is via the existing grassed vehicle access track off C.J. Langenhoven Street, that no road widening, upgrading or new access construction is proposed, and that no increase in vehicle movements is anticipated during the operational phase, as the confirmed maximum occupancy of 60 persons does not add to historical family use — it is the confirmed ceiling on that same use.
The proposed campsite could well be permanently occupied as it would not only be occupied by members of the family, but by their friends as well, as stated.	This is not accepted. The confirmed development is restricted to occupation by registered Lovemore family members and Lovemore Children's Secondary Trust beneficiaries only; it is not open to friends or other guests outside this defined group, and no public accommodation, booking system or paying guests are proposed.
This is a huge jump in what could be daily numbers of people, on a single property in a highly protected area. We would like to see an assessment in a worst-case scenario, ie that there are 60 plus people on site every day of the year.	Eco Route confirms the environmental significance ratings in the BAR and EMPr have been based on the confirmed maximum occupancy (60 persons, 8 per EUA) operating at full capacity, rather than on a lower, more typical usage pattern, so as not to understate potential impacts. Continuous, uninterrupted occupation at this maximum every day of the year is not the applicant's stated pattern of use (which follows historical family holiday and recreational patterns), but the assessment has

	nonetheless been conducted conservatively against the confirmed maximum rather than the anticipated actual usage.
What would be the cumulative impact of these activities on the environment of this property, and on the surrounding neighbours who have chosen to live in a protected area, away from people, traffic, noise, pollution etc? This also affects the residents of Leisure Isle.	Noted. Cumulative impact on the surrounding area, including Leisure Isle, is a recognised NEMA consideration and has been addressed within the scope appropriate to this site-specific BAR: the confirmed 0.9% development footprint, the binding occupancy limit, and the EMPr's noise, lighting and wastewater mitigation measures. A region-wide cumulative assessment across all existing and future developments is a matter for the competent authority's broader spatial and biodiversity planning frameworks.
One needs to assess the number of occupants residing permanently on the surrounding properties by way of comparison.	Noted. This is a reasonable comparative consideration; Eco Route confirms the confirmed maximum occupancy of 60 persons across the five-EUA property has been assessed on its own merits against the site's specialist findings and mitigation measures, rather than by direct comparison to neighbouring properties' permanent occupancy, given the differing nature of permanent residential use versus this confirmed, capped recreational use.
In the light of the above comments, we feel that this draft needs more scrutiny and some type of lawful protection instituted to prevent a future increase in development. There is no guarantee of this in this application.	Eco Route agrees that a statement of present intention is not, by itself, a legally enforceable restriction. As set out in response to the equivalent comments raised earlier in this report, the mechanisms intended to make the confirmed occupancy limit and non-commercial restriction durable and binding on future owners are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), prohibiting use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use is intended to be captured as a binding condition.
The property lies within a unique biodiverse area and is rated the highest in conservation importance among South African estuaries,	Noted, and agreed. This is precisely what has informed the independent terrestrial biodiversity, faunal, aquatic and visual specialist assessments underpinning the BAR and EMPr, and the

and protected areas. It needs to be protected not only for these unique features, but in particular for the generations to come.	further specialist confirmation against the current 2023 WCBSP framework committed to elsewhere in this report.
This application such as it is, does not guarantee any protection against future development under this proposal.	As set out in response to the comment above, Eco Route confirms the title deed restriction and SANParks stewardship agreement are the intended mechanisms against future commercial development, and that the 'Future Disturbance Area' shown on the SDP for long-term reference only is explicitly excluded from this application and would require its own full, independent environmental authorisation process, including public participation, before any activation could occur.
If this proposed development is allowed, it will open the door to further development in the area. One only needs to look at the eastern Head to see what could happen in time.	Noted. Each future application, on this or any other property, is assessed by the competent authority on its own merits against the facts, specialist findings and mitigation measures presented for that specific site at that time, and does not automatically follow from approval of this application.
Alison Sandra Collier (resident & property owner, Erf 1692, 39 Cearn Drive, Leisure Isle, Knysna) – 20 June 2025 (resent to Eco Route 26 June 2026, valid for this round of comment)	
Submitting comments to the EAP undersigned regarding the Proposed Development on Portion 104 of Farm 216 Uitzicht, Knysna, Western Cape: Please register me as an interested party / affected party regarding this on/before 30/06/2025. My full name: Alison Sandra Collier, SA ID# 7904030095083. I am a resident & property owner on Leisure Isle. Erf 1692 (39 Cearn Drive, Leisure Isle). I do not have any direct business interest or direct financial interest in the development of this site. I am a resident on Leisure Isle, and enjoy spending time on the lagoon sailing, skiing, swimming and the natural peaceful environment Knysna lagoon offers. I work full time (remotely from my home on Leisure Isle) as a MD of Endeavor SA, a Consulting and Venture Capital Company.	Noted. Ms Collier's registration as an I&AP is acknowledged.

I am writing to you to as I have just become aware that the Lovemore's have applied to build various structures on their land (for potential tourism use) and to re-zone their land - From: Agricultural Zone 1 with Consent Use for Camping Facilities; - To: Open Space III with Consent Use for Tourist Accommodation. My ask is that the land remains zoned as it is today (Agricultural Zone 1 with Consent Use for Camping Facilities) and no commercial tourist accommodation or tourism is allowed on this land.	Noted. The applicant is applying to rezone from Agriculture Zone I (Consent Use for Camping Facilities) to Open Space III (Consent Use for Tourist Accommodation). As set out in response to the comment below, 'Tourist Accommodation' is the applicable statutory consent-use category name under the Knysna Zoning Scheme By-law for the confirmed private, non-commercial use being applied for — it is not an application to operate a commercial tourism business.
Topline of my concerns as a resident on Leisure Isle, is the building of so many structures, the increased number of people potentially staying overnight and the change in use of "Portion 104 of Farm 216 Uitzicht" from "Agricultural Zone 1 with Consent Use for Camping Facilities" to: "Open Space III with Consent Use for Tourist Accommodation", as well as wording included in the development application saying "...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..."	Noted. As set out in the Rezoning Motivation (TMBA, 21 August 2026) and confirmed throughout the BAR, the reference to 'visitors and tourists' describes the statutory consent-use category being applied for under the Zoning Scheme By-law, not the intended occupants. The Rezoning Motivation states plainly that the Landowners have no intention of providing tourist accommodation to the public, that the facilities will be used for private purposes only, and that the title deed will be amended to record that none of the facilities may be used for tourist accommodation for income purposes.
I am opposed to "Portion 104 of Farm 216 Uitzicht" land use to be revised to allow tourism and to offer overnight tourist accommodation. The additional number of tourists that would potentially stay overnight and visit the site in the day could be up to 80-120 people per day (80-120 people = 5x camping nodes, each with 4x platforms/cabins and assume 4-6 people per platform/cabin). Additional Staff needed to oversee and clean tourist campsite.	The calculation in this comment (5 camping nodes x 4 platforms x 4–6 people = 80–120 persons) reflects an early planning-stage assumption and does not represent the confirmed operational limit. The applicant has since confirmed, and this has been incorporated into the Final BAR (Section 2.3) and EMPr, a binding operational occupancy limit: a maximum of 8 people per EUA at any one time, and a maximum of 60 registered Lovemore family members and Lovemore Children's Secondary Trust beneficiaries in total across the property at any one time. No paying tourists, additional cleaning staff for a commercial operation, or public bookings are proposed.

The Leisure Isle residents will be negatively affected through: Setting a precedent for land use of beachfront property on Western Head to be changed to allow for "commercial overnight tourism/ resort use". Our aim is to keep land along the lagoon in its natural state and to preserve the flora and fauna of the lagoon.	This is not accepted. The confirmed development is a private, non-commercial family facility, not a commercial overnight tourism or resort use, and the title deed restriction and SANParks stewardship agreement referenced in response to the comments above are the mechanisms intended to prevent this characterisation from changing in future. Regarding precedent: each future application is assessed by the competent authority on its own merits, as set out in response to the comment above.
Noise pollution: extra 80-120 people (potentially tourists) every night camping will cause a lot of additional noise, especially in the evenings, at night and early mornings. When there is no wind, the noise travels easily over the lagoon from featherbed to leisure isle and is heard clearly on the front of the island.	Eco Route confirms the EMPr (Section 11.8, Mitigation Measure NM-1) includes binding noise management conditions set with reference to the confirmed maximum occupancy of 60 persons: compliance with SANS 10103:2008 noise limits, defined quiet hours enforced by the Responsible Person, and a prohibition on amplified music, generators and motorised watercraft beyond specified levels or times. Where a formal stewardship arrangement is concluded with SANParks, the EMPr further commits to obtaining and applying the noise standards applicable to the relevant GRNP Management Plan Zonation category, to be reflected in the Property Site Rules.
Eye sore & Light pollution: Today the land is covered in vegetation (bush, grass, trees) and has no light coming from the site at night. There will be significant light at night for the extra 80-120 people camping on the site.	Eco Route confirms the EMPr requires low-glare, downward-facing lighting designed to minimise light pollution and visual impact at night, consistent with the visual specialist's recommendations, and that the confirmed maximum occupancy is 60 persons, not the 80-120 figure referenced in this comment.
The bank from the site going down to the beach is already eroding with current limited use by the Lovemore family over summer months. With extra 80-120 people going up and down the cliff, the sand and bank will erode further.	Eco Route confirms the aquatic specialist's recommended buffer and setback requirements, and the EMPr's erosion and stormwater management provisions, apply to protect the cliff and bank areas referenced in this comment; the confirmed maximum occupancy is 60 persons, not the 80-120 figure referenced in this comment, and no new or additional beach access infrastructure is proposed.

There is no space on the beach area in front of this site to moor boats or canoes (the high tide comes right up to the steep cliff). Perhaps the tourist's boats will anchor in the channel blocking an already congested lagoon channel during the summer months making it dangerous for swimmers & boaters alike.	Eco Route confirms no boat mooring, launching or anchoring infrastructure is proposed as part of this development; the EMPr and prior SANParks correspondence (6 August 2026) confirm that any estuary access will be via the Brenton-on-Lake SANParks facility only, with no unauthorised moorings permitted, consistent with the confirmed private, non-commercial nature of the use.
Additional sewage and rubbish from the extra 80-120 people using the site (plan is for 1x bio-septic tanks at each camping node). Having 5x extra soak aways sewage systems for 80-120 additional people daily is a lot of extra human excrement very close to the lagoon. Septic tanks give problems from time to time, and tanks will need to be drained by a honey sucker. The current access road (single lane) is not easy for the "honey sucker truck" to navigate, and no place for other vehicles to pass. Same issues with removal of all the extra rubbish daily / weekly from the site.	Eco Route confirms the sewage design does not use septic tanks or soakaways: each EUA is served by an independent, packaged Bio Bloo biological treatment system, which is a fully enclosed unit that does not rely on ground infiltration. Desludging, when eventually required, is carried out by a licensed private contractor via off-site removal; the manufacturer confirms each unit is rated to operate for up to 10 years between such removals under normal use, meaning this is an infrequent, scheduled service rather than a regular or daily occurrence. Eco Route commits to confirming the desludging contractor's vehicle access requirements against the existing access road for inclusion in the Final BAR. Waste (rubbish) is disposed of at appropriate municipal or other authorised sites, consistent with normal household-scale waste generation for the confirmed maximum occupancy of 60 persons, not the 80–120 figure referenced in this comment.
The natural bush, birdlife & fauna will be damaged / disturbed through the construction of the additional slabs, cabins, sheds and septic tanks. Should the land be occupied by up to 80-120 overnight guests, the natural bush and fauna will suffer further. Portion 104 is classified as CBD1 or CORE1 with objective of "Keep natural, with no further loss of habitat. Degraded areas should be rehabilitated. Only low impact, biodiversity-sensitive land-uses are appropriate"	Eco Route confirms the disturbance associated with construction and operation has been assessed by the terrestrial biodiversity, faunal and aquatic specialists and is subject to the EMPr's no-go area, fauna and flora management, and human-wildlife conflict mitigation provisions. Regarding the CBA1/CORE1 classification: this reflects the 2017 WCBSP; the current 2023 WCBSP reclassifies the property under the single category of 'Protected Area,' as set out in response to equivalent comments elsewhere in this report, and Eco Route has committed to confirming with the specialists whether their findings remain valid under this current framework. The

	confirmed maximum occupancy is 60 persons, not the 80–120 figure referenced in this comment.
Alison Collier (Property owner & resident, 31 Cearn Drive, Leisure Isle, Knysna) – 20 July 2026 (detailed BAR comments & objection)	
Comments & Objections to the above development. Summary of Objection & Comments. There are three key parts to this objection. 1. The BAR/application is not in line with planning policy framework as the current Zone of the erf today is Agriculture Zone 1. Agriculture Zone 1 allows consent for camping of up to 15 people for occasional use. The application is to build 5x permanent camping sites with bungalows and permanent toilet and kitchen facilities that can houses up to 100 people (although the application states that only 50-60 people will occupy the proposed new bungalows designed for 100 people. Finally, currently there is not any existing established "primary use" under Agriculture Zone 1 except for "Open Land". The "Camping Consent" would therefore become the Primary Use of the erf, which breaches the Agriculture Zone 1 policy. The report also includes references to tourist accommodation, which is a significant change to the current land zoning and use. The application contravenes the current zoning on three fronts: a. permanent campsites compared to the occasional campsites allowed; b. 50-100 people compared to the 15 people allowed; c. "Camping Consent" is not allowed to be Primary Use on Agriculture Zone 1 land and d. makes reference to tourist accommodation which is not allowed given the Zoning of the land (current zone or zone in the application).	Noted. This raises the same town-planning classification question addressed in response to the comment at item 1 below, and the same confirmed occupancy figures addressed in response to the comments elsewhere in this report: the confirmed, binding maximum is 60 persons in total (not 100, and not 50–100), 8 per EUA. The structures' physical design capacity and the confirmed operational occupancy limit are two different figures; Eco Route confirms the operational limit is the one that governs environmental significance and any future compliance monitoring.
2. There are multiple risk management data that is missing. For example: inadequate engineering plans regarding waste water management, waste management, insufficient fire risk evaluation, traffic planning, access to lagoon and lagoon risk assessment amongst others. 3. The Basic Assessment (BA) does not demonstrate	Noted. Eco Route confirms wastewater management, fire risk, and traffic are addressed in the BAR and EMPr and in the responses to the specific comments below; waste management and lagoon/estuary access risk assessments are addressed in response

that the proposed camping development is environmentally appropriate or legally justified for one of the most environmentally sensitive areas in the Western Cape, the Knysna Lagoon and the Western Head land area.	to the comments below and in response to equivalent comments raised by Mr & Mrs Bern earlier in this report.
The application is stated as a private family camping facility, however it seeks approval for a permanent Camping Site with multiple fixed buildings, bungalows, kitchens and toilets for use by approximately 50–60 people (but designed for up to 100 people) before counting the staff, creating planning rights that would attach to the property rather than the current owners. The BA repeatedly relies on the applicant's stated intentions instead of legally enforceable restrictions, leaving open the possibility of future expansion or commercialisation with no legal recourse for residents and/or other parties to object.	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for long-term reference only would require its own full, independent environmental authorisation process, including public participation.
The BA contains many shortcomings in its evaluation of land use, environmental impacts and long-term planning implications. It does not adequately explain why a permanent Camping Site consent is required if the development is genuinely intended only for private family recreation, nor does it assess the broader consequences of granting tourism-related accommodation rights on Agricultural Zone I land. Other important information such as: occupancy patterns, frequency of use, traffic generation, noise, water demand, increased pressure on the lagoon and feather bed bay	Eco Route confirms the confirmed occupancy limit (60 persons, 8 per EUA) is now a fixed maximum in the Final BAR and EMPr. Traffic, noise, and water demand are addressed in response to the specific comments below; the environmental assessment has been based conservatively on this confirmed maximum operating at full capacity.

beach including boats, canoes etc and long-term management—is either entirely absent or insufficiently reviewed.	
The environmental assessment does not show compatibility with the conservation objectives of the Western Cape Biodiversity Spatial Plan 2023. The Western Cape Biodiversity Spatial Plan of 2023 identifies the property as lying within a Protected Area containing Critically Endangered Knysna Sand Fynbos. Specialist studies rely on outdated biodiversity mapping and do not adequately assess the cumulative impacts of accommodating 50–60 people (or up to 100 people) within such a sensitive ecosystem. The report places emphasis on the limited physical footprint of the infrastructure while underestimating the ecological impacts arising from sustained human activity (land and lagoon), including habitat disturbance, fire risk, noise, lighting, waste generation and fragmentation.	Eco Route commits to obtaining written confirmation from the terrestrial biodiversity, faunal and aquatic specialists on whether their significance ratings and recommendations would change when assessed against the 2023 WCBSP's Protected Area management framework and objectives (as opposed to the 2017 WCBSP CBA/ESA classification on which the specialist reports were based), and to reflect this confirmation in the Final BAR. Eco Route confirms that the BAR itself (Section 5) already identifies and discusses both the 2017 and 2023 WCBSP classifications and their implications for the property.
The alternatives assessment is inadequate because it assumes the proposed carrying capacity is fixed and fails to meaningfully evaluate lower-density or reduced-footprint options that would avoid sensitive habitat. Despite specialist recommendations identifying significant impacts on threatened plant species and recognising lower-sensitivity areas elsewhere on the property, the BA does not properly consider reducing the number of camping nodes or relocating development into already disturbed areas in accordance with the mitigation hierarchy required by NEMA.	This is accepted as a valid critique of the alternatives assessment, for the reasons given in response to the equivalent comment raised by Vernon Rice earlier in this report. Eco Route commits to including, in the Final BAR, an explicit lower-density alternative assessment addressing reduced occupancy, fewer camping nodes, and further concentration within already-disturbed, lower-sensitivity areas of the property, consistent with the avoid-before-mitigate hierarchy required by NEMA.
Several specialist issues remain unresolved, including traffic impacts, fire management, water availability, wastewater disposal, and cumulative environmental effects on the land and the lagoon. CapeNature is a critical party to include in the environmental assessment and review process, and they are the authority on Protected Areas. CapeNature's assessment needs to be included and considered.	Eco Route confirms traffic, fire management, water availability and wastewater disposal are each addressed in response to the specific comments below. This is not accepted on the facts. CapeNature has provided comments during the Application Phase Basic Assessment process: a letter from Dr Marianne de Villiers, Manager: East Landscape Conservation Intelligence Unit, dated 21 July 2026, is captured and answered in full in this Comments and Response Report. CapeNature's comments have accordingly been

	received and addressed, including matters relating to biodiversity, occupancy, fire management and the stewardship process.
Overall, the land zoning and the proposed use of the land is not in line with the planning policy framework and the BA does not provide sufficient evidence to demonstrate that the proposed Camping Site is compatible with the long-term conservation objectives of the Western Heads landscape or that the environmental impacts are justified by any broader public or socio-economic benefit. Significant uncertainties remain regarding the true intensity of the proposed land use, its future expansion potential, and its cumulative environmental consequences. Accordingly, the competent authority should require substantial additional information, updated specialist assessments, a rigorous evaluation of lower-impact alternatives, and legally enforceable restrictions before any decision is made on the application.	Noted. Eco Route confirms the town-planning classification question, the WCBSP 2023 specialist confirmation, the lower-density alternatives assessment, and the enforceability mechanisms (title deed and SANParks stewardship agreement) are each addressed in the responses throughout this report.
1. THE APPLICATION TYPE DOES NOT MEET THE PLANNING POLICY FRAMEWORK (i.e. the application contravenes the current & proposed ZONE of the land). One: The application type is fundamentally incorrect and does not meet the planning policy framework. I will discuss this below. Agriculture I does permit consent use for Camping, but this has a number of clear conditions: 1. Consent for Camping is limited to 12-15 people for occasional use. Clearly this application well exceeds these numbers and it creates permanent use campsites. (their intentions are irrelevant). 2. Consent for Camping does NOT allow for fixed campsites or permanent structures. This application proposes fixed structures and units. 3. The camping use under Consent for Camping MUST be the secondary use to the existing primary use of the property. There is no existing established primary use of the property under Agriculture, other than Open Land. This Camping Consent would become the primary use of the property, which breaches policy. Given that these main conditions of the "Zone" are breached, the	This raises a genuine town-planning question that falls within the Knysna Municipality's parallel rezoning application (Case Officer: Mr S. Mqhele) rather than the environmental authorisation process. As set out elsewhere in this Comments and Response Report, the applicant is applying to rezone to Open Space III, under which Tourist Accommodation is available as a Consent Use in its own right (not the Agriculture Zone I Camping consent use referenced in this comment). Eco Route commits to obtaining the town planner's written confirmation of the applicable consent-use category and its associated conditions, including any resulting infrastructure or services requirements, and to reflecting the outcome in the Final BAR.

application type is incorrect, and does not meet the planning policy framework.	
The proposed development of a permanent camp site with bungalows, bathrooms and kitchens etc built to house up to 100 people, matches the requirements of Zone "Resort Use". Hence the landowner needs to apply for a full rezoning application to "Resort Use". This re-zoning to Resort Use requires much stricter and more detailed environment and infrastructure surveys. These are important to us as residents and likewise to our local Knysna Municipality as they demonstrate the required upgrades to public services to meet the needs of the Resort, and more importantly, the public funding required to enable the proposed build (with the Municipality then being able to claim the funding of the required upgrades from the property owner).	This is a town-planning question that falls within the Knysna Municipality's parallel rezoning application rather than the environmental authorisation process. As set out in response to the comment above, the applicant is applying to rezone to Open Space III (Tourist Accommodation Consent Use), not Resort Use. Eco Route commits to obtaining the town planner's written confirmation of the applicable category and any associated municipal infrastructure or development contribution requirements, for inclusion in the Final BAR.
2. THE PROPOSED DEVELOPMENT IS EXCLUSIVELY FOR PRIVATE USE BY THE LOVEMORE FAMILY. The EAP stated the following in the Basic Assessment: "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." Furthermore it was stated that the '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	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for

Environmental Authorisation application. It will require a separate application process if the family wishes to activate it in future."	long-term reference only would require its own full, independent environmental authorisation process, including public participation.
The Basic Assessment states, "...as the family has grown across generations...". This is an important admission. It acknowledges that increasing family numbers are the reason for expanding the camping area. A reasonable planning question therefore becomes - If continued family growth is the justification today, what mechanism prevents further expansion when the next generation doubles in size? That is not speculation—it follows directly from the applicant's stated motivation. The fact that a 'Future Disturbance Area' of 7,733 m² is included is evidence that the family intends to expand, and the property would accommodate additional family members over time. If increasing family numbers are the reason for seeking approval now, what mechanism will prevent future applications for additional camping nodes, increased occupancy, expanded infrastructure, or eventual commercial use, as subsequent generations continue to grow? Neither the Basic Assessment nor the planning motivation appears to identify any legally enforceable mechanism that limits future expansion or confines the use permanently to the current beneficiary group.	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for long-term reference only would require its own full, independent environmental authorisation process, including public participation.
If the application to the municipality is indeed for a Consent Use for a Camping Site (or tourist accommodation), then there is an apparent inconsistency between the land use application and the Basic Assessment. A Consent Use application is not merely a request to approve the applicant's current intentions, it is an application to establish a new lawful land use on the property. The Municipality is therefore required to assess whether a Camping Site is an appropriate land use within Agricultural Zone I, having regard to the Municipal Spatial Development Framework (MSDF), the environmental sensitivity of the site, surrounding land uses, and the public interest. The applicant's repeated assertions that the facility is "not a tourist lodge" or "not a camping resort" do not alter the fact	This raises a genuine town-planning question that falls within the Knysna Municipality's parallel rezoning application (Case Officer: Mr S. Mqhele) rather than the environmental authorisation process. As set out elsewhere in this Comments and Response Report, the applicant is applying to rezone to Open Space III, under which Tourist Accommodation is available as a Consent Use in its own right (not the Agriculture Zone I Camping consent use referenced in this comment). Eco Route commits to obtaining the town planner's written confirmation of the applicable consent-use category and its associated conditions, including any resulting infrastructure or

that the land use being applied for is a Camping Site. If the applicant's position is that the proposal is not a tourism-related accommodation use, then it is unclear why approval for a Camping Site is required at all. Although the Knysna Zoning Scheme distinguishes between "Camping Site" and "Tourist Facilities" as separate consent uses, the Scheme expressly provides that a camping site accommodates transient guests and is subject to the development parameters applicable to tourist accommodation. It is therefore a tourism-related accommodation land use rather than an ordinary ancillary residential or agricultural activity. Accordingly, the planning implications of granting a permanent consent use for a camping site extend beyond the applicant's current intention to restrict its use to members of the Lovemore family. Unless legally enforceable conditions are imposed, the consent would attach to the property and could potentially be relied upon by future owners or trustees.	services requirements, and to reflecting the outcome in the Final BAR.
The municipality cannot normally approve a land use based solely on the applicant's current intention not to operate commercially. Land use rights generally attach to the land, not to the current owner or their personal circumstances. If the proposal were for a private family picnic area used occasionally, it would be difficult to characterise it as a camping establishment. However, where the proposal is for a permanent, purpose-designed camping site accommodating 50–60 people, requiring Consent Use under Agriculture Zone I, the land use has characteristics that go beyond ordinary incidental family recreation. One of the fundamental principles of land use planning is that approvals regulate how land is used, rather than who uses it. A campsite does not necessarily cease to be accommodation merely because the users are related.	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the current owner. As set out in response to the equivalent comments raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for

	long-term reference only would require its own full, independent environmental authorisation process, including public participation.
The EAP states "...will only ever be used...", however, it does not specify: number of visits per year; maximum nights occupied; average annual occupancy; seasonal occupancy; duration of stays; frequency of vehicle movements; whether different branches of the family visit independently; whether the facility is occupied continuously during holiday periods. Without these details, it is difficult to assess operational impacts, which are a key consideration under NEMA. The current owner's intentions are relevant, but they do not necessarily determine the scope of the land use right for all future owners or trustees. Unless they are incorporated as enforceable conditions of the Consent Use approval, the Environmental Authorisation, or another legally binding instrument, they are not by themselves legally binding. A future trustee could simply argue that the property already has approval for a camping site. The Basic Assessment does not state what mechanisms will be put in place to ensure this outcome.	Noted. Eco Route confirms the confirmed occupancy limit (60 persons, 8 per EUA) is now stated as a fixed maximum in the Final BAR and EMPr, and the environmental assessment has been based conservatively on this confirmed maximum operating at full capacity. As set out in response to the comment at item 1 above, the durability of this restriction for future owners or trustees is addressed through the title deed restriction and the SANParks stewardship agreement.
The EAP stated the following in the Basic Assessment: "The existing access has been adequate for historical family use and will remain so during the operational phase. No increase in vehicle movements is anticipated during the operational phase. The same family members who have historically accessed the property will continue to do so. The C.J. Langenhoven Street/Dolly Raats Road intersection will not experience any increase in traffic frequency as a result of operational use." The frequency and number of people visiting the site has not been detailed in the Basic Assessment report, and therefore the impact on traffic cannot be realistically determined. To state that the families historical use will remain the same is not realistic considering that the proposed development can accommodated up to 60 people at one time, with intention of expanding in the future. A Traffic Impact study should be	This is not accepted on the facts. The BAR (Section 2.4, Access and Traffic) confirms that access is via the existing grassed vehicle access track, with no road widening, upgrading or new access construction proposed, and no anticipated increase in vehicle movements, because the confirmed maximum occupancy (60 persons) is not additional to historical family use — it is the confirmed ceiling on that same use. A formal Traffic Impact Study has not been conducted; given the confirmed absence of any proposed road upgrade and the private, non-public nature of the access, this has not been considered necessary for this application.

undertaken to determine the impact of increased vehicle users, specifically during peak season. Estimating a total of 60 visitors over the holiday season or at one time would greatly increase the current capacity of road users. This however cannot be accurately evaluated without a traffic impact study informing the assessment.	
In conclusion, the apparent inconsistency between the Consent Use application and the Basic Assessment is therefore not merely semantic. It goes to the heart of the planning assessment. The Municipality is being asked to grant a permanent land use right for a Camping Site, while the Basic Assessment seeks to minimise the planning significance of that land use by characterising it as private family recreation. Unless the proposed restrictions on occupancy and use are incorporated into legally enforceable conditions of approval, they remain statements of present intention rather than binding limitations on the land use rights that would attach to the property. In these circumstances, the competent authority should carefully consider whether the application accurately reflects the nature, intensity and long-term implications of the land use rights being sought.	Noted. As set out in the responses above, Eco Route confirms the confirmed occupancy limit, the title deed restriction and the SANParks stewardship agreement are together intended to ensure the nature, intensity and long-term implications of the land use rights sought are accurately and durably reflected.
Important questions to consider: If I were reviewing this Basic Assessment, I would expect the following issues to be clarified: Why is a consent use for a Camping Site required if the proposal is presented as merely private family recreation? What is the planning distinction between this development and a commercial camping establishment? If the camping site is to remain private, why should the municipality grant permanent camping site rights rather than a more limited approval tied to the specific circumstances? How is the "family only" restriction to be enforced in perpetuity? Including the definition of family, e.g. does this include second and third cousins etc and how is this practically enforced. How many beneficiary families currently exist, and what is the projected increase over the next 20–30 years? What legal mechanism	These questions are noted, and addressed as follows. The applicable consent-use category and any resulting conditions are being confirmed through the parallel rezoning application (see response to the comment at item 1 above). Enforceability of the family-only, non-commercial restriction is addressed through the title deed restriction and SANParks stewardship agreement. Eco Route confirms 'family' for these purposes means registered Lovemore family members and Lovemore Children's Secondary Trust beneficiaries as defined under the Trust deed, and commits to confirming this precise defined class in the Final BAR. On staff: Eco Route commits to confirming, for the Final BAR, whether any staff are required on-site during occupation and, if so, ensuring the confirmed maximum occupancy of 60 persons is inclusive of any

prevents future trustees or owners from commercialising the approved camping site? Why was the ecological assessment based on peak occupancy of 50–60 people without assessing the cumulative impacts of repeated seasonal use? The proposed structures can accommodate 100 people. If the intention is now to agree to only accommodate this new, fewer and restricted number of 50-60 persons, why is the applied for development / structures not being proportionally reduced in size and number? There is no mention of staff and the additional impact the staff complement would have on the environment impact. Staff are potentially an additional 10-20 pax for 50 to 100 people staying in the proposed accommodation.	such staff rather than additional to it. On structure sizing relative to the confirmed 60-person limit: this is noted as a fair question, and Eco Route commits to confirming with the applicant and project architect whether the Site Development Plan will be revised to align more closely with the confirmed occupancy limit, for the Final BAR.
3. SOCIO-ECONOMIC ASPECTS. Given that the proposed use of the property is a Camping Site, which constitutes a tourism-related accommodation land use rather than an ordinary ancillary agricultural or residential activity, it is submitted that the socio-economic implications of the proposal have not been adequately assessed. The Basic Assessment places considerable emphasis on the fact that the facility will be used only by members of the Lovemore family and beneficiaries of the Trust, and that no commercial income will be generated. While this may describe the applicant's current intention, it does not remove the requirement under NEMA to assess the broader social and economic consequences associated with the establishment of a new accommodation land use within a highly sensitive environmental setting. The establishment of a Camping Site accommodating approximately 50 to 60 people represents a material change in land use intensity. Such a change has the potential to influence a range of socio-economic considerations that extend beyond the immediate property, including the character of the area, neighbouring land uses, infrastructure demand, traffic generation,	Noted. As set out in response to the equivalent comment raised by Vernon Rice earlier in this report, Eco Route acknowledges this is a private, non-commercial family facility that does not generate the wider socio-economic benefits that might otherwise be weighed against environmental costs for a commercial development; the applicant's basis for authorisation rests on reasonable use of privately owned land assessed through a comprehensive environmental process, including the confirmed and binding occupancy limit and EMPr mitigation and monitoring commitments.

fire management, emergency access, and the cumulative effects of increased seasonal occupation.	
In addition, the proposal raises questions regarding the long-term sustainability and management of the development. The Basic Assessment states that the motivation for the proposal is the continued growth of successive generations of the Lovemore family. This acknowledgement indicates that occupancy demand is expected to increase over time. However, no assessment has been undertaken of the long-term implications of this growth, including whether future pressure for additional camping nodes, expanded infrastructure or increased occupancy may arise. The socio-economic assessment should also consider whether the approval of a Camping Site on Agricultural Zone I land within the Western Heads may create a planning precedent for similar applications within an environmentally sensitive landscape. Although each application must be considered on its own merits, decision-makers are required to consider the cumulative implications of incremental land use changes and whether approval would be consistent with the broader spatial planning and biodiversity objectives applicable to the area. Furthermore, if the facility is genuinely intended to remain a private family camping area with no commercial component, the Basic Assessment should explain why a permanent Consent Use for a Camping Site is necessary and whether a less intensive planning mechanism could achieve the same objective. The assessment does not evaluate whether the planning rights being sought are proportionate to the stated need or whether they may facilitate a broader range of future land uses than those currently described.	As set out in response to the comments above, the confirmed maximum occupancy of 60 persons is a fixed ceiling, not an open-ended figure that grows with the family across generations; any future activation of additional capacity would require its own full, independent environmental authorisation process. Each future application, on this or any other property, is assessed by the competent authority on its own merits.
From a socio-economic perspective, the assessment should therefore evaluate not only the applicant's present intentions but also the consequences of creating a permanent accommodation land use right that attaches to the property. Unless legally	Eco Route agrees that a present statement of intention is not, by itself, an enforceable land-use condition, and that planning and environmental approvals attach to the property rather than to the current owner. As set out in response to the equivalent comments

enforceable restrictions are incorporated into the Consent Use approval and Environmental Authorisation, the planning rights created may extend beyond the current ownership structure and could be relied upon by future owners or trustees. For these reasons, it is submitted that the socio-economic assessment is incomplete and does not adequately evaluate the broader planning, social and cumulative implications associated with establishing a Camping Site within an area of exceptional environmental sensitivity. Because the applicant states that, "No commercial revenue will be generated...", there is also a legitimate question regarding the public benefit of the proposal. One of the balancing exercises under NEMA is whether the environmental impacts of a proposal are justified by its social and economic benefits. If the facility is intended solely for the private recreational use of one extended family and does not generate employment, tourism revenue, agricultural production, public recreation opportunities or other wider socio-economic benefits, then the societal benefits that would ordinarily be weighed against the environmental costs may be limited. That does not mean private developments cannot be approved. However, it does mean that where a proposal is located within a Critically Endangered ecosystem and a Protected Area, the decision-maker should carefully consider whether the environmental impacts are justified by the nature and extent of the public or broader socio-economic benefits arising from the proposal. This becomes a relevant consideration when applying NEMA's principles of sustainable development and balancing environmental protection with justifiable social and economic development.	raised by Vernon Rice / Witgoud Beleggings (Portion 103) earlier in this report, the two mechanisms intended to make the private, non-commercial restriction durable and binding on future owners or trustees are: the title deed amendment recorded in the Rezoning Motivation (TMBA, 21 August 2026), which prohibits use of the facilities for tourist accommodation for income purposes; and the SANParks stewardship agreement, within which a restriction against commercial use of the property is intended to be captured as a binding condition. The confirmed maximum occupancy (60 persons total, 8 per EUA) is likewise a fixed ceiling in the Final BAR and EMPr, not a figure that adjusts with future family growth; any activation of the 'Future Disturbance Area' shown on the SDP for long-term reference only would require its own full, independent environmental authorisation process, including public participation.
4. PROPER CONSIDERATION OF THE WESTERN CAPE BIODIVERSITY SPATIAL PLAN 2023. The WCBSP 2017 has been used in the Basic Assessment Report as well as Terrestrial Biodiversity Assessment and Faunal Assessment. The mapping for the WCBSP 2017 changed in	Eco Route commits to obtaining written confirmation from the terrestrial biodiversity, faunal and aquatic specialists on whether their significance ratings and recommendations would change when assessed against the 2023 WCBSP's Protected Area

the 2023 WCSDP such that the property was categorised as a Protected Environment (Designated) from CBA 1 & 2. It is crucial that the specialist assessments are updated to reflect the WCBSP 2023 mapping, and within the management objectives of a Protected Environment. The Basic Assessment states that the property as situated within a Critical Biodiversity Area (CBA:1 – To maintain and CBA:2 – To restore), including terrestrial and aquatic features. An Ecological Support Area (ESA:2 – To restore) is also included on the property. It does further state that the new 2023 Western Cape Biodiversity Spatial Plan designated the entire property as a protected area, and that the entire property will be dealt with according to the general guidelines for protected areas. However, compatibility with the land use management objectives of a protected area have not been adequately addressed in the Basic Assessment. The management objectives are that it must be kept in a natural state, with a management plan focused on maintaining or improving the state of biodiversity. Importantly, all operational aspects of managing these areas must be subject to their main purpose, which is to protect and maintain biodiversity and ecological integrity and should be governed by a formally approved management plan including land-use activities that support the primary function of these areas as sites for biodiversity conservation. It is clear that the main purpose must be for conservation, and the allowed land-use activity should support this primary function. [WCBSP Table 4.5, Protected Areas category, general and specific guidelines and conservation-category conditions quoted in full, as per the WHGC and Vernon Rice submissions above.]	management framework and objectives (as opposed to the 2017 WCBSP CBA/ESA classification on which the specialist reports were based), and to reflect this confirmation in the Final BAR. Eco Route confirms that the BAR itself (Section 5) already identifies and discusses both the 2017 and 2023 WCBSP classifications and their implications for the property.
The primary use of the property as conservation allows for low intensity ecotourism activities. The proposed camp site does not demonstrate eco-tourism aspects, nor does it fall under a low intensity activity or very low impact land-use. It cannot be stated	Eco Route agrees that low-impact infrastructure is not the same test as low-impact land use, and that intensity, duration and nature of human activity are relevant to compatibility with the WCBSP 2023

that the proposed development is low impact given the high number of people accommodating the property at one time (approx. 50 to 60 people according to the EAP). The number of people is also expected to increase over time. Furthermore, "low-impact tourism" is not synonymous with "low-density accommodation." There is an important distinction between low-impact infrastructure and low-impact land use. A camping facility may have: tents rather than permanent buildings; platforms instead of concrete slabs; composting toilets; limited earthworks; low building footprints. From an engineering perspective this may qualify as a low-impact development. However, NEMA does not assess impact based only on the size of the structures. The assessment considers: 1. intensity of human activity; 2. ecological sensitivity; 3. cumulative impacts; 4. fragmentation; 5. disturbance; 6. fire risk; 7. invasive species; 8. lighting; 9. noise; 10. long-term management.	Protected Area objectives — this is precisely the assessment committed to in response to the comment at item 4 above.
A campsite accommodating 50–60 people simultaneously is no longer a small family recreation area. It represents a relatively intensive tourism land use with repeated human presence. A campsite occupied by 60 family members will generate many of the same ecological pressures as one occupied by 60 paying guests: trampling; parking; lighting; noise; waste generation; fire risk; vegetation disturbance. On Critically Endangered Knysna Sand Fynbos, even repeated pedestrian movement can significantly affect ecological functioning. From an ecological perspective, the receiving environment does not distinguish between family members and tourists. The Western Heads area is recognised as one of the most environmentally sensitive landscapes within the Knysna Municipal area. The property lies within an area identified by multiple statutory and strategic planning instruments as requiring a precautionary approach to development. The Knysna Municipal Spatial Development Framework (MSDF) identifies the Western	Noted, and the same commitment applies: whether the confirmed maximum occupancy and pattern of use is compatible with the WCBSP 2023 Protected Area and CBA1 objectives for this habitat will be specifically addressed in the specialist confirmation committed to in response to the comment at item 4 above.

Heads–Goukamma Conservancy as an area of exceptional biodiversity importance and recognises the need to protect the ecological integrity of this landscape. The property is situated within Critically Endangered Knysna Sand Fynbos, falls within a Critical Biodiversity Area (CBA 1), and forms part of a Protected Area as identified in the Western Cape Biodiversity Spatial Plan (WCBSP) 2023.	
The MSDF indicates that low-impact, nature-based tourism may be supported only where it is compatible with biodiversity objectives. It does not establish an entitlement to tourism development merely because the proposed infrastructure is physically small or visually unobtrusive. Rather, it establishes a qualifying test that requires the applicant to demonstrate, through credible scientific assessment, that the proposed land use is compatible with the conservation objectives applicable to the site. The burden of proof therefore rests with the applicant to demonstrate that the proposed Camping Site will not compromise the biodiversity values that the planning instruments seek to protect. For Protected Areas, Critical Biodiversity Areas (CBA 1) and Critically Endangered vegetation types, the overarching management objectives are generally to: maintain ecological integrity and natural ecosystem functioning; prevent further habitat transformation; avoid fragmentation of remaining natural habitat; minimise disturbance to ecological processes; maintain habitat connectivity; avoid incremental degradation through cumulative impacts; and limit land uses to those that are demonstrably compatible with long-term biodiversity conservation. These objectives reflect the precautionary approach embedded in the National Environmental Management Act (NEMA), particularly where development is proposed within irreplaceable or highly threatened ecosystems.	Noted, and agreed that the burden rests with the applicant to demonstrate compatibility with the conservation objectives applicable to the site. This is the purpose of the specialist confirmation against the WCBSP 2023 framework committed to in response to the comment at item 4 above.
Although the proposed Camping Site may have a relatively limited built footprint, the environmental assessment should not be	Eco Route confirms, as set out in response to the comment at item 4 above, that the specialist assessments were conducted with

confined to the physical footprint of the infrastructure alone. The operational characteristics of the proposed land use—including accommodation of approximately 50 to 60 people during peak periods, associated vehicle movements, pedestrian activity, parking, lighting, noise, waste generation, fire risk and repeated seasonal occupation—are all capable of generating ecological impacts that extend well beyond the immediate development footprint. In this context, it is not self-evident that a Camping Site of the proposed scale constitutes a "low-impact" land use simply because permanent structures are limited. The relevant question is whether the intensity of human activity associated with the development is compatible with the biodiversity objectives for this highly sensitive landscape. The Basic Assessment does not adequately demonstrate this compatibility.	reference to the 2017 WCBSP layer, and commits to obtaining written confirmation from each specialist on whether their significance ratings remain valid when assessed against the current 2023 WCBSP Protected Area framework, with this confirmation to be included in the Final BAR.
Likewise, there will be a similar increase 50-60 people accessing the Knysna lagoon via the small beach in front of this Erf and the neighbouring Erf to the North. The 50-60 people will have boats, canoes and other water sport activities and there is no clear plan on how and where these will be launched, anchored amongst other items to ensure there is no negative impact on the surroundings. The space in Brenton-on-Lake is extremely limited and the path to the lagoon from proposed site is steep and already badly eroded with very limited activity. The Basic Assessment also does not adequately demonstrate this compatibility.	Eco Route confirms no boat mooring, launching or anchoring infrastructure is proposed as part of this development; the EMPr and prior SANParks correspondence (6 August 2026) confirm that any estuary access will be via the Brenton-on-Lake SANParks facility only, with no unauthorised moorings permitted. Eco Route confirms the aquatic specialist's recommended buffer and setback requirements, and the EMPr's erosion and stormwater management provisions, apply to protect the cliff/bank path referenced in this comment, and that the confirmed maximum occupancy is 60 persons.
Furthermore, the terrestrial biodiversity, botanical and faunal assessments appear to rely on outdated biodiversity mapping and earlier conservation planning datasets, despite the publication of the Western Cape Biodiversity Spatial Plan (WCBSP) 2023, which provides the current provincial biodiversity planning framework. The WCBSP 2023 identifies the site within a Protected Area and confirms the high conservation status of the surrounding landscape. In the absence of an assessment based on the most current biodiversity	Eco Route commits to obtaining written confirmation from the terrestrial biodiversity, faunal and aquatic specialists on whether their significance ratings and recommendations would change when assessed against the 2023 WCBSP's Protected Area management framework and objectives (as opposed to the 2017 WCBSP CBA/ESA classification on which the specialist reports were based), and to reflect this confirmation in the Final BAR. Eco Route confirms that the BAR itself (Section 5) already identifies and

spatial planning information, it is uncertain whether the significance ratings assigned to biodiversity impacts remain valid. This is particularly important where the conservation status of the receiving environment has changed since the earlier studies were undertaken, as reliance on superseded biodiversity information may underestimate both the sensitivity of the site and the significance of the proposed impacts. Given the recognised conservation importance of the Western Heads landscape and the precautionary principles contained in Section 2 of NEMA, it would be prudent for the competent authority to require the biodiversity assessment to be reviewed against the current WCBSP 2023 before determining whether the proposal is genuinely compatible with the biodiversity objectives of the area.	discusses both the 2017 and 2023 WCBSP classifications and their implications for the property.
Other points to consider: 1. The Basic Assessment states that "Fencing will be kept to the minimum necessary". Given that fencing has significant impact on fragmentation of habitat and animal movement, it must form part of this assessment and not considered at a later stage. 2. A Conservation Management Plan with zonation plan showing allowable activities should be presented. The EMPr and AIP Control Plan do not effectively address conservation management of the property.	On fencing: noted, and Eco Route confirms this is addressed in the EMPr, which requires that any fencing be kept to the minimum necessary, be designed to remain permeable to wildlife movement, and be confirmed with SANParks — this has not been deferred to a later, unassessed stage. On a Conservation Management Plan with zonation: Eco Route confirms the EMPr's no-go area demarcation, rehabilitation requirements and monitoring provisions serve this function at the scale of this application; a full Protected Area-style Conservation Management Plan and zonation plan would appropriately form part of the SANParks stewardship agreement process.
3. FIRE MANAGEMENT. The Terrestrial specialist acknowledges that the conservation of the fynbos vegetation is dependent upon an appropriate fire regime and that prolonged fire exclusion will result in thicket encroachment and the loss of fynbos specialist species. The proposed Camping Site is located within a fire-dependent fynbos ecosystem where periodic ecological burning is essential to maintain biodiversity, ecological processes and the long-term persistence of fynbos species. The establishment of five dispersed	Eco Route confirms the EMPr (Section 6.4) records the landowner's current membership of the Southern Cape Fire Protection Agency and commits to a dedicated Fire Management Plan, to be included in the Final BAR as an integrated component of the EMPr, developed and implemented in consultation with the Fire Protection Agency, and specifically addressing compatibility with

camping nodes accommodating up to 50–60 people, together with associated infrastructure and regular human occupation, has the potential to significantly influence both wildfire risk and future fire management. The development introduces multiple additional ignition sources, including campfires, braais, gas appliances, smoking and increased human activity, thereby increasing the likelihood of accidental wildfire ignition within a highly sensitive environment. Conversely, the presence of permanent camping infrastructure and seasonal occupation may restrict the ability of land managers to implement prescribed ecological burns due to safety, liability and operational constraints. The resulting alteration of the natural fire regime has the potential to contribute to vegetation succession, thicket encroachment and the gradual loss of fire-dependent fynbos species and ecological function.	prescribed ecological burning under any future SANParks stewardship arrangement.
Given the ecological importance of maintaining an appropriate fire regime within Critically Endangered Knysna Sand Fynbos, the long-term implications of the proposed development for wildfire risk, prescribed burning, emergency access and integrated fire management should be comprehensively assessed. Without such an assessment, there remains uncertainty as to whether the proposed Camping Site is compatible with the long-term conservation objectives of this highly sensitive landscape. In the Basic Assessment, it is stated that the property owners will be recommended to join the Southern Cape Fire Protection Agency to discuss management of the fire risks. However, no comments from the SCFPA have been received and no discussion regarding management of fire risk has been included in the report for consideration. Furthermore, the proposed stewardship agreement with SANParks, whereby the property would be managed as part of the Garden Route National Park in terms of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) (NEMPAA), should be carefully evaluated in light of the	Eco Route confirms the EMPr (Section 6.4) records the landowner's current membership of the Southern Cape Fire Protection Agency and commits to a dedicated Fire Management Plan, to be included in the Final BAR as an integrated component of the EMPr, developed and implemented in consultation with the Fire Protection Agency, and specifically addressing compatibility with prescribed ecological burning under any future SANParks stewardship arrangement.

proposed Camping Site. The long-term conservation objectives of restoring and maintaining Critically Endangered Knysna Sand Fynbos are likely to depend on the implementation of appropriate ecological management, including periodic prescribed burns. The location and distribution of the proposed camping nodes, together with associated infrastructure and seasonal occupation, may constrain the ability to undertake controlled ecological burns safely and effectively, thereby potentially compromising the achievement of the property's long-term conservation objectives.	
4. FAILURE TO ADEQUATELY ASSESS A LOWER-DENSITY ALTERNATIVE. The Terrestrial Biodiversity Assessment identified two Species of Conservation Concern (SCC) within the proposed development footprint, namely <i>Lebeckia gracilis</i> (Endangered) and <i>Selago villicaulis</i> (Vulnerable). The specialist concluded that the loss of these species, particularly <i>Lebeckia gracilis</i>, would constitute a High Negative impact. To reduce this impact, the specialist recommended a number of essential mitigation measures, including: the exclusion or relocation of one of the proposed camping areas; modification of the layout of the remaining camping sites to avoid Species of Conservation Concern; and rehabilitation and active management of disturbed vegetation. Although the revised Site Development Plan (SDP) has reportedly been amended to avoid the individual plants identified during the field survey, this represents only a partial response to the specialist findings.	Noted, and this is an accurate summary of the Terrestrial Biodiversity Assessment's findings regarding <i>Lebeckia gracilis</i> and <i>Selago villicaulis</i>. Eco Route confirms the Site Development Plan was revised specifically in response to these findings to avoid the mapped individuals, consistent with the specialist's recommended mitigation.
Avoiding the mapped individuals does not avoid the broader ecological impact associated with the permanent disturbance of their habitat. The proposed development footprint continues to extend substantially into medium sensitivity Fynbos Thicket, which the specialist identified as habitat supporting these Species of Conservation Concern. Consequently, while direct destruction of the recorded individuals may have been avoided, the proposal still	Eco Route agrees that avoiding mapped individual plants is not equivalent to avoiding all habitat-level impact. This is directly relevant to the lower-density alternative committed to in response to the comment at item 4 (Failure to Adequately Assess a Lower-Density Alternative) below.

results in habitat loss, habitat degradation and fragmentation within vegetation recognised as supporting threatened flora. This distinction is important. The conservation objective under NEMA is not merely the protection of individual plants but the maintenance of viable populations, ecological processes and habitat integrity. Habitat loss within Critically Endangered Knysna Sand Fynbos cannot be regarded as fully mitigated simply because known individuals have been excluded from the construction footprint. The specialist further concluded that the disturbed fynbos habitat has moderate restoration potential, provided that active ecological management is implemented. This finding suggests that the remaining indigenous vegetation retains ecological value and should therefore be conserved wherever reasonably possible, rather than regarded as suitable for additional development. Conversely, the assessment identifies areas of Low Sensitivity Degraded Dune Thicket and Very Low Sensitivity Transformed Habitat elsewhere on the property. These areas appear to have received little or no meaningful consideration as potential locations for camping infrastructure, despite presenting a significantly lower ecological risk. In these circumstances, it is difficult to conclude that the hierarchy of impact avoidance has been properly applied in the Basic Assessment report.	
Perhaps more significantly, the specialist findings should have prompted consideration of a lower-density development alternative rather than simply rearranging the proposed layout. The proposal seeks to accommodate approximately 50 to 60 people through multiple camping nodes within a highly sensitive ecological environment. The primary response to the specialist findings has been to modify the layout sufficiently to avoid individual SCC locations while maintaining substantially the same development intensity. The specialist recommendations, read together with the ecological sensitivity of the site, raise a broader question - Should	This is accepted as a valid critique of the alternatives assessment, for the reasons given in response to the equivalent comment raised by Vernon Rice earlier in this report. Eco Route commits to including, in the Final BAR, an explicit lower-density alternative assessment addressing reduced occupancy, fewer camping nodes, and further concentration within already-disturbed, lower-sensitivity areas of the property, consistent with the avoid-before-mitigate hierarchy required by NEMA.

the number of camping sites, and consequently the carrying capacity of the development, have been reduced to minimise habitat disturbance? This question does not appear to have been addressed. The Environmental Impact Assessment Regulations require consideration of reasonable and feasible alternatives, including alternatives relating to the scale, density and design of the proposed development. A lower-density alternative would have represented a logical and environmentally preferable option, particularly given that: the site falls within Critically Endangered Knysna Sand Fynbos; the property is located within a Protected Area and a Critical Biodiversity Area (CBA 1); Species of Conservation Concern occur within the affected habitat; the MSDP supports only development demonstrably compatible with biodiversity objectives; and NEMA requires that environmental impacts be avoided wherever reasonably possible before reliance is placed on mitigation.	
Instead, the assessment appears to have proceeded on the assumption that accommodating approximately 50–60 people is a fixed project requirement, with the layout adjusted to fit this objective. There is no indication that a reduced-capacity alternative—for example, a smaller number of camping nodes located entirely within already disturbed or transformed portions of the property—was assessed as a reasonable and feasible option. The approach adopted in the Basic Assessment also appears inconsistent with the recognised mitigation hierarchy applied under NEMA, namely: 1. Avoid impacts where reasonably possible; 2. Minimise impacts that cannot be avoided; 3. Rehabilitate disturbed areas; and 4. Offset residual impacts only where appropriate. In this instance, the assessment has focused primarily on minimising impacts through site layout adjustments after selecting a development footprint that continues to encroach upon ecologically sensitive habitat. Greater emphasis should have been	This is accepted as a valid critique of the alternatives assessment, for the reasons given in response to the equivalent comment raised by Vernon Rice earlier in this report. Eco Route commits to including, in the Final BAR, an explicit lower-density alternative assessment addressing reduced occupancy, fewer camping nodes, and further concentration within already-disturbed, lower-sensitivity areas of the property, consistent with the avoid-before-mitigate hierarchy required by NEMA.

placed on impact avoidance, including relocating development into previously disturbed portions of the property and reducing the overall development footprint. Given the availability of Low Sensitivity Degraded Dune Thicket and Very Low Sensitivity Transformed Habitat, together with the specialist's identification of significant impacts on SCC and habitat supporting threatened species, there is a reasonable basis to conclude that a lower-density alternative would have represented a more appropriate response to the ecological constraints of the site. The faunal assessment also highlights that habitat loss can be further reduced on the site through additional minimizations of all footprints. The Basic Assessment does not consider reducing 25 campsites to 15, reducing five camping nodes to three, reducing overall occupancy, or concentrating development entirely in degraded areas. Instead, the carrying capacity appears fixed. That is inconsistent with good alternatives assessment. In these circumstances, the Basic Assessment should have rigorously evaluated a lower-density, reduced-footprint development alternative located preferentially within already disturbed or transformed areas. By treating the proposed accommodation capacity of approximately 50–60 people as effectively fixed, rather than testing whether a smaller-scale development could achieve the project objectives with substantially reduced environmental impact, the alternatives assessment does not fully satisfy the objectives of NEMA or the Environmental Impact Assessment Regulations.	
5. PUBLIC PARTICIPATION. No comments have been received from CapeNature during the Basic Assessment process. Given the environmental sensitivity of the site, this is a significant omission. CapeNature is the provincial conservation authority with statutory responsibility for biodiversity conservation in the Western Cape and is recognised as the primary specialist authority on matters relating	This is not accepted on the facts. CapeNature has provided comments during the Application Phase Basic Assessment process: a letter from Dr Marienne de Villiers, Manager: East Landscape Conservation Intelligence Unit, dated 21 July 2026, is captured and answered in full in this Comments and Response Report. CapeNature's comments have accordingly been received and

to threatened ecosystems, Species of Conservation Concern, Critical Biodiversity Areas (CBAs), Protected Areas and the application of the Western Cape Biodiversity Spatial Plan (WCBSP). Its role is particularly important where developments are proposed within or adjacent to areas identified as having exceptional conservation value. The proposed development is situated within the Western Heads area, supports Critically Endangered Knysna Sand Fynbos, contains Species of Conservation Concern, and falls within an area identified for biodiversity conservation under the Western Cape Biodiversity Spatial Plan. As stated in the Basic Assessment, 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). Furthermore, the proposal involves the establishment of a Camping Site as a new land use within a highly sensitive ecological environment. These are precisely the types of applications for which CapeNature's technical input is intended to assist the competent authority. In the absence of comments from CapeNature, the competent authority does not have the benefit of the independent advice of the Provincial conservation authority on matters that are central to the environmental decision. Given the recognised ecological sensitivity of the site and the potential implications of the proposed development, every reasonable effort should be made to obtain CapeNature's comments before a decision is taken. This would assist in ensuring that the decision is informed by the best available biodiversity expertise and is consistent with the environmental management principles of the National Environmental Management Act, including the precautionary approach and the protection of biodiversity.	addressed, including matters relating to biodiversity, occupancy, fire management and the stewardship process.
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6. NOISE POLLUTION. The BAR repeatedly states that the development will remain consistent with the property's historic use and that it is not a commercial tourism facility. It also argues that objections relating to noise are predicated on the assumption that the proposal is a commercial tourism operation. However, from an environmental impact perspective, noise is generated by the intensity of human activity, not by whether visitors pay to stay there. The assessment should therefore consider the likely impacts arising from the proposed occupancy, regardless of whether the users are family members, beneficiaries of a trust or paying guests. The Basic Assessment concludes that noise impacts associated with the proposed Camping Site will be limited and manageable. However, this conclusion does not appear to be supported by a realistic assessment of the proposed operational intensity. The report notes that there have been no historical complaints relating to noise associated with the property's informal recreational use. This comparison is not an appropriate basis upon which to assess future impacts. Historically, the property has been used intermittently for temporary family camping, whereas the current application seeks permanent approval for a Camping Site accommodating approximately 50 to 60 people at one time, together with multiple camping nodes and associated communal facilities.	Eco Route agrees noise impact is a function of the intensity of human activity, not of whether occupants pay to stay, and confirms the EMPr's noise provisions (Section 11.8, Mitigation Measure NM-1) have been set with reference to the confirmed maximum occupancy of 60 persons across all EUAs, not a lower, typical historical-use level: compliance with SANS 10103:2008 noise limits, defined quiet hours enforced by the Responsible Person, and a prohibition on amplified music, generators and motorised watercraft beyond specified levels or times, with further noise standards to be adopted under any future SANParks stewardship arrangement.
The absence of previous complaints does not demonstrate that future noise impacts will be insignificant. Rather, it reflects the fact that neighbouring landowners have historically tolerated occasional short-term family gatherings because these visits were infrequent and temporary. The proposed development represents a materially different land use by formalising and intensifying camping activity over the long term. In practice, previous camping events have resulted in clearly audible noise extending beyond the property boundary. Formal complaints were not lodged because these occasions were accepted as temporary family gatherings.	Eco Route agrees noise impact is a function of the intensity of human activity, not of whether occupants pay to stay, and confirms the EMPr's noise provisions (Section 11.8, Mitigation Measure NM-1) have been set with reference to the confirmed maximum occupancy of 60 persons across all EUAs, not a lower, typical historical-use level: compliance with SANS 10103:2008 noise limits, defined quiet hours enforced by the Responsible Person, and a prohibition on amplified music, generators and motorised watercraft beyond specified levels or times, with further noise

The current application, however, seeks authorisation for a substantially larger and permanent camping facility with potentially double the occupancy previously experienced. It cannot therefore be assumed that the historic absence of complaints is indicative of the likely impacts associated with the proposed development. Furthermore, the assessment appears to focus primarily on noise as an ecological disturbance to fauna, identifying sources such as talking, shouting and music around the camping units, and concludes that the residual impact can be reduced through signage requesting guests to minimise noise. While these measures may assist in reducing disturbance to biodiversity, they do not constitute a comprehensive assessment of the social impacts on neighbouring properties.	standards to be adopted under any future SANParks stewardship arrangement.
The assessment does not evaluate the cumulative effect of multiple camping nodes operating simultaneously, evening and night-time noise when campers are most likely to socialise, the carrying of sound across the estuary and surrounding open landscape, the potential duration and frequency of occupation during peak holiday periods, or the impact of repeated seasonal gatherings on the quiet rural character of the Western Heads area. These factors are particularly relevant because the proposed facility consists of numerous dispersed camping nodes rather than a single dwelling. Noise generated from multiple groups occupying separate campsites has the potential to be continuous and widespread across the property, making it substantially different from the occasional use associated with a single family residence. The assessment also places significant reliance on the applicant's intention that the facility will remain for private family use. However, from an environmental assessment perspective, the source of the noise is irrelevant. Whether generated by family members or paying visitors, the environmental impact experienced by neighbouring landowners is the same. The assessment should therefore have	Eco Route agrees noise impact is a function of the intensity of human activity, not of whether occupants pay to stay, and confirms the EMPr's noise provisions (Section 11.8, Mitigation Measure NM-1) have been set with reference to the confirmed maximum occupancy of 60 persons across all EUAs, not a lower, typical historical-use level: compliance with SANS 10103:2008 noise limits, defined quiet hours enforced by the Responsible Person, and a prohibition on amplified music, generators and motorised watercraft beyond specified levels or times, with further noise standards to be adopted under any future SANParks stewardship arrangement.

been based on the maximum authorised occupancy and the reasonably foreseeable intensity of use, rather than the identity of those using the facility. Given the proposed scale of the Camping Site and its location within a quiet, environmentally sensitive landscape, the assessment does not provide sufficient evidence to support the conclusion that operational noise impacts will be of low significance. A more robust assessment of operational noise, based on the proposed occupancy and likely patterns of use, is warranted before the significance of this impact can be reliably determined.	
7. WATER SUPPLY. The Basic Assessment Report appears to assume that an adequate water supply exists to service the proposed development. However, it is unclear whether this conclusion is based on comprehensive hydrogeological investigations, long-term borehole yield testing, seasonal groundwater monitoring, or an assessment of cumulative demand during periods of prolonged drought. In the absence of this information, there is insufficient evidence to conclude that the proposed development can be supplied sustainably over the long term. The report also fails to adequately distinguish between the historical use of the property and the proposed future use. Historically, the property has been occupied only intermittently by family members for relatively short periods. Consequently, water demand has been low, infrequent and seasonal. The proposed development represents a significant increase in both the intensity and duration of occupation, with the potential for substantially greater daily water consumption. The applicant may only occupy the property for limited periods each year and may therefore not appreciate the practical realities experienced by permanent residents. Those living in the area throughout the year experience seasonal fluctuations in groundwater availability, extended dry periods, and the cumulative effects of increasing pressure on local water resources.	Eco Route confirms the water supply design consists of on-site rainwater harvesting (78,750 L total storage) supplemented by the existing borehole during periods of family residence, with the borehole not operated during periods of non-use to allow natural aquifer recharge. Eco Route acknowledges a formal hydrogeological assessment, including borehole yield testing and drought resilience modelling, has not been conducted, and commits to obtaining a water demand and supply-security assessment for inclusion in the Final BAR, as set out in response to the equivalent comment raised by Vernon Rice earlier in this report.

These factors should form an integral part of any assessment of water availability. The stated storage capacity of 78 750 L does not, on its own, demonstrate water security. At 60 occupants, this equates to only 1 312.5 L per person for the entire occupation period. The BAR therefore should provide a detailed water demand calculation based on maximum seasonal occupancy, realistic daily consumption, tank refill assumptions, borehole yield data, drought conditions and potential impacts on neighbouring groundwater users.	
8. WASTEWATER EFFLUENT. BOCMA stated the following in their comment dated 13 June 2025: 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. The EAP responds by stating that the need for a Water Use Authorisation in relation to the discharge of treated effluent is currently being assessed. Final confirmation on whether authorisation is required will be included in the Draft Basic Assessment Report. However, this does not appear to have been included or considered in the Draft BAR. On page 40 of the BAR, the EAP states that the aquatic specialist confirmed that no watercourses are present on the site, that the Knysna Estuary is not classified as a watercourse under the National Water Act, and that no Section 21(c) or (i) water uses are triggered. However, the Aquatic report does not reflect the updated SDP that includes the proposed Bio Bloo sewage water treatment system that will use treated effluent on site by means of controlled sub-surface/drip irrigation within designated landscaped areas inside each developed EUA footprint. This is clearly irrigation of treated wastewater and requires a Water Use Authorisation as per BOCMA comments. The aquatic specialist should be given the opportunity to assess the impacts of the five Bio Bloo sewage water treatment	This comment is now resolved by the confirmed design. The sub-surface/drip irrigation reuse of treated effluent referenced in this comment reflected an earlier iteration of the wastewater design and has been superseded: the confirmed Bio Bloo design is a fully closed-loop system in which treated water is recycled internally within each EUA solely for toilet flushing and outdoor/utility tap points, with no irrigation and no discharge to the environment, any watercourse, or groundwater (BAR Section 2.4, EMP Section 4.2.3). As no water use activity contemplated in Section 21 of the National Water Act is triggered by this closed-loop design, a Water Use Authorisation is not required for this aspect of the development.

system as part of the development, and the impacts on aquatic features.	
Glenrise (Pty) Ltd – submitted by JR Macey (Owner & Director, Portion 100 of Farm Uitzicht 216 – neighbouring property sharing the CJ Langenhoven access road) – 20 June 2025 (resent to Eco Route 25/26 June 2026, valid for this round of comment)	
COMMENT ON THE PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE ASSISTED CAMPING FACILITY ON PORTION 104 FARM UITZICHT 216, KNYSNA MUNICIPAL DISTRICT. Submitted on behalf of Glenrise (Pty) Ltd, owner of portion 100 Farm Uitzicht 216 by JR Macey. The pre-application Basic Assessment Report: Version 1 (hereafter referred to as the BAR), dated 29 May 2025 [REF: 2025.09.09] compiled by EcoRoute, along with Appendices A–H inclusive of the (Planning) motivation and Knysna Plett Herald newspaper advert have been studied in order to supply comment on this application. 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 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. For ease of reference, our objections are dealt with under specific headings and we would appreciate if the EAP can respond accordingly as well.	Noted, with thanks for this detailed technical review of the pre-application BAR. Eco Route confirms this submission has been carried forward and addressed as part of this Application Phase round of comment, and responds to each point below.
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. Under the same section the Landowner Details are listed as the Lovemore	Eco Route confirms the Applicant is the Lovemore Children's Secondary Trust, with Mr Rob Lovemore acting as trustee; this will be clarified and made internally consistent throughout the Final BAR, together with the Trust's contact details. As the registered landowner and the applicant are the same entity (the Trust), no

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 Lovemore 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.	separate written landowner consent is required; Eco Route will confirm this alignment in the Final BAR.
ALTERNATIVES: 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 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 applicable 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. 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 bring into question the location of the northern node in the landscape as well (noting that site specific contours may be different to the 5m contour dataset). The EAP must clarify whether the statement	Noted. Eco Route confirms the repositioning of Unit Node 4 (EUA 5) was necessitated by Species of Conservation Concern identified during specialist survey, and that an updated Terrestrial Biodiversity Assessment (Capensis, 12 November 2024) was subsequently prepared specifically to assess this repositioned layout, superseding the original 3 July 2024 assessment for this purpose. Eco Route commits to replacing the outdated Appendix D1 in the Final BAR with this updated assessment.

about slope/topography being restrictive for Unit Node 4 was informed by a slope analysis, or desktop only.	
It is noted that all 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. 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 clarify 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.	This is accepted as a valid concern regarding specialist currency for the faunal, aquatic and visual assessments (the terrestrial biodiversity assessment has been updated — see response to the comment above). Eco Route commits to obtaining written confirmation from the faunal, aquatic and visual specialists on whether their assessments and significance ratings remain valid for the current preferred alternative, including the revised enclosed-structure configuration per node, and to reflect this confirmation (including any updated reports) in the Final BAR.
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. Similarly, where Section 38 of the NHRA is triggered, the Standard Operating Procedure between Heritage Western Cape and the Department	This is addressed. A Notice of Intent to Develop (NID) in terms of Section 38(1) and (8) of the National Heritage Resources Act was submitted to Heritage Western Cape (HWC). HWC's Heritage Officers Meeting considered the application (Case Decision 389121, decided 9 February 2026) and resolved that no further studies are required, as heritage resources will not be impacted upon, subject to the HWC Chance Finds Procedure and Accidental Finds Protocol, which have been incorporated into the EMPr.

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 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.	
TERRESTRIAL BOTANICAL & BIODIVERSITY ASSESSMENT: 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	Noted, and this is a fair observation. As set out in response to the comment at item 3 (Alternatives) above, Eco Route commits to obtaining specialist confirmation of whether the current preferred alternative and the passage of time since the original survey (including a Spring flowering season) warrant a supplementary botanical survey, for inclusion in the Final BAR.

done during Spring, especially given the noted presence of SCCs on the site. 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.	
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 [Table 4: Resort Size Categories – 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 than 120m² per unit (Approval of a resort of more than 50 units, though not impossible, is discouraged)]. 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 development as proposed is the preferred alternative (25	Noted, and this is an accurate statement of the CBA1/CBA2 management objectives under the 2017 WCBSP. As set out in response to comments elsewhere in this report, Eco Route commits to obtaining specialist confirmation of whether the development remains compatible with the current 2023 WCBSP's Protected Area management objectives (which supersede the 2017 CBA1/CBA2 designation referenced in this comment), for inclusion in the Final BAR.

units) is unlikely to qualify as a 'low' impact land use given its 'medium' scale classification. 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.	
It is mentioned in the SSVR contained in the BAR "...it should be noted that the 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). 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 reflected in the VIA, Botanical/Biodiversity Assessments as it may have bearing on the findings of these studies.	Noted, and agreed this compatibility should be clearly demonstrated rather than assumed. This is directly addressed by the specialist confirmation against the 2023 WCBSP Protected Area framework committed to in response to the comment above, which Eco Route confirms will specifically consider whether the confirmed occupancy and land-use intensity supports the primary conservation function of the area.
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 specialist specifically recommends that the fynbos-thicket must be rehabilitated 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	Noted, and Eco Route confirms the EMPr requires rehabilitation of disturbed areas and ongoing alien invasive species removal. Eco Route acknowledges a dedicated Rehabilitation Plan (addressing phasing against the specialist's recommendations) has not yet been prepared as a standalone document, and commits to obtaining one, informed by the specialist's recommendations, for inclusion in the Final BAR.

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 mitigation measures 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 area is the likely position for a fire break. Reduced vegetation cover along an extended fire break along the	This is accepted as a valid and important point. Eco Route commits to including fire break requirements (location, width and maintenance) between the development and the upper slopes as part of the Fire Management Plan committed to elsewhere in this report, to be developed in consultation with the Southern Cape Fire Protection Agency and the terrestrial specialist, balancing fire break maintenance against the specialist's ecological burning recommendations for the upper slopes.

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.	
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. The BAR lacks information and detail about (A) the location of sewage package plants/treatment facilities its 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. Similarly the provision for on-site sewage package plant/treatment facility appears not to have been considered its 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).	This is substantially resolved by the confirmed design. The Bio Bloo sewage treatment locations are shown on the Site Development Plan (Appendix B), sited landward of the 30 m building line and the aquatic specialist's recommended 36 m estuary buffer. As set out in response to the equivalent comment raised by Vernon Rice earlier in this report, the confirmed design is fully closed-loop (no discharge to the environment, any watercourse, or groundwater), which was not the design assessed by the 2024 aquatic specialist report. Eco Route commits to providing the aquatic specialist with the confirmed closed-loop design and site layout to confirm the assessment's conclusions remain valid, for inclusion in the Final BAR.
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. 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	As set out in response to the comment at item 8 (Rehabilitation) above, Eco Route commits to obtaining a Rehabilitation Plan addressing the specialist's recommended 10 m cliff-edge and 36 m estuary buffers, for inclusion in the Final BAR.

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 Plans, 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. 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 reasonably interrogated as a potential long-term impact to 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.	Eco Route confirms no lagoon access infrastructure is proposed as part of this development; prior SANParks correspondence (6 August 2026) confirms that any estuary access will be via the Brenton-on-Lake SANParks facility only, with no direct boat launching from the property and no unauthorised moorings permitted. Eco Route commits to confirming in the Final BAR what measures (such as signage or access control) will prevent informal, erosion-prone pedestrian access down the cliff referenced in this comment.
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	As set out in response to the comment at item 3 (Alternatives) above, Eco Route commits to obtaining written confirmation from the faunal specialist on whether the repositioned Unit Node 4 (EUA

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. Very specifically, the Faunal Assessment states on p. 53 that a new site layout must be (re)assessed by 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. 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 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 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.	5) and the current preferred alternative have been adequately assessed, including in relation to the Very High Sensitivity fauna zone referenced in this comment, for inclusion in the Final BAR.
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 is to rezone the property to Open Space III (with tourist accommodation), it is	The Site Sensitivity Verification Report (Appendix E) confirms the Agriculture theme as being of low sensitivity. The property was not, is not, and will not be used for agricultural production, irrespective of its current Agriculture Zone I status or the proposed rezoning to Open Space III, and an Agricultural Compliance Statement

unlikely that no agricultural study will be required. The EAP must confirm why no agricultural study has been undertaken.	prepared by a specialist would add no additional information to this assessment. No further agricultural study is required.
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. 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 set out in response to the comment at item 3 (Alternatives) and item 4 (Faunal) above, Eco Route commits to obtaining written confirmation from the visual specialist on whether the Visual Impact Assessment reflects the current preferred alternative, including the revised enclosed-structure configuration per node, for inclusion in the Final BAR.
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 states 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. Despite this recommendation by the specialist, the BAR does not contain any of these mitigation plans which raises	Eco Route acknowledges a dedicated landscape/rehabilitation planting plan prepared by a registered Landscape Architect, as recommended by the visual specialist, has not yet been included, and commits to obtaining one for inclusion in the Final BAR.

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 to the glint and glare considerations, neither is the VIA considering the cumulative glint/glare associated with 15x enclosed structures.	
Curiously the key visual points discussed in the VIA are 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 'probable view catchment' and 'zone of visual influence'. 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 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. 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. It appears as though the development in its preferred format/alternative, does not align 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	Eco Route commits to confirming with the visual specialist whether the nine assessed Observer Locations include vantage points from neighbouring properties to the north and south (including Featherbed Nature Reserve) within the identified zone of visual influence, and will supplement the assessment with any viewpoints not already covered, for inclusion in the Final BAR.

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. Considering the location of this property in proximity to the estuary, within an area 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.	Eco Route confirms the existing dirt road, disturbed patch of grass, dwelling and garage are disclosed in the BAR (Section 2, referencing 2016 Google Earth imagery) as pre-existing features of the property, used under the property's existing Agriculture Zone I consent use for camping. Eco Route is not aware of any historical compliance action against the property, and confirms the proposed development does not rely on or extend any unlawful historical land use; the current application is itself the process by which the confirmed development is being lawfully authorised.
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. It is also not clear how the impact on the common transport access road has been assessed and how this impact, through increased traffic on the private road, will be mitigated. It is deemed a serious flaw in the BAR that no concrete information is available to services.	Eco Route acknowledges a dedicated Services Report or services layout map has not been included as a standalone document, and commits to preparing one — addressing water supply, sewage treatment, and waste management infrastructure locations and capacities — for inclusion in the Final BAR, so that all specialists have the opportunity to review it.
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	Eco Route acknowledges the borehole's registration status and yield sustainability have not been confirmed, and commits, as set

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. In the event that the borehole is registered with DWS, it's 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.	out in response to the equivalent comment raised by Vernon Rice earlier in this report, to obtaining a water demand and supply-security assessment — including confirmation of the borehole's registration status with the Department of Water and Sanitation and whether a General Authorisation or Water Use Licence Application is required given the confirmed private, non-commercial use — for inclusion in the Final BAR.
There is no details provided on how sewage will be treated other than reference 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. 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.	Eco Route confirms the sewage design is now fully specified: one independent, packaged Bio Bloo treatment system per EUA (five in total), sited landward of the 30 m building line and 36 m estuary buffer as shown on the Site Development Plan. As set out in response to the comment at item 11 (Aquatic) above, treated water is fully recycled internally within each EUA (toilet flushing and outdoor taps only) with no discharge to the environment, borehole, or estuary, and Eco Route commits to confirming this design with the aquatic specialist for the Final BAR.
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?). 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	This is not accepted on the facts as regards operational traffic: the BAR (Section 2.4, Access and Traffic) confirms the existing grassed vehicle access track off C.J. Langenhoven Street is used for both construction and operational access, with no road widening, upgrading or new access construction proposed, and no increase in vehicle movements anticipated during the operational phase. A formal Traffic Impact Study has not been conducted; given the

inform comment or decision-making. The common road is serviced by landowners, who pay for its maintenance and upkeep. The additional traffic from the proposed development will cause faster degradation of the road, and the cost will need to be carried by existing landowners.	confirmed absence of any proposed road upgrade, this has not been considered necessary. Eco Route acknowledges the concern regarding shared road maintenance costs and commits to raising this directly with the applicant for consideration outside the environmental authorisation process.
OSCA REGULATIONS: The BAR does not comment on the applicability of the OSCA Regulations. This must be verified by the EAP and the Knysna Municipality's environmental directorate approached for comment.	Eco Route acknowledges the applicability of the Once-Off Site Clearance and Alien Vegetation Eradication (OSCA) Regulations has not been explicitly addressed, and commits to confirming this with the Knysna Municipality's environmental directorate and reflecting the outcome in the Final BAR.
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. 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'. 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.	Eco Route confirms the Rezoning Motivation was prepared by TMBA (Pty) Ltd, a qualified architectural practice, and has been submitted to the Knysna Municipality's Planning & Development: Land Use Management directorate as part of the parallel rezoning application; whether an urban/town planner's input is additionally required is a determination for that Municipal process. Regarding the Rural Development Guidelines and the characterisation of 'tourist accommodation' as a resort: Eco Route confirms the confirmed development is a private, non-commercial family facility with a binding maximum occupancy of 60 persons, restricted by title deed and the SANParks stewardship agreement (see responses to equivalent comments elsewhere in this report), and commits to obtaining the town planner's written confirmation of the applicable consent-use category for the Final BAR.

In addition the Rural Development Guidelines refer to "Camping establishments should be restricted to a low impact 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 to 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 to scale/density.	As set out in response to the equivalent comment raised by Vernon Rice / Witgoud Beleggings earlier in this report, whether the proposed structures constitute 'additional dwelling units' under the Zoning Scheme By-law is a town-planning determination under active consideration through the parallel rezoning application. Eco Route commits to obtaining the town planner's written confirmation of this point, including any resulting implications for scale or density, and reflecting the outcome in the Final BAR.
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. The EAP must be more specific to 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 EAP's 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. Considering the tourist nature, as well as possible historical accommodation components, the following listed activities 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) –	Eco Route commits to reviewing and, where necessary, expanding the Final BAR's listed activities table to specify which component of the confirmed development (EUAs, decks, Bio Bloo units, access track, etc.) triggers each listed activity, and the reasoning for excluding any activity considered, rather than relying on a general disclaimer.

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). 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.	
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). 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. If necessary, the land use approval requested should be amended to reflect the intended use. For example, zoning as Nature Reserve with limitation on use may be more appropriate. 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".	Eco Route confirms the confirmed development is a private, non-commercial facility restricted to registered Lovemore family members and Lovemore Children's Secondary Trust beneficiaries, with no public accommodation and no tourism income. As set out in response to the comments elsewhere in this report regarding the Open Space III / Tourist Accommodation consent-use category, that terminology reflects the applicable statutory land-use category under the Zoning Scheme By-law rather than the facility's actual, restricted operation; Eco Route commits to ensuring this distinction is stated clearly and consistently throughout the Final BAR.
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	Noted. Eco Route acknowledges the pre-application BAR had the shortcomings identified throughout this detailed submission, and confirms the commitments made in response to each point above

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 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 to the need and desirability of the proposal of an assisted camping facility on Portion 104/216.	— specialist confirmation of the preferred alternative, updated terrestrial biodiversity assessment, Rehabilitation Plan, Services Report, water security assessment, Fire Management Plan with fire breaks, confirmation that the Agriculture theme is of low sensitivity and requires no specialist compliance statement, landscape plan, and refined listed activities table — are intended to close these gaps in the Final BAR ahead of a decision by the competent authority.
Alison Lloyd (long-standing neighbour and landowner on the Western Head) – 20 July 2026 (added objection email)	
Please see our added objection to the Lovemore development on portion 104 of farm 216 Uitzicht. As long standing neighbours and landowners on the Western head we are not comfortable that the proposed re-zoning as well as the obvious densification of this property is aligned to the Western head future or planned conservancy.	Noted, with thanks for this submission. Eco Route confirms the confirmed development — a binding maximum occupancy of 60 persons across five EUAs, restricted to registered Lovemore family members and Trust beneficiaries, secured through the title deed restriction and SANParks stewardship agreement — is addressed in detail in the responses below.
The Basic Assessment (BA) fails to demonstrate that the proposed camping development is environmentally appropriate, proportionate, or legally justified for one of the most environmentally sensitive areas in the Western Cape. The BA contains significant shortcomings in its assessment of land use, environmental impacts and long-term planning implications. The application is presented as a private family camping facility, it seeks approval for a permanent Camping Site land use accommodating approximately 50–60 people (originally 100 people), creating planning rights that would attach to the property	Eco Route confirms the confirmed, binding maximum occupancy is 60 persons in total (not the 100 figure referenced), 8 per EUA, now incorporated into the Final BAR (Section 2.3) and EMPr. As set out in response to equivalent comments raised by Vernon Rice / Witgoud Beleggings earlier in this report, this restriction, and the exclusion of further development, is intended to be made durable through the title deed amendment (recorded in the Rezoning Motivation, TMBA, 21 August 2026) and the SANParks stewardship agreement. The 'Future Disturbance Area' of 7,733 m² shown on the Site Development Plan for long-term reference only is explicitly

rather than the current owners. The assessment repeatedly relies on the applicant's stated intentions instead of legally enforceable restrictions, leaving open the possibility of future expansion or commercialisation and excessive densification of the Western heads conservancy. The most recent architects plan has 5 separate EAUs which each have 2 small chalets. It also shows a future development area of over 7000 metres squared which is two thirds of the initial development area requested. It does question, at what point the land usage is capped to ensure the fauna and flora on the western head not only survive but also flourish.	excluded from this application and would require its own full, independent environmental authorisation process, including public participation, before any activation could occur; it does not represent an intention to develop the full property.
It does not adequately explain why a permanent Camping Site consent is required if the development is genuinely intended only for private family recreation, nor does it assess the broader consequences of granting tourism-related accommodation rights on Agricultural Zone I land. The request to re-zone to Open space 111 and lack of town planning input is concerning as what would prevent the family from continuing to build these EAUs until the full property is covered.	As set out in response to the equivalent comments raised by Vernon Rice earlier in this report, whether Camping Site or Tourist Accommodation is the correct and applicable consent-use category is a town-planning determination under active consideration through the parallel Knysna Municipality rezoning application (Case Officer: Mr S. Mqhele), and Eco Route commits to obtaining the town planner's written confirmation of this and reflecting it in the Final BAR. Regarding the extent of future EUA development: the confirmed development is capped at the five EUAs and binding 60-person occupancy limit described in this application; any further EUAs would constitute a materially different development requiring its own full environmental authorisation process.
The environmental assessment also fails to demonstrate compatibility with the conservation objectives of the Western Cape Biodiversity Spatial Plan 2023, which identifies the property as lying within a Protected Area containing Critically Endangered Knysna Sand Fynbos. Specialist studies rely on outdated biodiversity mapping and do not adequately assess the cumulative impacts of accommodating 50–60 people (and possibly more in future) within such a sensitive ecosystem. The report places undue emphasis on the limited physical footprint of the infrastructure while	Eco Route commits to obtaining written confirmation from the terrestrial biodiversity, faunal and aquatic specialists on whether their significance ratings and recommendations would change when assessed against the 2023 WCBSP's Protected Area management framework (as opposed to the 2017 WCBSP CBA/ESA classification on which the specialist reports were based), and to reflect this confirmation in the Final BAR, as set out in response to equivalent comments raised by Vernon Rice earlier in this report.

underestimating the ecological impacts arising from sustained human activity, including habitat disturbance, fire risk, noise, lighting, waste generation and fragmentation.	
The alternatives assessment is inadequate because it assumes the proposed carrying capacity is fixed and fails to meaningfully evaluate lower-density or reduced-footprint options that would avoid sensitive habitat. Despite specialist recommendations identifying significant impacts on threatened plant species and recognising lower-sensitivity areas elsewhere on the property, the BA does not properly consider reducing the number of camping nodes or relocating development into already disturbed areas in accordance with the mitigation hierarchy required by NEMA.	This is accepted as a valid critique of the alternatives assessment, for the reasons given in response to the equivalent comment raised by Vernon Rice earlier in this report. Eco Route commits to including a lower-density alternative — addressing reduced occupancy, fewer camping nodes, and further concentration within already-disturbed, lower-sensitivity areas — in the Final BAR's alternatives assessment.
Several specialist issues remain unresolved, including traffic impacts, fire management, water availability, wastewater disposal, and cumulative environmental effects. The report also lacks critical input from CapeNature despite the proposal affecting a Protected Area and threatened ecosystem, while comments from other authorities especially town planning, have not been adequately addressed.	Eco Route confirms traffic, fire management, water availability and wastewater disposal are each addressed in the responses to equivalent comments raised by Vernon Rice and Glenrise (Pty) Ltd / JR Macey earlier in this report, including commitments to a water security assessment and a Fire Management Plan. This is not accepted as regards CapeNature: CapeNature has in fact provided comments during this Application Phase (letter dated 21 July 2026), which are captured and answered in full in this Comments and Response Report.
Overall, the BA does not provide sufficient evidence to demonstrate that the proposed Camping Site is compatible with the long-term conservation objectives of the Western Heads landscape or that the environmental impacts are justified by any broader public or socio-economic benefit. Significant uncertainties remain regarding the true intensity of the proposed land use, its future expansion potential, and its cumulative environmental consequences. Accordingly, the competent authority should require substantial additional information, updated specialist assessments, a rigorous evaluation of lower-impact alternatives,	Noted. Eco Route confirms the specialist confirmations, lower-density alternative, water security assessment, Fire Management Plan, and enforceability mechanisms (title deed restriction and SANParks stewardship agreement) committed to throughout this report are intended to close the gaps identified in this and the related submissions ahead of a decision by the competent authority.

and legally enforceable restrictions before any decision is made on the application.	
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PART B STATUS:

The Application Phase Public Participation Process is in the process of being closed out. This report will be updated as the remaining responses above are finalised, and the consolidated report will form part of the submission of the Final Basic Assessment Report to the Department of Forestry, Fisheries, and the Environment (DFFE) for review and decision-making.