



**Enquiries**

A Minne

**Contact Details**

044 501 3318

**E-Mail**

[aminne@plett.gov.za](mailto:aminne@plett.gov.za)

**File Ref: 18/RE6503/PB**

15 October 2024

**Attention: Mr F Byleveld**

Tel:

044 874 0365

E-Mail:

[francois@cape-eaprac.co.za](mailto:francois@cape-eaprac.co.za)

Dear Sir / Madam

**COMMENT ON DRAFT BASIC ASSESSMENT REPORT IN TERMS OF THE NEMA ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS FOR THE PROPOSED PLETT LAGOON ESTATE, REMAINDER OF ERF 6503, BITOU MUNICIPALITY**

**DEAD&P Reference Number: 16/3/3/6/7/1/D1/13/0177/23**

Bitou Local Municipality would like to thank you for the opportunity to review and comment on the Draft BAR for the proposed development on the Remainder of Erf 6503, within the Bitou Municipal area. Please note that these comments have been drafted by the Land Use and Environmental Management department within the Planning and Development directorate. Additional comments may be required from other relevant departments within the Bitou Local Municipality.

The following information was taken from the supplied report and summarise the proposed activities.

**DESCRIPTION OF ACTIVITY**

Plett Lagoon Estate (Pty) Ltd are proposing the development of a residential estate on the Remainder of Erf 6503 consisting of a mix of general, single residential and group housing erven as well as a clubhouse and associated infrastructure. Approximately 41% of the property is to be developed, specifically within previously transformed areas with the remainder proposed as Private Open Space and Nature Conservation.

**LOCATION**

The property is situated adjacent to the Keurbooms Estuary and contains transformed areas, Secondary Grassy Fynbos, Goukamma Dune Thicket and Cape Seashore Vegetation (Terrestrial Plant Species Specialist Assessment Report, Biodiversity Africa, 2023).

Following a review of the documentation and appendices the following comments are made:

1. The proposed Nature Conservation Areas should be formally declared as Protected Environment in terms Section 28 of the National Environmental Management: Protected Areas Act (NEM:PAA, Act 57 of 2003) to be able to give legal recognition of the sensitivity of the site.
2. The top eastern boundary of the property adjacent to the Keurbooms Estuary is prone to erosion due to tidal action and adjacent hardened structures (rock riprap) at the Keurbooms Caravan park. Soft maintenance measures might be required to protect banks with sensitive tree species from collapse. It is noted that Farm 449 stretches along the estuary edge. This property belongs to Garden Route District Municipality. However, the High Water Mark (HWM) which has shifted since the determination of the

boundaries will have resulted in redetermination of the boundaries of Farm 449 and will most likely be deemed Coastal Public Property. As such the position of the HWM may be along the certain sections of the eastern boundary of Erf 6503 and erosion mitigation and maintenance management would be applicable. As such, it is suggested to include such soft management measures including active rehabilitation or the use of mulch bags or the like in the Environmental Management Programme as part of the Open Space management.



Comment from Spatial Planning:

3. It is noted from the report that a single access was originally proposed from Susan Drive/ Cuthbert Close, via the Poortjies residential neighbourhood. This would mean that all traffic to the development would have to travel through the Poortjies residential neighbourhood. The development should gain access both directly off Beacon Way via the access road leading between the Plett Primary School and Checkers, as well as through Poortjies. Basically, it is critically important that a public through-road be established that links up Susan Street/ Cuthbert Close with the road past Plett Primary to Beacon Way (see yellow arrow in the adjacent diagram). The new development can then take access off such a through-road. This will lead to the more efficient functioning of the greater area from a movement perspective, and will better integrate the proposed development with the Poortjies residential area. The layout should be suitably amended to make provision for such a road.



4. It is noted that several inhabitants of Poortjies have objected against the (sole) access from Susan Street/ Poortjies. This is understandable, as the original proposal would have resulted in a noteworthy increase in traffic through the Poortjies area. However, they were not provided with a through-road/ combined access proposal as proposed above. To address the public concerns, the applicant has taken the “easy”

option by “turning its back” on Poortjies/ Susan Street, and instead proposing the sole access off Beacon Way, past Plett Primary. However, this is not the only viable alternative, as explained above.

5. It cannot be stressed enough how important establishing said road linkage between past Plett Primary/ Checkers through to Susan Street/ Poortjies would be for the public benefit and functioning of the area. It will be to the benefit of both the residents of the new development (who will then be able to directly access the Poortjies public beaches/ estuary and residential area for recreational purposes, and will then also have an alternative access point to Beacon Way via Zenon Street), and will also benefit the current residents of Poortjies (who will then have an alternative means of access to and from Beacon Way and the N2). Although it might result in a slight increase in traffic through Susan Street/ the Poortjies area (which would be minimal in my opinion, as most residents of the new development would utilise the most direct access, which would be past Plett Primary), it would in the same breath then alleviate pressure/ traffic on the Beacon Way intersection in front of Plett Primary, which we know is already a problematic intersection. The combined effect will be overwhelmingly positive in my opinion.
6. It simply does not make sense for a person staying in Susan Street, for instance, to have to drive back to Zenon Street (creating unnecessary traffic through the residential area) in order to join Beacon Way on their way to the N2, for instance. Providing such a through-road would provide residents with an alternative to access the N2, as well as coming back from the N2. Residents that stay in the southern side of Poortjies would still make use of the existing Zenon Street linkage to Beacon Way.
7. The Traffic Impact Statement was conducted based on a sole access via Cuthbert Close/ Poortjies, which would link up to the existing traffic circle in Beacon Way via the Poortjies residential area/ Zenon Street. Thus, even if all traffic is directed through Poortjies, the TIS found the impact to be acceptable from a traffic impact perspective. The option to access directly from Beacon Way (past Plett Primary) as well as via Susan Street could surely only result in benefits. Any argument that enabling such a “secondary” access through Poortjies would be unacceptable from a traffic perspective, especially given that the main access would be directly off Beacon Way past Plett Primary, would thus not be valid.
8. If the applicant/ developer is not in agreement with my proposal, the correct response would be to amend the TIS to assess the options of allowing through-traffic as per my proposal above, vs a single access road past Plett Primary, as is currently proposed by the applicant. Even if such a study would find the single access more acceptable from a traffic perspective (which I highly doubt it would), one also needs to weigh up the practicality, social and accessibility benefits that the through-road option poses.

The Bitou Municipality reserves the right to revise initial comments and request further information based on any additional information that might be received. The onus remains on the registered property owner to confirm adherence to any relevant legislation with regards to the activities which might trigger and/or need authorisation for.

Should you require any additional information please do not hesitate to contact this office.

Yours faithfully,



Anjé Minne

**Environmental Management Officer**

**Planning and Development: Land Use and Environmental Management**

**Bitou Municipality**

## Francois Byleveld

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**From:** Anjé Minne <aminne@plett.gov.za>  
**Sent:** Tuesday, 15 October 2024 12:59  
**To:** Francois Byleveld  
**Cc:** Marcel Minne  
**Subject:** RE: Erf 6503 Plett  
**Attachments:** Comments on Erf 6503 Draft BAR.pdf

Dear Francois,

Please see consolidated environmental and spatial comments attached on the Draft Basic Assessment Report.

**Regards,**

**Anjé Minne**

Environmental Management Officer | Town Planning | Planning & Development | Bitou Municipality  
Mobile: 072 229 6640 | Work: 044 501 3318 | Email: [aminne@plett.gov.za](mailto:aminne@plett.gov.za) | Website:  
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**From:** Anjé Minne  
**Sent:** Tuesday, 15 October 2024 11:32  
**To:** Francois Byleveld <francois@cape-eaprac.co.za>  
**Cc:** Marcel Minne <MMinne@plett.gov.za>  
**Subject:** FW: Erf 6503 Plett

Dear Francois,

Please see Spatial Planning comments below.

**Regards,**

**Anjé Minne**

Environmental Management Officer | Town Planning | Planning & Development | Bitou Municipality  
Mobile: 072 229 6640 | Work: 044 501 3318 | Email: [aminne@plett.gov.za](mailto:aminne@plett.gov.za) | Website:  
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**From:** Marcel Minne <[MMinne@plett.gov.za](mailto:MMinne@plett.gov.za)>  
**Sent:** Wednesday, 02 October 2024 13:05  
**To:** Marius Buskes <[mbuskes@plett.gov.za](mailto:mbuskes@plett.gov.za)>  
**Cc:** Chris Schliemann <[CSchliemann@plett.gov.za](mailto:CSchliemann@plett.gov.za)>; Ludolph Gericke <[lgericke@plett.gov.za](mailto:lgericke@plett.gov.za)>; Anjé Minne <[aminne@plett.gov.za](mailto:aminne@plett.gov.za)>  
**Subject:** Erf 6503 Plett - application for rezoning

Good day Marius,

I hereby have the following important comments from a Spatial Planning perspective, for consideration by the applicant and decision-maker:

1. It is noted from the report that a single access was originally proposed from Susan Drive/ Cuthbert Close, via the Poortjies residential neighbourhood. This would mean that all traffic to the development would have to travel through the Poortjies residential neighbourhood. The development should gain access both directly off Beacon Way via the access road leading between the Plett Primary School and Checkers, as well as through Poortjies. Basically, it is critically important that a public through-road be established that links up Susan Street/ Cuthbert Close with the road past Plett Primary to Beacon Way (see yellow arrow in the adjacent diagram). The new development can then take access off such a through-road. This will lead to the more efficient functioning of the greater area from a movement perspective, and will better integrate the proposed development with the Poortjies residential area. The layout should be suitably amended to make provision for such a road.
2. The above comments were also submitted on the pre-application Basic Assessment Report, but were not sufficiently addressed by the applicant in their response. We will be taking this up with the Environmental consultants again in the EIA process going forward.
3. I note that several inhabitants of Poortjies have objected against the (sole) access from Susan Street/ Poortjies. This is understandable, as the original proposal would have resulted in a noteworthy increase in traffic through the Poortjies area. However, they were not provided with a through-road/ combined access proposal as proposed above. To address the public concerns, the applicant has taken the “easy” option by “turning its back” on Poortjies/ Susan Street, and instead proposing the sole access off Beacon Way, past Plett Primary. However, this is not the only viable alternative, as explained above.
4. I cannot stress enough how important establishing said road linkage between past Plett Primary/ Checkers through to Susan Street/ Poortjies would be for the public benefit and functioning of the area. It will be to the benefit of both the residents of the new development (who will then be able to directly access the Poortjies public beaches/ estuary and residential area for recreational purposes, and will then also have an alternative access point to Beacon Way via Zenon Street), and



will also benefit the current residents of Poortjies (who will then have an alternative means of access to and from Beacon Way and the N2). Although it might result in a slight increase in traffic through Susan Street/ the Poortjies area (which would be minimal in my opinion, as most residents of the new development would utilise the most direct access, which would be past Plett Primary), it would in the same breath then alleviate pressure/ traffic on the Beacon Way intersection in front of Plett Primary, which we know is already a problematic intersection. The combined effect will be overwhelmingly positive in my opinion.

5. It simply does not make sense for a person staying in Susan Street, for instance, to have to drive back to Zenon Street (creating unnecessary traffic through the residential area) in order to join Beacon Way on their way to the N2, for instance. Providing such a through-road would provide residents with an alternative to access the N2, as well as coming back from the N2. Residents that stay in the southern side of Poortjies would still make use of the existing Zenon Street linkage to Beacon Way.
6. The Traffic Impact Statement was conducted based on a sole access via Cuthbert Close/ Poortjies, which would link up to the existing traffic circle in Beacon Way via the Poortjies residential area/ Zenon Street. Thus, even if all traffic is directed through Poortjies, the TIS found the impact to be acceptable from a traffic impact perspective. The option to access directly from Beacon Way (past Plett Primary) as well as via Susan Street could surely only result in benefits. Any argument that enabling such a “secondary” access through Poortjies would be unacceptable from a traffic perspective, especially given that the main access would be directly off Beacon Way past Plett Primary, would thus not be valid.
7. If the applicant/ developer is not in agreement with my proposal, the correct response would be to amend the TIS to assess the options of allowing through-traffic as per my proposal above, vs a single access road past Plett Primary, as is currently proposed by the applicant. Even if such a study would find the single access more acceptable from a traffic perspective (which I highly doubt it would), one also needs to weigh up the practicality, social and accessibility benefits that the through-road option poses.

**Regards,**

**Marcel Minne**

Pr. Pln A/1851/2014 | Spatial Planner | Planning & Building Control | Planning & Development | Bitou Municipality

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Physical Address: Office 50, Melville’s Corner, 3 Kloof Street, Plettenberg Bay, 6600, Western Cape, South Africa



# Bitou Municipality

*To be the best together*

For all

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**Enquiries**

A Minne

**Contact Details**

044 501 3318

**E-Mail**

[aminne@plett.gov.za](mailto:aminne@plett.gov.za)

**File Ref: 18/RE6503/PB**

31 January 2024

**Attention: Mr F Byleveld**

Tel:

044 874 0365

E-Mail:

[francois@cape-eaprac.co.za](mailto:francois@cape-eaprac.co.za)

Dear Sir / Madam

**COMMENT ON PRE-APPLICATION BASIC ASSESSMENT REPORT IN TERMS OF THE NEMA ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS FOR THE PROPOSED PLETT LAGOON ESTATE, REMAINDER OF ERF 6503, BITOU MUNICIPALITY**

**DEAD&P Reference Number: 16/3/3/6/7/1/D1/13/0177/23**

Bitou Local Municipality would like to thank you for the opportunity to review and comment on the Pre-Application BAR for the proposed development on the Remainder of Erf 6503, within the Bitou Municipal area. Please note that these comments have been drafted by the Land Use and Environmental Management department within the Planning and Development directorate. Additional comments may be required from other relevant departments within the Bitou Local Municipality.

The following information was taken from the supplied report and summarise the proposed activities.

**DESCRIPTION OF ACTIVITY**

Plett Lagoon Estate (Pty) Ltd are proposing the development of a residential estate on the Remainder of Erf 6503 consisting of a mix of general, single residential and group housing erven as well as a clubhouse and associated infrastructure. Approximately 41% of the property is to be developed, specifically within previously transformed areas with the remainder proposed as Private Open Space and Nature Conservation.

**LOCATION**

The property is situated adjacent to the Keurbooms Estuary and contains transformed areas, Secondary Grassy Fynbos, Goukamma Dune Thicket and Cape Seashore Vegetation (Terrestrial Plant Species Specialist Assessment Report, Biodiversity Africa, 2023).

Following a review of the documentation and appendices the following comments are made:

1. It is acknowledged and commended that the proposed development is to only make use of the least sensitive areas of the property with the remainder being proposed as private open space and nature conservation areas. This also ensures that the development is appropriately set back from the sensitive Keurbooms Estuary, and this is supported.
2. It is requested that the proposed Nature Conservation Areas be formally declared as Protected Environment in terms Section 28 of the National Environmental Management: Protected Areas Act (NEM:PAA, Act 57 of 2003) to be able to give legal recognition of the sensitivity of the site. As such, Open Space Zone IV in the Bitou Zoning Scheme (2023) would be the appropriate zoning to apply for.



3. The property in question falls within an area that has been classified as an Outeniqua Sensitive Coastal Area (previously Portion 51 of Farm 444) in terms of the OSCAE Regulation in terms of Government Notice No. R879 of May 1996 and it is the owner's responsibility to ensure compliance with these regulations. Please contact this office for additional information on requirements for application purposes.
4. The National Environmental Management: Integrated Coastal Management Act (NEM:ICMA, Act 24 of 2008) and Section 13 specifies that all people in South African have a "right of reasonable access to the coastal public property" and Section 18(9) specifies that: "Each municipality approving the rezoning, subdivision or development of a land unit within or abutting on coastal public property must ensure that adequate provision is made in the conditions of approval to secure public access to that coastal public property". A Coastal Access Audit has been undertaken for the Garden Route District (WCPCASP, DEA&DP, 2019).

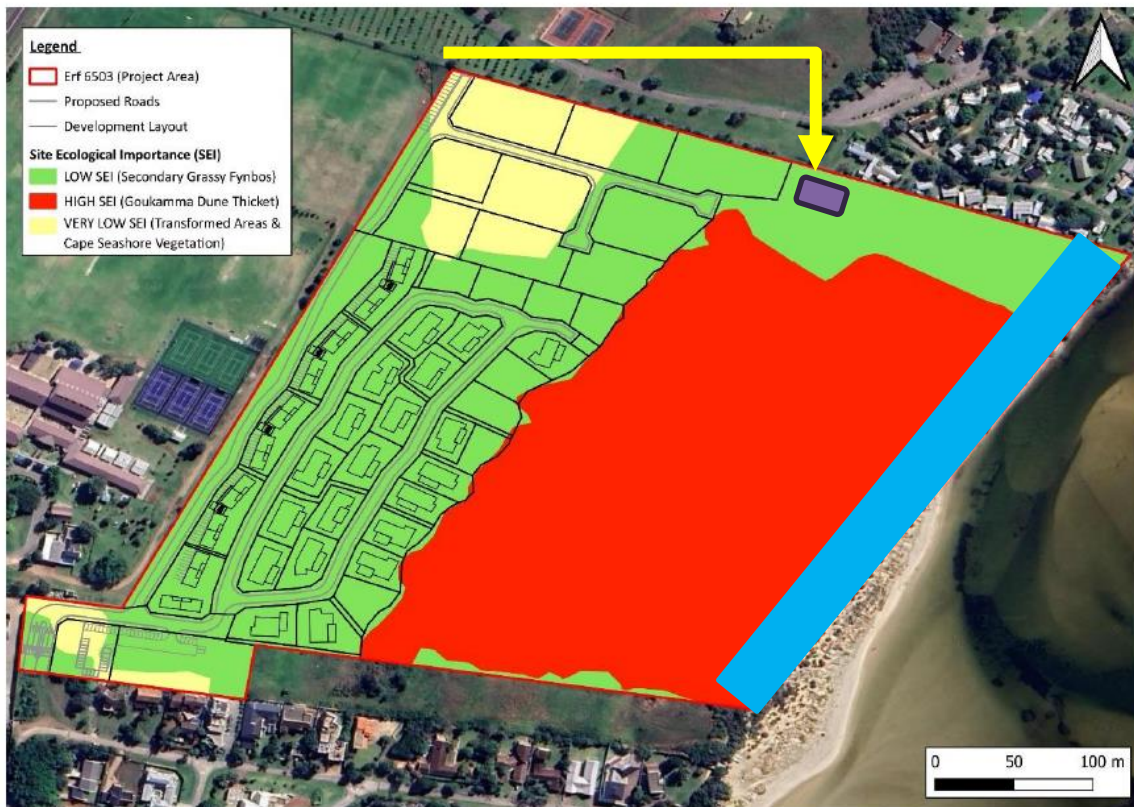


Figure 50: Plettenberg Bay

*Figure 1 - Figure extracted from DEA&DP (2019) WCPCASP - Western Cape Provincial Coastal Access Audit undertaken for the Garden Route Municipal District. The red star indicates the position of Remainder of Erf 6503 in relation to the audit.*

The figure shows that the section along the western banks of the Keurbooms Estuary has limited access to the Coastal Public Property. It is requested that the applicant investigates a manner in which an additional access point to the Coastal Public Property can be created for the use of the public. Two suggestions that could be investigated are creation of a small parking area with pedestrian access via the northern boundary of the property or the inclusion of a public open space strip along the eastern perimeter

of the demarcated wetland. Potentially an agreement can be reached with the Keurbooms Caravan Park as additional vehicular access from the N2 Highway to the estuary is sorely needed.



*Figure 2 – Figure extracted from Terrestrial Biodiversity Compliance Statement for Plettenberg Bay Lagoon Residential Estate (Biodiversity Africa, 2023). The purple and yellow and blue areas indicate possible investigations for public access.*

5. The top eastern boundary of the property adjacent to the Keurbooms Estuary is prone to erosion due to tidal action and adjacent hardened structures (rock riprap) at the Keurbooms Caravan park. Soft maintenance measures might be required to protect banks with sensitive tree species from collapse. Should the project specialists agree it is suggested to include such soft management measures including active rehabilitation or the use of mulch bags or the like in the Environmental Management Programme as part of the Open Space management.
6. The specialist recommendations regarding the type, placement of fencing and mitigation measures that should be utilised to encourage animal movements are supported and required. No fencing should be allowed along the eastern coastal boundary.
7. It is noted from the report that a single access is proposed from Susan Drive / Cuthbert Close behind the Checkers Centre via the Poortjies residential neighbourhood. With the current proposal, all traffic to the development will have to travel through the Poortjies residential neighbourhood. The development should gain access both directly off Beacon Way via the access road leading running past the Plett Primary School to the subject property, as well as through Poortjies (indicated in yellow in the adjacent screenshot). This will require the movement of the security gate to the area marked with a cross. Furthermore, it is critically important that vehicular and pedestrian through-



movement also be established between Susan Street/ Cuthbert Close (Poortjies) and Beacon way, through establishing a new public road directly past the entrance to the proposed development (around the north-eastern corner of the Checkers centre). This will lead to the more efficient functioning of the greater area from a movement perspective, and will better integrate the proposed development with the Poortjies residential area. A condition of approval should be inserted to compel the developer to establish such a link road.

The Bitou Municipality reserves the right to revise initial comments and request further information based on any additional information that might be received. The onus remains on the registered property owner to confirm adherence to any relevant legislation with regards to the activities which might trigger and/or need authorisation for.

Should you require any additional information please do not hesitate to contact this office.

Yours faithfully,



Anjé Minne

**Environmental Management Officer**

**Planning and Development: Land Use and Environmental Management**

**Bitou Municipality**

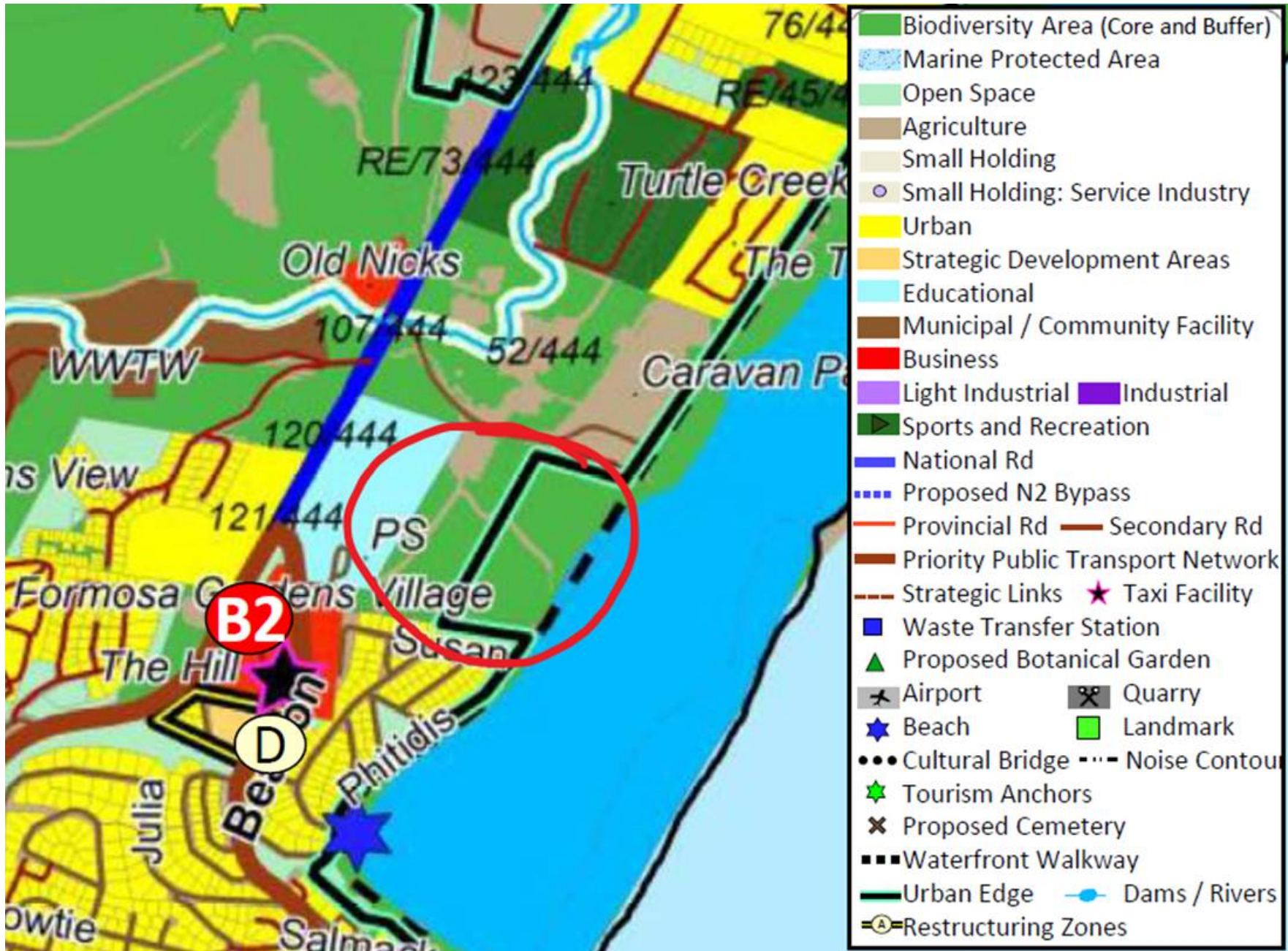
## Marike Vreken

---

**From:** Marcel Minne <MMinne@plett.gov.za>  
**Sent:** Wednesday, 05 July 2023 10:45  
**To:** Marike Vreken  
**Cc:** Chris Schliemann; Marius Buskes  
**Subject:** RE: Pr23/09 - Plettenberg Bay Erf 6503 - Pre-application feedback from Municipality  
**Attachments:** PB 6503 - LAYOUT 04.pdf; PB 6503 - LAYOUT 04 - no fills.pdf

Good day Marike,

The fact that the SDF shows the portion of erf 6503 that has been included inside the urban edge as “biodiversity area” and “agriculture”, is purely because of the “background information” layers used to compile the maps. It is not an indication that the area should remain conservation/ agriculture/ undeveloped. It should merely be seen as an indication that the land is likely environmentally sensitive, and that the sensitivities should be adequately investigated/ taken into account when the site is developed (through the necessary investigations such as an EIA/ OSCAER permit/ forestry permits or what have you). But in principle, the development of that portion of erf 6503 is considered to be consistent with the 2021 Bitou SDF, as it has been included in the urban edge for development purposes.



The following snippet from the SDF (see yellow section) also provides some further context:

The Tourism Nodes mostly comprise holiday homes/accommodation which are periodically occupied (during the holiday season). As a rule community facilities are not provided in these areas and the economic base is limited to tourism related activities.

These nodal points should be carefully planned, maintained and managed as these represent the major areas of future population growth, service delivery and economic development within the Bitou LM.

It is essential to compile/maintain detailed Local SDF's to guide and direct the location, type, extent and phasing of development in these areas. Such Local SDF's should determine the future spatial structure, function and associated land use composition of these areas – not only to ensure orderly, cost efficient and sustainable development, but also to harness private investor confidence and to attract investment.

**Action 2.2: Contain settlement sprawl by means of an urban edge as growth management instrument**

The Bitou SDF promotes radical settlement transformation in support of accessible, walkable, inclusive and livable environments that offer multiple opportunities for all sectors of society. This approach in turn facilitates the protection of environmentally sensitive and agricultural land, as less land will need to be developed. Hence the Bitou SDF defined an urban edge aimed at containing lateral urban sprawl within the municipality as illustrated on Figure 55.2.

It should be noted that the urban edge is to be viewed as a conceptual, indicative measure (growth management tool) aimed at illustrating a concept, rather than being an exact line with statutory status.

The urban edge is a proposed limit for expansion of any urban node beyond which development should not occur unless the land is already provided with, or can connect directly to existing municipal services infrastructure.

All land development applications for the use of land abutting an urban edge should be considered consistent with the SDF if the land has at any time in the past been used or designated for any urban development, which includes all development of land where the primary use of the land is for the erection of structures.

This includes all erven zoned and used for residential, business, commercial, industrial, institutional, less- or informal residential and services uses, i.e. zonings where the primary use would be the construction of a building development, thus residential estates on farms and golf estates would be defined as urban uses, albeit that the "primary use" is "agriculture" or "private open space" and the "secondary use" is "residential".

**Action 2.3: Manage development in rural and agricultural landscapes**

Development in the rural and agricultural landscapes of the Bitou LM should be managed in line with the guidelines provided in Western Cape Province Land Use Planning Guidelines: Rural Areas (2019) as summarised in Annexure B in this report.

Thus, should portions of the site falling outside of the urban edge be found to be developable from an environmental and engineering services perspective, such would also be considered to be consistent with the SDF. Although in this case it is probably wise to avoid the wetland/ densely vegetated area altogether, as you have rightly done in your draft layout.

Regards,

**Marcel Minne**

Pr. PIn A/1851/2014

**Spatial Planner & Projects**

Directorate: Planning & Development

Section: Planning & Building Control

Office 50, Second Floor, Melville's Corner, 3 Kloof Street, Plettenberg Bay, 6600

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Bitou Municipality