



FORESTRY WESTERN CAPE: Private Bag X 12, Knysna 6570

Reference: EIA-WC-GR-0058-2023-24

Enquiries: M Koen/ Tel: (044) 302 6900/ Fax: (044) 382 5461/ E-mail: [MKoen@dffe.gov.za](mailto:MKoen@dffe.gov.za)

## Cape Eaprac

Attention: Francois Beyleveld

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

Tel/Fax: 044 874 0365

### COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT (BAR) FOR KEURBOOMS LIFESTYLE VILLAGE ON PORTION 38 OF FARM GANSE VALLEI 444, PLETTENBERG BAY:

- 1 Forestry is responsible for the implementation and the enforcement of the National Forest Act (NFA), Act 84 of 1998 as amended and the National Veld and Forest Fire Act, Act 101 of 1998 as amended (NVFFA).
- 2 Section 15 of the National Forest Act (NFA) (Act No. 84 of 1998) as amended prohibits the cutting, disturbing, damaging or destroying of protected tree species without a licence. Section 7 of the National Forest Act (NFA), act no 84 of 1998 as amended provides for the prohibition of the destruction of indigenous trees in any natural forest without a licence. Under Section 7 of the NFA the whole forest ecosystem is protected and not just the indigenous/protected trees within the forest. "Forest" is defined in the NFA to include i.a. "a natural forest... and the ecosystems which it makes up", thereby including all components of the forest, not only the trees." Under section 62 (1) of the NFA any person who contravenes the prohibition of certain acts in relation to trees in natural forests referred to in Section 7 (1) is guilty of a second category offence. A person who is guilty of a second category offence may be sentenced on a first conviction for that offence to a fine or imprisonment for a period of up to two years, or to both a fine and such imprisonment.
- 3 According to the report: The above property is covered from west to east with sensitive Coastal forest (consisting of protected species); Coastal Scrub Forest also occurring towards the sea; which is protected under sections 7 and 15 of the NFA.



- 4 According to the report: "Portion 38 of Farm Ganse Vallei 444 is currently zoned Agriculture Zone I and it is the intention of the applicant to subdivide the property into two (2) portions and to rezone it to a Residential Zone II portion (3.17ha) and Open Space Zone III portion (5.41ha) (Figure 2). The proposed development within the Residential Zone II portion will entail the following infrastructure: Twelve (12) x sectional title group housing units (single storey), each with a double garage and two (2) additional parking bays. Each unit will cover ~655m<sup>2</sup> and will therefore calculate to 1.39 units per hectare over the entire site. Entrance gate (from Rietvlei Road); Guard house; Maintenance and staff rooms, Communal areas (clubhouse, conference room, gym, pool, doctor/nurse office and admin office); Six (6) x visitor parking bays at the communal buildings / facilities; Internal access roads (5.5m wide). No development is proposed in the Open Space Zone III; portion (~5.41ha) and this area which encompass the Keurbooms Estuary will act as private open space; Sections of external water link line and sewage line within road reserves of the Rietvlei Road; and N2"



- 5 Forestry conclude/ request the following:
  - a. Forestry request that the Coastal Forest on the property should be GPS'd and incorporated within the proposed development design as no-go areas
  - b. Forestry object to current layout and request that the number of units be reduced in order to retain coastal forest
  - c. Forestry request a site visit in order to further clarify the impact on the Coastal Forest as reports were not clear on this
  - d. Kindly note that this letter is not a NFA licence. Continuing above activity without a valid NFA licence is illegal and a criminal offence under the NFA.
- 6 Forestry reserves the right to revise initial comment based on any additional information that may be received.

Yours Faithfully

pp. AREA MANAGER FORESTRY: WESTERN CAPE





**Cape Environmental Assessment Practitioners (Pty) Ltd**

**ATTENDANCE REGISTER**

Tel: (044) 874 0365      www.cape-eaprac.co.za      Facsimile: (044) 874 0432

PROJECT: Keurbaans Lifestyle Village Pt 38/4114      PROJECT REF: BITT29      DATE: 22/07/24

NAME	REPRESENTING	CONTACTS	EMAIL	SIGNATURE
Melanie Koen	Forestry DFFE	TEL: FAX: CELL: 0609730991	mkoen@dffe.gov.za	
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## Francois Byleveld

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**From:** Francois Byleveld  
**Sent:** Wednesday, 24 July 2024 08:14  
**To:** Melanie Koen  
**Subject:** Keurbooms Lifestyle Village Portion 38 of Farm Ganse Vallei 444 Site Inspection

Good morning Melanie,

I trust you are doing well.

Thank you very much for accommodating me with a Site Inspection on Portion 38 of Farm Ganse Vallei 444 on 22 July 2024.

Please note a few key points as discussed on site:

- All Very High Sensitive Thicket have been mapped and incorporated into the Site Development Plan as No-Go Areas.
- All Protected Tree Species have been GPS'd and avoided by the development proposal.
- Alien vegetation management will be incorporated into the Environmental Management Programme.

We will share the Draft Basic Assessment Report with you once the Public Participation Period commences to receive formal written comment from your office on the above mentioned.

Thank you very much.

Kind regards/Vriendelike groete

### Francois Byleveld

#### Candidate EAP

MSc Geology (UFS)

Candidate EAP Reg # 2023/6770

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