

**REFERENCE:** 16/3/3/1/D1/6/0035/24

**DATE:** **26 November 2024**

The Managing Director  
INTERGREEN (PTY) LTD.  
P.O. Box 55265  
Northlands  
2116

**Attention:** Nils Brink van Zyl  
Cell: 083 271 6095  
Email: [nils@intergreen.co.za](mailto:nils@intergreen.co.za) | [christopher@intergreen.co.za](mailto:christopher@intergreen.co.za)

Dear Sir,

## **COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (BAR) FOR THE PROPOSED KEURBOOMS LIFESTYLE VILLAGE, PORTION 38 OF THE FARM GANSE VALLEY 444, PLETTENBERG BAY, WESTERN CAPE**

1. The abovementioned document compiled by the appointed Environmental Assessment Practitioner, Ms. Louise-Mari van Zyl (EAPASA No: 2019/1444) and assisted by Candidate Environmental Assessment Practitioner ("Candidate EAP"), Mr. Francois Byleveld (EAPASA No: 2023/6770) of, of Cape Environmental Assessment Practitioners Pty Ltd. (t/a Cape EAPrac), refers.
2. This letter serves as an acknowledgment of receipt of the abovementioned document.
3. This Directorate has reviewed the Draft Basic Assessment Report and provides the following comment:
  - 3.1. Consideration of Alternatives:
    - Cape Nature ("CN") recommended the development of buildings in the Site Development Plan ("SDP") be clustered within a fire-free zone and be protected with firebreaks. It is unclear how this recommendation (alternative) has been taken into account.
    - Furthermore, CN recommended ecological corridors, the SDP does not indicate an ecological corridor. This may also pertain to the biodiversity risks and impacts. As such the relevant specialist must clearly address this aspect.
  - 3.2. Engineering Services
    - Sewage:  
It is noted that additional infrastructure will be required to connect the proposed development to the existing municipal sewer system, furthermore it is noted that the Bitou Municipality requested augmentation contributions in order for the Municipality to implement the upgrade to bulk engineering services.

You are required to provide the specific detail and implementation programme of the required upgrades. It must be demonstrated that none of the required upgrades constitute a listed activity which require Environmental Authorisation or any other permit. The person / party responsible for the implementation of such upgrades must be confirmed (i.e., the proponent or the Municipality), and how this must be accommodated in the implementation of the proposed development (should it be approved). Furthermore it must be demonstrated why such upgrade should not form part of this application.

● Water Network:

According to the Civil Engineering Report which was compiled by Vita Consulting Engineers regarding the water supply to the proposed development it is noted that the bulk water system to the Goose Valley, Wittedrift and Matjiesfontein reservoirs is at its capacity and must be upgraded according to the Bitou Master Plan before additional development within the reservoir supply area can be accommodated. However, this is a temporary solution and not a permanent solution. The Bitou Municipality did state that the Municipality has bulk infrastructure capacity in its network, subject to the fact that the developer makes payment of the prescribed Augmentation contributions in order for the municipality to implement the bulk upgrade of services as detailed and required in the GLS report, dated 3 October.

It is understood that the Bitou Municipality does not have the capacity at present for the proposed development and must firstly obtain funds for the upgrades. Please provide more clarity in this regard.

You are also required to provide the specific detail and implementation programme of the required upgrades. It must be demonstrated that none of the required upgrades constitute a listed activity which require Environmental Authorisation or any other permit. The person / party responsible for the implementation of such upgrades must be confirmed (i.e., the proponent or the Municipality), and how this must be accommodated in the implementation of the proposed development (should it be approved). Furthermore it must be demonstrated why such upgrade should not form part of this application.

● Stormwater management

This Directorate is concerned about the stormwater management on site as there is no formal bulk municipal stormwater infrastructure available in vicinity of the property.

You are required to provide this Directorate with a detailed stormwater management plan and include such plan and measures in the EMPr (environmental management plan) that must be submitted with the Basic Assessment Report.

Comment must be obtained from the Bitou Municipality on the adequacy of the proposed stormwater management plan.

### 3.3. Fire-maintained ecosystems

- Cape Nature stated that the Fynbos is a fire-maintained ecosystem and fire plays an important role in determining the species composition and community type. Furthermore, it was mentioned that the exclusion of fire from certain habitats will be considerable unacceptable as this may ultimately cause the loss of fynbos species.

You are required to address this risk and impact on the plant species and biodiversity. Please provide more information regarding the fire management of this habitat and how it will be addressed.

## 2.5. Coastal Processes

- It is noted from the comments from the sub-directorate: Coastal Management that the location of the property is possibly at risk to coastal processes as these coastal processes have been observed by the increase in frequency and magnitude of storm events along the coast and estuaries as a result of climate change.

The BAR must clearly demonstrate how the relevant considerations of Section 63 of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) were taken into account and explain how this influenced your proposed development. Furthermore, you must demonstrate how the avoidance principle has been considered and caution will be applied in design and placement of the proposed structures.

4. Please ensure the final Basic Assessment Report ("BAR") and Environmental Management Programme ("EMPr") contain all information requirements outlined in Appendices 1 and 4 respectively of the Environmental Impact Assessment Regulations, 2014 (GN R. 982 of 4 December 2014, as amended).

### General

5. Kindly note that this Directorate requires that when the final BAR is submitted, one (1) electronic copy of the document must be submitted to the Directorate for consideration. Hard copies of the document are no longer required but must be made available upon request.
6. Please note that the activity may not commence prior to an environmental authorisation being granted by this Directorate.
7. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any new or revised information received.

pp **Francois Naudé**

Digitally signed by Francois Naudé  
Date: 2024.11.26 13:58:49 +02'00'

**HEAD OF DEPARTMENT**

**ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 3**

**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

(reference: 16/3/3/1/D1/6/0035/24)

Copied to: **Bitou Municipality**  
Planning and Environmental Management E-mail: [cschliemann@plett.gov.za](mailto:cschliemann@plett.gov.za)

**Cape Environmental Assessment Practitioners (Cape EAPrac)**

EAP: Ms Louise-Mari van Zyl

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**REFERENCE:** 16/3/3/6/7/1/D1/6/0121/22  
**ENQUIRIES:** Dorien Werth  
**DATE:** 17 May 2024

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## **COMMENT ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT (BAR) FOR THE KEURBOOMS LIFESTYLE VILLAGE ON PORTION 38 OF THE FARM GANSE VALLEI 444, PLETTENBERG BAY, WESTERN CAPE**

1. The abovementioned document received by the Directorate: Development Management (Region 3), hereinafter referred to as "this Directorate" via electronic mail on 09 May 2024 refers.
2. It is understood that the proposal entails the development of a residential lifestyle estate, with private amenities on Portion 38 of Farm Ganse Vallei 444 (8.58ha), Plettenberg Bay. There will be in-house services available for nursing care at home for ill and/or elderly residents.

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).

The development proposal 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 with a development footprint of 655 square metres.
- Entrance gate (from Rietvlei Road).
- Guard house.
- Maintenance and staff rooms.
- Communal area.
- 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 reserve of the Rietvlei Road and N2.

This Directorate comment as follows:

3. This Directorate notes that a Water Use License application is not applicable, as the proposed development does not fall within the regulated area of a watercourse. However, you are advised to still consult with the Breede-Olifants Catchment Management Agency (BOCMA) and include their comments/inputs on the proposal in the BAR.
4. It is further noted that there are two protected trees species on the proposed site, as such you are advised to also consult and obtain written comment from the Department of Agriculture, Forestry & Fisheries, should the proposal involve any disturbance or removal of any of the protected tree species on the site.
5. Portion 38 of Farm Ganse Vallei 444 is located in a Freshwater Ecosystem Priority Area (FEPA), although the development footprint falls outside the 33m buffer zone of the estuary. It is however still critical that the management of and discharge of stormwater from the development site be taken into consideration. The proposed mitigation measures stormwater specifications and method statements that will be required as a minimum is noted in the pre-application draft BAR. However, this Directorate requires that a detailed stormwater management plan forms part of the Environmental Management Programme (EMPr), which must be submitted with the Basic Assessment Report.
6. Please ensure that written confirmation is obtained from the Bitou Municipality: Technical Services that there are sufficient unallocated services (i.e. water, sewage and solid waste exists within the Bitou Municipal service network grid) to support the proposed development. The aforementioned confirmation is crucial to the success of the application.
7. This Directorate awaits the submission of the Application for Environmental Authorisation.

### **General**

8. All applications, reports and documents, which include all signatures and Annexures which are included as part of the application and subsequent reports, must be submitted via e-mail to this Department, with attached PDF versions of said letters and reports. If the documents are too large to attach to an e-mail, this Department must be notified per e-mail and provided with an electronic link to such documents that is accessible by the Department.

**Note:** The Directorate: Development Management (Region 3), has created a generic e-mail **address to centralise its administration within the component (i.e. notifying clients of decisions** and receiving EIA applications, Notice of Intent form; request for fee reference numbers, etc.) Please make use of the new e-mail address when submitting such documents:

[DEADPEIAAdmin.George@westerncape.gov.za](mailto:DEADPEIAAdmin.George@westerncape.gov.za)

9. Please note that the activity may not commence prior to an environmental authorisation being granted by this Directorate.
10. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any new or revised information received.

Yours faithfully

 **Malcolm Fredericks** Digitally signed by Malcolm Fredericks  
Date: 2024.05.17 12:38:03 +02'00'

**HEAD OF DEPARTMENT  
ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 3  
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Copies to: Ms. L. van Zyl

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