

COMMENTS AND RESPONSE REPORT

Bitou Municipality Land Use and Environmental Management via Email on Pre-App DBAR	
COMMENTS	RESPONSE
<p>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.</p>	<p>The environmental application stipulates that the remaining natural area is a No-Go area (irrespective of the final zoning) and it must be managed as a conservation area in any event.</p> <p>Apart from the already existing walkways/paths, pedestrian routes and dedicated vehicle routes for fire management and invasive alien management, the open space area must be managed by the applicant and in the future, the Managing Agent or Body Corporate / Homeowners Association of the proposed Plett Lagoon Estate.</p> <p>The long-term responsibilities of the applicant / HOA will be as follows (irrespective of the open space area being zoned Open Space III or IV):</p> <ul style="list-style-type: none"> • Invasive alien clearing. • Maintenance of all walkways/paths/vehicle access routes. This includes ensuring that no new paths are created apart from what is already present. Managing vehicular access for only the purposes of invasive alien clearing and fire management. Ensuring that the necessary educational signage is put up and remains in place. • Access control measures as per the Estate's protocols and EA specifications (the property remains private,

	<p>therefore the manner of security control i.e., CCTV cameras, security guard patrol etc.).</p> <p>The land use description for Open Space Zone III is as follows: “nature conservation area” means the use and management of land with the objective of preserving the natural biophysical characteristic of that land, including fauna and flora.</p> <p>It is evident from the proposal, that the objective of the proposed open space area will be in line with the land use description of Open Space Zone III.</p>
<p>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.</p>	<p>The proposed development intends to obtain Environmental Authorisation on the Remainder of Erf 6503. The developer will comply with the OSCAE Regulation in terms of Government Notice No. R879 of May 1996 by applying for an OSCAE Exemption for the entire proposed development should Environmental Authorisation be obtained. Bitou Municipality Land Use and Environmental Management will be approached for additional information on requirements for application purposes.</p>
<p>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). The figure shows that the section along the western</p>	<p>The Remainder of Erf 6503 (proposed development property) is separated from the Keurbooms estuary by a privately owned property (Farm 449).</p> <p>It is therefore not feasible for the developer of the Remainder of Erf 6503 to include proposals that will allow public/vehicle access to privately owned Farm 449. The entire remaining 10ha natural vegetation will remain intact. Security measures such as CCTV cameras, security patrols and motion sensors will be implemented in order to ensure the safety of the residents of the proposed Plett Lagoon Estate as well as to prevent any vagrancy.</p>

<p>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.</p>	<p>It is evident from the considerations regarding the NEM:ICMA, that the proposed development will not prevent the achievement of any coastal management objectives and is not in contrary to the interests of the surrounding community. The proposed development will not cause irreversible or long-lasting adverse affects to any aspect of the coastal environment. The proposed development will not deny the public access to the coastal environment.</p>
<p>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.</p>	<p>The Remainder of Erf 6503 (proposed development property) is separated from the Keurbooms estuary by a privately owned property (Farm 449) and it is therefore not feasible to include any recommendations for coastal erosion as the developer of the Remainder of Erf 6503 has no say regarding Farm 449.</p> <p>However, the entire remaining 10ha natural vegetation will remain intact. No development is proposed within this important buffer between the development and the estuary. All applicable coastal risk management lines and datasets have been taken into account and forms part of the parameters that have informed the decision not to encroach into the remaining natural vegetated area on the property at all.</p> <p>In the event that erosion from the estuary becomes a problem in the future on the Remainder of Erf 6503, the owner will follow the correct procedure to obtain approval to implement preventative measures, should the owner of Farm 449 not have done so already.</p>

<p>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.</p>	<p>Fencing on the eastern boundary of the property will be animal permeable and will not cause any fragmentation of animal corridors. Fencing will only be developed as a safety measure for residents of the proposed Plett Lagoon Estate and to prevent vagrancy in the large open space area.</p>
<p>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 northeastern 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.</p>	<p>The Developer would prefer to have the access to this site via the existing gravel road situated between the Plettenberg Bay Primary School and the Checkers Centrum. The Developer consulted with the Bitou Municipality at the inception stage of the project and was advised by the Bitou Municipality that the intersection at that point is not suitable, hence the alternative of coming in via Susan/Cuthbert Street. The concern about through traffic has been noted and the Developer has again approached the Bitou Municipality to discuss their preferred access.</p> <p>The project engineer subsequently engaged with the SANRAL Roads Authority who will be starting work on the large traffic roundabout on the N2/Beacon Drive intersection in the near future and based on this upgrade, were able to establish that a smaller traffic circle at the intersection between Beacon Drive and the road between the Plettenberg Bay Primary School and Checkers Centrum is potentially viable. Such an upgrade will enable the primary access to the proposed development to be at the current access point to the site (between the Plettenberg Bay Primary School and the Checkers Centrum).</p> <p>The preferred Site Development Plan has since been amended, and the proposed entrance is now located between the Plettenberg Bay Primary School and the Checkers Centrum.</p>

Chris Mulder via Email on Pre-App DBAR

COMMENTS

We strongly object to the entrance and exit of the development being accessed from Cuthbert Close via Poortjies. The entrance should rather be from the main road behind the Checkers building.

RESPONSE

Use of the road between the Checkers Centrum and the Plettenberg Bay Primary School was investigated and the findings was submitted and discussed with Bitou Municipality. Bitou Municipality suggested that the entrance be moved to the southern boundary of Erf 6503 onto the Susan Road reserve to avoid additional congestion at the Beacon Way / School road intersection. Placing the entrance at the southern boundary onto Susan Road also allows for enough space to accommodate four lanes (two lanes going in and two lanes going out), which will not be possible if the entrance is to be placed between the Checkers Centrum and Plettenberg Bay Primary School. The use of four lanes at the entrance to the proposed development is preferred to reduce congestion and vehicle stacking at the access road.

Updated Response

The Developer would prefer to have the access to this site via the existing gravel road situated between the Plettenberg Bay Primary School and the Checkers Centrum. The Developer consulted with the Bitou Municipality at the inception stage of the project and was advised by the Bitou Municipality that the intersection at that point is not suitable, hence the alternative of coming in via Susan/Cuthbert Street. The concern about through traffic has been noted and the Developer has again approached the Bitou Municipality to discuss their preferred access.

The project engineer subsequently engaged with the SANRAL Roads Authority who will be starting work on the large traffic

	<p>roundabout on the N2/Beacon Drive intersection in the near future and based on this upgrade, were able to establish that a smaller traffic circle at the intersection between Beacon Drive and the road between the Plettenberg Bay Primary School and Checkers Centrum is potentially viable. Such an upgrade will enable the primary access to the proposed development to be at the current access point to the site (between the Plettenberg Bay Primary School and the Checkers Centrum).</p> <p>The preferred Site Development Plan has since been amended, and the proposed entrance is located between the Plettenberg Bay Primary School and the Checkers Centrum.</p>
Dave Arthur Holt via Email on Pre-App DBAR	
COMMENTS	RESPONSE
<p>In my opinion, the Traffic Impact Statement prepared by UDS does not properly assess the impact on the roads through Poortjies. This was set out in my email of 23 November 2023 which was addressed to UDS, Marike Vreken and the Municipality. This showed that, by my calculations, using UDS data, traffic through Plato Road North could be increased by about 120%.</p> <p>Subsequent to that email, I realised that the proposal for the 28 erven seemingly identified as being for single dwellings was in fact that these be zoned as "Group Housing". The definition of "Group Housing" is "Group Housing means a building unit constructed or to be constructed with one or more floors having more than two dwelling units having common service facilities". This means that if this zoning is granted, many more than 28</p>	<p>The Developer would prefer to have the access to this site via the existing gravel road situated between the school and the Checker's Centre. They consulted with the Bitou Municipality at the inception stage of the project and was advised by the Municipality that the intersection at that point is not suitable, hence the alternative of coming in via Susan/Cuthbert Street. The concern about through traffic has been noted and the Developer has again approached the Municipality to discuss their preferred access. The project engineer subsequently engaged with the SANRAL Roads Authority who will be starting work on the large traffic roundabout on the N2/Beacon Drive intersection in the coming weeks and based on this upgrade, were able to establish that a smaller traffic circle at the entrance to the school/Checkers Centre is potentially viable. Such an</p>

dwelling units will effectively be permitted. I raised this issue in my email of 27 November 2023, addressed to Marike Vreken and the Municipality. The email pointed out that if the intention was that only single dwelling units were intended the zoning should be "Single Residential". The response received from Marike Vreken was that the proposal that these erven be zoned "Group Housing" was that the intention that there be "harmonious architectural designs". I pointed out in my reply that this could be achieved by the developer or Body Corporate setting the rules and that the "Group Housing" zoning would allow the developer or a subsequent owner to erect multiple dwellings on each of the 28 erven.

I sent a revised email, incorporating the effect of the 28 erven potentially resulting in multiple dwelling units - I assumed 4 dwelling units per erf. The assumption of 4 dwelling units per erf more than doubles takes the total dwellings for the proposed development from 75 to 159. This very significant change then showed that the traffic through Plato Road North could increase by about 279%. This email was again addressed to UDS, Marike Vreken and the Municipality and was sent on 1 December 2023..

This is clearly unacceptable. Quite apart from the unfavourable short and longer term impact on the residents affected by the routing via Plato Road, I am sure that as the roads were designed for suburban residential use and will not be able to withstand the heavy traffic which would result during the construction phase. Apart from an acknowledgement of receipt by UDS of the 1 December email, I have received no response to either of my emails.

The impact of this and other developments, both in the pipeline and active, north of Plettenberg Bay surely require that a full study be made by a roads engineer of the immediate and short

upgrade will enable the primary access to the proposed development to be at the current access point to the site (between the school and the Checker Centre). The project engineer is awaiting feedback from the Municipality on this alternative proposal which, if supported by the Municipality, would move the primary access back to the current access point (and not through Poortjies via Susan/Cuthbert Street). Since it is Municipal roads, the Applicant cannot insist on such a proposal, but they are hopeful that the Municipality will support this proposal instead. We'll be sure to communicate the outcome of this alternative access discussions with the Municipality with all registered stakeholders including yourself.

Updated Response:

The preferred Site Development Plan has since been amended, and the proposed entrance is located between the Plettenberg Bay Primary School and the Checkers Centrum.

<p>and longer term road requirements. This will undoubtedly lead to the identification of a completely different layout and routing of roads which will serve our fast growing town into the future.</p>	
<p>In recent years there have been repeated incidents of raw sewage flowing out of manholes in the Poortjies area. This sewage spreads across roads and also into the drainage channel which runs parallel to Earp Jones Street and from there feeds into and pollutes the lagoon. From the sewage maps included in Annexure H to the application, these incidents, which seem to occur 3 or 4 times per annum, are mainly on the sewage line which apparently runs down Bird Street. These events are dangerous, smelly and as mentioned, pollute the lagoon. There is a belief among Poortjies residents that these incidents have been the result of adding the Checkers development to this line. None of the maps included in Annexure H identify where the sewage from either Checkers or the school is directed.</p> <p>I have had a number of discussions with Municipal officials but have not yet been able to find out where sewage from those two sources is directed. It is clear that the proposal assumes that the sewage connection from the proposed development will join the sewer line which runs down Susan Street. Whilst this is a separate line from the Bird Street line, the events on the Bird Street line are indicative of the problems which might occur if the sewage from a large development is added to the line. If it transpires that the problems on the Bird Street line are not caused by the addition of the Checkers development, then one can only conclude that they arise from ageing, inadequate infrastructure. If the latter is the case then there is every reason to believe that the additional load on the Susan Street line, which</p>	<p>There are a number of residents from the Poortjies area that have raised sewage specifically as an existing problem with spills noted at manholes at specific points. I've alerted the project engineer to this and he is going to engage with the Bitou Municipality about this. The way he explained it to me is that the current (pipeline) capacity of the gravity sewer lines in Poortjies is designed to accommodate approximately 500 residential properties. The current number of households in Poortjies is less and according to the Engineer the additional units proposed at Plett Lagoon development will therefore not increase the sewer volumes beyond the current design capacity because there is sufficient spare capacity in this part of the sewer reticulation network. However that said, he has indicated that the spills are likely due to (a) blockages in the gravity pipelines, or (B) sinking of the pipeline. Because it is gravity lines (no pumping in some of the lines) the moment there is a blockage, or if the elevation of the pipeline changes i.e. a tree root grows underneath or over the line and causes it to move, it results in sewage 'pooling' at specific areas. When this 'pooling' reaches a manhole, it will overflow until such time as the flow volume reduces (typically outside of 'peak' hours when most people are at home instead of at work for instance). To resolve this the Municipality is suppose to investigate to either find the blockage(s), or the sections of the line that is no longer running according to the design elevation. A private entity may not proceed with such an investigation/repairs on its own because its municipal infrastructure. But the engineer has indicated that it would be necessary for the Applicant to assist the Municipality in</p>

<p>itself runs on an almost horizontal course for most of the distance from the proposed connection point, will also fail.</p> <p>The cause of the Bird Street problems need to be clearly identified and resolved and the lessons must be applied to the proposed Susan Street connection. In addition, the impact of the 28 erven probably resulting in multiple dwelling units must be taken into account.</p>	<p>whichever way necessary to resolve this ongoing problem before any development contributes additional sewage flow to the system. I am waiting for further confirmation from the engineer on how best such an arrangement can be made because maintenance of the sewer network remains a municipal responsibility, but understandably additional sewer from additional households will exacerbate the problem which is unwanted.</p> <p><u>Updated Response:</u></p> <p>The Ganse Vallei Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI.</p> <p>According to Bitou Municipality the remaining 0.2MI is reserved for approved developments.</p> <p>Upgrades to the Ganse Vallei WWTW is therefore required to accommodate new developments.</p> <p>Due to the fact that said upgrade of the WWTW may take some months/years still (considering approvals / funding / delays etc), the proposal for this development is for the installation of an on-site package plant.</p> <p>Confirmation of the use of such a temporary WWTP has been obtained from Bitou Municipality on 02 July 2024 on condition that the plant will be decommissioned once Bitou Municipality finished upgrades to the Ganse Vallei WWTW and the proposed Plett Lagoon Estate can be connected to the municipal system.</p>
<p>With regard to the zoning classification of the 28 erven, either the classification request needs to be amended to “Single Residential” or, if it is to remain as “Group Housing”, the impact of there being the potential for multiple dwelling units on each</p>	<p>With regards to the zoning I’m a bit out of my depth as to the technical explanation Ms Vreken provided to you previously, but I endeavour to follow up with her to get clarity on the issue you</p>

<p>erf, must be taken into account in revised studies. I repeat that using an assumption of 4 dwelling units per erf for the 28 erven more than doubles the total dwelling units mentioned in the proposal from 75 to 159. This brings a very significant change to the proposal.</p> <p>In summary my objection is in respect of the impact to roads and sewage in the Poortjies area which will clearly be very much greater if the proposed zoning of the 28 erven as “Group Housing” is permitted</p>	<p>raise about the zoning depicted in the land use planning documentation.</p> <p>I’ll definitely verify with the Planner, but as with an Environmental Authorisation (if the Department of Environmental Affairs authorises the development or a portion thereof), then a very specific site plan, coupled with a very specific number of numbers is described in the authorisation.</p>
<p>Thank you for your comprehensive response. My apologies, I should have added a couple more comments to my email other than just that I had been advised that I had an incorrect definition of Group Housing. In this regard I was directed to the Bitou Zoning Scheme (Provincial Gazette dated 28 July 2023) – the following is an incomplete extract:</p>	<p>I’ll find our from the Planner about the zoning. I suspect the difference comes with the so-called ‘primary rights’ under Group Housing vs die ‘consent use rights’ under the same.</p> <p>I’ll definitely verify with the Planner, but as with an Environmental Authorisation (if the Department of Environmental Affairs authorises the development or a portion thereof), then a vey specific site plan, coupled with a very specific number of numbers is described in the authorisation.</p> <p>When that changes (using the example of a authorisation under Group Housing for 100 units, but into the future the Developer wants to further densify and do additional units under primary or consent uses), then that change will be subject to a similar application process (so-called Part 2 Amendment application process) in terms of the environmental regulations.</p> <p>The whole purpose being to avoid a situation where something is deemed ‘in line with planning policies’, or being ‘within infrastructure capacity’ when the initial development considered, and then once the development is approved – anything goes.</p>

GENERAL RESIDENTIAL ZONE II (GRZII)		
<p>The objective of this zone is to promote higher density residential development. The dominant use within this zone must be residential, but limited mixed-use development is possible with the Municipality's consent.</p>	<p>Primary use</p> <ul style="list-style-type: none"> • Flats • Group/town housing 	<p>Consent uses</p> <ul style="list-style-type: none"> • Backpackers' lod • Boarding house • Convenience sho • Home occupatio • Tourist accommc • Renewable energ • Rooftop base telecommunicati
<p>"group/town housing"</p> <p>Land use description: "group/town housing" and "group/town housing scheme" mean separate or linked dwelling units where—</p> <ul style="list-style-type: none"> (a) every dwelling unit has a ground floor; (b) the units may be cadastrally subdivided; (c) the units are planned, designed and built as a harmonious architectural entity way; (d) the units are integrated with communal private open spaces, private roads and (e) it may include facilities reasonably associated with a group/town housing dev <p>Development parameters:</p> <ul style="list-style-type: none"> (a) Design principles All buildings and structures must be planned, designed and built as a architectural entity and special attention must be given to aesthetics, coordination, urban design and landscaping. (b) Density The maximum gross density in any zone is 35 dwelling units per hectare. ex 		

With regard to Sewage, I should also have mentioned that the Municipality have confirmed that the waste from the Checkers development does indeed feed into the Poortjies line identified on the map as starting in Bird Street. The question remains open as to where the waste from the school is fed. Your feedback on the traffic routing is encouraging. Let's hope that this can be resolved in the near future!

So there are definitely checks & balances in place to avoid (for lack of a better word 'hidden') increases or changes going unchecked.

On the sewage, I've let the Engineer know that the Checkers centrum is linked to the Poortjies sewage system and asked that he confirms whether that (volume) has been taken into account with his calculations and also to verify whether the school's sewage is linked to the Poortjies system, (and their volume taken in to account as well?).

Department of Forestry, Fisheries and the Environment (DFFE) via Email on Pre-App DBAR

COMMENTS	RESPONSE
<p>Forestry request that should protected Milkwood and Cheesewood trees occur within the western part of the property it should be GPS'd and incorporated within the proposed development design as no-go areas.</p>	<p>There is only one single Milkwood tree identified in the western portion of the property. This Milkwood tree has been marked with GPS coordinates and incorporated in the site development plan as a no-go area.</p> <p>The Milkwood tree is accommodated in the Site Development Plan and will be on an island within the communal parking area near the entrance of the proposed development.</p> <p>Although care has been taken to avoid the protected tree, it is still recommended at the time of construction (since this can be over a period of 5 – 10 years) to ensure that units/roads/structures and/or infrastructure do not result in the damage or removal of protected trees found across the study site.</p>
<p>Forestry supports that the eastern portion of the property be conserved (remain undisturbed) and request that this portion be indicated as a green belt and a no-go area for all future development proposals.</p>	<p>The eastern portion of the proposed development property is marked as a no-go area to be managed as a conservation area and no infrastructure is proposed on this portion apart from the existing walkways, pedestrian/cycling routes and dedicated vehicle routes for fire management and invasive alien management).</p> <p>Fencing must be in line with the CapeNature policy document on Fencing & Enclosures of Game, Predators & Dangerous Animals in the Western Cape (installation methods, maintenance methods etc). Fire breaks must be maintained, but clearing</p>

	<p>methods of fire breaks, must be adhered to, to ensure minimal disturbance of the on-site wetland and thicket vegetation.</p> <p>This area must be managed by the Applicant and down the line the Managing Agent or Body Corporate or Home Owners Association accordingly.</p>
<p>Forestry request that individual units be forwarded to the Department for further comment in order to ensure the protection of protected trees as well as indigenous forest- should Forestry's mandate under the NFA be affected.</p>	<p>Only a single protected Milkwood tree has been identified in the western portion of the property.</p> <p>The Milkwood tree is accommodated in the Site Development Plan and will be on an island within the communal parking area near the entrance of the proposed development.</p> <p>The amended site development plan will be distributed to the DFFE for further comment during the next public participation period.</p>
<p>Doreen Butterworth via Email on Pre-App DBAR</p>	
<p>COMMENTS</p>	<p>RESPONSE</p>
<p>From a neighbour's perspective we look forward to the following positive spin-offs:</p> <ul style="list-style-type: none"> • The envisaged entrance gate with security and fencing will address the long lasting security problem on this largely vacant piece of land which used to spill over onto our premises. • The lack of "bos slaapers" who routinely lit fires and caused bush fires on the property will lead to less risk of dangerous fires. 	<p>The proposed open space area (eastern portion of the proposed development property) contains existing walkways, pedestrian routes and dedicated vehicle routes for fire management and invasive alien management.</p> <p>These existing access routes will be maintained by brushcutting up to a maximum width of 3m. It is recommended in the Environmental Maintenance and Management Plan to cease mowing of the northern area of the wetland with the exception of one path along the boundary fence that can be maintained for</p>

<ul style="list-style-type: none"> • The 10ha 'green lung' that the property owners are generously allowing to remain, despite the fact that the surrounding properties (Poortjies/The Tides) were allowed to build houses in the wetland and floodplain area. <p>I have briefly read your specialist and technical reports and have taken note of the suggested mitigation measures that could be put in place to lessen the impact on both flora and fauna, but I see no mention of vehicular road access for fire fighting trucks that will inevitably be needed to fight the occasional fire that might occur on the 10ha open space area that includes dense dune thicket. During the last fire approx. 4 years ago on a windy Christmas day), the fire truck actually got bogged down and had to be towed out by one of my tractors. So some sort of low impact road network is actually needed in the 'soft recreational area'. Furthermore, the reason why the 'area to the north' is mowed, is to create a firebreak between the adjoining properties. My question is therefore: What sort of mitigating measures will be put in place to fight potential bush fires?</p>	<p>access to the estuary which will be large enough for a single vehicle. This single path will be sufficient to act as a fire break between the two properties and provide access to the estuary for pedestrians of the proposed Plett Lagoon Estate as well as temporary vehicle access for alien vegetation management and Fire Management in such an event.</p> <p>The Goukamma Dune Thicket vegetation and wetland habitat is not subject to a burning regime to maintain the natural vegetation. The thicket vegetation present on the property is not a highly flammable fuel source and it would be highly beneficial if the northern portion currently subject to mowing could return to its natural state to protect the sensitive wetland habitat. The owner of the Remainder of Erf 6503 is a member of the Southern Cape Fire Protection Agency who will be assisting in maintain fire breaks as well as respond to emergency situations.</p>
<p>My final comment concerns the stabilisation of the lagoon edge. Since 2014 we have seen a huge change in the course of the river flowing on the western side of the estuary. It has increased in strength and washed away or eroded a good 10-50 metres of the 'mainland'. So much so that the erf "Lagoon Edge 449" is now 80% underwater. Contrary to popular belief, the flora on the sandy banks does not prevent water erosion, but merely slows it down. I have no idea if the actual highwater mark is now on erf 6503 or still on "lagoon edge 449", but the waters edge has been receding/eroding in a westerly direction towards the development area for the last 10 years. My question is : What</p>	<p>The Remainder of Erf 6503 (proposed development property) is separated from the estuary by a privately owned property (Farm 449) and it is therefore not feasible to include any recommendations for coastal erosion as the developer of the Remainder of Erf 6503 has no say regarding Farm 449.</p> <p>However, the entire remaining 10.58ha natural vegetation will remain intact. No development is proposed within this important buffer between the development and the estuary. All applicable coastal risk management lines and datasets have been taken into account and forms part of the parameters that have informed</p>

<p>measures will be put in place to stabilise the eroding embankment, or has it been deemed not necessary?</p>	<p>the decision not to encroach into the remaining natural vegetated area on the property at all.</p> <p>In the event that erosion from the estuary becomes a problem in the future on the Remainder of Erf 6503, the owner will follow the correct procedure to obtain approval to implement preventative measures, should the owner of Farm 449 not have done so already.</p>
<p>Did you hear that there was a huge police presence on the property this morning, trying to arrest an armed shooter! Successfully in the end. This might go a long way to allowing them to erect a security fence along the water line.</p>	<p>As a security development, fencing is proposed to be installed on the eastern side of the conservation area to ensure safe access to residents to this area. By securing this area, future residents are more likely to take 'ownership' and 'responsibility' for this area (compared to excluding the conservation area from fencing). Fencing must be in line with the CapeNature policy document on Fencing & Enclosures of Game, Predators & Dangerous Animals in the Western Cape (installation methods, maintenance methods etc).</p>
<p>Jannie Vermeulen on behalf of Dreyer Trust via Email on Pre-App DBAR</p>	
<p>COMMENTS</p>	<p>RESPONSE</p>
<p>Clubhouse. What would be the purpose of the Clubhouse? The proposed clubhouse will be opposite our house and quiet braai area in the back garden. If the Clubhouse were to be used for social gatherings one can only anticipate excessive alcohol consumption and loud music. If so, this will have a significant negative impact on us (neighbouring properties in Poortjies) and for this reason it would be difficult for us to support this proposal.</p>	<p>The proposed site development plan has been amended after inputs received from local authorities as well as from the public during the public participation process and the clubhouse has subsequently been removed from the proposal. The clubhouse area has been replaced by three single erven approximately 1100m² in size each.</p>

Site Access. I notice site access is via the Poortjies residential area and this makes no sense to me. In practise this means residence turning off the N2 will have to cross two traffic lights on Beacon Way, turn left at the next roundabout into Zenon Street, turn left at the next T-junction into Plato Road, turn left into Bird Street, left into Susan Street and then finally right into Cuthbert Close to get to the entrance gates to the proposed development. An alternative would simply be to turn left at the first set of traffic lights on Beacon Way and drive up to the entrance gates next to the school, i.e. use existing infrastructure and current access to the site. We will be extremely concerned if you continue with the existing entrance, as this will turn our peaceful streets into a through road that will be disruptive to all residents of poortjie. Furthermore, and to alleviate pressure on Beacon Way during peak times the development could benefit from a second entrance to the North of the site, giving direct access to the N2 (opposite Old Nick).

The Developer would prefer to have the access to this site via the existing gravel road situated between the school and the Checker's Centre. They consulted with the Bitou Municipality at the inception stage of the project and was advised by the Municipality that the intersection at that point is not suitable, hence the alternative of coming in via Susan/Cuthbert Street. The concern about through traffic has been noted and the Developer has again approached the Municipality to discuss their preferred access. The project engineer subsequently engaged with the SANRAL Roads Authority who will be starting work on the large traffic roundabout on the N2/Beacon Drive intersection and based on this upgrade, were able to establish that a smaller traffic circle at the entrance to the school/Checkers Centre is potentially viable. Such an upgrade will enable the primary access to the proposed development to be at the current access point to the site (between the school and the Checker Centre).

Updated Response:

The proposed site development plan has been amended after inputs received from local authorities as well as from the public during the public participation process and the proposed entrance is located between the Plettenberg Bay Primary School and the Checkers Centrum.

Foul Sewer Works. I notice that the Foul sewer network for the entire site of 77 houses connects to an existing sewer manhole in Cuthbert Close, nearly the highest point on the site (14.5m).

That is correct. It is proposed for all sewage to gravitate to a single location on the proposed development site and then be pumped towards the sewer network in Susan Road.

<p>Perhaps I have this wrong but does this mean that foul water will be pumped from lower levels (Eg. 7m @ FS39) toward Cuthberth close?</p>	<p><u>Updated Response:</u></p> <p>The Ganse Vallei Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI. According to Bitou Municipality the remaining 0.2MI is reserved for approved developments. Upgrades to the Ganse Vallei WWTW is therefore required to accommodate new developments. Due to the fact that said upgrade of the WWTW may take some months/years still (considering approvals / funding / delays etc), the proposal for this development is for the installation of an on-site package plant. Confirmation of the use of such a temporary WWTP has been obtained from Bitou Municipality on 02 July 2024 on condition that the plant will be decommissioned once Bitou Municipality finished upgrades to the Ganse Vallei WWTW and the proposed Plett Lagoon Estate can be connected to the municipal system.</p>
<p>Electricity. The lack of electricity supply is a known problem across the country, Plettenbergbay is not immune from this. My understanding is that this development will be dependent on existing infrastructure. We are concerned that this will overload the existing infrastructure.</p>	<p>The proposed development is located in the Plettenberg Bay town area which is currently supplied by Substation – 1 Ferdinand. The substation is shared with Eskom by Bitou Municipality and has an installed capacity of 20MVA with 2 x 10MVA transformers.</p> <p>The Notified Maximum Demand for the substation is 15.5MVA and therefore it has sufficient capacity to accommodate the additional 800 kVA (maximum demand) of the proposed development on the Remainder of Erf 6503.</p>

<p>Guineafowl. Last but not least, is the colony of guineafowl that lives where the proposed car park and Clubhouse will be. This colony has been there for as long as I can remember, and we usually feed them, took pictures over the years and as recently as last week. I cannot find any reference to this in Appendix G4 but accept that I may have missed it. I noticed that this development makes ample provision for open space trials in the private nature reserve. Rather than building a car park and Clubhouse, why not create a guineafowl sanctuary that integrates with the private nature reserve, saving the cost of the development of a clubhouse, the maintenance of same and the habitat of this guineafowl colony.</p>	<p>The proposed development is focused on the already transformed portions of the property, with more than 10.5ha of open space to be managed as a conservation area.</p> <p>The conservation status for Guineafowl according to the South African National Biodiversity Institute is Least Concern as these birds are widely distributed in southern Africa in any kind of habitat. Guineafowl tend to roost in trees and shrubs to avoid predators and would therefore be well suited to live in the open space area where human/vehicle movement will be limited.</p>
Garden Route District Municipality Department of Health via Email on Pre-App DBAR	
COMMENTS	RESPONSE
<p>Bitou Municipality provide all bulk water to the development.</p>	<p>The proposed development will make use of municipal water supply for all potable and irrigation water needs.</p> <p>Extract from Civil Engineering Report compiled by Vita Consulting Engineers (July 2023) regarding water supply to the proposed development:</p> <p><i>“The bulk water system to the Goose Valley, Wittedrift and Matjiesfontein reservoirs is at capacity and must be upgraded according to the Bitou master plan before additional developments within the reservoir supply areas can be accommodated. However, GLS Consulting provided the following temporary solution:</i></p>

	<ul style="list-style-type: none"> • <i>Installation of an additional 160mm bulk main off the existing 160mm distribution main in the N2 road reserve which will free up an additional 860kl/day.</i> • <i>There is sufficient capacity in the 860kl/day to accommodate the developments on Farm 444/38, Farm 304/32 and Erf 6503.</i> <p>The proposed development will therefore make use of Bitou Municipality infrastructure and supply to obtain water.</p>
<p>Bitou Municipality must have enough bulk space capacity to render this service.</p>	<p>Bitou Municipality has confirmed bulk infrastructure capacity in its network that can accommodate the proposed development of Plett Lagoon Estate on Remainder of Erf 6503 subject to the following conditions:</p> <ul style="list-style-type: none"> • That the developer enters and sign a Service Level Agreement with Bitou Municipality. • 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 network analysis report, dated 3 October 2022. • That the developer implements and maintain a temporary wastewater treatment plant until the upgrades to the Ganzevallei WWTW has been completed. The temporary wastewater treatment plant must be approved by the relevant authorities as part of the civil engineering services for the development. A bulk connection to the Bitou sewer network must be commissioned once the Ganzevallei WWTW has been upgraded and the temporary WWTP must be decommissioned and removed from site. All costs will be for the account of the developer.

	<ul style="list-style-type: none"> • That the developer duly communicate point 3 above with all future owners/Homeowners Associates and or Body corporate.
<p>All upgrading to the bulk water supply lines must be completed before commencement of the development.</p>	<p>All bulk water pipeline upgrades will be completed before the commencement of construction of the proposed development on Erf 6503.</p>
<p>All sewage is to be connected to the Bitou Municipality sewer system into Waste Water Treatment Plant.</p>	<p>The Ganse Vallei Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI.</p> <p>According to Bitou Municipality the remaining 0.2MI is reserved for approved developments.</p> <p>Upgrades to the Ganse Vallei WWTW is therefore required to accommodate new developments.</p> <p>Due to the fact that said upgrade of the WWTW may take some months/years still (considering approvals / funding / delays etc), the proposal for this development is for the installation of an on-site package plant.</p> <p>Confirmation of the use of such a temporary WWTP has been obtained from Bitou Municipality on 02 July 2024 on condition that the plant will be decommissioned once Bitou Municipality finished upgrades to the Ganse Vallei WWTW and the proposed Plett Lagoon Estate can be connected to the municipal system.</p> <p>The temporary on-site package plant (fully enclosed) is proposed to be installed inside a 12m container directly adjacent to the proposed maintenance building at the entrance of the proposed development.</p> <p>The temporary package plant will have a treatment capacity of 40m³ per day and will use a combination of conventional</p>

	<p>treatment (natural bacteria) and membrane technology (microfiltration) to treat the household sewage to comply with general water limits stipulated by the Department of Water Affairs.</p> <p>For the duration of the package plant being in operation, all treated effluent is then to be used for irrigation within the estate. Dedicated irrigation storage tanks (4 x 10KI) forms part of the design and will be located next to the container.</p> <p>Once the Municipal Ganse Vallei WWTW has been upgraded to capacity to accommodate the proposed Plett Lagoon Estate development (and the package plant decommissioned), sewage will be pumped towards the existing 160mm underground municipal bulk sewer pipe connection in the Susan Road Reserve on the southern boundary of Erf 6503. To enable this switch-over in future, this connection line to the municipal sewer system will be installed as part of the project services installation.</p>
<p>The Bitou Municipal Waste Water Treatment Plant must have the capacity to handle the additional load without any negative effect.</p>	<p>The Ganse Vallei Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI.</p> <p>According to Bitou Municipality the remaining 0.2MI is reserved for approved developments.</p> <p>Upgrades to the Ganse Vallei WWTW is therefore required to accommodate new developments.</p> <p>Due to the fact that said upgrade of the WWTW may take some months/years still (considering approvals / funding / delays etc), the proposal for this development is for the installation of an on-site package plant.</p>

Confirmation of the use of such a temporary WWTP has been obtained from Bitou Municipality on 02 July 2024 on condition that the plant will be decommissioned once Bitou Municipality finished upgrades to the Ganse Vallei WWTW and the proposed Plett Lagoon Estate can be connected to the municipal system.

The temporary on-site package plant (fully enclosed) is proposed to be installed inside a 12m container directly adjacent to the proposed maintenance building at the entrance of the proposed development.

The temporary package plant will have a treatment capacity of 40m³ per day and will use a combination of conventional treatment (natural bacteria) and membrane technology (microfiltration) to treat the household sewage to comply with general water limits stipulated by the Department of Water Affairs.

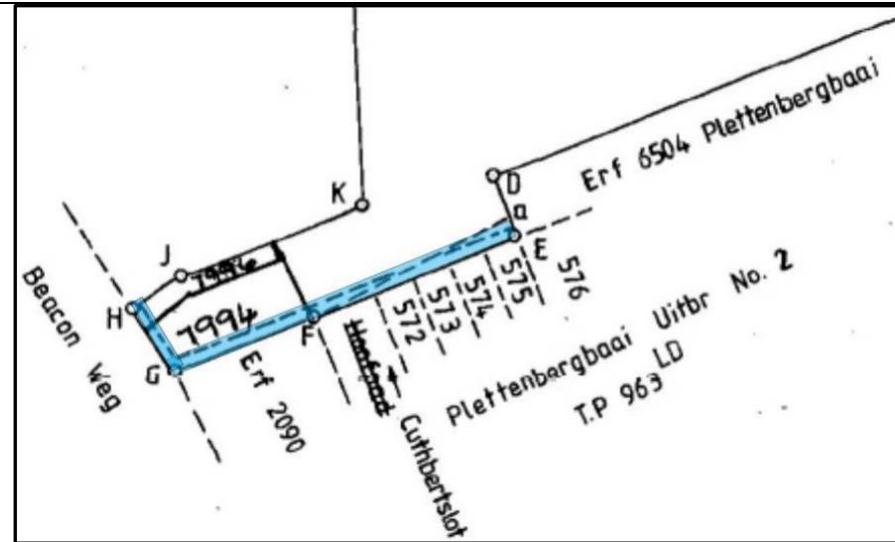
For the duration of the package plant being in operation, all treated effluent is then to be used for irrigation within the estate. Dedicated irrigation storage tanks (4 x 10KI) forms part of the design and will be located next to the container.

Once the Municipal Ganse Vallei WWTW has been upgraded to capacity to accommodate the proposed Plett Lagoon Estate development (and the package plant decommissioned), sewage will be pumped towards the existing 160mm underground municipal bulk sewer pipe connection in the Susan Road Reserve on the southern boundary of Erf 6503. To enable this

	switch-over in future, this connection line to the municipal sewer system will be installed as part of the project services installation.
All necessary upgrades to the bulk sewer lines must be completed before commencement of the development.	No upgrades to bulk sewer lines are proposed as part of the development on Erf 6503. Bitou Municipality has confirmed bulk infrastructure capacity.
Installed sewer pump station must have standby non electrical pumps available in case of power outages, failures or mechanical malfunction of the existing pump.	The sewer pumpstation will be equipped with duty- and standby pumpsets.
Sewer pumpstation must have an emergency-overflow storage sump (8hours).	The sewer pumpstation will be designed to provide eight (8) hours of emergency-overflow storage.
Solid waste stored on – site in a designated area approved by Bitou Municipality.	Refuse collection area is proposed at the entrance of the development.
Refuse collection area enclosed with no rainwater or stormwater run off, water point for proper cleaning and gully connected to sewer on lowest point of concrete floor.	The refuse collection area will be designed to be enclosed with no rainwater or stormwater runoff. The collection area will have a water point for cleaning purposes with a gully connected to a sewer on the lowest point of the concrete base as prescribed in the comments received from Garden Route District Municipality Department of Health.
All refuse is to be incorporated into the Bitou Municipal solid waste stream.	All refuse from the proposed development on the Remainder of Erf 6503 is to be incorporated into the Bitou Municipal solid waste stream. Bitou Municipality has confirmed that there is sufficient capacity for Waste Disposal for the proposed development on 03 June 2024.

<p>Stormwater exit points must include a best management practical approach to trap pollutants and minimise impacts on nearby lagoon/ river system(no wash away).</p>	<p>The following erosion preventative measures will be incorporated in the detail stormwater design:</p> <ul style="list-style-type: none"> • Concentration of stormwater will be minimized to prevent high volume/flow rates. • Hard surface run-off (driveways) will be routed into swales via the internal roadways. • Sheetflow into open swales will be promoted to maximize contact time with the permeable dune sands. • All channels with an internal velocity higher than 1 m/s will be formalized (armorflex). • All unlined channels will be landscaped with appropriate vegetation. • Energy dissipation structures will be installed at high energy discharge points.
<p>All service agreements between developer and Bitou Municipality must be in place.</p>	<p>All service level agreements will be concluded between the developer and the Bitou Municipality prior to the commencement of any construction of civil engineering services.</p>
<p>Geannine Steyn via Email on Pre-App DBAR</p>	
<p>COMMENTS</p>	<p>RESPONSE</p>
<p>At the back of my house erf 574 is a servitude and the servitude in my land . Municipality said nothing can be build there. How close to my house will the development be? As we use the back for parking of 2 cars. Anyway possible that we can still get access to use the back. Erf 572, 573, 574, 574 worried about the development. And I know in the documents the say about the</p>	<p>According to the appointed Urban and Environmental Planner, the servitude located on the southern boundary of Erf 6503 was registered as a Right of Way Servitude to be used by Erf 6504 as an access only. I marked the servitude in Blue in the image below.</p>

servitude canceled. But how can they cancel a servitude if there is one. Servitude goes through my land it Burts 3 times that the municipality came and fixed it. And we can put the water off for campsite.



This servitude was cancelled, and Erf 6504 now obtains access directly from Susan Street. From what we can gather from the information in the Title Deed and Planning Report, this servitude was only registered in favour of Erf 6504 and does not have an impact on the property boundaries of Erf 572, 573, 574 and 575.

Regarding the placement of the proposed clubhouse: It will be approximately 6 meters from the property boundary. However, this is only a conceptual plan and detailed building design has not commenced yet.

<p>How can someone cancel a servitude if there is one behind my house. . And the pipes goes through my property. So that means the blue line is actually for municipality and us to use (Right of way) so know one can build there . I am scared off the clubhouse and the rubbish room will be at my house . If we can keep a the club house and rubbish building more to middle of the Property or to the otherside where the caravan park is. . It gives us still use for the back of thr property. 6 m is still on the servitude. Must be 15 m then if the servitude Burts they woud have a problem.</p>	<p>The servitude that was cancelled, was only a Right of Way Servitude registered on Erf 6503 to be used by Erf 6504 as an access only and had no relevance to any water pipelines or the Municipality for access to this water point. The cancelled Right of Way Servitude does not have an impact on the property boundaries of Erf 572, 573, 574 and 575 and was never intended to be used by Erf 572, 573, 574 and 575 as the Servitude was registered on the Title Deed of Erf 6503.</p> <p>I sent your images and concern regarding the water pipelines to the appointed Civil Engineer for review and comment. The Civil Engineer informed me that the water line is the connection for the current house on RE/6503. This line will not be used for the proposed development as the capacity is insufficient and therefore access to this valve will no longer be necessary if the development is completed.</p>
<p>Our worries about the club house plus rubbish department being on outside our house. Rubbish department going to be so close our house the smell and then the clubhouse being so close to our house they will see everything that is going on in our house and the noise. We have build at the back of our house 2 flats . And at the moment we using at the back for 3 cars for parking . The other house as well use it for parking as well.</p> <p>The new owner of 6503 Can you please speak to him . Ask him if possible if we could use the property still for parking .</p> <p>That's why we were glad about the servidude at the back. If they build the clubhouse plus rubbish department 15 m away from the 4 house . Then we woud have a problem with clubhouse taking our parking plus our view of the lagoon . And then smell of the rubbish department.</p>	<p>Refuse Collection Area: The outer edge of the refuse collection area will be approximately 70 metres from the property boundary of Erf 574 as well as approximately 15 metres from the closest property boundary of Erf 572. The refuse collection area will be administrated by the developments homeowner's association which will be adequately sized to accommodate the correct amount of refuse bins. The management of this area will be very important for the homeowner's association as they would not want any odour to be emitted from this area that would cause an inconvenience for their neighbours and residents of the proposed Plett Lagoon Estate.</p> <p>Clubhouse Location: Thank you very much for your concern regarding the clubhouse. The detailed design of this building has not commenced and will only be completed at a later stage. I will be sure to communicate your concern to the developer and</p>

	<p>appointed architect. I will also share your request regarding the parking at the back of your property with the developer and owner of Erf 6503.</p> <p><u>Updated Response:</u></p> <p>The proposed site development plan has been amended after inputs received from local authorities as well as from the public during the public participation process and the clubhouse has subsequently been removed from the proposal. The clubhouse area has been replaced by three single erven approximately 1100m² in size each.</p> <p>The refuse collection area has also been moved further away from Erf 572, 573, 574 and 575 and is now located next to the entrance between the Checkers Centrum and Plettenberg Bay Primary School.</p> <p>Regarding the use of the Remainder of Erf 6503 as access and parking for your property: The Remainder of Erf 6503 is privately owned and will be fenced and developed by Plett Lagoon Estate (Pty) Ltd and therefore it will no longer be possible for you to gain access to your property through the Remainder of Erf 6503.</p>
Libby Gledhill via Email on Pre-App DBAR	
COMMENTS	RESPONSE
<p>With regards the above development, I have serious concerns with respect to possible sewerage issues that may arise from the development.</p>	<p>A significant amount of people in the Poortjies area have raised concern about the sewage spills and adding more sewage to the system being of great concern.</p>

We own No. 29 Plato Road in the Poortjies and have been impacted by sewerage spills on numerous occasions. The last time, we had to make an insurance claim as the sewerage water dammed up so badly that it 'drowned' the pool DB board.

I've spoke with the project engineer and he's also been made aware of this, so he has undertaken to take it up with the Municipality to find out how, if any, they can assist to determine the cause.

From what he's told me, the spills are mostly as sewage flows out of manholes in the area which implies the spills are on gravity lines (not pump lines).

The way he explained it to me is that the current (pipeline) capacity of the gravity sewer lines in Poortjies is design to accommodate approximately 500 residential property. The current number of households in Poortjies is less and the additional units proposed at Plett Lagoon development will not increase the sewer volumes beyond the current design capacity because there is still sufficient spare capacity in this part of the sewer reticulation network.

However that said, he has indicated that the spills are likely due to (a) blockages in the gravity pipelines, or (B) sinking of the pipeline. Because it is gravity lines (no pumping in some of the lines) the moment there is a blockage, or if the elevation of the pipeline changes i.e. a tree root grows underneath or over the line and causes it to move, it results in sewage 'pooling' at specific areas. When this 'pooling' reaches a manhole, it will overflow until such time as the flow volume reduces (typically outside of 'peak' hours when most people are at home instead of at work for instance).

To resolve this the Municipality is suppose to investigate to either find the blockage(s), or the sections of the line that is no longer running according to the design elevation.

A private entity may not proceed with such an investigation/maintenance on its own because its municipal

infrastructure. But the engineer has indicated that it would be necessary for the Applicant to assist the Municipality in whichever way necessary to resolve this ongoing problem before any development contributes additional sewage flow to the system. It would be unfair to hold the development ransom to failure on the part of the Municipality to maintain a functioning sewage system, but at the same time also unfair for the developer to add sewage to an already problematic system.

So, I am waiting for further confirmation from the engineer on how best such an arrangement can be made/resolved, because maintenance of the sewer network remains a municipal responsibility, but understandably additional sewer from additional households will exacerbate the problem, which is unwanted.

Updated Response:

The Ganse Vallei Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI. According to Bitou Municipality the remaining 0.2MI is reserved for approved developments. Upgrades to the Ganse Vallei WWTW is therefore required to accommodate new developments. Due to the fact that said upgrade of the WWTW may take some months/years still (considering approvals / funding / delays etc), the proposal for this development is for the installation of an on-site package plant. Confirmation of the use of such a temporary WWTP has been obtained from Bitou Municipality on 02 July 2024 on condition that the plant will be decommissioned once Bitou Municipality finished upgrades to the Ganse Vallei WWTW and the proposed Plett Lagoon Estate can be connected to the municipal system.

Susan Donald via Email on Pre-App DBAR

COMMENTS

Plan 4, being the preferred subdivision plan proposal indicates that the primary access to the development is provided from Cuthbert Close, a minor residential access road in the Poortjies residential neighbourhood. All traffic ingress and egress to the proposed development of the approximate 50 residential opportunities, that is 9 low density, 28 medium density, and 10 higher density flats (2 x 5), can generate up to 100 additional trips per day. Not only does this provide a threat to road safety in the quaint quiet residential neighbourhood, but places pressure on the residential road network.

It is suggested that a traffic study be undertaken to assess the impact of the proposed development on the surrounding area and seek measures ventilate and distribute the traffic flow by means of other access points such as Erf 7996 (abutting the school) and Portion 52 of the Farm NO. 444. If a TIA has been completed then a revision thereof with alternatives should be done.

RESPONSE

The Developer would prefer to have the access to this site via the existing gravel road situated between the school and the Checker's Centre. They consulted with the Bitou Municipality at the inception stage of the project and was advised by the Municipality that the intersection at that point is not suitable, hence the alternative of coming in via Susan/Cuthbert Street. The concern about through traffic has been noted and the Developer has again approached the Municipality to discuss their preferred access. The project engineer subsequently engaged with the SANRAL Roads Authority who will be starting work on the large traffic roundabout on the N2/Beacon Drive intersection in the coming weeks and based on this upgrade, were able to establish that a smaller traffic circle at the entrance to the school/Checkers Centre is potentially viable. Such an upgrade will enable the primary access to the proposed development to be at the current access point to the site (between the school and the Checker Centre). The project engineer is awaiting feedback from the Municipality on this alternative proposal which, if supported by the Municipality, would move the primary access back to the current access point (and not through Poortjies via Susan/Cuthbert Street). Since it is Municipal roads, the Applicant cannot insist on such a proposal, but they are hopeful that the Municipality will support this proposal instead. We'll be sure to communicate the outcome of

	<p>this alternative access discussions with the Municipality with all registered stakeholders including yourself.</p> <p><u>Updated Response:</u></p> <p>The preferred Site Development Plan has since been amended, and the proposed entrance is located between the Plettenberg Bay Primary School and the Checkers Centrum.</p>
<p>It is noted that Plan 4, Alternative Development Proposal, has placed the Clubhouse and communal recreation facility on the site Zoned as Open Space II (Private Open Space). The intended land use will require a Consent Use approval for either a Function venue and/or Sports and Recreation Centre. No mention the Consent Use is made in the application.</p> <p>It is feared that the clubhouse and recreation space located directly adjacent to the Poortjies mat cause disruption such as noise, parking and rowdy behaviours is uses such as host weddings, parties and other functions are permitted.</p> <p>It is suggested that the proposed land use be located in the centre of the development, adjacent to the existing school site, and importantly, be supported by a Consent Use approval.</p>	<p>The internal placing of land uses on the property falls within the scope of the Land Use Planning Application for which Marike Vreken Urban Town Planners is responsible. We'll liaise with her to get feedback into the location of this specific land use and revert back to you.</p> <p><u>Updated Response:</u></p> <p>The proposed site development plan has been amended after inputs received from local authorities as well as from the public during the public participation process and the clubhouse has subsequently been removed from the proposal. The clubhouse area has been replaced by three single erven approximately 1100m² in size each.</p>
<p>It is a well-known fact that Plettenberg Bay sewer infrastructure is over stressed and is well over its designed capacity. Taking into consideration that the urban edge is on the boundary of the erven to the North of Susan Street, according to the Bitou Municipal Online GIS Viewer (https://bitou.maps.arcgis.com/aos/webappviewer), it is a concern that no mention is made of the plans to alleviate or eliminate this, let alone provide for the new development. Historic town planning may have allowed for future development</p>	<p>The are a number of residents from the Poortjies area that have raised sewage specifically as an existing problem with spills noted at manholes at specific points. I've alerted the project engineer to this and he is going to engage with the Bitou Municipality about this. The way he explained it to me is that the current (pipeline) capacity of the gravity sewer lines in Poortjies is design to accommodate approximately 500 residential property. The current number of households in Poortjies is far less and the additional 75 units proposed at Plett Lagoon</p>

but as it relates to the (original) urban fence just North of Susan Street and not a shifted one. If the urban fence has indeed been shifted beyond the one mentioned, it is a fact that no improvements or upgrades to the current infrastructure has been made to cater for this and therefor and objection to the development is raised in this regard.

development will not increase the sewer volumes beyond the current design capacity because there is sufficient spare capacity in this part of the sewer reticulation network. However that said, he has indicated that the spills are likely due to (a) blockages in the gravity pipelines, or (B) sinking of the pipeline. Because it is gravity lines (no pumping in some of the lines) the moment there is a blockage, or if the elevation of the pipeline changes i.e. a tree root grows underneath or over the line and causes it to move, it results in sewage 'pooling' at specific areas. When this 'pooling' reaches a manhole, it will overflow until such time as the flow volume reduces (typically outside of 'peak' hours when most people are at home instead of at work for instance). To resolve this the Municipality is suppose to investigate to either find the blockage(s), or the sections of the line that is no longer running according to the design elevation. A private entity may not proceed with such an investigation on its own because its municipal infrastructure. But the engineer has indicated that it would be necessary for the Applicant to assist the Municipality in whichever way necessary to resolve this ongoing problem before any development contributes additional sewage flow to the system. I am waiting for further confirmation from the engineer on how best such an arrangement can be made because maintenance of the sewer network remains a municipal responsibility, but understandably additional sewer from additional households will exacerbate the problem which is unwanted.

Updated Response:

The Ganse Vallel Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI. According to Bitou Municipality the remaining 0.2MI is reserved for approved

	<p>developments. Upgrades to the Ganse Vallei WWTW is therefore required to accommodate new developments. Due to the fact that said upgrade of the WWTW may take some months/years still (considering approvals / funding / delays etc), the proposal for this development is for the installation of an on-site package plant. Confirmation of the use of such a temporary WWTW has been obtained from Bitou Municipality on 02 July 2024 on condition that the plant will be decommissioned once Bitou Municipality finished upgrades to the Ganse Vallei WWTW and the proposed Plett Lagoon Estate can be connected to the municipal system.</p>
Stuart Macgregor via Email on Pre-App DBAR	
COMMENTS	RESPONSE
<p>Sewerage and road infrastructure study is superficial and the unintended consequence are not fully understood.</p>	<p>There are a number of residents from the Poortjies area that have raised sewage specifically as an existing problem with spills noted at manholes at specific points. I've alerted the project engineer to this and he is going to engage with the Bitou Municipality about this. The way he explained it to me is that the current (pipeline) capacity of the gravity sewer lines in Poortjies is designed to accommodate approximately 500 residential properties. The current number of households in Poortjies is less and according to the Engineer the additional units proposed at Plett Lagoon development will therefore not increase the sewer volumes beyond the current design capacity because there is sufficient spare capacity in this part of the sewer reticulation network. However that said, he has indicated that the spills are likely due to (a) blockages in the gravity pipelines, or (B) sinking</p>

of the pipeline. Because it is gravity lines (no pumping in some of the lines) the moment there is a blockage, or if the elevation of the pipeline changes i.e. a tree root grows underneath or over the line and causes it to move, it results in sewage 'pooling' at specific areas. When this 'pooling' reaches a manhole, it will overflow until such time as the flow volume reduces (typically outside of 'peak' hours when most people are at home instead of at work for instance). To resolve this the Municipality is supposed to investigate to either find the blockage(s), or the sections of the line that is no longer running according to the design elevation. A private entity may not proceed with such an investigation/repairs on its own because its municipal infrastructure. But the engineer has indicated that it would be necessary for the Applicant to assist the Municipality in whichever way necessary to resolve this ongoing problem before any development contributes additional sewage flow to the system. I am waiting for further confirmation from the engineer on how best such an arrangement can be made because maintenance of the sewer network remains a municipal responsibility, but understandably additional sewer from additional households will exacerbate the problem which is unwanted.

The Developer would prefer to have the access to this site via the existing gravel road situated between the school and the Checker's Centre. They consulted with the Bitou Municipality at the inception stage of the project and was advised by the Municipality that the intersection at that point is not suitable, hence the alternative of coming in via Susan/Cuthbert Street. The concern about through traffic has been noted and the Developer has again approached the Municipality to discuss their preferred access. The project engineer subsequently engaged with the SANRAL Roads Authority who will be starting

work on the large traffic roundabout on the N2/Beacon Drive intersection in the coming weeks and based on this upgrade, were able to establish that a smaller traffic circle at the entrance to the school/Checkers Centre is potentially viable. Such an upgrade will enable the primary access to the proposed development to be at the current access point to the site (between the school and the Checker Centre). The project engineer is awaiting feedback from the Municipality on this alternative proposal which, if supported by the Municipality, would move the primary access back to the current access point (and not through Poortjies via Susan/Cuthbert Street). Since it is Municipal roads, the Applicant cannot insist on such a proposal, but they are hopeful that the Municipality will support this proposal instead. We'll be sure to communicate the outcome of this alternative access discussions with the Municipality with all registered stakeholders including yourself.

Updated Response:

The preferred Site Development Plan has since been amended, and the proposed entrance is located between the Plettenberg Bay Primary School and the Checkers Centrum.

The Ganse Vallei Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI. According to Bitou Municipality the remaining 0.2MI is reserved for approved developments. Upgrades to the Ganse Vallei WWTW is therefore required to accommodate new developments. Due to the fact that said upgrade of the WWTW may take some months/years still (considering approvals / funding / delays etc), the proposal for this development is for the installation of an on-site package plant. Confirmation of the use of such a temporary WWTP has been obtained from Bitou Municipality on 02 July

	2024 on condition that the plant will be decommissioned once Bitou Municipality finished upgrades to the Ganse Vallei WWTW and the proposed Plett Lagoon Estate can be connected to the municipal system.
Niel Malan via Email on Pre-App DBAR	
COMMENTS	RESPONSE
<p>Hi, just to confirm that the ongoing sewage spills and run-off into the lagoon have been reported to the municipality on many occasions via there Land-line, Collab App and raised with the Bitou Environmental Officer. It has also been discussed and minuted at the Keurbooms Estuary Advisory Forum several times. If anything, the situation is now worse than when first mentioned and the “water” runs down the open canal continuously, regardless of whether we had rain or not. 26 Phitidis has also had sewage overflows and I cannot see how an increased sewage flow won’t cause further problems. 🤮 storie. They need to investigate alternative strategies to deal with the sewage challenges.</p>	<p>There are a number of residents from the Poortjies area that have raised sewage specifically as an existing problem with spills noted at manholes at specific points. I’ve alerted the project engineer to this and he is going to engage with the Bitou Municipality about this. The way he explained it to me is that the current (pipeline) capacity of the gravity sewer lines in Poortjies is designed to accommodate approximately 500 residential properties. The current number of households in Poortjies is less and according to the Engineer the additional units proposed at Plett Lagoon development will therefore not increase the sewer volumes beyond the current design capacity because there is sufficient spare capacity in this part of the sewer reticulation network. However that said, he has indicated that the spills are likely due to (a) blockages in the gravity pipelines, or (B) sinking of the pipeline. Because it is gravity lines (no pumping in some of the lines) the moment there is a blockage, or if the elevation of the pipeline changes i.e. a tree root grows underneath or over the line and causes it to move, it results in sewage ‘pooling’ at specific areas. When this ‘pooling’ reaches a manhole, it will overflow until such time as the flow volume reduces (typically outside of ‘peak’ hours when most people are at home instead</p>

of at work for instance). To resolve this the Municipality is supposed to investigate to either find the blockage(s), or the sections of the line that is no longer running according to the design elevation. A private entity may not proceed with such an investigation/repairs on its own because its municipal infrastructure. But the engineer has indicated that it would be necessary for the Applicant to assist the Municipality in whichever way necessary to resolve this ongoing problem before any development contributes additional sewage flow to the system. I am waiting for further confirmation from the engineer on how best such an arrangement can be made because maintenance of the sewer network remains a municipal responsibility, but understandably additional sewer from additional households will exacerbate the problem which is unwanted.

Updated Response:

The Ganse Vallei Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI. According to Bitou Municipality the remaining 0.2MI is reserved for approved developments. Upgrades to the Ganse Vallei WWTW is therefore required to accommodate new developments. Due to the fact that said upgrade of the WWTW may take some months/years still (considering approvals / funding / delays etc), the proposal for this development is for the installation of an on-site package plant. Confirmation of the use of such a temporary WWTP has been obtained from Bitou Municipality on 02 July 2024 on condition that the plant will be decommissioned once Bitou Municipality finished upgrades to the Ganse Vallei WWTW and the proposed Plett Lagoon Estate can be connected to the municipal system.

Joanne Macgregor via Email on Pre-App DBAR

COMMENTS

The increase in traffic through the suburb of Poortjies will be massive. This will destroy the peace and quiet of the suburb and lead to a reduction of property values.

It is imperative that a new access point (along the road to the caravan park, or behind checkers) is provided for.

RESPONSE

The Applicant of this development always planned to have the access to the property at the current location between the school and the Checkers Centre. In consultation with the Municipality however they were advised that they may not use that as an entrance to the development due to capacity constraints at that intersection. Hence the proposal to make use of an alternative access which ultimately runs through the residential area of Poortjies. Subsequently however the N2 traffic circle at the interchange with Beacon Road will be implemented shortly (my understanding is that construction on the circle will commence in the coming weeks) and as a result there is an opportunity to also introduce a smaller traffic circle at the intersection of the Checkers Centre/School (in other words opposite the Engen filling station where the property currently gets its access from. The Applicant has since approached the Municipality again to discuss this as an alternative and from my discussions with the Engineer it appears they are waiting for consent from the Municipality to build a traffic circle at that intersection which will then allow them to make use of it as their primary access (in which case they won't have to make use of the current proposal via Susan / Cuthbert Road through Poortjies). As soon as the Engineer have confirmation from the Municipality that such a proposal is acceptable, I'll send through communication to all registered stakeholders to confirm the final entrance access to the proposed development. Should this alternative access be condoned by the Bitou Municipality I am confident that it will

	<p>address the concern about traffic needing to pass through the residential area. Your concern about through traffic if the entrance remains via Susan/Cuthbert Road is duly noted.</p> <p><u>Updated Response:</u></p> <p>The preferred Site Development Plan has since been amended, and the proposed entrance is located between the Plettenberg Bay Primary School and the Checkers Centrum.</p>
<p>The development will mean the loss of yet another green space in this town, making it more built up. This urban sprawl is negatively impacting the Garden Route's appearance, viability as an eco-tourist spot, quality of life for residents, and ecosystems.</p>	<p>The property is earmarked for urban infill development in terms of the local Spatial Development Framework of Bitou. It implies that the site will be developed and that it will not remain vacant. Importantly however, the remaining natural portion of the site which comprises more than 10ha will not be affected and no development is proposed within this natural environment. The development is limited to the transformed area of the site only and care has been taken with input from several biodiversity specialists to ensure that the remaining open space will continue to act as a habitat and green lung in an otherwise built-up urban environment.</p>
<p>This development is not just a couple of houses. The density of units is out of keeping with the character of that lagoonside green belt.</p>	<p>The number of units proposed amounts to 75. Again, because the area is earmarked for infill development the planning policies (both local and Provincial) stipulate that vacant land must be optimised – amongst others so that remaining natural areas can be protected and also to curb urban sprawl beyond the urban edge of a town. The initial layout plan for this site covered most of the property at a much reduced density. However to maintain the remaining natural habitat on the lower half of the property, the 'available' transformed area had to be densified. If a lower density had to be considered, it would imply that there would be encroachment into the remaining natural areas of the site which</p>

	<p>is not supported from an environmental perspective. In addition, the density had to also be verified in terms of services capacity. The engineers have confirmed that service capacity is available in the sewage and water networks, as well as bulk supply. Service availability, coupled with optimising of the already transformed areas of the site and complying with spatial policies its density is what ultimately helps inform the proposal. Your concern about density in this area is however noted and will be recorded as part of the environmental process for the Authority to also consider.</p> <p><u>Updated Response:</u></p> <p>Following input from authorities and the public during the public participation process, the site development plan has been amended.</p> <p>The total number of residential possibilities have been reduced from 75 to 50.</p>
<p>The roads, water pipes, electricity substations and especially sewerage cannot handle even existing demands. There is no capacity to add so much more demands. It's frightening how often we have sewerage running down the roads in Poortjies and this will only exacerbate the problem.</p>	<p>I have received numerous queries about the sewage in the area especially. Apparently there is a manhole close to the triangle park that overflows regularly and it is obviously a concern. The Engineer on the project has been made aware of this and is engaging with the Bitou Municipality. What has been determined to date is that the spill is on the existing municipal gravity sewer line and the speculation at this point is (to be verified still) that the gravity line in that area has a blockage that the Municipality is obliged to clear out. Alternatively it could also be that a section of the existing sewer line in that area has dropped, or often a tree root is growing underneath or next to a sewer line and because it is a gravity line, a change in elevation will result in sewage 'pooling' in a specific area. When that 'pooling' gets to a certain</p>

volume and gets to a manhole, it pushes out. The Engineers have confirmed that the existing line has capacity for approximately 500 residential homes. Currently the area services has roughly 100 homes. Therefore the capacity of the line is not the challenge and adding a further 75 households will not exceed the design capacity. However the requirement of maintenance on this line appears to be problematic and the Engineer on this project has indicated that they will engage with the Municipality on the matter so as not to exacerbate the problem further. Maintenance on a municipal line cannot however be done by a private individual – so getting the Municipality to investigate and fix either the blockage or re-align the affected section of the sewer line in that particular location is important.

Updated Response:

Following input from authorities and the public during the public participation process, the site development plan has been amended.

The total number of residential units have been reduced from 75 to 50.

The Ganse Vallei Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI. According to Bitou Municipality the remaining 0.2MI is reserved for approved developments. Upgrades to the Ganse Vallei WWTW is therefore required to accommodate new developments. Due to the fact that said upgrade of the WWTW may take some months/years still (considering approvals / funding / delays etc), the proposal for this development is for the installation of an on-site package plant. Confirmation of the use of such a temporary

	<p>WWTP has been obtained from Bitou Municipality on 02 July 2024 on condition that the plant will be decommissioned once Bitou Municipality finished upgrades to the Ganse Vallei WWTW and the proposed Plett Lagoon Estate can be connected to the municipal system.</p> <p>The proposed development is located in the Plettenberg Bay town area which is currently supplied by Substation – 1 Ferdinand. The substation is shared with Eskom by Bitou Municipality and has an installed capacity of 20MVA with 2 x 10MVA transformers.</p> <p>The Notified Maximum Demand for the substation is 15.5MVA and therefore it has sufficient capacity to accommodate the additional 800 kVA (maximum demand) of the proposed development on the Remainder of Erf 6503.</p> <p>Bitou Municipality has confirmed bulk infrastructure capacity in its network that can accommodate the proposed development of Plett Lagoon Estate on Remainder of Erf 6503</p>
<p>This development will have a negative impact on the sensitive ecosystem of the lagoon which is very much protected currently. The visuals from the lagoon will be changed for a beautiful natural spot to a development. I also believe the development will be at risk of flooding.</p>	<p>If the development encroached into the remaining natural area, there would definitely have been a risk of coastal erosion and flooding. As it stands however the roughly 10ha area will not be developed and will remain as a buffer between the proposed development and the Estuary. The risk of the proposed development impacting on the Estuary with this large buffer in place is extremely low.</p>
<p>The Plett Lagoon is a precious and ecologically vulnerable asset to the Garden Route and especially to the town of Plettenberg Bay. I object strongly to this planned development being approved by only local town planners and authorities. A much</p>	<p>The Environmental Regulations is very prescriptive in terms of the requirements for public participation. This application has been advertised twice already, once in terms of the Environmental application, and a second time in terms of the</p>

<p>broader consultation process needs to be implemented to hear and seriously consider the views of local residents, towns folk generally, the tourism industry which is the economic lifeblood of this town and region, nature and ecological experts and organisations, and coastal management. I consider the process so far to have been very hush-hush and not conducted transparently or in good faith.</p>	<p>Planning application. In addition, site notices have been placed at entrance points to the site so as to be visible to people moving in proximity to the site. All mandated State Departments, inclusive of the Department of Forestry, CapeNature, Heritage Western Cape, Integrated Coastal Management, Bitou Municipality, Provincial Roads, Department of Water Affairs etc have been notified and given the opportunity to comment. Likewise all neighbouring property owners have been notified, the local Councillor and ratepayers association. The application has been made available on our website and it has been distributed electronically to interested and affected parties that have either seen the notifications or heard of the application via other stakeholders. In addition to the environmental process, a separate planning application has also been followed with additional opportunity to comment. I do believe that the consultation and opportunity for potential stakeholders to engage with us and/or submit comment on the application have been ample, with more to come. This initial 60-day commenting period will also be follow-up by another 30-day commenting period and all registered stakeholders such as yourself, will be notified when the updated Draft Basic Assessment Report will be available for review and further comment. You are also invited to distribute this email to any other stakeholders you may think have an interest in the application and they are most welcome to contact us directly.</p>
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Shoprite Checkers via Email on Pre-App DBAR

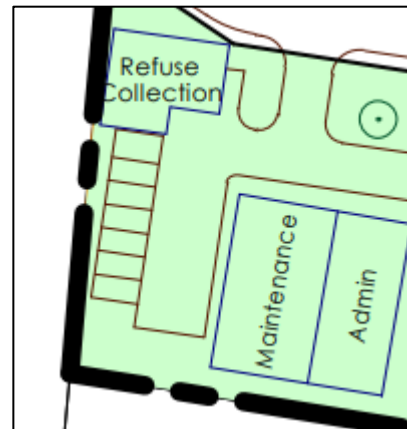
COMMENTS	RESPONSE
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The portion of the proposed development directly abutting the Checkers shopping centre delivery yard, i.e. the gatehouse and entrance lanes, is positioned in very close proximity to our boundary wall. Although there is a small buffer proposed between the entrance lanes and our boundary wall, we are concerned about the potential impacts of this portion of the development on the structural integrity of said boundary wall. We thus request more detail, including height levels and a section / elevation of this portion of the development to depict how same will interface with our boundary wall.

Following input from authorities and the public during the public participation process, the site development plan has been amended.

Detailed building design has not commenced as yet, however, the proposed entrance have been moved from the corner of Cuthbert Close/Susan Street to between the Checkers Centrum and the Plettenberg Bay Primary School.

The site is to be fenced and a small parking area is proposed abutting the Checkers boundary wall.



It is unclear how the development will link up with Cuthbert Close / Susan Street as there are no specific details in the documents availed illustrating this. We further wish to bring to your attention that there is an existing pedestrian entrance to our shopping centre from Cuthbert Close / Susan Street. We thus require more details on this aspect of the development as reassurance that our pedestrian entrance will not be impacted adversely.

The Applicant of this development always planned to have the access to the property at the current location between the school and the Checkers Centre. In consultation with the Municipality however they were advised that they may not use that as an entrance to the development due to capacity constraints at that intersection. Hence the proposal to make use of an alternative access which ultimately runs through the residential area of Poortjies. Subsequently however, the N2 traffic circle at the interchange with Beacon Road will be implemented shortly and

	<p>as a result there is an opportunity to also introduce a smaller traffic circle at the intersection of the Checkers Centrum/School (in other words opposite the Engen filling station where the property currently gets its access from. The Applicant has since approached the Municipality again to discuss this as an alternative.</p> <p><u>Updated Response:</u></p> <p>The preferred Site Development Plan has since been amended, and the proposed entrance is located between the Plettenberg Bay Primary School and the Checkers Centrum.</p>
<p>The documents availed include an Environmental Management and Maintenance Programme for the development from the construction phase to the operational phase. It is, however, unclear how construction vehicles will enter the future construction area and what measures are proposed to limit the impact hereof on surrounding properties. We thus request clarity on this important aspect.</p>	<p>All construction traffic will make use of the access road between the Checkers Centrum and the Plettenberg Bay Primary School.</p> <p>The following mitigation measures will be put in place to be adhered to by all contractors:</p> <ul style="list-style-type: none"> • Construction related activities should be timed where possible, to avoid peak periods. • No construction workers, apart from security personnel, should be allowed to stay overnight. • Contractors appointed by the development must ensure that workers are transported to and from site daily. • Construction related activities should comply with all relevant building regulations. In this regard activities on site should be restricted to between 07:00 and 18:00 during weekdays and 08:00 and 13:00 on Saturdays. No work should be permitted on Sundays and public holidays.
<p>We note that no application for a borehole / underground water extraction forms part of the WULA and thus assume that all the</p>	<p>That is correct. The proposed development does not make use of boreholes to obtain potable water.</p>

<p>water-supply to the proposed development (potable and irrigation) will be municipal supplied. Can you please confirm whether our interpretation hereof is correct. We are in the process of registering a borehole on our property and are concerned that any further boreholes in the area will severely impact on our borehole water yield.</p>	
<p>Alison Myburg via Telephone on Pre-App DBAR</p>	
<p>COMMENTS</p>	<p>RESPONSE</p>
<p>Concern about the traffic , specifically the proposed entrance to the development (associated with development traffic coming through the residential area with its main entrance off Susan/Cuthbert Street).</p>	<p>The Applicant originally initiated the development with its primary access being off Beacon Way, coming past between the school and the Checkers centrum. When they approached the Municipality about it during their pre-planning stage, the Municipality recommended the access rather be via the Susan/Cuthbert access, as the intersection at the Checkers Centre experiences traffic congestion in its current state which the development is likely to exacerbate;</p> <p>Subsequently the Applicant entered into discussions with the Municipality again and the alternative on the table at the moment is that intersection should be upgraded with a traffic circle if the Applicant prefers that to be the primary access. This apparently came about because of the planned N2 traffic circle upgrade and the engineering work that's been done around that. So the project engineers (on this application) have been able to engage with those engineers and back to the Municipality.</p> <p>Should a traffic circle be possible (to fit into the space that's available at said intersection) then the primary access will</p>

	<p>changed to be from this traffic circle, past the school/checkers centre instead.</p> <p><u>Updated Response:</u></p> <p>The preferred Site Development Plan has since been amended, and the proposed entrance is located between the Plettenberg Bay Primary School and the Checkers Centrum.</p>
<p>Sewage capacity with regular spills at Plato/Strydom Street intersection (alleged record of these spills being reported to the Municipality often) which appears to be at the point of the exiting rising main sewer line and additional sewage may compound this sewage problem.</p>	<p>The summary from the civil engineering report confirms that the development's sewage will enter the existing municipal sewage reticulation network at a point in Susan Street from where it will gravitate to Pump Station 1 that is located in the triangle park area (please see below map for orientation), from where it will be pumped to Pump Station 1a from where the sewage from this catchment area is pumped to the Ganse Valley Waste Water Treatment Works.</p> <p>According to the engineering report, this section of the municipal sewage reticulation network has sufficient capacity to accommodate the additional sewage flow.</p> <p>I endeavour to contact the Engineer to discuss your concern about the (potential) capacity issue that (may) result in the sewage overflow contributing to the existing sewage problem/spill at Plato/Strydom Street. Also noting that the Municipality must provide additional written confirmation that their infrastructure capacity (for sewage, stormwater, water, electricity, solid waste etc) is in fact sufficient. I'll revert back to you on this specific concern as soon as I have feedback from the Engineer responsible for the planning/design of the engineering services associated with this application.</p> <p><u>Updated Response:</u></p>

	<p>The Ganse Vallei Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI. According to Bitou Municipality the remaining 0.2MI is reserved for approved developments. Upgrades to the Ganse Vallei WWTW is therefore required to accommodate new developments. Due to the fact that said upgrade of the WWTW may take some months/years still (considering approvals / funding / delays etc), the proposal for this development is for the installation of an on-site package plant. Confirmation of the use of such a temporary WWTP has been obtained from Bitou Municipality on 02 July 2024 on condition that the plant will be decommissioned once Bitou Municipality finished upgrades to the Ganse Vallei WWTW and the proposed Plett Lagoon Estate can be connected to the municipal system.</p>
<p>I thought that I should mention that these photos are appearing daily on the 'Poortjies' chat. The existing infrastructure simply cannot 'manage'. The overflow runs onto the roads and no one cleans up. There is speculation that it is as a result of Checkers and fat traps not being used, but residents are extremely concerned.</p>	<p>I do believe the project civil engineer has engaged with the Municipality to find out what the problem is and it appears that capacity of the sewage system is not the problem (in other words the pipelines are big enough and the pump stations have enough capacity). But along the sewage pipeline routes in the Poortjies area, there are sections where the pipelines have moved ever so slightly below ground, most likely because of large tree roots that grow up and around it. When the roots push against the sewer pipes, the levels in the pipes change (they get pushed down or up) and because the sewage in Poortjies is gravity fed (so not pumped on all of the lines), then the level of the pipelines change, the sewage does not flow as it should. It effectively dams up at these points along the line and then it pushes back in the line. And the sewage exists at the manholes. Because it is Municipal infrastructure the Applicant for Plett Lagoon Estate cannot go in to find and fix these points, but as they will add</p>

	<p>additional sewage to the system (i.e. exacerbating the problem), they must ensure that the problem is fixed before they may put any sewage into the system. So the project civil engineer has indicated that (if the development is approved), they'll have to go in there and check on the lines (with the Municipality's permission) and then fix the problem areas before any houses can be connected to the sewer system.</p> <p><u>Updated Response:</u></p> <p>The Ganse Vallei Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI. According to Bitou Municipality the remaining 0.2MI is reserved for approved developments. Upgrades to the Ganse Vallei WWTW is therefore required to accommodate new developments. Due to the fact that said upgrade of the WWTW may take some months/years still (considering approvals / funding / delays etc), the proposal for this development is for the installation of an on-site package plant. Confirmation of the use of such a temporary WWTP has been obtained from Bitou Municipality on 02 July 2024 on condition that the plant will be decommissioned once Bitou Municipality finished upgrades to the Ganse Vallei WWTW and the proposed Plett Lagoon Estate can be connected to the municipal system</p>
Johan Loots via Email on Pre-App DBAR	
COMMENTS	RESPONSE
Urban Sprawl in respect of current legislation.	The property falls within the urban edge of Plettenberg Bay and is designated for urban infill development in terms of the spatial

	<p>development framework plan. The general planning policy of Bitou and Western Cape is for vacant land within urban edges to be optimised so as to avoid unwanted urban sprawl (beyond designated urban edges). The proposed development is deemed to be in line with the applicable planning policies and legislation in as far as the proposed land use.</p>
<p>Loss of Open Space in towns in respect of current legislation.</p>	<p>The original layout plan presented to us as the outset of the development planning phase covered the entire site all the way down to the Estuary. This would have resulted in the loss of pristine thicket and a fully functional wetland with significant ecological value. The specialists brought in to assess the site put down very strict development parameters one of which was the total avoidance of the nearly 10ha of remaining intact natural habitat. This area acts as a buffer between the Estuary and the development area and has been specifically set aside as a conservation area. This property is one of the last remaining sites in the urban edge that actually contains such a beautiful intact natural area. Given the outcome of the specialist studies the developers had to withdraw from the lower lying area completely. The development proposal is therefore focussed on the transformed areas of the site only. The +/- 10ha remaining natural area will therefore continue to serve a purpose as a functional open space link with the Estuary. Furthermore a provision of the environmental application is that this thicket area not be fenced in so that faunal movement between this area and the Estuary is not compromised.</p> <p><u>Updated Response:</u></p> <p>Fencing must be in line with the CapeNature policy document on Fencing & Enclosures of Game, Predators & Dangerous Animals in the Western Cape (installation methods, maintenance</p>

	<p>methods etc). Fire breaks must be maintained, but clearing methods of fire breaks, must be adhered to, to ensure minimal disturbance of the on-site wetland and thicket vegetation.</p>
<p>Over-development out of character with the environment in question and need unsubstantiated. Need and desirability not supported.</p>	<p>Duly noted. The way in which the site plan has avoided the remaining natural area completely and focussed development on the transformed areas only, is critical in terms of the need & desirability of the proposal. The inclusion of the property within the urban edge of the SDF further addresses the feasibility of considering development on a portion of the property. As a result of the large area deemed to not be suitable for development i.e. the remaining 10ha natural thicket, the density on the transformed area which is deemed more suitable for development, has been increased. The planning principle of densifying urban developments within urban edges is acknowledged and in general low density development is no longer supported by the planning authorities especially if a property falls within an urban edge. That said, it remains for the Provincial Department of Environmental Affairs & Development Planning to consider the density to the site conditions and character of the area.</p>
<p>Full study in respect of municipal resources and capacity.</p>	<p>A detailed civil engineers study forms part of the application assessment. The engagement between the engineer and the Bitou Municipality indicates that sufficient spare capacity is available in the sewer, water and electrical networks. However, numerous residents in the area have raised concern about sewage spills already taking place in the Poortjies area and we have raised this with the project engineer who have committed to finding out from the Municipality what the reason for such spills may be. The engineer is convinced that it is not as a result of lack of capacity in the gravity lines because the design capacity</p>

	<p>of the lines in the Poortjies area exceeds the number of households in the same area and adding the additional houses of the Plett Lagoon development will still not exceed the available spare capacity. That said, the engineer will have to engage with the Municipality to find out what the problem is (he is of the opinion the lines may have blockages or may have dropped in level causing pooling of sewage in the pipes that eventually spill out the manholes), but since it is a municipal function to maintain and fix such problems the engineer will have to find a way of working with the Municipality to resolve this before additional sewage can be added to the system because that is likely to exacerbate the problem further. I'm hoping to have more feedback from the engineer on this matter in due course and will be sure to share it with registered stakeholders as we progress with the process further.</p>
<p>Ditto hydrology and impact on the health of the whole lagoon eco-system.</p>	<p>The environmental investigation included a detailed aquatic impact assessment, as well as a Water Use License investigation specifically to understand the function and sensitivity of the large wetland that is found on the remaining 10ha of natural habitat separating the development from the Estuary. They gave very specific advise to the engineer on how to deal with stormwater runoff to ensure that no erosion/silt/pollution enters the Estuary. The remaining natural 10ha area will act as a very good buffer, not only protecting the development from future coastal erosion, but also it will help filter and prevent any unwanted impacts on the estuary and receiving eco-system.</p>
<p>Independent reports required to assess possible under-reporting of impacts.</p>	<p>You are welcome to provide evidence of any of the environmental specialist reports you might think have not been done independently, or where impacts may have been under-</p>

	<p>reported. The specialists who have participated in the environmental assessment process for this evaluation are highly qualified, SACNASP registered and experienced. Their findings and recommendations are clear and in line with best practice principles. I have not noted any indication of under-reporting, but again if you are aware of specific instances please do point them out by discipline and impact so that it can be investigated.</p>
<p>Road Access proposal unacceptable.</p>	<p>The current proposed access via Susan/Cuthbert Streets are also not the Applicant's preferred access for the development however when they initially approached the Municipality, they advised that the existing access (at the intersection of the school/Checker Centre) is sub-standard and cannot accommodate the development traffic. Hence the proposal to make use of an alternative access. Subsequently the traffic engineer have engaged with the SANRAL engineers responsible for (commencing with) the Beach Drive/N2 traffic circle upgrade due to comment in the next few weeks and came to the conclusion that another smaller traffic circle can be accommodated at this intersection. Should this be feasible, it will address the potential concern about traffic associated with the development and remove the need to have access via the Poortjies residential area. The proposal has been drafted and presented to the Municipality since it is their road infrastructure and they will have to approve such a new traffic circle at that position first. As soon as we have feedback on this matter, we'll be sure to inform all registered stakeholders such as yourself of the outcome and we'll then also be able to report on it in the updated Basic Assessment report along with the amended site plan to show the traffic circle and alternative access point.</p> <p><u>Updated Response:</u></p>

	<p>The preferred Site Development Plan has since been amended, and the proposed entrance is located between the Plettenberg Bay Primary School and the Checkers Centrum.</p>
<p>Access to the lagoonside by the public.</p>	<p>The property is bordered by private land on both sides facing the estuary. Since there will be no fencing erected along the remaining 10ha natural area access along the estuary will not be compromised. It is noted however that the property remains private land and measures can be taken to monitor security and prevent unauthorised access onto the Plett Lagoon property.</p> <p><u>Updated Response:</u></p> <p>Fencing must be in line with the CapeNature policy document on Fencing & Enclosures of Game, Predators & Dangerous Animals in the Western Cape (installation methods, maintenance methods etc). Fire breaks must be maintained, but clearing methods of fire breaks, must be adhered to, to ensure minimal disturbance of the on-site wetland and thicket vegetation.</p>
<p>A holistic perspective and special character of lagoon iro Plettenberg Bay.</p>	<p>Since no development is proposed against the estuary, in fact the development is setback by maintaining the remaining natural habitat that separates the development footprint from the estuary, the character of the estuary will not be impacted negatively by the proposed development.</p>
<p>Questioning of High Water Marks and floodlines taking local changes as well as global warming into account. Buffer zone between high water mark and building lines to be extended.</p>	<p>The entire remaining natural vegetation extended 10ha will remain intact. No development is proposed within this important buffer between the development and the estuary. All applicable coastal risk management lines and datasets have been taken into account and forms part of the parameters that have informed the decision not to encroach into the remaining natural vegetated area on the property at all.</p>

<p>Heritage Assessment</p>	<p>The environmental application process included a heritage investigation and submission to the Heritage authorities. Heritage Western Cape concluded that development on the already transformed areas of the property does not pose a threat to potential heritage resources. Construction monitoring is still a requirement and should any heritage remains be unearthed or exposed during construction the relevant Protocols will be enforced to secure and protect such features.</p>
<p>Emotional Impact and public disturbance associated with new developments in sensitive areas to be addressed.</p>	<p>The development footprint is contained within a transformed area. Construction will be regulated by means of very specific conditions and it will be continuously monitored by both an aquatic, as well as an environmental officer to ensure compliance. Applicable health and safety requirements will be applicable which will help govern construction times and phasing of the development over time. Construction activities within an urban environment is not uncommon, especially within areas designated for urban infill development. Disturbances associated with construction activities will be short term and can be mitigated successfully. Stakeholders have the opportunity to comment and give input to the process and in the event that the development, or part thereof, if authorised there will also be an opportunity for stakeholder who might still not be in agreement with such an approval to appeal the decision. The sensitive areas on the site have been avoided and excluded from the development footprint which in itself speaks to how people and the environment have been considered as part of the application process to date.</p>

<p>Alternative proposals considered eg Arboretum, Public Park, Camp Site Extension, New High School, Sports fields, Farm. Environmental Centre. Maritime Training Centre?</p>	<p>The property is privately owned and therefore the applicant has the right to make a submission of his/her choice as long as the proposal can be showed to not exceed environmental and social thresholds / services capacity and planning policies. The Applicant is not experienced in, neither do they have any interest in establishing camp sites or schools or sports fields of environmental / training centres. The property is earmarked for urban infill which is what they are proposal to do in order to align with the local spatial planning. Since alternatives have to be reasonable and feasible, such options are not considered to be viable.</p>
<p>Possible proliferation of other even less acceptable developments sparked by this proposed development. Eg Off-sales outlets, Industrial Plants, Malls, etc.</p>	<p>In the event that a development of this nature, which is deemed to be compatible with the local spatial development framework, results in other developments being attracted to the area it will be a requirement that such applications must also be considered in terms of applicable legislation and decisions about such developments will have to be considered on their own merit. Importantly development within an area like Plettenberg Bay must comply with the local zoning scheme regulations and the SDF which means that something which is not deemed compatible with an area such as Poortjies (such as industrial parks for instance) will not be considered.</p>
<p>Substantial reduction in the size, or less densification, of the proposed development considered,</p>	<p>The density is partially a factor of services capacity, road infrastructure capacity and site specific constraints. The information and findings that have been submitted on these key parameters confirms that the proposed density and scale of the development can be considered. If it becomes clear (after the further investigations that the engineer is making into the sewage capacity for instance) that the number of units cannot be accommodated it will needlessly be necessary to adjust the</p>

	<p>proposal accordingly. The density as is currently proposed however is well within the recommended density as per the zoning scheme regulations of the Municipality and considering the large area of open space that will remain undeveloped, decreasing density further will have to be justified with very specific constraints. If such specific constraints do exist to your knowledge that have not been considered, please do notify us so that it can be taken into account as part of the ongoing investigation.</p> <p><u>Updated Response:</u></p> <p>Following input from authorities and the public during the public participation process, the site development plan has been amended.</p> <p>The total number of residential opportunities have been reduced from 75 to 50.</p>
David Cox via Email on Pre-App DBAR	
COMMENTS	RESPONSE
<p>There is no need for more housing development on the North Eastern (Lookout side) of Plettenberg Bay. There is already substantial urbanisation/densification between Beacon Island and the Robberg peninsula and room for more on that South Western side without any unfavourable environmental/visual impact.</p>	<p>The property falls within the urban edge of Plettenberg Bay and is designated for urban infill development in terms of the spatial development framework plan. The general planning policy of Bitou and Western Cape is for vacant land within urban edges to be optimised so as to avoid unwanted urban sprawl (beyond designated urban edges). The proposed development is deemed to be in line with the applicable planning policies and legislation in as far as the proposed land use.</p>

<p>Because of its elevated position, this development will be a blot on the landscape and will impinge on/spoil the view of the entire North/East facing, well established properties extending from the townhouses on Salmack Road, to the upper levels of Bow Tie, Sewell and High Streets.</p>	<p>Since no development is proposed against the estuary, in fact the development is setback by maintaining the remaining natural habitat that separates the development footprint from the estuary, the character of the estuary will not be impacted negatively by the proposed development.</p>
<p>There are already severe service delivery problems affecting The Bitou Municipality due to the recent rapid development. See the Plett Ratepayers Association recent reports on water supply, sewerage and waste disposal. New developments before municipal infrastructure improvements simply exacerbate the problems.</p>	<p>Bitou Municipality confirmed bulk infrastructure capacity in its networks and can accommodate the proposed development, subject to the following conditions:</p> <ul style="list-style-type: none"> • That the developer enters and sign a Service Level Agreement with Bitou Municipality. • That the developer implements the upgrade of services as detailed and required in the GLS network analysis report, dated 27 February 2023. <p>A detailed civil engineers study forms part of the application assessment. The engagement between the engineer and the Bitou Municipality indicates that sufficient spare capacity is available in the sewer, water and electrical networks. However, numerous residents in the area have raised concern about sewage spills already taking place in the Poortjies area and we have raised this with the project engineer who have committed to finding out from the Municipality what the reason for such spills may be. The engineer is convinced that it is not as a result of lack of capacity in the gravity lines because the design capacity of the lines in the Poortjies area exceeds the number of households in the same area and adding the additional houses of the Plett Lagoon development will still not exceed the available spare capacity. That said, the engineer will have to engage with the Municipality to find out what the problem is (he is of the opinion the lines may have blockages or may have dropped in level causing pooling of sewage in the pipes that eventually spill</p>

out the manholes), but since it is a municipal function to maintain and fix such problems the engineer will have to find a way of working with the Municipality to resolve this before additional sewage can be added to the system because that is likely to exacerbate the problem further. I'm hoping to have more feedback from the engineer on this matter in due course and will be sure to share it with registered stakeholders as we progress with the process further.

Updated Response:

The Ganse Vallei Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI. According to Bitou Municipality the remaining 0.2MI is reserved for approved developments. Upgrades to the Ganse Vallei WWTW is therefore required to accommodate new developments. Due to the fact that said upgrade of the WWTW may take some months/years still (considering approvals / funding / delays etc), the proposal for this development is for the installation of an on-site package plant. Confirmation of the use of such a temporary WWTP has been obtained from Bitou Municipality on 02 July 2024 on condition that the plant will be decommissioned once Bitou Municipality finished upgrades to the Ganse Vallei WWTW and the proposed Plett Lagoon Estate can be connected to the municipal system.

The proposed development is located in the Plettenberg Bay town area which is currently supplied by Substation – 1 Ferdinand. The substation is shared with Eskom by Bitou Municipality and has an installed capacity of 20MVA with 2 x 10MVA transformers.

	<p>The Notified Maximum Demand for the substation is 15.5MVA and therefore it has sufficient capacity to accommodate the additional 800 kVA (maximum demand) of the proposed development on the Remainder of Erf 6503.</p> <p>Bitou Municipality has confirmed bulk infrastructure capacity in its network that can accommodate the proposed development of Plett Lagoon Estate on Remainder of Erf 6503</p>
<p>Is the 10,57 ha private nature reserve officially declared, protected as such and sacrosanct, or is it simply an intended phase 2 of the development?</p>	<p>As part of the current proposal and environmental application process, the eastern portion of the Remainder of Erf 6503 is proposed to remain in a natural state with the exception of existing walkways, pedestrian/cycling routes and dedicated vehicle routes for fire management and invasive alien management. These access routes will be maintained by brushcutting to a maximum width of 1.5m.</p> <p>The environmental process stipulates that the remaining natural area on the Remainder of Erf 6503 is a No-Go area to be managed as a conservation area.</p> <p>In short, there is no Phase 2 of the development proposed as part of this environmental application and no infrastructure is proposed on the remaining natural eastern portion of the property.</p> <p><u>Updated Response:</u></p> <p>Access routes will be maintained by brushcutting to a maximum width of 3m.</p>
<p>Department of Environmental Affairs and Development Planning via Email on Pre-App DBAR</p>	

COMMENTS	RESPONSE
<p>Declarations</p> <p>The Pre-App BAR does not have a signed declaration and neither has the specialists who compiled the Terrestrial Plant, Animals and Terrestrial Biodiversity Reports attached such declaration. This indicates that the applicant does not declare that the information submitted is true and correct, similarly the specialists' reports are not verified as true and correct.</p>	<p>Applicant and specialist declaration to be submitted with the Draft Basic Assessment Report.</p>
<p>Municipal Engineering Services</p> <p>The content of the Civil Engineering Services Report is acknowledged. It is however noted that the Bitou Municipality has provided you with a letter confirming the availability of engineering services; however, the Municipality has provisionally confirmed the availability of certain engineering services and requires that you develop certain infrastructure identified on the GLS Network Analysis Report, dated 27 February 2023. Please note that this Department does not support incremental decision-making, and it is vital for the competent authority to understand what the upgrade or development of infrastructure entails and if such activities require environmental authorisation. Furthermore, it is important to understand when any of the upgrades will take place. This must be clarified and if necessary, the Bitou Municipality may need to update the letter. Please refer to the points below for additional issues.</p>	<p>Bitou Municipality has confirmed bulk infrastructure capacity in its network that can accommodate the proposed development of Plett Lagoon Estate on Remainder of Erf 6503 subject to the following conditions:</p> <ul style="list-style-type: none"> • That the developer enters and sign a Service Level Agreement with Bitou Municipality. • 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 network analysis report, dated 3 October 2022. • That the developer implements and maintain a temporary wastewater treatment plant until the upgrades to the Ganzevallei WWTW has been completed. The temporary wastewater treatment plant must be approved by the relevant authorities as part of the civil engineering services for the development. A bulk connection to the Bitou sewer network must be commissioned once the Ganzevallei WWTW has been upgraded and the temporary WWTP must be decommissioned and

	<p>removed from site. All costs will be for the account of the developer.</p> <ul style="list-style-type: none"> • That the developer duly communicate point 3 above with all future owners/Homeowners Associates and or Body corporate.
<p>Potable Water</p> <p>It is noted that the bulk water system to Goose Valley, Wittedrift and Matjiesfontein reservoirs is at capacity and should be upgraded before additional developments within the reservoir supply areas can be accommodated. This upgrade would consist of an additional 160mm bulk main off the existing 160mm distribution main in the N2 road reserve which will free up an additional 860kl/day and only once this is done, will the development be accommodated in terms of water supply. It is unclear whether this upgrade will require and environmental authorisation (or other approvals) and when this upgrade is proposed as no implementation plan has been included. It is further noted that this will be done by the developer of Portion 19 and 27 of Farm 444. More information is required.</p>	<p>Extract from Civil Engineering Report compiled by Vita Consulting Engineers regarding water supply to the proposed development:</p> <p><i>“The bulk water system to the Goose Valley, Wittedrift and Matjiesfontein reservoirs is at capacity and must be upgraded according to the Bitou master plan before additional developments within the reservoir supply areas can be accommodated”.</i></p> <p><i>GLS Consulting Engineers (on behalf of the Bitou Municipality), provided the following temporary solution as part of their master planning:</i></p> <ul style="list-style-type: none"> • <i>Installation of a temporary 160Ømm bulk main off the existing 160mm distribution main in the N2 road reserve, will free up 860kl/day water supply.</i> • <i>This capacity rectification will accommodate the development demand for Farm 444/38, Farm 304/32 and Erf 6503 (this application).</i> <p>According to Vita Consulting Engineers, implementation of this temporary solution is to be undertaken by the developer of Erf Portion 19 and 27 of Farm 444 (construction on this development commenced June 2024).</p> <p>The 160mm diameter pipeline of approximately 460m in length, is to be installed as a temporary measure till the Municipality has its bulk water supply network capacity funding. It will be installed</p>

	<p>above ground, following the existing water servitude that runs from the Goose Valley Reservoir to the existing distribution main in the N2 road reserve.</p> <p>The existing servitude already contains a 200mm and 250mm diameter underground pipelines (of which one is defunct).</p> <p>The temporary pipeline is to be installed in short 2.4m sections that will be welded together on site. The implementation of the temporary solutions does not entail earthworks, or the removal of vegetation, although trimming of vegetation to clear the route is anticipated.</p>
<p>Sewer and sewage treatment</p> <p>In terms of sewerage, it is noted that there is sufficient capacity in the existing Plettenberg Bay sewer reticulation system to accommodate the proposed development. It is understood that sewage will be pumped to the Gansevallei wastewater treatment works (WWTW). The reports are unclear whether this facility indeed has adequate capacity to treat the sewage that will be generated by the proposed development. In light hereof it will be prudent that the following is confirmed:</p> <ul style="list-style-type: none"> • the total existing capacity of the wastewater treatment works (“WWTW”); • any additional expansion of the WWTW capacity already approved of by the environmental authority, but not yet effected; • unallocated sewage treatment capacity available to service both the phased and completed (total) expected sewage output load by the abovementioned applications, or sufficient approved unallocated capacity able to accommodate the abovementioned applications in future; 	<p>The Ganse Vallei Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI.</p> <p>According to Bitou Municipality the remaining 0.2MI is reserved for approved developments.</p> <p>Upgrades to the Ganse Vallei WWTW is therefore required to accommodate new developments.</p> <p>Due to the fact that said upgrade of the WWTW may take some months/years still (considering approvals / funding / delays etc), the proposal for this development is for the installation of an on-site package plant.</p> <p>Confirmation of the use of such a temporary WWTP has been obtained from Bitou Municipality on 02 July 2024 on condition that the plant will be decommissioned once Bitou Municipality finished upgrades to the Ganse Vallei WWTW and the proposed Plett Lagoon Estate can be connected to the municipal system.</p> <p>The temporary on-site package plant (fully enclosed) is proposed to be installed inside a 12m container directly adjacent</p>

to the proposed maintenance building at the entrance of the proposed development.

The temporary package plant will have a treatment capacity of 40m³ per day and will use a combination of conventional treatment (natural bacteria) and membrane technology (microfiltration) to treat the household sewage to comply with general water limits stipulated by the Department of Water Affairs.

For the duration of the package plant being in operation, all treated effluent is then to be used for irrigation within the estate. Dedicated irrigation storage tanks (4 x 10KI) forms part of the design and will be located next to the container.

The internal sewage network will consist of a 160mm diameter uPVC Class 34 gravity pipe network. The internal sewage pipes will drain towards a small underground pump station located between Erf 5 and 6 of the development, from which sewage will be pumped along the eastern boundary of the development footprint through a 75mm diameter rising main towards the temporary package plant.

Once the Municipal Ganse Vallei WWTW has been upgraded to capacity to accommodate the proposed Plett Lagoon Estate development (and the package plant decommissioned), sewage will be pumped towards the existing 160mm underground municipal bulk sewer pipe connection in the Susan Road Reserve on the southern boundary of Erf 6503. To enable this switch-over in future, this connection line to the municipal sewer system will be installed as part of the project services installation.

The internal sewage network will not encroach into the sensitive thicket in the eastern portion of Erf 6503 but is subject to a Water

	Use License (WULA) considering its proximity within the regulated area (within 500m from the on-site wetland).
<p>Stormwater management and infrastructure</p> <p>The report states that there is no formal bulk municipal stormwater infrastructure in the vicinity of the site. The high permeability of the in-situ sands ensures that all stormwater runoff permeates into the subsoil layers and a formalised bulk stormwater connection for the development is not required. Specific detail (designs) must be given for the proposed stormwater structures that will be constructed to cater for the stormwater to access the wetland area. this includes positions. Also, indicate whether these structures will extend beyond the “no-go” boundary indicated.</p> <p>The Bitou Municipality must provide written comment on the adequacy of the stormwater infrastructure design.</p>	<p>Please see extract from the Aquatic Biodiversity Impact Assessment (Confluent Environmental, 2024) below regarding stormwater management:</p> <p><i>The stormwater management plan compiled by Vita Consulting Engineers proposes SuDS-type design features for the management of stormwater which are fully supported. The report acknowledges the high erodibility of soils on the site. Being downslope of the proposed development the wetland is vulnerable to localised smothering by transported sediment from eroded slopes, and being inward draining, this material would eventually form terrestrialised islands with different vegetation, most likely being colonised by alien plant species. Avoidance of erosion is therefore the primary aim of managing stormwater on the site. The following additional mitigation measures are recommended to further reduce impacts:</i></p> <ul style="list-style-type: none"> • <i>Wherever possible driveways and parking areas must use open paver / permeable paving systems such as grass blocks or sudpave-type products. These should not be underlain with G7 due to its low permeability. This will utilise the highly permeable nature of soils at the site to reduce runoff to roads in > 1:5 year rainfall events.</i> • <i>Stormwater outlets leading towards the wetland will need to ensure water does not form concentrated flow paths downslope and is attenuated and drained on the upper slope area. Following discussions with the engineer and engineering specialist at BOCMA it was considered likely that soil permeability at the site will be sufficient to facilitate local draining to groundwater if small detention</i>

	<p><i>ponds are included at the end of outlets. This will avoid the need for constructed outlets directing stormwater into the wetland.</i></p> <ul style="list-style-type: none"> • <i>Detention ponds for stormwater management must be located on the inside of the fenced residential area so they can be monitored for erosion and maintained clear of aliens and free of litter.</i>
<p>Solid waste disposal</p> <p>It is unclear from the Bitou Municipality's letter whether there is indeed sufficient unallocated waste disposal capacity available to service both the phased and completed (total) expected solid waste output load by the proposed development, or sufficient approved unallocated capacity able to accommodate the abovementioned applications. It is understood that solid waste is not necessarily managed by the Directorate Engineering Services.</p>	<p>Bitou Municipality has confirmed that there is sufficient capacity for Waste Disposal for the proposed development on 03 June 2024.</p>
<p>Electricity transmission and demand</p> <p>It is unclear from the report and Bitou Municipality's letter whether there is sufficient unallocated electrical distribution capacity available to service the abovementioned applications, or sufficient approved unallocated electrical distribution capacity (i.e. still to be constructed) able to accommodate the abovementioned applications in future. With reference to electrical capacity, the notified demand of the municipality must be provided, and whether an increase thereof is required to service a development. If the notified demand will be exceeded, the capacity must be confirmed by ESKOM. Alternatively, it must be demonstrated how the electrical demand will be dealt with to</p>	<p>The proposed development is located in the Plettenberg Bay town area which is currently supplied by Substation – 1 Ferdinand. The substation is shared with Eskom by Bitou Municipality and has an installed capacity of 20MVA with 2 x 10MVA transformers.</p> <p>The Notified Maximum Demand for the substation is 15.5MVA and therefore it has sufficient capacity to accommodate the additional 800 kVA (maximum demand) of the proposed development on the Remainder of Erf 6503.</p> <p>A full Electrical Capacity Investigation was completed by GLS Consulting and is attached to the Draft Basic Assessment Report as Appendix G9.</p>

<p>the standard set by the Bitou Municipality. Clarity is sought on the above.</p>	
<p>No-Go Alternative</p> <p>In the report the reasons why the No-Go alternative is not preferred has been described but not what the No-Go Alternative is. Kindly complete this section. Also, note that this Department can consider and authorise any alternative presented.</p>	<p>The No-Go alternative (status quo) with no development of a lifestyle resort. Under this alternative, the current land use would continue within the primary rights of agriculture.</p>
<p>Aquatic Impact Assessment.</p> <p>It is note in this report that a mitigation is to cease the mowing of the wetland on the northern extent of the wetland and to maintain a pathway for access to the estuary and a strip large enough for a single vehicle along the boundary. This requirement for a strip for a vehicle has not been justified. Also, it would seem prudent to rehabilitate this section of the wetland. It is suggested that a rehabilitation plan be developed for this purpose.</p> <p>The delineated wetland area extends to the neighbouring property (Erf 6504) and it must be noted that development is proposed on this property. It is suggested that the landowner be requested to comment on this as it may have bearing on his proposal to develop on his land.</p>	<p>The strip will provide temporary access for vehicles to collect alien vegetation biomass as well as for Fire Management during such an event. The strip will also act as a fire break between the Remainder of Erf 6503 and the property to the north (Keurbooms Caravan Park).</p> <p>This strip is not to be used for vehicle access by the residents of the proposed Plett Lagoon Estate for recreational purposes except in the case of disabled persons to obtain access to the estuary.</p> <p>The northern portion of the wetland habitat that was historically subject to mowing, is passively rehabilitating without the need of human interference. It would be sufficient to cease mowing in an attempt to support passive rehabilitation.</p> <p>The neighbouring landowner of Erf 6504 is included in the stakeholder register and is also part of the development team for the proposed Plett Lagoon Estate.</p>
<p>Terrestrial Animal Species Assessment.</p> <p>It is noted that the potential impacts on animal species by having pedestrian and cycling routes through the wetland area has not been appropriately assessed. This is important to assess since</p>	<p>The pedestrian routes are existing routes that will be maintained by brushcutting and be used for vehicle access for alien vegetation management as well as fire management.</p>

<p>the specialist has indicated that numerous Species of Conservation Concern (SCCs) are likely to occur in the area. this is especially important to note what the impact of constant human disturbance would be on the animals in their habitat once the area is open for walkways and cycling routes. Furthermore, it is written that the Goukamma Dune thicket area and wetland area must declared a No-Go area, yet pedestrian and cycling access should be allowed.</p>	<p>Access control from the Remainder of Erf 6503 will only reduce the amount of human disturbance on the existing pedestrian routes. It is evident that the routes are too short and pose unnecessary disturbance by allowing cycling access and the proposal for cycle routes have therefore been removed.</p>
<p>Terrestrial Plant Species Assessment.</p> <p>It has not been noted that the specialist has considered that the section of the wetland that has been continuously mowed, be restored / rehabilitated. This appears to be a flaw in this assessment.</p>	<p>The northern portion of the wetland habitat that was historically subject to mowing, is passively rehabilitating without the need of human interference. It would be sufficient to cease mowing in an attempt to support passive rehabilitation.</p>
<p>Open Space Trail Map.</p> <p>As mentioned above, the provision for pedestrian access in the wetland as well as cycle routes does not make sense considering the high sensitivity as indicated by the Aquatic Specialist and botanist. Also, the length of the cycle routes are short which adds to the need thereof being questioned. It is suggested that this need be re-evaluated.</p>	<p>Access control from the Remainder of Erf 6503 will only reduce the amount of human disturbance on the existing pedestrian routes. It is evident that the routes are too short and pose unnecessary disturbance by allowing cycling access and the proposal for cycle routes have therefore been removed.</p>
<p>General</p> <p>Kindly refrain from summarising comments in the comments and responses report. It has been found that not all comments are addressed when this occurs.</p>	<p>All comments received will be portrayed <i>Verbatim</i> in the comments and responses report.</p>
<p>Breede-Olifants Management Catchment Agency (BOCMA) via Email on Pre-App DBAR</p>	

COMMENTS	RESPONSE
<p>We confirm that the proposed development triggered the requirements for a water use authorization in terms of sections 21 (c) & (i) of the National Water Act, 1998 (Act 36 of 1998) (NWA). An application for the water use authorization as required in terms of section 22 of NWA was lodged and its processing is underway. The water uses applied for are therefore required to not commence prior issuance of the authorization.</p>	<p>Noted. An application for the water use authorisation is being facilitated by Confluent Environmental.</p>
Western Cape Department of Agriculture via Email on Pre-App DBAR	
COMMENTS	RESPONSE
<p>From an agricultural perspective, the Western Cape department of Agriculture has no objection to the development of the Plett Lagoon Estate.</p>	<p>Noted.</p>
Western Cape Government Department of Infrastructure via Email on Pre-App DBAR	
COMMENTS	RESPONSE
<p>This Branch is not affected by this proposed development.</p>	<p>Noted.</p>