

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><u>Updated Response:</u></p> <p>Following input received from Bitou Municipality Land Use and Environmental Management as well as the Department of Environmental Affairs and Development Planning, the preferred proposed zoning for the open space area located on the eastern portion of the Remainder of Erf 6503 is Open Space Zone IV.</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><u>Updated Response:</u></p> <p>This Basic Assessment application process is inclusive of detailed biophysical specialist studies that have informed the preferred site development plan and considers the impact of (a) vegetation removal, as well as (b) construction related activities</p>

	<p>i.e. earthworks. It is therefore assumed that Bitou Municipality will be in a position to issue an OSCA Exemption for this development.</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 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>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>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</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>

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.

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.

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.

Updated Response:

Erf 449 is owned by Garden Route District Municipality. In response to the Draft Basic Assessment Report, the Department of Environmental Affairs: Sub-directorate Coastal Management stated the following: *The applicant must also be reminded that the erection of any protection measures against erosion or accretion is prohibited in terms of Section 15 of the NEM: ICMA, which states: (1) No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or such other coastal public property, or of land adjacent to coastal public property, unless the erosion is caused by an intentional act or omission of that organ of state or other person; (2) No person may construct, maintain or extend any structure, or take*

	<p><i>measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided for in this Act, the NEMA or nay other specific environmental management Act. As such, any measures against the processes of erosion or accretion may only occur within the boundaries of the subject property (RE/6503).</i></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 / subdivide the portion of land below the HWM which effectively become property of the State.</p> <p>The development of all the proposed dwellings, maintenance building, admin building and parking garages are purposefully limited to the existing, disturbed secondary grassland area. By clearly following the impact hierarchy approach in this design, this layout avoids the sensitive estuarine area containing wetland and natural, intact thicket vegetation, thus creating a sizeable coastal buffer along the Keurbooms Estuary that will act to conserve a large habitat intact.</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><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>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> <p><u>Updated Response:</u></p> <p>Following discussions with the Traffic Engineer and Bitou Municipality on 22 October 2024, it was noted that additional</p>

	<p>vehicular traffic at the Beacon Way – School road intersection is not supported and that is rather suggested that a link between the Poortjies residential area and the School / Beacon Way be provided by the way of a non-motorized traffic link.</p> <p>The preferred alternative will allow for a pedestrian walkway (open during daylight hours) located between the existing boundary wall of the Checkers Centrum and the perimeter of the proposed development. This existing access route is currently being utilised by pedestrians to gain access to and from the Poortjies residential neighbourhood / Beacon Way / Plettenberg Bay Primary School (Figure 9 in the Final Basic Assessment Report). It is the intention of the proposed development to continue to allow pedestrian access at this point (crossing the Remainder of Erf 6503 property boundaries) and therefore not fragment foot traffic between the Poortjies residential neighbourhood and Beacon Way/Plettenberg Bay Primary School.</p>
Chris Mulder via Email on Pre-App DBAR	
COMMENTS	RESPONSE
<p>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.</p>	<p>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</p>

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 in the Poortjies residential neighbourhood 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 is working 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 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).

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 preferred alternative will allow for a pedestrian walkway (open during daylight hours) located between the existing boundary wall of the Checkers Centrum and the perimeter of the proposed development. This existing access route is currently being utilised by pedestrians to gain access to and from the Poortjies residential neighbourhood / Beacon Way / Plettenberg Bay Primary School (Figure 9 in the Final Basic Assessment Report). It is the intention of the proposed development to continue to allow pedestrian access at this point (crossing the Remainder of Erf 6503 property boundaries) and therefore not fragment foot traffic between the Poortjies residential neighbourhood and Beacon Way/Plettenberg Bay Primary School.

Based on further discussions held with Bitou Municipality, it is suggested that **a traffic signal** at this intersection be considered as an alternative. The provision of traffic signals **would not require additional road widening at the intersection**, and would have **a lesser impact on the existing operations** of the Checkers Centrum / Filling Station delivery vehicles at/through the intersection. Traffic signals at this intersection can be expected to result in acceptable services levels along all approaches to the intersection. As a result of the available intersection spacing along Beacon Way, the said analyses were done taking into consideration the proximity of the surrounding

	intersections in the vicinity (i.e. Market Square-signalised intersection and N2-Beacon Way roundabout).
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 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</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 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</p>

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 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.

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 preferred alternative will allow for a pedestrian walkway (open during daylight hours) located between the existing boundary wall of the Checkers Centrum and the perimeter of the proposed development. This existing access route is currently being utilised by pedestrians to gain access to and from the Poortjies residential neighbourhood / Beacon Way / Plettenberg Bay Primary School (Figure 9 in the Final Basic Assessment Report). It is the intention of the proposed development to continue to allow pedestrian access at this point (crossing the Remainder of Erf 6503 property boundaries) and therefore not fragment foot traffic between the Poortjies residential neighbourhood and Beacon Way/Plettenberg Bay Primary School.

Based on further discussions held with Bitou Municipality, it is suggested that **a traffic signal** at this intersection be considered as an alternative. The provision of traffic signals **would not require additional road widening at the intersection**, and would have **a lesser impact on the existing operations** of the Checkers Centrum / Filling Station delivery vehicles at/through the intersection. Traffic signals at this intersection can be

	expected to result in acceptable services levels along all approaches to the intersection. As a result of the available intersection spacing along Beacon Way, the said analyses were done taking into consideration the proximity of the surrounding intersections in the vicinity (i.e. Market Square-signalised intersection and N2-Beacon Way roundabout).
<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</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</p>

infrastructure. If the latter is the case then there is every reason to believe that the additional load on the Susan Street line, which itself runs on an almost horizontal course for most of the distance from the proposed connection point, will also fail.

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.

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.

<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 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>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 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</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 accomm • Renewable energ • Rooftop base • telecommunicati
<p>"group/town housing"</p> <p>Land use description: "group/town housing" and "group/town housing scheme" mea 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 an 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 anv 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 nesr future!

infrastructure capacity' when the initial development considered, and then once the development is approved – anything goes.

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>

- 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.

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?

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.

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.

Updated Response:

The Southern Cape Fire Protection Agency confirmed the following specifications for Fire Breaks:

- 10m Fire Break must be maintained along the Northern boundary due to the proximity of existing development at Keurbooms Lagoon Caravan Park;
- 6m Fire Break must be maintained along the Southern boundary at lowest vegetation level without soil disturbance (exception is the wetland area where vegetation can be maintained at 1m height and **no vehicle access**);

	<ul style="list-style-type: none"> • Existing vehicle access tracks must be maintained minimum 3 metres to allow vehicle access for fire fighting vehicle in the event of a fire; <p>The recommendations made by the Southern Cape Fire Protection Agency is in line with the recommendations made by the Aquatic Specialist who also stated that it would be preferable to maintain narrower paths at a width of 3m to allow sufficient maintenance of alien vegetation and access for fire management in emergency situations. It is also stipulated that existing pathways may not be enlarged and no new pathways may be created.</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 measures will be put in place to stabilise the eroding embankment, or has it been deemed not necessary?</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 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><u>Updated Response:</u></p>

	<p>Erf 449 is owned by Garden Route District Municipality. In response to the Draft Basic Assessment Report, the Department of Environmental Affairs: Sub-directorate Coastal Management stated the following: The applicant must also be reminded that the erection of any protection measures against erosion or accretion is prohibited in terms of Section 15 of the NEM: ICMA, which states: (1) No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or such other coastal public property, or of land adjacent to coastal public property, unless the erosion is caused by an intentional act or omission of that organ of state or other person; (2) No person may construct, maintain or extent any structure, or take measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided for in this Act, the NEMA or nay other specific environmental management Act. As such, any measures against the processes of erosion or accretion may only occur within the boundaries of the subject property (RE/6503).</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</p> <p>The development of all the proposed dwellings, maintenance building, admin building and parking garages are purposefully limited to the existing, disturbed secondary grassland area. By clearly following the impact hierarchy approach in this design, this layout avoids the sensitive estuarine area containing wetland and natural, intact thicket vegetation, thus creating a</p>
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	sizeable coastal buffer along the Keurbooms Estuary that will act to conserve a large habitat intact.
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.	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).
Jannie Vermeulen on behalf of Dreyer Trust via Email on Pre-App DBAR	
COMMENTS	RESPONSE
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.	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 1100m ² in size each.
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	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,

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).

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.

Based on further discussions held with Bitou Municipality, it is suggested that **a traffic signal** at this intersection be considered as an alternative. The provision of traffic signals **would not require additional road widening at the intersection**, and would have **a lesser impact on the existing operations** of the Checkers Centrum / Filling Station delivery vehicles at/through the intersection. Traffic signals at this intersection can be expected to result in acceptable services levels along all approaches to the intersection. As a result of the available

	<p>intersection spacing along Beacon Way, the said analyses were done taking into consideration the proximity of the surrounding intersections in the vicinity (i.e. Market Square-signalised intersection and N2-Beacon Way roundabout).</p>
<p>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). 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>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> <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</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</p>

<p>existing infrastructure. We are concerned that this will overload the existing infrastructure.</p>	<p>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>
<p>Garden Route District Municipality Department of Health via Email on Pre-App DBAR</p>	
<p>COMMENTS</p>	<p>RESPONSE</p>
<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

	<p>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.</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>All upgrading to the bulk water supply lines must be completed before commencement of the development.</p>	<p>Construction programmes and schedules are complex and it is a recommendation of this BAR that the restrictive condition be for associated link infrastructure to be completed prior to occupation of any units because that is when such services must be readily available. To place the restriction on total development/commencement will result in an unreasonable time lapse without achieving a reasonable outcome (which is to prevent utilization of services prior to it being implemented).</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>

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.

The Bitou Municipal Waste Water Treatment Plant must have the capacity to handle the additional load without any negative effect.

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.

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	<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>All necessary upgrades to the bulk sewer lines must be completed before commencement of the development.</p>	<p>No upgrades to bulk sewer lines are proposed as part of the development on Erf 6503. Bitou Municipality has confirmed bulk infrastructure capacity.</p>
<p>Installed sewer pump station must have standby non electrical pumps available in case of power outages, failures or mechanical malfunction of the existing pump.</p>	<p>The sewer pumpstation will be equipped with duty- and standby pumpsets.</p>
<p>Sewer pumpstation must have an emergency-overflow storage sump (8hours).</p>	<p>The sewer pumpstation will be designed to provide eight (8) hours of emergency-overflow storage.</p>
<p>Solid waste stored on – site in a designated area approved by Bitou Municipality.</p>	<p>Refuse collection area is proposed at the entrance of the development.</p>
<p>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.</p>	<p>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</p>

	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.
Stormwater exit points must include a best management practical approach to trap pollutants and minimise impacts on nearby lagoon/ river system(no wash away).	The following erosion preventative measures will be incorporated in the detail stormwater design: <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.
All service agreements between developer and Bitou Municipality must be in place.	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.

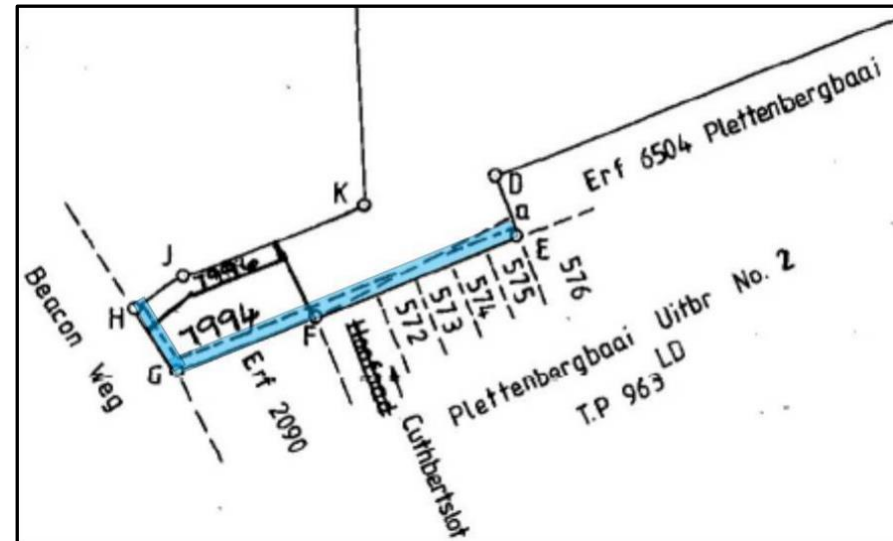
Geannine Steyn via Email on Pre-App DBAR

COMMENTS

At the back of my house erf 574 is a servidude and the servidude 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 servidude canceled. But how can they cancel a servidude if there is one. Servidude goes through my land it Burts 3 times that the municipality came and fixed it. And we can put the water off for campsite.

RESPONSE

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.



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,

	<p>this is only a conceptual plan and detailed building design has not commenced yet.</p>
<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 wound 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 wound have a problem with clubhouse taking</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>our parking plus our view of the lagoon . And then smell of the rubbish department.</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 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>
<p>Libby Gledhill via Email on Pre-App DBAR</p>	
<p>COMMENTS</p>	<p>RESPONSE</p>

With regards the above development, I have serious concerns with respect to possible sewerage issues that may arise from the development.

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.

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.

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

	<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>Susan Donald via Email on Pre-App DBAR</p>	
<p>COMMENTS</p>	<p>RESPONSE</p>
<p>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.</p> <p>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.</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 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</p>

	<p>(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.</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>Based on further discussions held with Bitou Municipality, it is suggested that a traffic signal at this intersection be considered as an alternative. The provision of traffic signals would not require additional road widening at the intersection, and would have a lesser impact on the existing operations of the Checkers Centrum / Filling Station delivery vehicles at/through the intersection. Traffic signals at this intersection can be expected to result in acceptable services levels along all approaches to the intersection. As a result of the available intersection spacing along Beacon Way, the said analyses were done taking into consideration the proximity of the surrounding intersections in the vicinity (i.e. Market Square-signalised intersection and N2-Beacon Way roundabout).</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>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>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 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 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.</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 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</p>

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 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.

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 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</p>

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.

Based on further discussions held with Bitou Municipality, it is suggested that **a traffic signal** at this intersection be considered as an alternative. The provision of traffic signals **would not require additional road widening at the intersection**, and would have **a lesser impact on the existing operations** of the Checkers Centrum / Filling Station delivery vehicles at/through the intersection. Traffic signals at this intersection can be expected to result in acceptable services levels along all approaches to the intersection. As a result of the available intersection spacing along Beacon Way, the said analyses were done taking into consideration the proximity of the surrounding intersections in the vicinity (i.e. Market Square-signalised intersection and N2-Beacon Way roundabout).

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>Based on further discussions held with Bitou Municipality, it is suggested that a traffic signal at this intersection be considered as an alternative. The provision of traffic signals would not require additional road widening at the intersection, and would have a lesser impact on the existing operations of the Checkers Centrum / Filling Station delivery vehicles at/through the intersection. Traffic signals at this intersection can be expected to result in acceptable services levels along all approaches to the intersection. As a result of the available intersection spacing along Beacon Way, the said analyses were done taking into consideration the proximity of the surrounding intersections in the vicinity (i.e. Market Square-signalised intersection and N2-Beacon Way roundabout).</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</p>

	<p>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 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>

	The total number of residential possibilities have been reduced from 75 to 50.
<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 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.</p> <p><u>Updated Response:</u></p>

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.

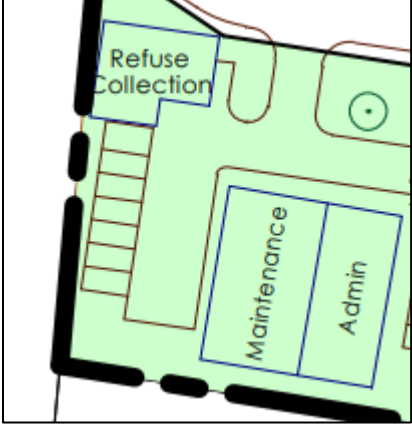
The Ganse Vallei Wastewater Treatment Works (WWTW) has an effluent discharge capacity of 6MI per day and is currently at an average daily discharge volume of 5.8MI. According to Bitou Municipality the remaining 0.2MI is reserved for approved developments. Upgrades to the Ganse Vallei WWTW is therefore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

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>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 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>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 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</p>

	<p>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 followed-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>
<p>Shoprite Checkers via Email on Pre-App DBAR</p>	
<p>COMMENTS</p>	<p>RESPONSE</p>
<p>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.</p>	<p>Following input from authorities and the public during the public participation process, the site development plan has been amended.</p> <p>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.</p> <p>The site is to be fenced and a small parking area is proposed abutting the Checkers boundary wall.</p>

	 A site plan diagram of a building layout. The plan is shaded in light green. At the top left, there is a blue-outlined rectangular area labeled 'Refuse Collection'. Below it is a staircase. To the right of the staircase are two adjacent rectangular areas labeled 'Maintenance' and 'Admin'. A circular feature with a central dot is located in the upper right corner. The building is bounded by a thick black line representing a wall or boundary.
<p>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.</p>	<p>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 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>Based on further discussions held with Bitou Municipality, it is suggested that a traffic signal at this intersection be considered as an alternative. The provision of traffic signals would not require additional road widening at the intersection, and would have a lesser impact on the existing operations of the Checkers Centrum / Filling Station delivery vehicles at/through the intersection. Traffic signals at this intersection can be expected to result in acceptable services levels along all approaches to the intersection. As a result of the available intersection spacing along Beacon Way, the said analyses were done taking into consideration the proximity of the surrounding intersections in the vicinity (i.e. Market Square-signalised intersection and N2-Beacon Way roundabout).</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.
We note that no application for a borehole / underground water extraction forms part of the WULA and thus assume that all the 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.	That is correct. The proposed development does not make use of boreholes to obtain potable water.
Alison Myburg via Telephone on Pre-App DBAR	
COMMENTS	RESPONSE
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>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</p>

	<p>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 be 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>Based on further discussions held with Bitou Municipality, it is suggested that a traffic signal at this intersection be considered as an alternative. The provision of traffic signals would not require additional road widening at the intersection, and would have a lesser impact on the existing operations of the Checkers Centrum / Filling Station delivery vehicles at/through the intersection. Traffic signals at this intersection can be expected to result in acceptable services levels along all approaches to the intersection. As a result of the available intersection spacing along Beacon Way, the said analyses were done taking into consideration the proximity of the surrounding intersections in the vicinity (i.e. Market Square-signalised intersection and N2-Beacon Way roundabout).</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</p>

catchment area is pumped to the Ganse Valley Waste Water Treatment Works.

According to the engineering report, this section of the municipal sewage reticulation network has sufficient capacity to accommodate the additional sewage flow.

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.

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.

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.

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 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.

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

	<p>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>Johan Loots via Email on Pre-App DBAR</p>	
<p>COMMENTS</p>	<p>RESPONSE</p>
<p>Urban Sprawl in respect of current legislation.</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>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</p>

	<p>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 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</p>

	<p>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 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-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</p>

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.

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.

Based on further discussions held with Bitou Municipality, it is suggested that **a traffic signal** at this intersection be considered as an alternative. The provision of traffic signals **would not require additional road widening at the intersection**, and would have **a lesser impact on the existing operations** of the Checkers Centrum / Filling Station delivery vehicles at/through the intersection. Traffic signals at this intersection can be expected to result in acceptable services levels along all approaches to the intersection. As a result of the available intersection spacing along Beacon Way, the said analyses were done taking into consideration the proximity of the surrounding

	intersections in the vicinity (i.e. Market Square-signalised intersection and N2-Beacon Way roundabout).
Access to the lagoonside by the public.	<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>
A holistic perspective and special character of lagoon iro Plettenberg Bay.	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.
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.	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>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 an 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 Final 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>

Bitou Municipality Land Use and Environmental Management via Email on DBAR

COMMENTS	RESPONSE
<p>The proposed Nature Conservation Areas should be formally declared as Protected Environment in terms Section 28 of the National Environmental Management: Protected Areas Act (NEM:PAA, Act 57 of 2003) to be able to give legal recognition of the sensitivity of the site.</p>	<p>Following input received from Bitou Municipality Land Use and Environmental Management as well as the Department of Environmental Affairs and Development Planning, the preferred proposed zoning for the open space area located on the eastern portion of the Remainder of Erf 6503 is Open Space Zone IV.</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. It is noted that Farm 449 stretches along the estuary edge. This property belongs to Garden Route District Municipality. However, the High Water Mark (HWM) which has shifted since the determination of the boundaries will have resulted in redetermination of the boundaries of Farm 449 and will most likely be deemed Coastal Public Property. As such the position of the HWM may be along the certain sections of the eastern boundary of Erf 6503 and erosion mitigation and maintenance management would be applicable. As such, it is suggested to include such soft management measures including active rehabilitation or the use of mulch bags or the like in the Environmental Management Programme as part of the Open Space management.</p>	<p>Erf 449 is owned by Garden Route District Municipality. In response to the Draft Basic Assessment Report, the Department of Environmental Affairs: Sub-directorate Coastal Management stated the following: The applicant must also be reminded that the erection of any protection measures against erosion or accretion is prohibited in terms of Section 15 of the NEM: ICMA, which states:</p> <p>(1) No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or such other coastal public property, or of land adjacent to coastal public property, unless the erosion is caused by an intentional act or omission of that organ of state or other person;</p> <p>(2) No person may construct, maintain or extent any structure, or take measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided for in this Act, the NEMA or nay other specific environmental management Act. As such, any measures against the processes</p>

	<p>of erosion or accretion may only occur within the boundaries of the subject property (RE/6503).</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</p> <p>The development of all the proposed dwellings, maintenance building, admin building and parking garages are purposefully limited to the existing, disturbed secondary grassland area. By clearly following the impact hierarchy approach in this design, this layout avoids the sensitive estuarine area containing wetland and natural, intact thicket vegetation, thus creating a sizeable coastal buffer along the Keurbooms Estuary that will act to conserve a large habitat intact.</p>
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It is noted from the report that a single access was originally proposed from Susan Drive/ Cuthbert Close, via the Poortjies residential neighbourhood. This would mean that all traffic to the development would have to travel through the Poortjies residential neighbourhood. The development should gain access both directly off Beacon Way via the access road leading between the Plett Primary School and Checkers, as well as through Poortjies. Basically, it is critically important that a public through-road be established that links up Susan Street/ Cuthbert Close with the road past Plett Primary to Beacon Way (see yellow arrow in the adjacent diagram). The new development can then take access off such a through-road. This will lead to the more efficient functioning of the greater area from a movement perspective, and will better integrate the proposed development with the Poortjies residential area. The layout should be suitably amended to make provision for such a road.

The possibility of a through road leading from Beacon Way to Cuthbert Close/Susan Street was discussed with Bitou Municipality on 22 October 2024 which concluded:

- The Beacon Way/Plett Primary School intersection will not be sufficient to support additional traffic generated by the Plett Primary School, the proposed Plett Lagoon Estate and the Poortjies residential neighbourhood. This intersection is already experiencing traffic congestion. This was also the case during the inception stage of the project which led to the Bitou Municipality preferring access from the Poortjies residential neighbourhood.
- During the first round of public participation, the residents from Poortjies residential neighbourhood raised their concerns and objections regarding additional traffic in the neighbourhood as a result of the new proposed development on Remainder of Erf 6503 and requested that the entrance to the proposed development should be from Beacon Way. Direct access from the Poortjies residential neighbourhood to Beacon Way will contribute to additional through traffic in the residential neighbourhood.
- The concern about traffic in the Poortjies residential neighbourhood was noted and the Developer again approached the Bitou Municipality to discuss their preferred access. The project engineer subsequently engaged with the SANRAL Roads Authority who is working on the large traffic roundabout on the N2/Beacon



It is noted that several inhabitants of Poortjies have objected against the (sole) access from Susan Street/ Poortjies. This is understandable, as the original proposal would have resulted in a noteworthy increase in traffic through the Poortjies area. However, they were not provided with a through-road/ combined access proposal as proposed above. To address the public concerns, the applicant has taken the “easy” option by “turning its back” on Poortjies/ Susan Street, and instead proposing the sole access off Beacon Way, past Plett Primary. However, this is not the only viable alternative, as explained above.

It cannot be stressed enough how important establishing said road linkage between past Plett Primary/ Checkers through to

Drive intersection 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. Bitou Municipality approved the proposed traffic roundabout in this position on 14 February 2024.

- Based on further discussions held with Bitou Municipality on 22 October 2024, it is suggested that **a traffic signal** at this intersection be considered as an alternative. The provision of traffic signals **would not require additional road widening at the intersection**, and would have a **lesser impact on the existing operations** of the Checkers Centrum / Filling Station delivery vehicles at/through the intersection. Traffic signals at this intersection can be expected to result in acceptable services levels along all approaches to the intersection. As a result of the available intersection spacing along Beacon Way, the said analyses were done taking into consideration the proximity of the surrounding intersections in the vicinity (i.e. Market Square-signalised intersection and N2-Beacon Way roundabout).
- Additional traffic from the Poortjies residential neighbourhood will also contribute to traffic congestion at the Plett Primary School entrance which is considered a safety concern for pedestrians.

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

It simply does not make sense for a person staying in Susan Street, for instance, to have to drive back to Zenon Street (creating unnecessary traffic through the residential area) in order to join Beacon Way on their way to the N2, for instance. Providing such a through-road would provide residents with an alternative to access the N2, as well as coming back from the N2. Residents that stay in the southern side of Poortjies would still make use of the existing Zenon Street linkage to Beacon Way.

- A through road linking Susan and School street will only place further load on the Beacon Way/School intersection and is therefore not desirable.

Following discussions with the Traffic Engineer and Bitou Municipality on 22 October 2024, it was noted that additional vehicular traffic at the Beacon Way – School road intersection is not supported and that is rather suggested that a link between the Poortjies residential area and the School / Beacon Way be provided by the way of a non-motorized traffic link.

The preferred access alternative from Beacon Way will allow for a pedestrian walkway (open during daylight hours) located between the existing boundary wall of the Checkers Centrum and the perimeter of the proposed development. This existing access route is currently being utilised by pedestrians to gain access to and from the Poortjies residential neighbourhood / Beacon Way / Plettenberg Bay Primary School (Figure 9 in the Final Basic Assessment Report). It is the intention of the proposed development to continue to allow pedestrian access at this point (crossing the Remainder of Erf 6503 property boundaries) and therefore not fragment foot traffic between the Poortjies residential neighbourhood and Beacon Way/Plettenberg Bay Primary School.

The Traffic Impact Statement was conducted based on a sole access via Cuthbert Close/ Poortjies, which would link up to the existing traffic circle in Beacon Way via the Poortjies residential area/ Zenon Street. Thus, even if all traffic is directed through Poortjies, the TIS found the impact to be acceptable from a traffic impact perspective. The option to access directly from Beacon Way (past Plett Primary) as well as via Susan Street could surely only result in benefits. Any argument that enabling such a “secondary” access through Poortjies would be unacceptable from a traffic perspective, especially given that the main access would be directly off Beacon Way past Plett Primary, would thus not be valid.

If the applicant/ developer is not in agreement with my proposal, the correct response would be to amend the TIS to assess the options of allowing through-traffic as per my proposal above, vs a single access road past Plett Primary, as is currently proposed by the applicant. Even if such a study would find the single access more acceptable from a traffic perspective (which I highly doubt it would), one also needs to weigh up the practicality, social and accessibility benefits that the through-road option poses.

Department of Environmental Affairs and Development Planning via Email on DBAR

COMMENTS

RESPONSE

This Directorate takes note of the EAP's opinion that the subject property is separated from the Keurbooms River Estuary by private property (Erf 449 - not owned by the applicant). However, a review of the relevant aerial imagery suggests that the coastal waters¹ has moved landward over time and has almost completely submerged the private property bordering the Remainder of Erf 6503. Furthermore, the aerial imagery suggests that a portion of Erf 449 may also be below the High-Water Mark² ("HWM") of the estuary.

In light of the above, it is strongly advised that the HWM be surveyed, in consultation with the relevant Surveyor-General, to determine the current position of the HWM.

NOTE: Your attention is drawn to Section 7 of the National Environmental Management: Integrated Coastal Management Act, Act 24 of 2008, as amended ("NEM:ICMA") which defines the composition of coastal public property as inter alia—

- (a) coastal waters;
- (b) land submerged by coastal waters, including—
 - (i) land flooded by coastal waters which subsequently becomes part of the bed of coastal waters; and

Erf 449 is owned by Garden Route District Municipality. In response to the Draft Basic Assessment Report, the Department of Environmental Affairs: Sub-directorate Coastal Management stated the following: *The applicant must also be reminded that the erection of any protection measures against erosion or accretion is prohibited in terms of Section 15 of the NEM: ICMA, which states:*

(1) No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or such other coastal public property, or of land adjacent to coastal public property, unless the erosion is caused by an intentional act or omission of that organ of state or other person;

*(2) No person may construct, maintain or extent any structure, or take measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided for in this Act, the NEMA or nay other specific environmental management Act. **As such, any measures against the***

<p>(ii) the substrata beneath such land;</p> <p>(d) the seashore, including—</p> <p>(i) land flooded by coastal waters which subsequently becomes part of the bed of coastal waters; and</p> <p>(ii) the substrata beneath such land;</p> <p>Furthermore, in accordance with Section 11 of the NEM:ICMA ownership of coastal public property vests in the citizens of the Republic and must be held in trust by the State on behalf of the citizens of the Republic; and coastal public property is inalienable and cannot be sold, attached or acquired by prescription and rights over it cannot be acquired by prescription.</p>	<p><i>processes of erosion or accretion may only occur within the boundaries of the subject property (RE/6503).</i></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 / subdivide the portion of land below the HWM which effectively becomes coastal public property.</p> <p>The development of all the proposed dwellings, maintenance building, admin building and parking garages are purposefully limited to the existing, disturbed secondary grassland area. By clearly following the impact hierarchy approach in this design, this layout avoids the sensitive estuarine area containing wetland and natural, intact thicket vegetation, thus creating a sizeable coastal buffer along the Keurbooms Estuary that will act to conserve a large habitat intact.</p>
<p>Conservation of the natural wetland</p> <p>This Directorate understands that the natural wetland between the proposed development and the Keurbooms River estuary will be conserved and will act as a buffer between the development and the estuary. It is proposed that the wetland will be used as a functional open space with pedestrian and cycling access. This Directorate also understands that clarification be obtained from the Southern Cape Fire Protection Association regarding to provision of paths up to 3m wide in order for small vehicle access (e.g. kabota) which may be used for maintenance, including alien clearing. However, this Directorate does not support</p>	<p>The Southern Cape Fire Protection Agency confirmed the following specifications for Fire Breaks:</p> <ul style="list-style-type: none"> • 10m Fire Break must be maintained along the Northern boundary due to the proximity of existing development at Keurbooms Lagoon Caravan Park; • 6m Fire Break must be maintained along the Southern boundary at lowest vegetation level without soil disturbance (exception is the wetland area where vegetation can be maintained at 1m height and no vehicle access);

vehicular access to this proposed open space or the establishment of 3m-wide paths within the natural wetland area. It is strongly advised that footprint be a maximum width of 1.2m which is considered adequate for two pedestrian traffic as well as wheelchairs.

Furthermore, it is understood that the natural wetland area will be rezoned to Open Space Zone III and will be managed for a conservation use as a private nature reserve. However, a review of the data on the National Department of Forestry, Fisheries and the Environment's Protected Areas Register ("PAR") indicates that the natural wetland area is mapped as part as a Priority Focus Area in terms of the National Protected Areas Expansion Strategy ("NPAES"). The wetland is therefore considered of high importance for land-based protected area expansion.

In light of the above, you are required to obtain comment from the South African National Parks ("SANParks") in respect of the proposed development and whether the proposed zoning is considered appropriate for the long-term management of the site. You are advised to also obtain comment from SANParks in respect of the Conservation Management Plan (Section 10 of the Environmental Management Programme).

- Existing vehicle access tracks must be maintained **minimum 3 metres** to allow vehicle access for fire fighting vehicle in the event of a fire;

The recommendations made by the Southern Cape Fire Protection Agency is in line with the recommendations made by the Aquatic Specialist who also stated that it would be preferable to maintain narrower paths at a width of 3m to allow sufficient maintenance of alien vegetation and access for fire management in emergency situations. It is also stipulated that existing pathways may not be enlarged and no new pathways may be created.

Following input received from Bitou Municipality Land Use and Environmental Management as well as the Department of Environmental Affairs and Development Planning, the preferred proposed zoning for the open space area located on the eastern portion of the Remainder of Erf 6503 is Open Space Zone IV. A private nature reserve comes with some administration at the outset (there is a registration process and once proclaimed, it must be added to the official Protected Area Register and formally Gazetted). A local managing authority (typically CapeNature) will be involved from an overall management perspective to monitor compliance. A standalone reserve management plan is typically drafted (prior to occupation) and kept on file at CapeNature who will do audits on a rotational basis (typically a five year cycle) to see where they can assist and to ensure compliance with the management plan.

SANParks have been approached for comment on several occasions to obtain input regarding the appropriate zoning of the open space area as well as comment on the Conservation Management Plan, however no feedback has been received.

Fencing along the eastern boundary of the natural wetland

The alternatives in respect of the fencing of the proposed development are noted. This Directorate understands that two additional alternatives (fence route alignment) are being considered to reduce security risks and fire risk management. According to the information in the DBAR as well as the information in the Aquatic Biodiversity Impact Assessment, it is proposed to develop a security fence along the eastern edge of the natural wetland. In this regard two alternatives have been identified, as depicted in Figure 22 (pg. 30) of the Aquatic Biodiversity Impact Assessment.

According to the information and the respective biodiversity related specialist reports, the natural wetland area has a “High” site ecological importance (“SEI”) and the Present Ecological State (“PES”) has been determined to be a Category A: Natural. Furthermore, the area is considered as an important refuge and corridor for faunal species. Notwithstanding the mitigation measures proposed in the respective reports, inter alia, the provision of adequate space between vertical struts of the security fence, this Directorate is of the considered opinion that a proposed fence along the eastern edge of the natural wetland will result in fragmentation of the faunal habitat as well as impact on faunal movement.

With due consideration of the above as well as the fact that the natural wetland has been identified as a Priority Focus Area in terms of the NPAES, this Directorate does not support the

A third fence line alternative where the fencing will be developed directly against the proposed development erven is considered. This alternative is **not preferable** as it will result in the entire Open Space area in the eastern portion of Remainder of Erf 6503 to remain open to the public which raises the concern potentially linked to the threat of land invasion of vacant portions of land within urban areas / poaching and wild fires.

The digging of camera-mounted pole holes and the trenching for cabling for a closed-circuit television monitoring system (as an additional security measure) would be a similar disturbance to that of the installation of fencing. The preferred fence line alternative follows existing jeep tracks and would therefore require minimal vegetation disturbance during installation.

Following input received from Bitou Municipality Land Use and Environmental Management as well as the Department of Environmental Affairs and Development Planning, the preferred proposed zoning for the open space area located on the eastern portion of the Remainder of Erf 6503 is **Open Space Zone IV**. A

Fenceline Specifications:

The proposed fence must be designed and constructed in line with the Policy on Fencing and Enclosure of Game, Predators and Dangerous Animals in the Western Cape Province (CapeNature, 2014), particularly in terms of the following minimum requirements:

The fence must be permeable to allow for movement of small, naturally occurring wild animals. Considering the faunal species

establishment of a fence along the eastern edge of the natural wetland. It is advised that alternative security measures (e.g. closed-circuit television monitoring system, security patrolling, etc.) be considered.

In light of the above, this Directorate requires that the alternative to establish the security fence be on the western side of the natural wetland area, above the 5 m topographical contour (referenced from the indicative mean sea level), outside of the 30m wetland buffer, be carefully assessed. The alternative/proposals must clearly show how the mitigation hierarchy regarding environmental impacts has been considered, of which “avoiding the impact” altogether is the primary objective.

likely to utilise the project area (particularly Sensitive Species 8), the proposed fence should be constructed using fencing with a 120 mm gap between pales to allow movement of fauna to and from the project area and the estuary. Larger breaks in the fence approximately 40 cm high (measured from the ground surface) and 21 cm wide, should be created at regular intervals along the length of the palisade fence to allow for faunal movement to and from the site.

A faunal specialist must be appointed to establish the faunal corridors linking the project area and the estuary once the fence plan is available. The location of faunal corridors must inform the placement of the breaks in the fencing (i.e. breaks must intercept faunal corridors to allow the continued movement of faunal species). However, a maximum spacing of 75 m between gaps in the fencing is permitted.

The straining, concern and gateposts should be sturdy and be set vertically into the ground.

All fence posts must stand erect and maintain the same height above ground level. In this way the undulations of the ground are followed.

The fence must be correctly maintained and gaps in the fencing must be inspected regularly for possible animals caught in the fence and minimum once a month to check on any obstruction to the gaps. These gaps must be kept free of obstructions, including plant growth and debris.

Straining posts must not be too far apart. The closer they are together, the sturdier the fence.

	<p>The fence must be visible to animals to prevent unnecessary collisions with the fence.</p> <p>The fence cannot be erected with inferior material.</p> <p>The landowner/body corporate must make provision for damage to the fence or enclosure as a result of fires, floods, or other emergencies or disasters.</p> <p>The proposed fence must follow the existing jeep track along either alternative route and additional clearing of thicket vegetation is not permitted although trimming is permitted (with the necessary Permits).</p> <p>Electric fencing, barbed and razor wire must be avoided as this could pose a collision threat to birds and result in the electrocution and death of faunal species moving through the fence. If electric fencing is used, this must be placed on top of the fence but should not exceed the height of the surrounding thicket vegetation.</p> <p>No electric strands should be within 1m of the ground as this can result in the electrocution and death of faunal species. Markers must be placed on electric fencing so that it is visible to birds. Although the fence will be erected along an existing jeep track, vegetation must not be allowed to touch the electric fencing. Where necessary, shrubs must be pruned and a gap between vegetation and electric fencing must be maintained [NB: vegetation clearance/strip clearing is not permitted, only pruning. If the pruning of any protected trees is required, the necessary permit must be obtained from the Department of Agriculture, Forestry and Fisheries (DAFF)].</p>
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	<p>Fencing must be of a dark colour and not blend into the surrounding vegetation so that it is visible to faunal species, particularly birds.</p>
<p>Proposed sewage package plant and operational requirements</p> <p>This Directorate understands that a sewage package plant is being proposed as the Ganse Vallei Wastewater Treatment Works (“WWTW”) does not have adequate capacity for any new developments within its catchment without upgrades to the WWTW. In this regard, it is understood that the proposed package plant will be situated at the entrance to the proposed development and will have a treatment capacity of 40m³ per day. Furthermore, the sewage will be treated to the General Limits specified by the Department of Water and Sanitation (“DWS”).</p> <p>According to the information in the DBAR and supporting information, the treated effluent will be collected in 4 x 10 000ℓ storage tanks and will be used for the irrigation of the road verges, erven, open spaces, etc. (specified in Table 7 (pg. 24) of the Water Use License Application (“WULA”) Summary Report). It is understood that during abnormally wet conditions, where irrigation is not possible, that the treated effluent can be stored for 24-hours. However, this does not appear to be the best practicable environmental option as the likely impact of a perched water table has not been discussed in the relevant reports. During abnormally wet conditions, the water table may be saturated for a considerable period of time after rainfall events, which may result in more than one day (i.e., 24-hour period) that the areas may not be irrigated. In this regard, it is</p>	<p>The Municipal 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 future developments.</p> <p>Due to the fact that said upgrade of the WWTW may take an unknown time still (considering approvals / funding / delays etc), the proposal for this development is for the installation of a temporary on-site package plant within the confines of the development.</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>

understood that should it be required, the effluent will be collected by means of a honeysucker and disposed of at a licenced wastewater treatment facility. With reference to the information that there currently is no capacity at the Ganse Vallei WWTW, it is unclear where and how the effluent will be disposed of.

It is understood that the effluent from the treatment process will comply with the General Limits; however, it has not been adequately explained what will happen in the event where the effluent does not comply with the quality standards and whether the facility will have adequate storage capacity to temporarily store the non-compliant effluent. The procedure for such an eventuality must be adequately addressed in the respective reports.

Please be advised that in accordance with Section 152 the Constitution and Section 73 of the Local Government: Municipal Systems Act, 2000 (Act no. 32 of 2000), the general duties and functions of local government are described, which require inter alia that the local government must provide basic services. The Local Government: Municipal Systems Act, 2000 does however allow for the provision of such a municipal service in its area or part of its area, through an external mechanism by entering into a service delivery agreement with an entity or person legally competent to operate a business activity. As such the applicant must enter into a Service Level Agreement with the Bitou Municipality.

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 to be used for irrigation within the estates open space areas. Dedicated irrigation storage tanks (4 x 10KI) forms part of the design and will be located next to the container. This measure is to ensure that open space areas are not saturated unnecessarily, or that unwanted treated effluent enters the sensitive wetland system. It is important to note that as the development phases are completed, available vacant land for irrigation of treated effluent will become less, which increases the volume of treated effluent that will need to be irrigated onto private open space areas within the development (as intended) – excluding the conservation area. To ensure that this volume (depending on when the Municipal WWTW will have sufficient capacity to allow this operation to cease) does not impact negatively on the on-site wetland, shallow spikes must be installed (as per the Aquatic specialist recommendations) for groundwater monitoring to be able to pick up any unwanted leaching;

In the event that leaching is noted in the monitoring results, additional storage tanks must be installed, alternatively the plant

In light hereof, the Bitou Municipality's Department: Engineering Services must provide guidance on the requirements and implementation of such a service level agreement. In addition, the level of the service must be specified (i.e. service standard) and under which circumstances the municipality shall need to undertake the management and the maintenance of the facility to provide the service (i.e. failure to provide an adequate service).

Notwithstanding the above proposal and guidance, the BAR must clearly demonstrate why the Bitou Municipal WWTW is not an option. If the disposal of sewage at the Municipal WWTW only relates to the current capacity constraints, then the requirements and timing for the upgrade of the relevant WWTW facility must be detailed. Furthermore, it must be explained whether the required upgrade/expansion to the Ganse Vallei WWTW will require Environmental Authorisation or not.

must be modified to improved treated effluent standards to potable standards.

Emergency storage, should there be no need to irrigate due to high rainfall, is provided in the irrigation holding tanks with 40m³ capacity, equal to 24 hours emergency storage period. Though irrigation must take place, even when high rainfall is experienced, the predominantly sandy soil of RE/6503 has a very high permeability, which is estimated to be 86 mm/day.

In the event that a honey-sucker is required to empty treated effluent during high rainfall when no irrigation is required and when all dedicated irrigation tanks are full, the treated effluent can be taken to the Ganse Vallei WWTP should it be confirmed on that day that the WWTP has sufficient capacity to accommodate a maximum of 40m³ treated effluent from private service providers. As a contingency measure, the treated effluent can be stored in the honey-sucker tanker until such time that it can be used for irrigation purposes. Should it be determined during operation that the need for additional storage tanks are required, the developer will supply additional tanks to accommodate excess treated effluent.

It is anticipated that the maximum peak flow of ±40m³ /day of treated effluent at full occupation will be used for irrigation. The VITA Consulting Engineers water balance calculation, indicates that a deficit in irrigation water supply will be experienced when compared to the irrigation demand of the development area to

	<p>be irrigated. The irrigation requirement will be $\pm 45\,000\text{ m}^3/\text{a}$, whereas the irrigation supply will be $\pm 15\,000\text{ m}^3/\text{a}$.</p> <p>Should a problem occur in the MBR WWTP, it is usually fouling of the membrane. This is far along in the process and the water will be fully treated by this stage of the process, but the Total Suspended Solids would still be high. The MBR has 50% extra capacity to allow for more fouling before the membranes need cleaning, while the permeate pumps are designed to allow for increased pumping time should the membrane start to foul up, to allow for replacement of the membranes to be arranged. Certain parameters of the WWTP can be measured online and read at any time, so that changes can be made if need be. Spares of critical equipment will be on site should pumps or blowers break down. A back-up generator will also be available should electricity supply not be available.</p> <p>Based on the calculated water balance it is estimated that treated effluent generated from the package plant will not result in excess wastewater generated on the property, even at the fully developed stage. The calculations are based on a water demand of $3\text{ mm}/\text{m}^2$ for road verges, open erven, occupied erven and SUDS areas, and $5\text{ mm}/\text{m}^2$ for trees.</p>
<p>Proposed upgrades to the existing bulk water supply network</p> <p>It is understood that a temporary solution to the bulk network is proposed to accommodate the proposed development in the municipal water supply network. The proposed solution is the installation of an additional 460m long, 160mm diameter pipeline</p>	<p>Vita Consulting Engineers have consulted with Bitou Municipality regarding the installation of the temporary water pipeline from the Goose Valley Reservoir who verbally approved the temporary solution and connection to the Municipal network in the N2 road reserve. Vita Consulting Engineers have requested</p>

within the N2 National Road road reserve. It is understood that the proposed temporary pipeline will be laid above ground and will not require any clearance of vegetation (only brush-cutting) or earthworks. According to the information the proposed temporary solution will be undertaken by the developer of Portions 19 and 27 of the Farm Ganse Valleï No. 444. In this regard, you are required to provide this Directorate with the requisite approvals, including but not limited to an environmental authorisation and approval from the South African National Roads Agency Limited (“SANRAL”).

written approval of the above-mentioned on various occasions with no feedback.

Vita Consulting Engineers noted that the temporary water solution was identified by GLS Consulting Engineers on behalf of Bitou Municipality and that Wayleave Approvals are usually only obtained prior to construction

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 already commenced June 2024).

Bitou Municipality has since confirmed bulk infrastructure capacity in its network on 02 July 2024, that can accommodate the proposed development of Plett Lagoon Estate on Remainder of Erf 6503 subject to the following conditions:

- *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.

- *That the developer duly communicate point 3 above with all future owners/Homeowners Associates and or Body corporate.*

Please also see confirmation regarding the Temporary Water Connection from Vita Consulting Engineers below:

"I hereby confirm that, through my various meetings and discussions with Bitou Municipality, they are in agreement with the findings of the GLS Capacity Report for the development on Erf 6503 (February 2023) and therefore request/endorse the temporary 160mm diameter water connection (refer Item 4 – GLS report Figure 5) between the Goosevalley Reservoir and the existing 150mm diameter watermain in the N2 road reserve.

The watermain in the N2 road reserve is the property of Bitou Municipality and therefore a wayleave application will be required for the connection. The appointed civil engineering contractor will obtain the necessary wayleave approval from both SANRAL and Bitou Municipality (water and sanitation department) for the work inside the N2 road reserve. The wayleave application can only proceed once the civil engineering services have been approved. Bitou Municipality will only approve the civil engineering services once the Site Development Plan has been approved." Letter from Vita

	Consulting Engineers attached to the Civil Engineering report as Appendix G8 of the Final Basic Assessment Report.
<p>National Water Act, Act No. 36 of 1998</p> <p>This Directorate notes the WULA Summary Report included as Appendix O of the DBAR. Furthermore, it is understood that the DBAR along with the WULA Summary Report is being circulated for a period of 60 days in order to comply with the requirements of the National Water Act, Act 36 of 1996.</p> <p>In this regard, it must be ensured that any information required by the DWS is included in the BAR. Please be advised that the EIA process and the Water Use Application process / information must be synchronised. You are reminded that if these processes are not properly aligned, the lack of synchronisation; omission of any reports/information; or delay as a result thereof, may prejudice the success of the application for environmental authorisation.</p>	Noted.
Department of Environmental Affairs and Development Planning: Biodiversity and Coastal Management via Email on DBAR	
COMMENTS	RESPONSE
On page 30 of the draft BAR the applicant indicated that the NEM: ICMA is not considered an applicable legislation for the proposed development. Be advised that Erf 6502 in it's entirety is located within the coastal protection zone an as such the NEM:	Noted. The Basic Assessment Report has been corrected and indicates that the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) is applicable to the proposed development.

<p>ICMA is indeed applicable and it should be indicated as such in the draft BAR.</p>	
<p>The applicant adequately considered all critical biodiversity and ecological support areas in relation to Erf 6503, and in accordance with the to the Western Cape Biodiversity Spatial Plan (2017) and proposed mitigation measures as stipulated in the draft EMPr to address environmental concerns are both appropriate and practical and should be strictly adhered to</p>	<p>Noted.</p>
<p>The applicant has depicted Erf 6503 relation the Coastal Protection Zone (“CPZ”) as defined in Section 16 of the NEM: ICMA in Appendix A2 (Coastal Risk Lines) and it should be noted that the purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes, including the risk of sea level risks. Due to the subject property’s location within the CPZ, Section 63 of the NEM: ICMA must be considered where an authorisation is required in terms of Chapter 5 of the NEMA. Furthermore, Section 62 of the NEM: ICMA obliges all organs of state that regulates the planning of land to apply that legislation in a manner that gives effect to the purpose of the CPZ. As such, Section 63 of the NEM: ICMA must be considered by local authorities for land use decision making.</p>	<p>Considerations regarding the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“ICMA”):</p> <ul style="list-style-type: none"> • Whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and protecting those areas. <ul style="list-style-type: none"> ○ The proposed development is not located in coastal public property and will have no effect on surrounding coastal public properties. ○ Remainder of Erf 6503 is not designated as coastal access land. ○ The proposed development site is partially located in the Coastal Protection Zone. However, development will be limited to already disturbed areas while preserving/maintaining the remaining coastal habitat (eastern portion of RE/6503).

- The estuarine management plans, coastal management programmes and coastal management objectives applicable in the area.
 - The Keurbooms Estuary is of high conservation value and in terms of the management objectives, the Keurbooms-Bitou Estuarine Management Plan (K-BEMP) stipulates that formal protections mechanisms to obtain conservation status for land parcels within or spanning the estuarine functional zone (EFZ) must be investigated. The following guidelines are provided in the K-BEMP and are relevant to the proposed land-use and infrastructure:
 - *Planning should allow for the maintenance of a riparian zone along the length of the estuary where sensitive habitats (wetlands, supratidal saltmarshes and indigenous vegetation) occur.* The implementation of the coastal management lines (CML), coastal protection zones (CPZ), flood lines and the inclusion of CBA's within all planning schemes will allow for compliance with this guideline. The proposed development layout will allow for the maintenance/preservation of the riparian zone located in the eastern portion of RE/6503 (wetland habitat within Goukamma Dune Thicket vegetation).

	<ul style="list-style-type: none">▪ <i>Development and land use in the catchment and estuarine area should not lower water quality or interfere with normal hydrodynamic or sedimentary process and cycles.</i> The proposed development will not discharge any effluent water in the estuarine area and will therefore not alter the water quality.• Socio-Economic impact if the activity is authorised / not authorised.<ul style="list-style-type: none">○ If the proposed development is authorised, it will have the following impacts relating to socio-economics:<ul style="list-style-type: none">▪ Create temporary employment opportunities during construction and operational phase.▪ Preserve and maintain the riparian zone (wetland habitat vegetation) in the eastern portion of the proposed development site.▪ Optimise vacant land in an urban setting, therefore increasing the holistic financial sustainability of Bitou Municipality.▪ Meet the management objectives of the Keurbooms-Bitou Estuarine Management Plan.○ If the proposed development is not authorised, it will have the following impacts relating to socio-economics:
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	<ul style="list-style-type: none">▪ Property remains vacant and will therefore not increase the holistic financial sustainability of Bitou Municipality.▪ Property will not be maintained in such a way as to support the management objectives of the Keurbooms-Bitou Estuarine Management Plan.▪ No employment opportunities will be created for the local community of Bitou Municipality. <ul style="list-style-type: none">• The likely impact of the proposed activity on the coastal environment, including the cumulative effect of its impact together with those of existing activities.<ul style="list-style-type: none">○ The proposed development will be limited to already disturbed areas on RE/6503, therefore applying avoidance mitigation to the riparian zone. An environmental maintenance and management plan will be adhered to for the proposed development which will aim to preserve/maintain the natural coastal environment.• The likely impact of coastal environmental processes on the proposed activity.<ul style="list-style-type: none">○ The proposed development will not be affected by coastal processes such as wave, current and wind action, erosion, accretion, sea-level rise, storm surges and flooding. The eastern portion of the proposed development site will be maintained in its natural state which will provide a sizeable buffer
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	<p>between the development activities and the Keurbooms Estuary.</p> <p>It is evident from the considerations regarding the NEM:ICMA mentioned above, that the proposed development will not prejudice 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 Garden Route District Coastal Management Line (“CML”) in relation to Erf 6503 has been adequately considered. The technical delineation of the CML was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk flooding, wave run-up modelling, inter alia and was delineated in conjunction with and supported by organs of state. The principal purpose of the CML is to protect coastal public property, private property, and public safety; to protect the coastal protection zone; and to preserve the aesthetic value of the coastal zone. The use of CMLs is of particular importance in response to the effects of climate change, as it involves both the quantification of risks and pro-active planning for future development. The SD: CM can confirm the proposed development on Erf 6503 will occur landward of the CML.</p>	<p>Noted.</p>

The SD: CM notes that the management objectives of the Keurbooms-Bitou Estuarine Management Plan (2018) was taken into consideration as it is noted on page 9 of the draft BAR that the proposed development was purposefully limited to the existing, disturbed secondary grassland area to avoid the sensitive estuarine area and thus create a sizeable coastal buffer along the Keurbooms Estuary. However, it is advised that the applicant ensures that the proposed development aligns with the Keurbooms Estuarine Management Plan 2023 as approved by Minister Bredell in June 2023.

The Keurbooms Estuary is of high conservation value and in terms of the management objectives, the Keurbooms-Bitou Estuarine Management Plan (K-BEMP) stipulates that formal protections mechanisms to obtain conservation status for land parcels within or spanning the estuarine functional zone (EFZ) must be investigated. The following guidelines are provided in the K-BEMP and are relevant to the proposed land-use and infrastructure:

- Planning should allow for the maintenance of a riparian zone along the length of the estuary where sensitive habitats (wetlands, supratidal saltmarshes and indigenous vegetation) occur. The implementation of the coastal management lines (CML), coastal protection zones (CPZ), flood lines and the inclusion of CBA's within all planning schemes will allow for compliance with this guideline. The proposed development layout will allow for the maintenance/preservation of the riparian zone located in the eastern portion of RE/6503 (wetland habitat within Goukamma Dune Thicket vegetation).
- Development and land use in the catchment and estuarine area should not lower water quality or interfere with normal hydrodynamic or sedimentary process and cycles. The proposed development will not discharge any effluent water in the estuarine area and will therefore not alter the water quality.

The SD: CM is satisfied with abovementioned coastal buffer area away from the estuarine functional zone as well as other sensitive areas as it addresses issues with potential coastal flooding and damages associated with sea-level rise and

Noted.

<p>increased storm events. The location of the proposed development on the subject property also aligns with the Western Cape Estuarine Management Framework and Implementation Strategy: Best Practice Activity Guidelines (2019).</p>	
<p>The SD: CM also confirms that the proposed development and its location on the subject property also aligns with the Departmental Circular (DEAD&DP 0004/2021) on the Consideration of Coastal Risk in Land Use Decisions as well as the way forward with respect to the establishment of Coastal Management Lines in terms of the NEM: ICMA.</p>	<p>Noted.</p>
<p>According to the Western Cape Provincial Coastal Access Audit for the Garden Route Municipal District (2019), the subject stretch of coast has restrictive access to the coast. Be advised that in accordance with Section 13 of the NEM: ICMA, the proposed development and associated activities may in no way impede the general public's ability to access coastal public property now or in the future. The SD: CM does however note on page 52 of the draft BAR, the applicant states that the proposed development will not deny the public access to the coastal environment as it is privately owned land and a private secure development.</p>	<p>Noted.</p>
<p>Furthermore, the applicant should be informed that they may not create any formal or informal walkways/pathways to the coast through the littoral active zone, with any future developments on</p>	<p>No new pathways are proposed. The area indicated as No-Go (delineated wetland habitat) is not intended to be set-aside as an area where there may be no</p>

<p>the subject property as this is an active area that performs an important ecological function.</p>	<p>access whatsoever. This area will be accessible to future residents for recreational use (along existing pathways/trails), alien clearing teams and/or fire management teams. Vehicle access in this area however is limited to only instances where the removal of alien vegetation biomass is required (and then it must be along existing vehicle routes only) and/or when vehicles must access for fire protection measures. Considering the presence of the on-site wetland central throughout this area however, vehicle access must only be permitted during the dry season and outside of breeding seasons for aquatic species. This is to ensure minimal disturbance to the sensitive wetland environment and habitat at all times.</p>
<p>The applicant must also be reminded that the erection of any protection measures against erosion or accretion is prohibited in terms of Section 15 of the NEM: ICMA, which states:</p> <p>(1) No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or such other coastal public property, or of land adjacent to coastal public property, unless the erosion is caused by an intentional act or omission of that organ of state or other person;</p> <p>(2) No person may construct, maintain or extent any structure, or take measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided</p>	<p>Noted.</p>

<p>for in this Act, the NEMA or nay other specific environmental management Act.</p> <p>As such, any measures against the processes of erosion or accretion may only occur within the boundaries of the subject property.</p>	
<p>Considering the location of the subject property, the applicant must be informed of risk pertaining to the loss of property should the highwater mark of the sea move inland of the property boundary. In this regard, Section 14 of the NEM: ICMA and the Advisory Note from the Office of the Chief Surveyor-General dated 15 October 2021, is applicable.</p>	Noted.
<p>Based on the information provided, the SD: CM does not object to the proposed development, provided all the abovementioned items are taken into considerations the proposed mitigation measures as proposed in the draft EMPr are strictly adhered to if the proposed development is approved.</p>	Noted.
Doreen Butterworth via Email on DBAR	
COMMENTS	RESPONSE
<p>Vehicle Access for fire management –</p> <p>I am glad to see that the road width has been updated to 3m, to allow fire fighting vehicles easier access. I sincerely hope that the thicket vegetation will not burn easily, as you have</p>	<p>The Southern Cape Fire Protection Agency confirmed the following specifications for Fire Breaks:</p>

<p>suggested, because a single 3m path will not act as a sufficient fire break between the two properties.</p>	<ul style="list-style-type: none"> • 10m Fire Break must be maintained along the Northern boundary due to the proximity of existing development at Keurbooms Lagoon Caravan Park; • 6m Fire Break must be maintained along the Southern boundary at lowest vegetation level without soil disturbance (exception is the wetland area where vegetation can be maintained at 1m height and no vehicle access); • Existing vehicle access tracks must be maintained minimum 3 metres to allow vehicle access for fire fighting vehicle in the event of a fire; <p>The vegetation type (mostly thicket intermixed with wetland) is not fire prone although there remains a fire risk in all natural vegetation at all times.</p>
<p>Stabilisation of the lagoon edge-</p> <p>I am not sure if you are aware, but the owner of Farm 449 is the Garden Route District Municipality, an Organ of State, and not a private property owner. Unless a sale has taken place since April 2021 of which I am not aware. They have been tasked with maintaining the riverbank in that area (Ref: 14/1/1/E3/4/2/3/L1001/18 DEA&DP), but have done nothing to comply with this directive. Thus, my concern, that no-one is taking responsibility for this much needed stabilisation.</p>	<p>Erf 449 is owned by Garden Route District Municipality. In response to the Draft Basic Assessment Report, the Department of Environmental Affairs: Sub-directorate Coastal Management stated the following: The applicant must also be reminded that the erection of any protection measures against erosion or accretion is prohibited in terms of Section 15 of the NEM: ICMA, which states: (1) No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or such other coastal public property, or of land adjacent to coastal public property, unless the erosion is caused by an intentional act or omission of that organ of state or other person; (2) No person may construct, maintain or extent any structure, or take measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided for in</p>

	<p>this Act, the NEMA or nay other specific environmental management Act. As such, any measures against the processes of erosion or accretion may only occur within the boundaries of the subject property (RE/6503).</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.</p> <p>The development of all the proposed dwellings, maintenance building, admin building and parking garages are purposefully limited to the existing, disturbed secondary grassland area. By clearly following the impact hierarchy approach in this design, this layout avoids the sensitive estuarine area containing wetland and natural, intact thicket vegetation, thus creating a sizeable coastal buffer along the Keurbooms Estuary that will act to conserve a large habitat intact.</p>
<p>Security Fencing-</p> <p>I am glad to see that the development is allowed to install security fencing on the river's edge. We continue to experience theft by criminals who gain access, via the river, to our properties and a fence will go a long way in preventing this happening in Plett Lagoon Estate.</p>	<p>Noted.</p>
<p>Geannine Steyn via Email on DBAR</p>	
<p>COMMENTS</p>	<p>RESPONSE</p>

<p>How close will the house build away from our house . Will they take our view of the lagoon.</p>	<p>The erven proposed closest to your property are proposed to be rezoned to General Residential Zone II.</p> <p>The Bitou Integrated Zoning Scheme By-Law of 2023 states that the height of buildings within this specific zoning scheme is limited to 8.5m from ground level to the ridge of the roof (typically a two-storey house). The By-Laws also state that buildings must be 3m away from the erf boundaries.</p>
<p>Jannie Vermeulen on behalf of Dreyer Trust via Email on DBAR</p>	
<p>COMMENTS</p>	<p>RESPONSE</p>
<p>Many thanks for the feedback Francois. My sense is that we are making good progress and I wish you the very best with this project.</p> <p>If everything goes to plan I assume you will start with a perimeter fence, is that correct ?</p> <p>If so, when do you think this will start and what kind of fence do you have in mind?</p>	<p>The Environmental Application Process is still roughly 4-5 months from completion. Until such time as the Department of Environmental Affairs and Development Planning provide a final decision on the application, no construction activities may take place on the property.</p> <p>The specifics of the construction plan as well as type of perimeter fencing will only be confirmed during building plan submissions to the municipality. This process only occurs after the Environmental Application process is completed.</p> <p>Fencing specifications recommended as part of our Environmental Application process is applicable to the eastern boundary fence between the proposed open space area and the Keurbooms Estuary with the main focus being to allow animal movement to and from the Open Space area.</p> <p>Specifications include:</p>

The proposed fence must be designed and constructed in line with the Policy on Fencing and Enclosure of Game, Predators and Dangerous Animals in the Western Cape Province (CapeNature, 2014), particularly in terms of the following minimum requirements:

The fence must be permeable to allow for movement of small, naturally occurring wild animals. Considering the faunal species likely to utilise the project area (particularly Sensitive Species 8), the proposed fence should be constructed using fencing with a 120 mm gap between pales to allow movement of fauna to and from the project area and the estuary. Larger breaks in the fence approximately 40 cm high (measured from the ground surface) and 21 cm wide, should be created at regular intervals along the length of the palisade fence to allow for faunal movement to and from the site.

A faunal specialist must be appointed to establish the faunal corridors linking the project area and the estuary once the fence plan is available. The location of faunal corridors must inform the placement of the breaks in the fencing (i.e. breaks must intercept faunal corridors to allow the continued movement of faunal species). However, a maximum spacing of 75 m between gaps in the fencing is permitted.

The straining, concern and gateposts should be sturdy and be set vertically into the ground.

All fence posts must stand erect and maintain the same height above ground level. In this way the undulations of the ground are followed.

The fence must be correctly maintained and gaps in the fencing must be inspected regularly for possible animals caught in the fence and minimum once a month to check on any obstruction

	<p>to the gaps. These gaps must be kept free of obstructions, including plant growth and debris.</p> <p>Straining posts must not be too far apart. The closer they are together, the sturdier the fence.</p> <p>The fence must be visible to animals to prevent unnecessary collisions with the fence.</p> <p>The fence cannot be erected with inferior material.</p> <p>The landowner/body corporate must make provision for damage to the fence or enclosure as a result of fires, floods, or other emergencies or disasters.</p> <p>The proposed fence must follow the existing jeep track along either alternative route and additional clearing of thicket vegetation is not permitted although trimming is permitted (with the necessary Permits).</p> <p>Electric fencing, barbed and razor wire must be avoided as this could pose a collision threat to birds and result in the electrocution and death of faunal species moving through the fence. If electric fencing is used, this must be placed on top of the fence but should not exceed the height of the surrounding thicket vegetation.</p> <p>No electric strands should be within 1m of the ground as this can result in the electrocution and death of faunal species. Markers must be placed on electric fencing so that it is visible to birds. Although the fence will be erected along an existing jeep track, vegetation must not be allowed to touch the electric fencing. Where necessary, shrubs must be pruned and a gap between vegetation and electric fencing must be maintained [NB: vegetation clearance/strip clearing is not permitted, only pruning. If the pruning of any protected trees is required, the necessary</p>
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	<p>permit must be obtained from the Department of Agriculture, Forestry and Fisheries (DAFF)).</p> <p>Fencing must be of a dark colour and not blend into the surrounding vegetation so that it is visible to faunal species, particularly birds.</p>
Pierre du Preez via Email on DBAR	
COMMENTS	RESPONSE
<p>I hereby confirm that I am the owner of Erf 6504, Plettenberg Bay, bordering Erf 6503 on the southern side of the property. As the property owner I hereby object to the suggestion made by both Confluent and Cape EA-Prac. on the appropriate management and size of the firebreak on the southern boundary bordering our property. Both professionals suggest that this firebreak needs to be narrowed over time, by virtue of its location to the urban edge.</p> <p>As the owner of Erf 6504, I am acutely aware of the fire hazard that the vegetation poses, as well as the sheer size of the property; combined with the fact that the caravan park to the north has no fire retardants or fire control in place within the park. This poses a high risk to our property in the event that a fire does occur, and there are strong winds causing the fire to move on to</p>	<p>The Southern Cape Fire Protection Agency's feedback about fire risk and management requirements for the Plett Lagoon Bay Estate property are as follows and will be captured as part of the Basic Assessment process final submission:</p> <ol style="list-style-type: none"> 1. The SCFPA indicated that the Northern fire break must be maintained at a minimum width of 10m. This fire break must be maintained at the lowest vegetation level i.e. ankle height and he supports the continued use of lawn in this area (without soil disturbance); 2. This uninterrupted fire break must be accessible for fire fighting vehicles at all times; 3. The expanded area beyond the minimum 10m fire break along this boundary, need not be maintained as an active fire break and the recommendations made by the aquatic specialist for restoration of this area, keeping vehicles out of the wetland area

our property, and ultimately being a hazard to the entire Poortjies residential area.

The firebreaks cannot be eliminated or reduced over time. Case in point, in my time on my farm in Cape Town, which also fenced and monitored from a security perspective; we have had to deal with two very significant, devastating expansive fires in the Constantia and Southern Peninsula. Had we not maintained our perimeter and firebreaks, these fires would have been more catastrophic than they were as without the firebreaks, these fires would have spread uncontrollably across from the SANPARKS region to the Table Mountain National Park region. Our protective measures in maintaining the firebreaks has played a vital and commendable role in reducing the spread of wildfires in this particular region.

A formal assessment of the risks posed by the firebreaks needs to be undertaken, and I believe that formal guidance and recommendations need to come from the appropriate authorities on this matter. An informed recommendation needs to come from Dirk Smit and his team from SCFPA. I reserve my rights as a property owner and hold the professionals responsible for their suggestions.

I would like a timeline on when I can expect to receive the formal assessment on the firebreaks.

and cutting of wetland vegetation by hand to 1m height to manage biomass directly along the fire break, are all acceptable;

1. It is noted that Dr Dabrowski's recommendation for this Northern area is a 20m wide maintained fire break. The SCFPA said he will not object to such a wider fire break as it is more than the minimum 10m the SCFPA prescribes;

4. The Southern boundary fire break will be feasible at 3m width (for the current land use) to protect the fence, but to allow for the possibility of potential future development on your property as well, he recommends a maximum 6m fire break width at lowest vegetation level, without soil disturbance.

5. The exception along this Southern fire break is the wetland area where he supports the aquatic specialist recommendation of allowing a higher vegetation level (up to 1m instead of brushcut to ankle height), to be cut by hand only, with no vehicle access through the wetland portion deemed necessary since fire fighting vehicles can get close to the fire break/fence via existing tracks that run through the natural thicket vegetation;

6. The SCFPA recommends that the existing vehicle tracks through the thicket (excluding the wetland area) be maintained to always be accessible to fire fighting vehicles when the need arises;

7. Due to the provision for a new fence along the Eastern boundary as part of the development proposal, the SCFPA is of the opinion that the fire risk is significantly reduced for the remainder of the property. Considering the Estuary as the only

	<p>boundary, he does not require a fire break along this Eastern fence and acknowledge that the existing track (which the new fence will follow) is sufficient to allow vehicle access should fire fighters need to access the far Eastern portion of the site or get close to the Southern property boundary;</p> <p>8. The SCFPA commends the proposal to implement ongoing active invasive alien vegetation removal as part of the development proposal, because it reduces biomass which further reduced fire risk/liability;</p> <p>9. Despite the proposed zoning change for the property as a result of development, The SCFPA recommends the development continues to be a member of the SCPFA.</p> <p>I sincerely hope that this elevated input from the fire management authority in the Garden Route District, who has vast knowledge about fire risk and fire management requirements in the study area, helps to lessen your concern about the recommendations made as part of the ongoing Basic Assessment process.</p>
Plettenberg Bay Environmental Forum via Email on DBAR	
COMMENTS	RESPONSE
Revised Site Development Plan	Noted.

<p>The revised layout with reduced housing density and with the natural vegetation along the lagoon edge set aside as Private Open space is a significant improvement on previous proposals. This conserved habitat will act as an important buffer between the Estuary and the development. The limitation of the development to the already disturbed areas is positive. The revised layout is an improvement and is appreciated.</p>	
<p>Conservation Management Plan (CMP) for Open Space Areas</p> <p>The Environmental Assessment Practitioner (EAP) and applicant are commended for providing a comprehensive Conservation Management Plan (CMP) that addresses both the Construction and Operational phases of the project.</p>	<p>Noted.</p>
<p>Fencing Design - Preferred Fence line Route</p> <p>We commend the proposal in positioning the fencing along an existing disturbed pathway, out of sight from the lagoon edge, and that the fence design specification and mitigation measures would align with the CapeNature guidelines for wildlife-friendly fencing and the Terrestrial Animal Species Specialist Assessment. However, we recommend exploring a hybrid design that incorporates portions of thorny vegetation, such as indigenous thorn bushes, alongside the structured fence (e.g. in the south-east corner where the fence line is located closer to the lagoon). By utilising a vegetation barrier, the fencing would blend more seamlessly with the environment, help maintain</p>	<p>The preferred fence line route follows existing jeep tracks in order to minimize the need for vegetation removal and disturbance. Leaving portions of the fence open would raise the concern potentially linked to the threat of land invasion of vacant portions of land within urban areas / poaching and wild fires.</p> <p>The type of fencing will be determined by the developer prior to construction and will have to comply with the specifications stipulated in the specialist studies and the Basic Assessment Report submitted to the Department of Environmental Affairs and Development Planning. Please see the specifications below:</p> <p>The proposed fence must be designed and constructed in line with the Policy on Fencing and Enclosure of Game, Predators and Dangerous Animals in the Western Cape Province</p>

wildlife corridors, and support biodiversity by preserving the natural habitat.

Additionally, it is important to note that both the Aquatic Biodiversity Impact Assessment and Terrestrial Animal Species Specialist Assessment reports have recommended a palisade-type fence rather than a Clear View type fence. This suggestion should be considered to ensure that the fencing design is most effective in promoting local wildlife movement and habitat connectivity.

(CapeNature, 2014), particularly in terms of the following minimum requirements:

The fence must be permeable to allow for movement of small, naturally occurring wild animals. Considering the faunal species likely to utilise the project area (particularly Sensitive Species 8), the proposed fence should be constructed using fencing with a 120 mm gap between pales to allow movement of fauna to and from the project area and the estuary. Larger breaks in the fence approximately 40 cm high (measured from the ground surface) and 21 cm wide, should be created at regular intervals along the length of the palisade fence to allow for faunal movement to and from the site.

A faunal specialist must be appointed to establish the faunal corridors linking the project area and the estuary once the fence plan is available. The location of faunal corridors must inform the placement of the breaks in the fencing (i.e. breaks must intercept faunal corridors to allow the continued movement of faunal species). However, a maximum spacing of 75 m between gaps in the fencing is permitted.

The straining, concern and gateposts should be sturdy and be set vertically into the ground.

All fence posts must stand erect and maintain the same height above ground level. In this way the undulations of the ground are followed.

The fence must be correctly maintained and gaps in the fencing must be inspected regularly for possible animals caught in the

	<p>fence and minimum once a month to check on any obstruction to the gaps. These gaps must be kept free of obstructions, including plant growth and debris.</p> <p>Straining posts must not be too far apart. The closer they are together, the sturdier the fence.</p> <p>The fence must be visible to animals to prevent unnecessary collisions with the fence.</p> <p>The fence cannot be erected with inferior material.</p> <p>The landowner/body corporate must make provision for damage to the fence or enclosure as a result of fires, floods, or other emergencies or disasters.</p> <p>The proposed fence must follow the existing jeep track along either alternative route and additional clearing of thicket vegetation is not permitted although trimming is permitted (with the necessary Permits).</p> <p>Electric fencing, barbed and razor wire must be avoided as this could pose a collision threat to birds and result in the electrocution and death of faunal species moving through the fence. If electric fencing is used, this must be placed on top of the fence but should not exceed the height of the surrounding thicket vegetation.</p> <p>No electric strands should be within 1m of the ground as this can result in the electrocution and death of faunal species. Markers must be placed on electric fencing so that it is visible to birds. Although the fence will be erected along an existing jeep track,</p>
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	<p>vegetation must not be allowed to touch the electric fencing. Where necessary, shrubs must be pruned and a gap between vegetation and electric fencing must be maintained [NB: vegetation clearance/strip clearing is not permitted, only pruning. If the pruning of any protected trees is required, the necessary permit must be obtained from the Department of Agriculture, Forestry and Fisheries (DAFF)).</p> <p>Fencing must be of a dark colour and not blend into the surrounding vegetation so that it is visible to faunal species, particularly birds.</p>
<p>Erosion Management</p> <p>We recommend implementing erosion management measures along the northeastern boundary of the estate. This is crucial to protect the integrity of the land and mitigating potential negative impacts on surrounding ecosystems.</p>	<p>The proposed development property (Remainder of Erf 6503) is separated from the Keurbooms Estuary by Erf 449 which is owned by Garden Route District Municipality. In response to the Draft Basic Assessment Report, the Department of Environmental Affairs: Sub-directorate Coastal Management stated the following: <i>The applicant must also be reminded that the erection of any protection measures against erosion or accretion is prohibited in terms of Section 15 of the NEM: ICMA, which states:</i></p> <p><i>(1) No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or such other coastal public property, or of land adjacent to coastal public property,</i></p>

	<p><i>unless the erosion is caused by an intentional act or omission of that organ of state or other person;</i></p> <p><i>(2) No person may construct, maintain or extent any structure, or take measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided for in this Act, the NEMA or nay other specific environmental management Act. As such, any measures against the processes of erosion or accretion may only occur within the boundaries of the subject property (RE/6503).</i></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 / subdivide the portion of land below the HWM which effectively become coastal public property.</p> <p>The development of all the proposed dwellings, maintenance building, admin building and parking garages are purposefully limited to the existing, disturbed secondary grassland area. By clearly following the impact hierarchy approach in this design, this layout avoids the sensitive estuarine area containing wetland and natural, intact thicket vegetation, thus creating a sizeable coastal buffer along the Keurbooms Estuary that will act to conserve a large habitat intact.</p>
<p>Wetland Protection</p> <p>If feasible, the wetland and indigenous thicket area to be declared as a Protected Environment (PE) to formally recognise it as an area with conservation potential. This designation would</p>	<p>Following input received from Bitou Municipality Land Use and Environmental Management as well as the Department of Environmental Affairs and Development Planning, the preferred proposed zoning for the open space area located on the eastern</p>

<p>safeguard its ecological functions and protect it against any unsustainable development in the future.</p>	<p>portion of the Remainder of Erf 6503 is Open Space Zone IV (Private Nature Reserve to be included in the Protected Areas register of South Africa).</p>
<p>ECO Audits</p> <p>Within the Environmental Management & Maintenance Programme (EMMP), an Environmental Control Officer (ECO) should conduct annual audits of the water treatment plant. This monitoring process should be ongoing throughout the life of the estate to ensure that all environmental safeguards are effectively maintained.</p>	<p>The frequency of environmental audits post construction will be determined by the competent authority (Department of Environmental Affairs and Development Planning).</p> <p>It is however stipulated by the Aquatic Biodiversity Impact Assessment that two groundwater spikes / wells must be installed at 10m depth to monitor ground water on the upland area (within the estate) near the wetland buffer. These should be located at least 200 m apart and provide easy access during the construction and operational phase. They should not be located in any area of significant natural vegetation, and should rather be sited in grassy areas. Collect a water sample from each monitoring point on a monthly basis during operational phase and submit to a registered laboratory for the analysis of parameters indicated by DWS general limits.</p>
<p>Water Use Licence</p> <p>Regarding the statement, “The plant will treat the annual average sewage flow of up to 40m³ of wastewater per day”, it is crucial to inquire whether the system is designed to accommodate seasonal fluctuations in wastewater flow. High demand during peak periods, such as tourist seasons, may exceed average expectations and impact treatment efficiency. Regarding the statement, “Though irrigation must take place,</p>	<p>The 40m³ annual average is considered the worst case scenario (i.e. peak times with 100% occupancy of the proposed development).</p> <p><u>Mitigation Measures</u> identified in Aquatic Biodiversity Impact Assessment for the operational aspects associated with the temporary on-site wastewater treatment plant:</p> <ul style="list-style-type: none"> • Under NO circumstances can treated wastewater be discharged to the stormwater system, as this leads

even when high rainfall is experienced, the predominantly sandy soil of RE/6503 has a very high permeability, which is estimated to be 86 mm/day (Civil engineering report, Appendix 4).” We recommend assessing a worst-case scenario for potential runoff or saturation conditions during extreme weather events. This evaluation should include strategies for managing excess water and ensuring that irrigation does not lead to adverse environmental impacts.

directly to the wetland which has a unique water chemistry that supports a diverse assemblage of fauna and flora.

- Install 2 groundwater spikes / wells at 10m depth to monitor ground water on the upland area (within the estate) near the wetland buffer. These should be located at least 200 m apart and provide easy access during the construction and operational phase. They should not be located in any area of significant natural vegetation, and should rather be sited in grassy areas.
- Collect a water sample from each monitoring point on a monthly basis during operational phase and submit to a registered laboratory for the analysis of parameters indicated by DWS general limits.
- Water chemistry results should not vary by more than 10% of background values as established prior to the development. Therefore, the spikes must be installed for monitoring prior to the commencement of construction, and water sampling to establish the baseline should be undertaken for 3 months prior to operational phase of the package plant.
- If water chemistry deviates significantly from background levels and begins to indicate eutrophication (nutrient enrichment; e.g. elevated levels for > 3 months), then an alternative solution to the irrigation of water must be provided. This could involve discharging to clay-lined ponds, or irrigating on the neighbouring school's sports fields. Proactive steps to mitigate eutrophication must be

	<p>taken from the first month that elevated levels are noted, so that if elevated levels persist, a solution is fully actionable by the 3rd month, this may include additional storage tanks or alternatively the plant must be adjusted to discharge treated effluent of potable standards.</p> <ul style="list-style-type: none"> • Water samples must be submitted to the Bitou Municipality, BOCMA and be reviewed by an aquatic ecologist on a quarterly basis for the first two years of operation of the estate.
<p>Nature Reserve Accessibility</p> <p>We recommend that the designated Protected Environment be made accessible to the public by arrangement, with a paid entry system if necessary. This would allow for community enjoyment of the area's rich birdlife and enhance public appreciation of local natural resources. Incorporating informational signage within the nature reserve would further promote awareness of local ecology, conservation efforts, and the importance of preserving biodiversity.</p>	<p>The recommendation has been shared with the developer and owner of the property for consideration.</p>
<p>Access to the Lagoon</p> <p>We appreciate that the proposed pathways through the conservation area have been limited to following existing pathways/walkways. We recommend that raised boardwalks be constructed over particularly sensitive zones. Boardwalks would protect the sensitive ecosystems by reducing direct foot traffic</p>	<p>The existing pathways will be maintained and no boardwalks are proposed as part of the current development proposal. The Southern Cape Fire Protection Agency confirmed the existing vehicle access tracks must be maintained minimum 3 metres to allow vehicle access for fire fighting vehicle in the event of a fire. The development of boardwalks will limit the access for fire management vehicles should a fire emergency occur. The exception is the sensitive wetland area where vegetation can be</p>

<p>over vulnerable areas while still providing controlled access for residents and visitors.</p>	<p>maintained at 1m height and no vehicle access). No infrastructure is proposed within the sensitive wetland habitat in order to prevent any disturbance and faunal movement fragmentation during the construction of boardwalks.</p>
<p>Traffic Access to the development during high traffic volume periods is a concern.</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 in the Poortjies residential neighbourhood 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 is working 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 Way and the road between the Plettenberg Bay Primary School and Checkers Centrum is potentially viable.</p> <p>The preferred Site Development Plan has been amended, and the proposed entrance is now located between the Plettenberg Bay Primary School and the Checkers Centrum. The initial proposal to have the access come via Poortjies residential area is therefore eliminated.</p>

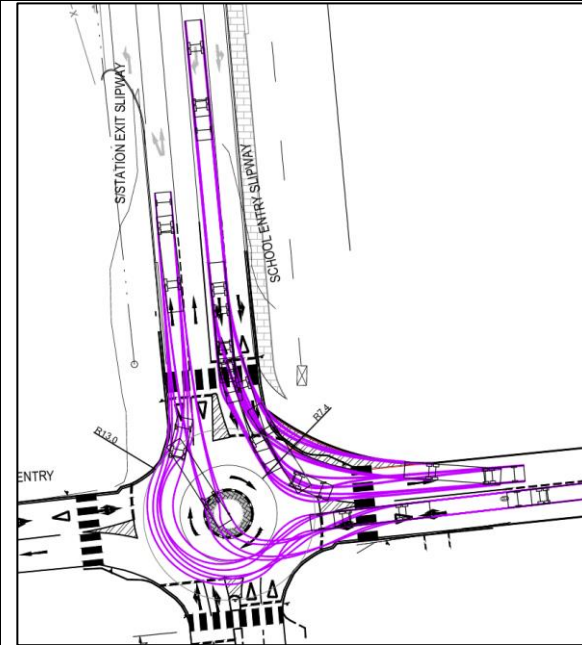
	<p>Based on further discussions held with Bitou Municipality, it is suggested by the Traffic Engineer that a traffic signal at this intersection be considered as an alternative. The provision of traffic signals would not require additional road widening at the intersection, and would have a lesser impact on the existing operations of the Checkers Centrum / Filling Station delivery vehicles at/through the intersection. Traffic signals at this intersection can be expected to result in acceptable services levels along all approaches to the intersection. As a result of the available intersection spacing along Beacon Way, the said analyses were done taking into consideration the proximity of the surrounding intersections in the vicinity (i.e. Market Square-signalised intersection and N2-Beacon Way roundabout).</p>
<p style="text-align: center;">Public Access</p> <p>Access to coastal zones is becoming more and more limited as developments take place. Bitou Municipality's comments address this and we support this concern and recommendation.</p>	<p>The proposed development will not deny the public access to the coastal environment as it is privately owned land and a private secure development.</p>
<p>Water Availability</p> <p>While water infrastructure has been addressed in the application, confirmation is needed from authorities that there is adequate water supply from our water sources to provide for this and all pending development applications.</p>	<p>Bitou Municipality has confirmed bulk infrastructure capacity in its network on 02 July 2024, 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"> • <i>That the developer enters and sign a Service Level Agreement with Bitou Municipality.</i> • <i>That the developer makes payment of the prescribed Augmentation contributions in order for the municipality to</i>

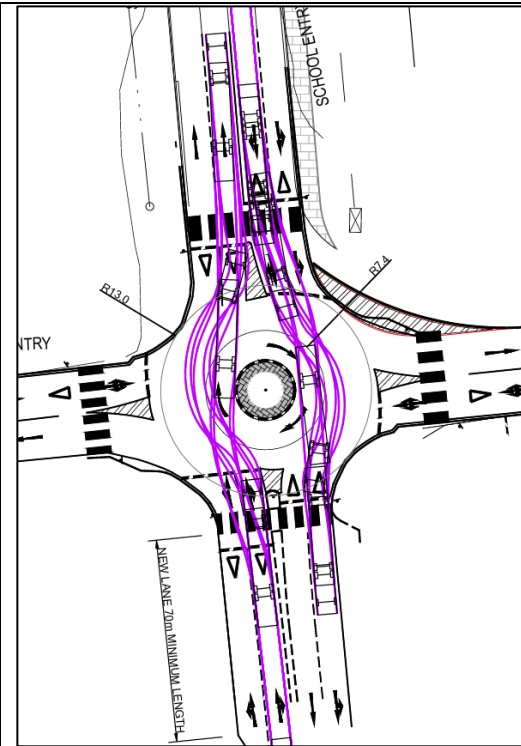
	<p><i>implement the bulk upgrade of services as detailed and required in the GLS network analysis report, dated 3 October 2022.</i></p> <ul style="list-style-type: none"> <i>That the developer implements and maintain a temporary wastewater treatment plant until the upgrades to the Ganzevallei WWTW has 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.</i> <i>That the developer duly communicate point 3 above with all future owners/Homeowners Associates and or Body corporate.</i>

Shoprite Checkers via Email on DBAR	
COMMENTS	RESPONSE
<p>We confirm receipt of your responses to our concerns raised in our previous letter dated 31 January 2024. In this regard we particularly request that the developer engages Shoprite's operational team before commencement of construction to</p>	<p>Your request has been shared with the developer of the proposed Plett Lagoon Estate.</p>

<p>agree to mutually accepted terms pertaining to construction vehicular movement along the school access road leading up to the intended development (“the Development”).</p>	
<p>Whilst we are in principle not opposed to access to the Development being obtained via a traffic circle at the proposed intersection and via the School Access Road, we wish to highlight the following concerns which need to be addressed by the applicant:</p> <p>1. The Traffic Circle in its current proposed format is noticeably not large enough and is not applicably designed to accommodate large truck movement. Whilst there is a concern for the safety of road users in general, this particularly presents a serious concern to Shoprite as convenient and safe truck maneuverability at the intersection in question is vital to the success of our Checkers supermarket’s delivery operations. Shoprite cannot support any traffic circle design that does not take the natural movement of our delivery trucks into account. We submit that the design of the Traffic Circle be revisited to accommodate our delivery truck movement and be presented to Shoprite for further comments therein.</p> <p>2. The above concern is corroborated by the applicant’s own traffic engineers who uphold that the proposed size of the Traffic Circle is considered undesirable as sufficient deviation is not provided for through traffic. The traffic engineers further maintain that the wheel-tracking for trucks making a right-turn movement would encroach on the left-turn lane of the same approach and</p>	<p>The traffic circle design was discussed with Bitou Municipality, the Civil Engineer, Traffic Engineer and developer during a meeting on 22 October 2024. The Bitou Municipality noted that the design of the traffic circle which they approved on 14 February 2024, is the standard size used for traffic roundabouts in the Bitou Municipal District. The traffic circle design allows for mountable curbs on the circle centre “island” which will allow large trucks to safely drive around the traffic circle. Bitou Municipality noted that this is the prescribed standard design due to spatial constraints and that the traffic circle currently under construction at the N2 – Beacon Way intersection is of a similar standard with large trucks driving over the mountable curbs.</p> <p>The slipway entry currently under construction from Beacon Way to the Plettenberg Bay Primary School entrance will allow large trucks to easily turn into the school road from Beacon Way and therefore alleviating traffic towards the school entrance.</p> <p>Wheel tracking for the proposed traffic circle design was simulated using an 18.2m single carriage truck.</p>

cut into both circulating lanes, which is undesirable. The engineering reports and traffic impact statement ("TIS") refer to truck tracking, but this is not indicated on any plans in said reports. It is also not clear on which truck size the applicant's engineers based their tracking modules on. It is essential that this information be revealed.

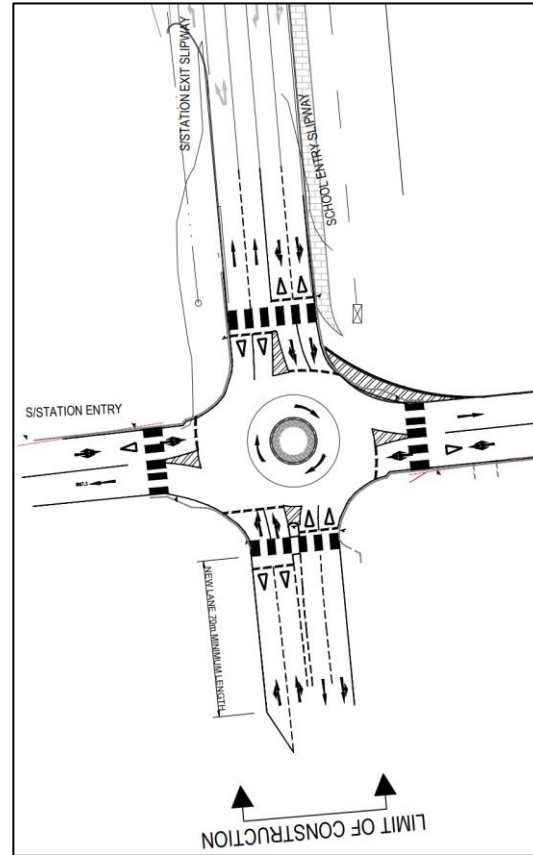




Based on further discussions held with Bitou Municipality, it is suggested by the Traffic Engineer that **a traffic signal** at this intersection be considered as an alternative. The provision of traffic signals **would not require additional road widening at the intersection**, and would have **a lesser impact on the existing operations** of the Checkers Centrum / Filling Station delivery vehicles at/through the intersection. Traffic signals at this intersection can be expected to result in acceptable services levels along all approaches to the intersection. As a result of the available intersection spacing along Beacon Way, the said analyses were done taking into consideration the proximity of the

	<p>surrounding intersections in the vicinity (i.e. Market Square-signalised intersection and N2-Beacon Way roundabout).</p>
<p>3. The engineering reports and TIS do not accurately portray how the Traffic Circle will connect and align with the existing lanes of the connector roads. It further does not indicate how traffic continuity will be maintained along Beacon Way between the N2 and especially the traffic signals at the Beacon Way / Checkers / Market Square intersection. It is also uncertain whether the Traffic Circle will encroach the boundary lines of any surrounding properties. It is essential that these aspects be clarified by the applicant's engineers.</p>	<p>The SANRAL roads authority is currently in the process of upgrading the N2-Beacon Way intersection, Beacon Way itself, and the Beacon Way – School road intersection.</p> <p>The diagram below portrays the as-built design of the Beacon Way – School road intersection currently under construction by SANRAL. The proposed traffic circle will therefore not require any additional lanes as the lanes portrayed in the diagram is already under construction.</p> <p>Should the alternative of a traffic circle be approved for the Beacon Way – School intersection, construction will be limited to the intersection itself due to the lanes already being constructed by SANRAL as depicted in the diagram below.</p> <p>It is noted however, that based on further discussions held with Bitou Municipality, it is suggested by the Traffic Engineer that a traffic signal at this intersection be considered as an alternative. The provision of traffic signals would not require additional road widening at the intersection, and would have a lesser impact on the existing operations of the Checkers Centrum / Filling Station delivery vehicles at/through the intersection. Traffic signals at this intersection can be expected to result in acceptable services levels along all approaches to the intersection. As a result of the available intersection spacing along Beacon Way, the said analyses were done taking into consideration the proximity of the surrounding intersections in the vicinity (i.e. Market Square-signalised intersection and N2-Beacon Way roundabout).</p>

The proposal of Traffic Signals at the Beacon Way – School road intersection is included as the **preferred alternative** in the Final Basic Assessment Report for submission to the Department of Environmental Affairs and Development Planning for decision making.



4. We cannot detect any proposed road upgrades for the School Access Road to accommodate the additional traffic which will be generated by the Development, bar the continuation of the existing pedestrian walkway along this road up to the entrance of the Development. It is imperative that the upgrading of the School Access Road to accommodate the additional traffic which will be generated by the Development be taken into consideration by the applicant and the Authorities.

There are no upgrades proposed for the road between the Checkers Centrum and the Plettenberg Bay Primary School as part of this development proposal, however it was noted during our discussion with Bitou Municipality on 22 October 2024 that they intend to upgrade this road in the future. Details and designs regarding these upgrades have not been completed and shared as yet.

It is noted that slipways from Beacon Way towards the School road and from the School road towards Beacon Way are currently under construction which also aims to alleviate traffic congestion at this intersection.



5. The position of the proposed gatehouse at the entrance to the Development and stacking distance from the development access point to same is not clear and should be clarified by the applicant's designers. The applicant's traffic engineers' recommendations herein should be considered.

The position of the proposed gatehouse will be approximately 38 metres from the property boundary. The entrance to the proposed development will be separated into three lanes for Service Entry, Visitors Entry and Residents Entry respectively.

The prescribed stacking distance for the proposed development is 25m to allow space for five vehicles. The conceptual design currently allows space for approximately eight vehicles, however congestion at the entrance will further be reduced due to the separate access lanes proposed for Service, Visitors and Residents Respectively.

