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REVISED

DRAFT BASIC ASSESSMENT REPORT (BAR) FOR A SMALL CAMPING RESORT, ASSOCIATED INFRASTRUCTURE AND TOURISM FACILITIES ON PORTION 152 OF THE FARM UITZICHT NO. 216, KNYSNA

BRENTON COVE



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REVISED DRAFT BASIC ASSESSMENT REPORT (BAR):

**THE DEVELOPMENT OF A SMALL CAMPING RESORT, ASSOCIATED INFRASTRUCTURE AND TOURISM
FACILITIES ON**

PORTION 152 OF THE FARM UITZICHT NO. 216, KNYSNA

Submitted for:

Public review and comment (20 March – 22 April 2026)

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In accordance with the NEMA: EIA Regulations (2014, as amended) – Appendix 1 of Government Notice 326 (2014, as amended), the following content must be included in a Basic Assessment Report (BAR):

Requirement	Details
(a) details of- (i) the EAP who prepared the report; and (ii) the expertise of the EAP, including a curriculum vitae;	Table A and Appendix I (CV)
(b) the location of the activity, including: (i) the 21-digit Surveyor General code of each cadastral land parcel; (ii) where available, the physical address and farm name; (iii) where required information in terms (i) and (ii) is not available, the coordinates of the boundary of the property or properties;	Section 3
(c) a plan which locates the proposed activity or activities applied for as well as associated structures and infrastructure at an appropriate scale; or if it is- (i) a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or (ii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken;	Section 3
(d) a description of the scope of the proposed activity, including- (i) all listed and specified activities triggered and being applied for; and (ii) a description of the activities to be undertaken including associated structures and infrastructure;	Section 3
(e) a description of the policy and legislative context within which the development is proposed including- (i) an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks, and instruments that are applicable to this activity and have been considered in the preparation of the report; and (ii) how the proposed activity complies with and responds to the legislation and policy context, plans, guidelines, tools, frameworks and instruments;	Section 4, 5 and 7
(f) a motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location;	Section 11
(g) a motivation for the preferred site, activity and technology alternative;	Section 7
(h) a full description of the process followed to reach the proposed preferred alternative within the site, including: (i) details of all the alternatives considered; (ii) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs; (iii) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them; (iv) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; (v) the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts- a. can be reversed; b. may cause irreplaceable loss of resources; and c. can be avoided, managed or mitigated; (vi) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;	Section 7 Appendix E The PPP is included in a report – Appendix E Section 6 Section 8 Section 8.1 Section 7.5 Section 10 Section 7

(vii) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; (viii) the possible mitigation measures that could be applied and level of residual risk; (ix) the outcome of the site selection matrix; (x) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and (xi) a concluding statement indicating the preferred alternatives, including preferred location of the activity;	Section 14
(i) a full description of the process undertaken to identify, assess and rank the impacts the activity will impose on the preferred location through the life of the activity, including- (i) a description of all environmental issues and risks that were identified during the environmental impact assessment process; and (ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures;	Section 7
(j) an assessment of each identified potentially significant impact and risk, including- (i) cumulative impacts; (ii) the nature, significance and consequences of the impact and risk; (iii) the extent and duration of the impact and risk; (iv) the probability of the impact and risk; (v) the degree to which the impact and risk can be reversed; (vi) the degree to which the impact and risk may cause irreplaceable loss of resources; and (vii) the degree to which the impact and risk can be avoided, managed or mitigated;	Section 8
(k) where applicable, a summary of the findings and impact management measures identified in any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final report;	Section 9 and 6
(l) an environmental impact statement which contains – (i) a summary of the key findings of the environmental impact assessment; (ii) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and (iii) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;	Section 7.8 and 7.5, 14
(m) based on the assessment, and where applicable, impact management measures from specialist reports, the recording of the proposed impact management outcomes for the development for inclusion in the EMPR;	Section 8
(n) any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation;	Section 14
(o) a description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed;	Section 2.2
(p) a reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation;	Section 14
(q) where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required, the date on which the activity will be concluded, and the post construction monitoring requirements finalised;	Section 8
(r) an undertaking under oath or affirmation by the EAP in relation to –	Attached to the Application and BAR section 16

(i)	the correctness of the information provided in the reports;	
(ii)	the inclusion of comments and inputs from stakeholders and I&APs;	
(iii)	the inclusion of inputs and recommendations from the specialist reports where relevant; and	
(iv)	any information provided by the EAP to interest and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties; and	
(s)	where applicable, details of any financial provision for the rehabilitation, closure and ongoing post decommissioning management of negative environmental impacts;	Section 14
(t)	any specific information that may be required by the competent authority; and	N/A
(u)	any other matters required in terms of section 24(4)(a) and (b) of the Act.	N/A

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	- HWM, 32m- and 100m buffer areas																								
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Table A: EAP and applicant details

EAP details	HillLand Environmental (Pty) Ltd Inge Delport EAP (EAPASA – 2019/1689), Cathy Avierinos review EAP (EAPASA – 2019/1053) Tell: 044 889 0229 Cell: 082 525 9995 / 082 558 6589 Fax: 086 542 5248 Address: 166 Mountview Farm, Victoria Heights, George, 6530 Postal address: PO Box 590, George, 6530 Email: cathy@hilland.co.za / environmental2@hilland.co.za / admin@hilland.co.za Website: www.hilland.co.za Please refer to the attached CV's (Appendix I)
Applicant details	Brenton Cove CC represented by Mr Rudi Neethling Cell: 083 445 2593 Email: brentoncoveknysna@gmail.com

1. EXECUTIVE SUMMARY

This Basic Assessment Report (BAR) assesses the proposed development of a low-impact camping resort on Portion 152 of the Farm Uitsicht No. 216, Knysna. The site is located within the Knysna National Lakes Area, adjacent to the Knysna Estuary.

The development includes 25 camping sites, associated infrastructure, and services located within the gardens of the existing home. **All infrastructure required for the tourism camping area is within existing transformed garden areas, avoiding all sensitive habitats.**

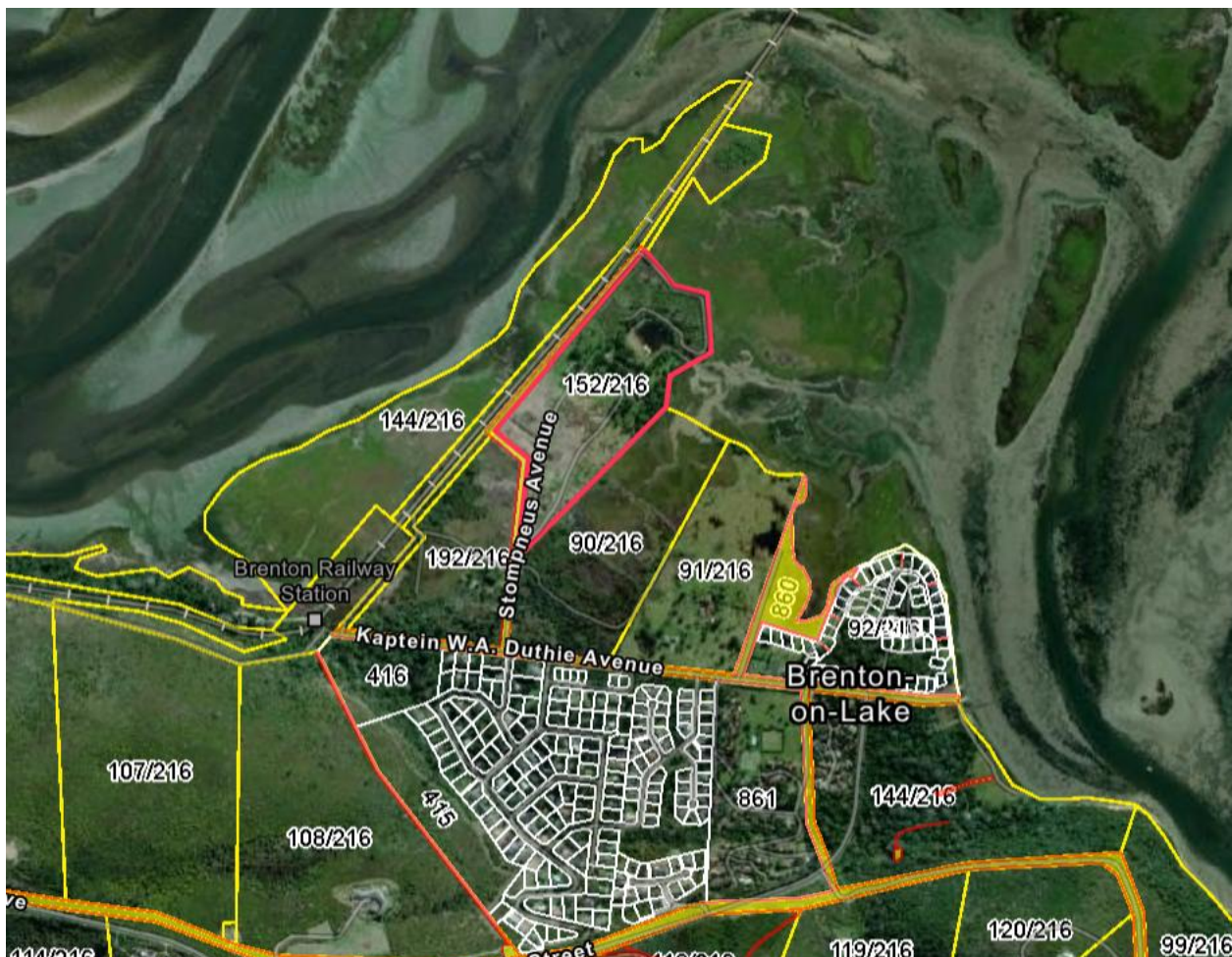


Figure 1 Locality plan showing the property located within Brenton-on-Lake accessed from Kaptein W.A Duthie Ave and Stompneus Ave and east of the Outeniqua Choo-Tjoe railway line

Historically, Knysna and the surrounding areas had many camping sites or “caravan parks” as they were known, over time these have mostly been converted into residential areas leaving a shortage of camping sites for tourists. The owner of Brenton Cove has noted this requirement and as the property is ideally suited to camping (tents only) due to the extensive lawn and garden areas, he is making an application to create a small camping area on his property. Camping sites are a consent use on Agricultural I zoned land and as such the use is compatible with the planning for the property, while the size of the property and the proximity to the National Park, makes it a desirable location for a camping destination.

Based on the comments received and objections from the local community towards traditional camping, the application has been amended to include only fixed tents on raised wooden decks,

each with a small bathroom on the deck. There will be no traditional “camping” and guests will experience a “glamping” eco-tourism type stay.

The existing buildings and infrastructure on the property will be used and converted where possible for use as part of the tourism facility. A planning application has been lodged with the Knysna Municipality for the consent use of the tourism facility which is permitted in terms of the Agricultural zoning of the property.

Initially the application was for 105 camp sites, however, based on comments received, the application has been amended culminating with this final site development plan for only 25 camping sites. These 25 camping sites are located within the existing gardens and are screened from view from the adjacent Brenton-on-Lake area and from the Knysna Estuary.

Various alternatives have been considered and amended based on comments received:

25 raised camp sites:

The proposal has been amended to allow for a total of 25 camping “pods” which consist of a low wooden deck with a permanent bathroom against which a more luxury tent can be erected. These will be erected over time based on the owner’s requirements culminating in a maximum of 25 decks.



Figure 2 Proposed camping sites in relation to the SANParks Development Control Area (DCA) in red.



Figure 3 Proposed camping node and services in relation to the SANParks DCA



Figure 4 SDP as included in the WULA application showing all services (EnviroSynergy, 2026).

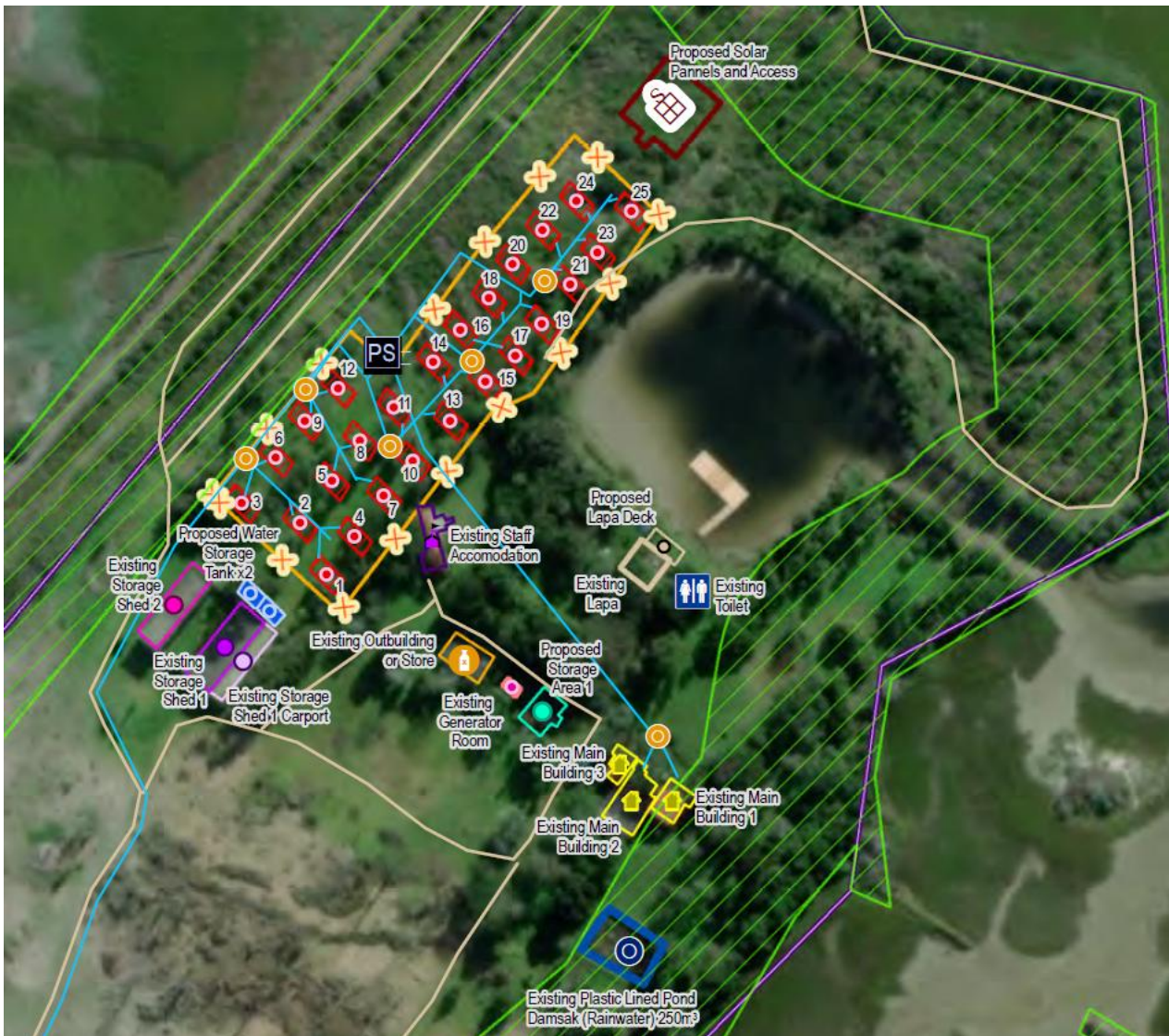


Figure 5 Zoom in of the SDP of the revised preferred alternative (EnviroSynergy, 2026).

The previous alternative of 5 raised deck camp sites and 20 grass camping sites has been replaced by the new SDP.



Figure 6: 5+20 Previous Site Development Plan now replaced with the new proposed layout of 25 raised deck camp sites.

Proposed infrastructure summary:

- **Electricity** - a small area for solar panels, batteries and inverters to supply electricity for the campers will be installed. This will be a modular system where additional solar panels can be added as the demand requires.
- **Sewage** – the concern relating to sewage and risk of pollution has resulted in the change to the proposed sewage treatment on site. A sealed reticulation system from the raised decks, through a series of pipelines and collection tanks (septic tanks) to a small pumpstation that will pump the sewage to a new small sewage mini-package treatment unit. Water will be treated to General Standard and be recycled for use in flushing toilets and garden irrigation. Sludge will be taken by private honey sucker to the municipal wastewater treatment plant.
- **Water** - The collection of roof water off existing roof areas will continue, a 250m³ "damask" for additional water storage will be installed in the existing lined pond area. Use of borehole water is proposed in addition to the current municipal water supply to the property. Water will be treated and filtered before use. Toilet flushing will make use of recycled water.
- **WULA** - A Water Use Licence Application is being made for borehole water use and storage, and for the mini package plant for the treatment of sewage water and use of treated effluent water for irrigation.
- **Roads** and tracks on site will be grass block surfaces where necessary to improve the existing tracks but the tracks will remain narrow "twee spoor" tracks to retain the rural character of the area and ensure that vehicle speed is dead slow for the local free-roaming wildlife.

The tourism facility will make use of the existing buildings and infrastructure on the property where available. The existing lapa will be used as a dining area, where this application includes the addition of a deck area in front of the lapa, the one building (previously used as a coffee shop) will be converted into a small convenience store for the campers for essential supplies. Existing staff accommodation will remain in use.

The small private lagoon area guests will have access to the existing jetty and slipway for non-motorised access to the water (canoes etc). The existing houseboat / barge / pontoon moored in the lagoon will remain.

Guest access to the greater Knysna Estuary area via the tidal channel will be subject to the standard SANParks requirements as applicable to any other visitor to the Knysna Estuary – specifically these are to comply with the use requirements of the "quiet zone" as per the Knysna Estuary Management Plan (see section 5 below).

SANParks requested a zoning plan for the property in order to correspond to the Estuary Management Plan. This zonation plan includes estuarine and terrestrial use zones that correspond with the Knysna Estuary MP.

- The Quiet Zone estuarine - will cover the manmade tidal pond
- The Quiet Zone terrestrial - will cover the restoration and rehabilitation area
- The Low-intensity Leisure Zone terrestrial - will cover the homestead, gardens, buildings and tourism accommodation area.

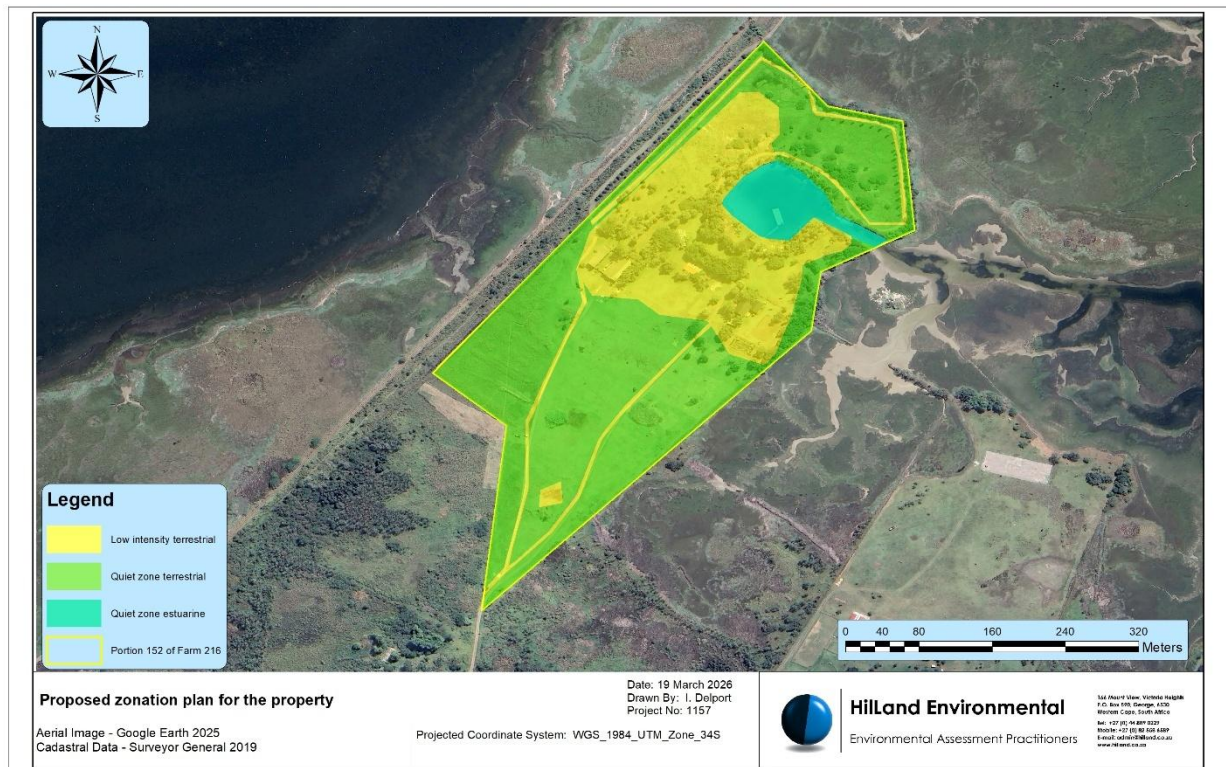


Figure 7: Proposed zonation plan

Specialist studies have confirmed that the proposed camping area has low ecological sensitivity and that the proposed activity will not impact estuarine systems or any protected vegetation. Linking this site assessment to the SANParks estuary management zones, allows for the protection of linking ecological corridors, restoration of areas linking to the surrounding estuarine saltmarshes and wetlands, and allows for achieving conservation outcomes for the property.

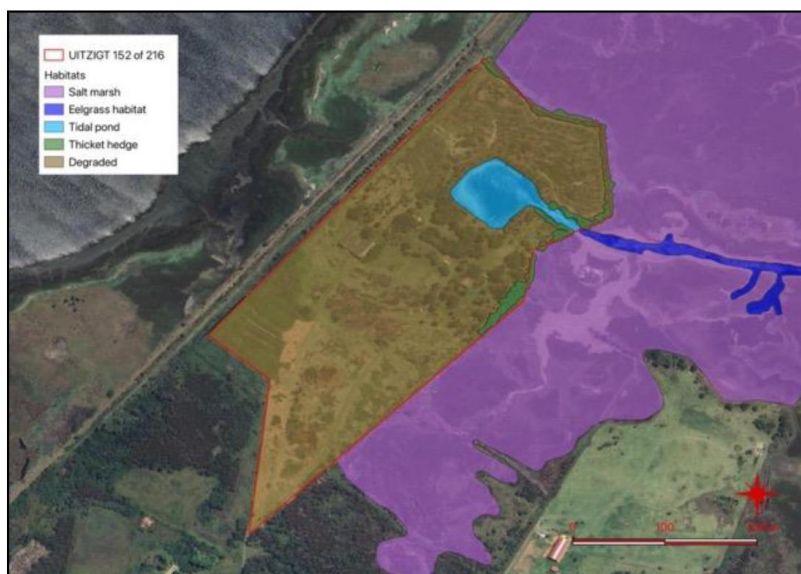


Figure 8: Habitats on the property and surrounding the property. (Hoare, 2025)

The proposal aligns with the Knysna SDF, IDP, and Western Cape PSDF, and supports local tourism and job creation. The proposal will provide limited tourism camping facilities in the area, where most of the historic camping facilities have been lost through rezoning to alternative uses.

All potential impacts are either avoided or will be mitigated through the implementation of the EMP on site and compliance with the Knysna Estuary Management Plan off site.

There has been considerable opposition from the local residents of Brenton-on-Lake due to various perceived impacts and changes to the character of the area.

Table 1: Concerns raised through the public participation process can be summarised as follows:

Concern raised or impact noted	Response or implication
WUL needs to be applied for	Application for the WUL for the sewage package plant, borehole water use and release of treated effluent to the system through irrigation has been made and integrated into this BAR and the NWA regulated processes.
Potential to pollute the Knysna Estuary through the management (mismanagement) of sewage system	The proposed sewage package plant WUL application has commenced with BOCMA in order to licence the treatment plant and the recycling of the treated effluent for toilet flushing. Treatment of water is proposed to be to General Standards and irrigation with the excess treated effluent is being requested in preference to the standard release of treated water directly into the water resource. Should BOCMA require, the standard of treated effluent may be raised from General Standard to Special Standard which would allow for the complete recycling and reuse of the water on site.
Impact on the local wildlife and biodiversity	The site for the 25 decks, which will take up 1250m² total garden area, has been selected specifically to be within the central existing lawn area of the homestead gardens so that there is no loss of vegetation or sensitive habitat disturbance. The large area retained between the village and the homestead forms part of a restoration ecological corridor where the owner has been removing alien invasive vegetation and is allowing the area to restore. Free-roaming wildlife can continue to make use of the property – no changes proposed in terms of fencing or obstructing animal movement in any way. Access to the estuary via canoe will be possible for guests who will be obliged to follow the rules imposed by the SANParks which are applicable to all users of the water. No pedestrian access into the surrounding estuarine saltmarshes will be permitted.
Scale of the accommodation facility being offered	The concerns raised imply that the application is for high-intensity use camping facility which is not the case. Only 25 sites are proposed which equates to a total of 1250m² of decks on which the bathroom and tent will be installed. This equates to 1.1% of the property size which will be changed for the accommodation facility. Number of guests will be 2 per tent = 50 persons Alternative numbers of tents have been mentioned as possible alternatives with 5, 8 and 15 being suggested. There is however no indication as to why a lower number would be preferable or for what reason. The planning authority will make a ruling on the number permitted in the consent use application and the environmental authority will rule on the various NEMA listed activities which are triggered.

	Consent use camping applications on agricultural land consider camping of up to 20 sites as low-impact. This application for a maximum of 25 sites is slightly higher than the norm. It is anticipated that during operation, fewer sites may be developed in order to create a more private experience for the guest (sufficient spacing and planting between the decks for privacy).
Increased traffic through the village	An additional 25 vehicles visiting the area is not regarded as a significant traffic impact. When viewed with the neighbouring property's application for 7 cabins, a total of 32 additional vehicles visiting the area is not regarded as significant. All road users are limited by the speed restrictions in the village and the abundant wildlife, which is the reason why visitors come to the area, encourages drivers to travel even slower.
Change in character of the village (noise, light and visual)	The visual assessment has confirmed that having permanent tents erected within the proposed node around the main homestead will not result in a significant visual impact. Residents living in the elevated areas of Brenton-on-Lake, have a view down over the property and they will continue to have that view down over the property which will include some additional roof and canvas sections visible between the trees. This is not offensive or obstructive in any way. Lighting will all be low level solar lighting and colours will be muted "khakis" and dark grey. Additional indigenous tree planting is proposed on the property to add to the forest thicket character which exists around the homestead at the moment. The area is more exposed currently as the owner has been systematically removing the alien invasive trees which had been left to invade the property subsequent to the 2017 fires by the previous landowner. The facility will cater to guests that are seeking the peace and tranquillity of the area and is NOT a noisy venue for rowdy campers. Strict rules will apply to all guests.
Fire risk	The 2017 fire is still fresh in most landowner's minds and the farm owner is no exception. Systematic removal of alien vegetation has been ongoing to remove the fuel load and fire risk linked to alien vegetation. In addition, the owner is a member of the FPA and is actively managing firebreaks on the property. The excessive fuel load from previously cut material left on the property is being removed. The owner is storing additional water specifically for firefighting purposes – this in addition to what is prescribed by the engineering risk levels.  Note the large water tanks already on site specifically for fire fighting.

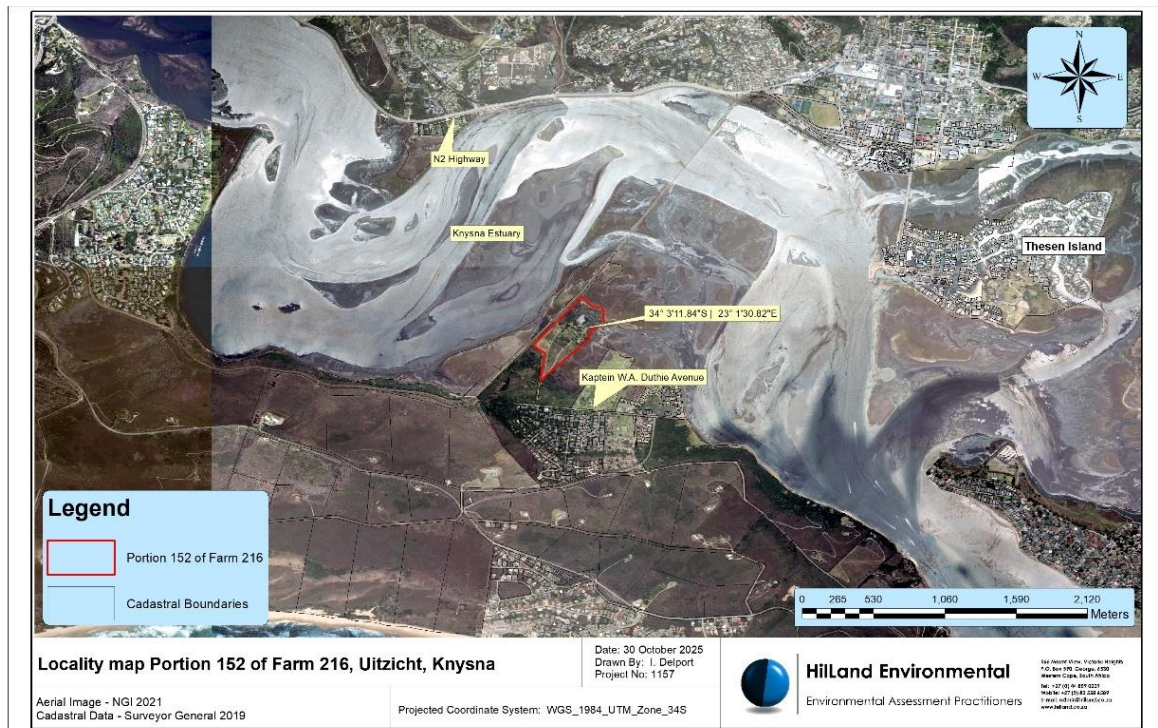
NEMA procedure followed	Concern was raised that the incorrect NEMA procedure was being followed. Activities from Listing Notices 1 and 3 are triggered by this proposed application and as such the regulated process is prescribed in the EIA regulations. A Basic Assessment process is the required regulatory process for the NEMA Environmental Authorisation application. There are no activities proposed from listing notice 2 and as such a Scoping EIA is NOT the required regulatory application process.
Planning concerns	Planning concerns are not covered in the NEMA application as they are dealt with in terms of the planning application. What is clarified is that the planning application is not for rezoning to a resort zone, the planning application is for a consent use for camping on Agriculturally zoned land.
Control of campers	Control of "general / conventional" campers was raised as a concern. The applicant has elected to remove the general camping from the application and will only include the tents on wooden decks. In this way there is no potential for conflict, guests arrive and stay in the tented accommodation that is provided. No private tents will be permitted.
Boat access and use of the public launch site.	Although it is not possible to control the use of the public slipway and launch site in Brenton-on-Lake, it is possible to indicate to guests that no boats are permitted to be brought to the property and no trailers can be parked on the property. Guests will be making use of private non-motorised vessels as per the SANParks Quiet Zone requirements and the property will have a selection of such craft available for guests to use subject to the SANParks rules and regulations. Guests at Brenton Cove are not expected to make use of the public launch site.
Rehabilitation and restoration potential of the site	The zonation plan has been developed to indicate the areas of use according to the SANParks Est MP. There are large areas that are currently being rehabilitated and retained for wildlife corridors.
Value of the manmade tidal pond as a nursery for estuarine organisms	The manmade tidal pond with its tidal channel inlet is an incredibly valuable nursery area and additional research in this area is planned by the owner. The pontoon functions as an artificial reef with a vast accumulation of wildlife now using this area as a shelter and nursery. There is submerged strapping dangling in the water beneath the pontoon which is rich in estuarine life.
Long term conservation outcomes	SANParks is requesting exploring potential conservation outcomes through stewardship agreement. At this stage the owner feels it is premature as the biodiversity value of the property does not support the required elements, but this could change over time. The operational management is already taking the longer-term restoration and conservation into account through the approved ACP and the proposed zonation plan.

Based on the assessment and taking concerns raised into account, together with the changes proposed to the application and specifically the services, the EAP is confident that impacts have been avoided and that where not possible to avoid, they have been mitigated and therefore the recommendation is to authorise the proposed activity, subject to the conditions outlined in this report and subject to the density proposed as acceptable by the competent authorities.

2. INTRODUCTION

HillLand Environmental have been appointed as the Environmental Assessment Practitioners (EAP) by the applicant, **Brenton Cove CC represented by Mr Rudi Neethling**, to ensure compliance with regulations contained in the National Environmental Management Act (NEMA Act No. 107 of 1998, as amended) and the Environmental Impact Assessment Regulations (2014, as amended) for the proposed activities on Portion 152 of Farm 216, Knysna (here after referred to as 'the property').

The property is located in Brenton-on-Lake and the southern banks of Knysna Estuary where the railway bridge crosses the estuary.



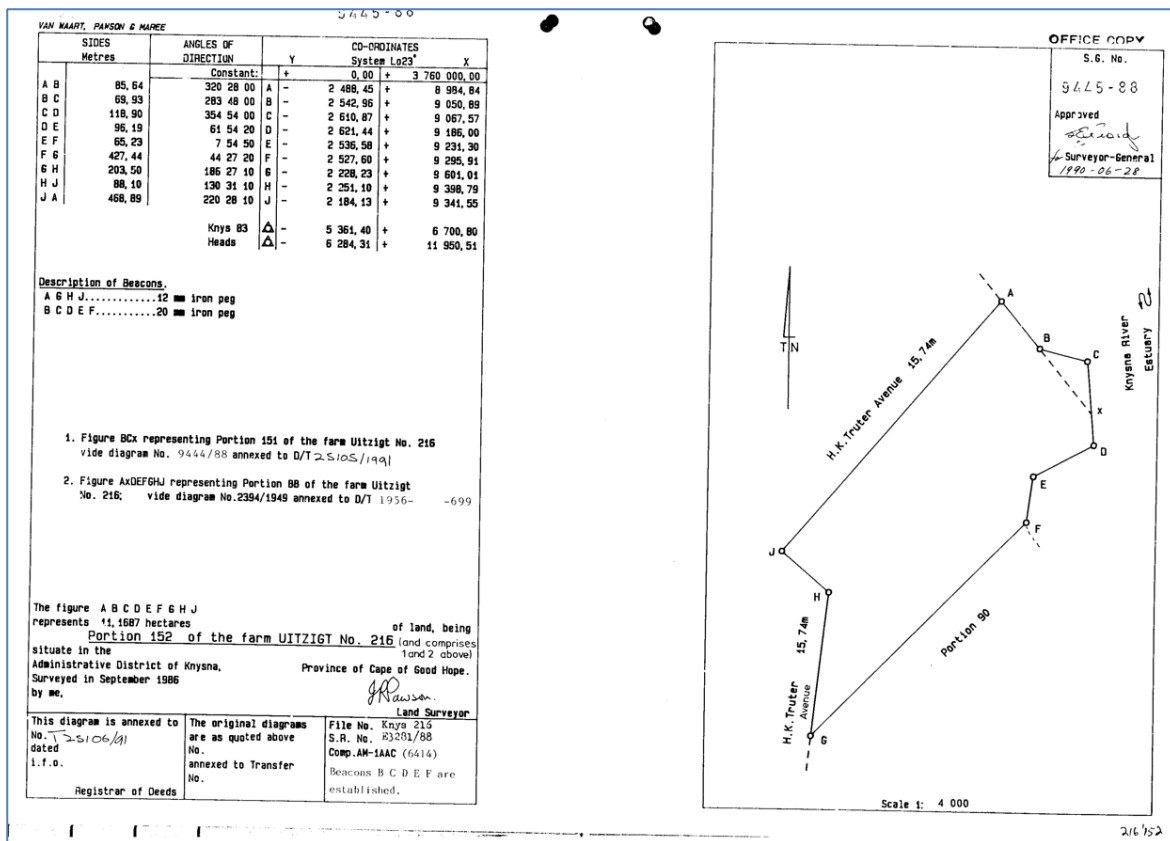


Figure 10: SG Diagram of portion 152 of 216 which was subdivided in 1986 (originally part of portion 20 of 216).

Access to the property is gained from Kaptein W.A. Duthie Avenue, and Stompneus Avenue (servitude). There are strict speed limits on the access due to the local wildlife.



Figure 11: Map showing the property boundary highlighted in red and servitude roads providing access to the property in yellow (CapeFarmMapper, 2025) – main access will remain from the existing roads

The proposal entails the establishment of a small camp site on the property. Various alternative site development plans have been considered and rejected. This report proposes the preferred SDP described in more detail further in this report. Minor changes have been made to the previous SDP proposed in order to address concerns raised in the authority and public consultation process.

The proposal will trigger various listed activities in terms of the NEMA EIA Regulations which requires Environmental Authorisation (EA) from the Competent Authority (CA) before it may be undertaken.

The property is located in the Brenton-on-Lake area within the Knysna National Lakes Area where the competent authority in terms of NEMA is the National Department of Forestry, Fisheries and Environment (DFFE).

Table 2: Property details

Portion and farm number	Portion 152 of the Farm Uitsicht No. 216
Property size	11.29ha
Zoning	Agriculture zone I
SG code	C03900000000021600152
Coordinates	34°3'8.92"S 23°1'33.84"E
Local Municipality	Knysna Municipality
District Municipality	Garden Route District Municipality

3. EXISTING INFRASTRUCTURE/DISTURBANCES

An excavated tidal pond is located on the northern part of the property with an existing slipway, jetty and pontoon/houseboat. This artificial pond was historically created and is visible on the 1989 historic aerial image and links to the Knysna Estuary. The slipway and jetty have been in existence since this original excavation.



Figure 12: 1989 aerial image. The pond is highlighted by the arrow and is surrounded by gardens and infilling on which the various buildings were constructed (NGI, 2025)

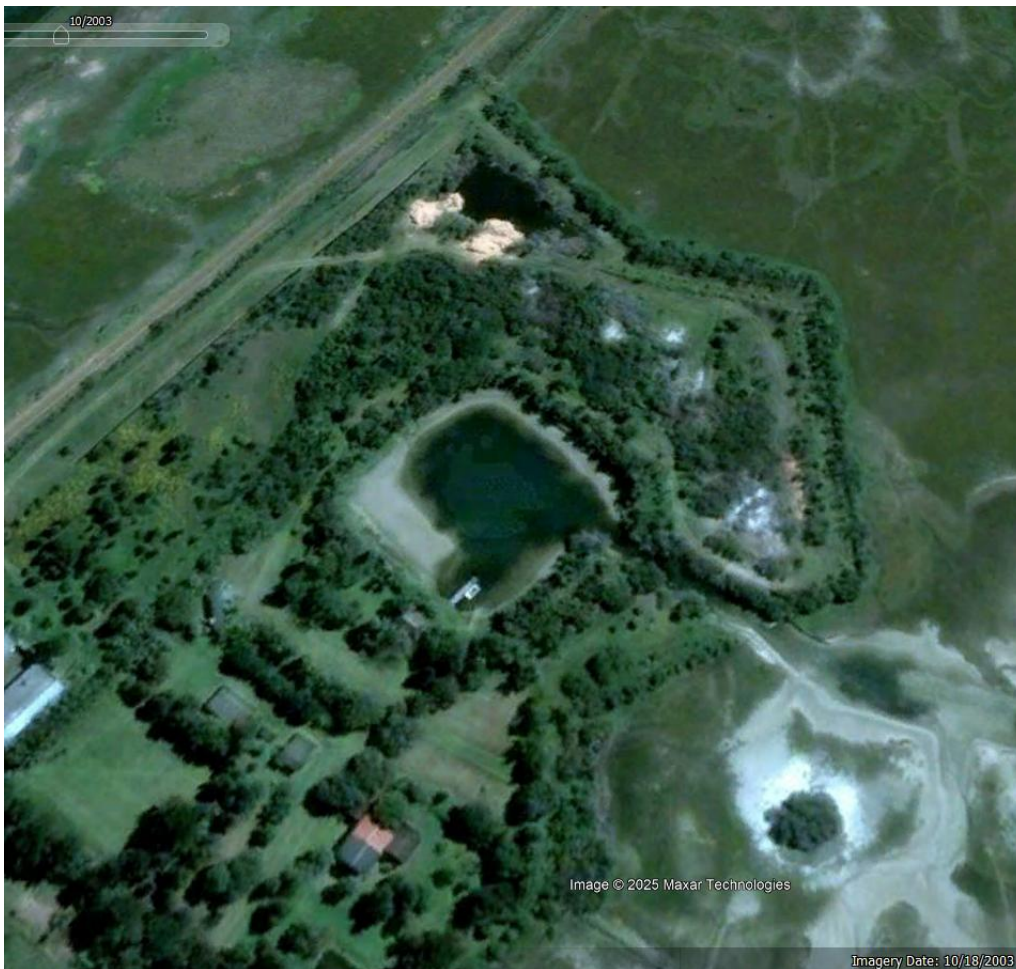


Figure 13 Google Aerial 2003 showing the existing jetty and slipway within the manmade tidal pond (Google Earth).

There are several existing structures on the property surrounded by open lawns and garden areas.



Figure 14 Current Google Earth, showing the existing infrastructure on the property in relation to the Knysna Estuary Development Control Area (red).



Figure 15: Drone photo showing the existing structures in the central area of the property

$25 \times 50\text{m}^2 = 1250\text{m}^2$ total for the 25 tents. This amounts to 1.1% of the property being physically transformed for the tents

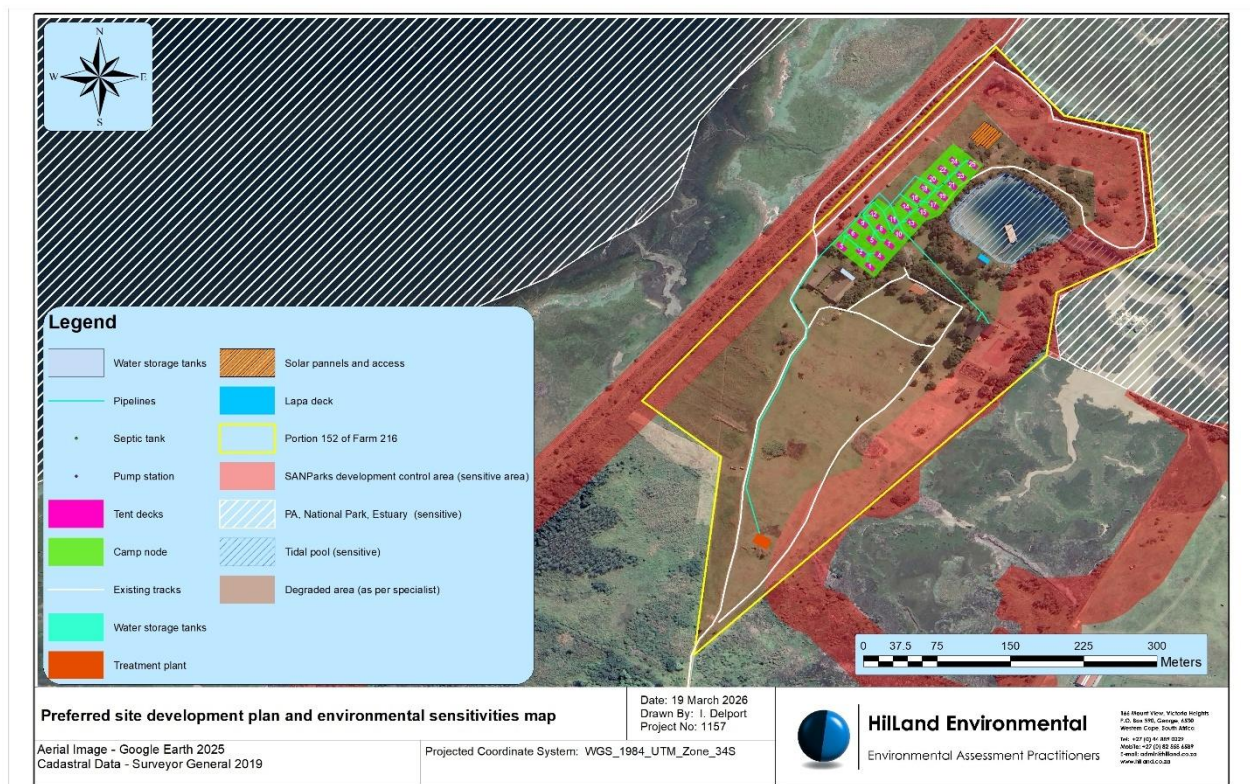


Figure 18: Proposed site plan showing the proposed camping area node and the proposed expansion to the existing Lapa with a wooden deck and proposed associated infrastructure



Figure 19 Plan showing the new proposed services - note all services fall outside of the SANParks Development Control Area (green hatching) (EnviroSynergy, 2026)

The proposal entails the establishment of a small camping resort on the property which will involve the following:

- Twenty five (25) permanent wooden decks, each with a small bathroom will be constructed on which a more luxury tent will be erected, associated services, access track and grass parking will be provided.
- By controlling the tent for each of the 25 sites, the exact numbers of guests can be limited and the potential of guests arriving with “non-conforming” camping equipment can be completely eliminated. Guest will pre-book and arrive with their tented accommodation ready and waiting for them.



Figure 20 3D representations of the proposed decks with a permanent bathroom and space for tent to be erected.

- Existing structures will be renovated where required and used by the landowner or as tourist facilities.
- The small deck area will be added to the existing lapa at the pond and the lapa will act as the dining facility for the resort.

Associated services will entail the following:

Summary on the potable water:

- Total water demand is 9000 litres per day for the 25 camping sites
- Required storage – 2x 9000 litres = 18 000 litres or 2x 10 000 litre jojo tanks.
- Water supply –
 - Rainwater harvesting – from all existing roof structures – the current rainwater storage capacity already exceeds the required 18 000 litres. Water will be chlorinated in the rainwater tanks and pumped to the 2 main supply tanks.
 - Borehole – has a supply of 18 000 litres per hour. This means 0.5 hrs of pumping will provide the entire daily demand requirements. Water from the boreholes will be sterilized with chlorine or UV before being pumped to the storage tanks.
 - Municipal supply – the property has existing municipal potable water supply that services all the existing water uses on the property.
- Water reticulation – water will be pumped in 75mm ring main with 20mm connections to all structures and buildings.
- Toilet and garden water – a separate recycling system will be used for water for toilet flushing and garden irrigation from the treated effluent at the sewage treatment package plant as part of the recycling of treated effluent. The sustainability of the project in terms of wise water use, will be maximised through the recycling of the treated effluent for flushing toilets and through not using potable water for garden irrigation.

Summary on the sewage:

- Sewage daily treatment 8600 litres (when at 100% occupancy)
- Internal sewage reticulation will be collected in sealed below ground plastic tanks of 5 x 3 600 litre capacity – (approximately 1 for every 5 tents / structures),
- Outflow from the tanks piped to a sealed underground sewage pump station of 5000 litre capacity

- Sewage will be pumped from the sealed tank to the sealed package plant with the capacity to treat 8 600 litres per day (at full occupancy).
- Water will be treated to General Standards
- Treated water will be sterilized and pumped to 2x 10 000 litre storage tanks
- From the tanks the water is recycled for use in garden irrigation and toilet flushing
- The treatment plant will be a Fluidco installed and managed and maintained system.
- As a precaution, all tanks will have a sump to ensure that should there be any overflow or accidental spillage or leakage, this cannot pollute any surrounding water body or ground water.

WULA – note:

- Any surplus water from the water treatment plant that is not recycled (closed treatment and use cycle) for toilet flushing must be discharged by municipal honey sucker tanker / private honey sucker tanker to the municipal sewage treatment works **until such time as the Water Use Licence for irrigation use of the treated effluent has been issued.**
- Potable water for the project will make use of ONLY the captured rainwater harvesting and existing potable municipal supply **until such time as the use of supplementary borehole water has been granted a Water Use Licence.** Borehole water requires filtration and UV sterilization / Chlorination prior to use.

Electrical supply

- The property has an existing electrical connection, however, the proposed facilities will connect to **solar power** that will be installed (infrastructure shown on the SDP).
- Municipal electrical supply is available and used on site currently.
- All cooking and water heating will be done using gas appliances.

Access

- The additional 25 cars making use of the camping site will access from the existing municipal roads in Brenton-on-Lake. There are strict speed limits due to the wildlife.
- The engineers confirm that this will not have any impact of traffic flow in Brenton-on-Lake.
- Existing roads and tracks on the property will be used, supplemented with a G5 or grass blocks where necessary. Internal speed limits will be restricted by the tracks specifically due to the free roaming wildlife in the area
- Stormwater will not be concentrated and will be dissipated in the existing garden areas (grass swales).

Refuse

- Refuse will be collected on site and divided into general waste (black bags), recyclable waste (blue bags) and compostable waste (plant matter) and this will be collected by the municipality as part of the weekly refuse collection service available in the area. Compostable materials will continue to be composted and used on site in the landscaping.

The construction and operational phases of the proposed camp site will be done in accordance with an Environmental Management Programme (EMPr) that includes "camping rules" which will be set by the owner in order to ensure compliance. Guests who do not abide by the rules set, will be requested to leave the property or will not be admitted to the property.

The property has access to the Knysna Estuary (as do most waterfront properties) and therefore visitors will be able to canoe /kayak. They will access the water using the existing jetty and slipway

and will be compelled to follow the GRNP rules and regulations relating to the Quiet Zone of the estuary in accordance with the Knysna Estuary Management Plan.

No power boats will be allowed to access the Knysna Estuary from the property or be moored in the pond area as the **Quiet Zone** is restricted to non-motorised watercraft.

No motorbikes and drones will be permitted based on the proximity to the estuary and limiting any nuisance impacts to the surrounding area.

Calculations:

- The camping area and associated services will require the **use of approximately 9000m² (pipelines are temporary disturbances that has been included into the calculation).**
- **There will however be only temporary vegetation clearing (for service installation) and limited loss of vegetation (for the 25 decks) – the area is all transformed gardens and lawns and no natural vegetation will be cleared.** As confirmed by the specialist, it will not require the clearance of any sensitive species and/or habitat as the entire site is transformed.
- Decks will be positioned to retain the existing trees and additional trees will be planted for screening and privacy between the tents.

Coordinates

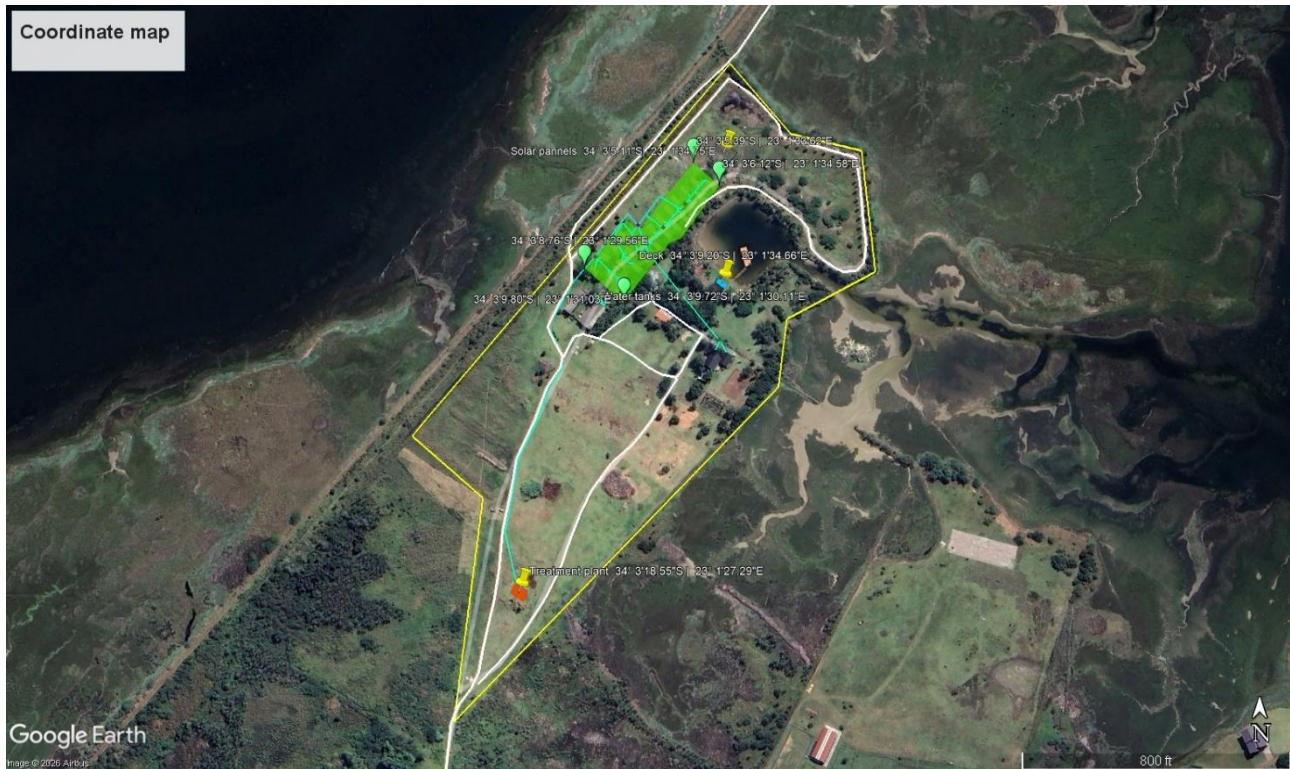


Figure 21: Plan to show the coordinates of the areas subject to the proposal

Table 3: Proposal coordinates

Description	Coordinate
Corners of camping node	34°3'5.39"S 23°1'33.62"E
	34°3'6.12"S 23°1'34.58"E
	34°3'9.80"S 23°1'31.03"E
	34°3'8.76"S 23°1'29.56"E
Solar pannels	34°3'5.11"S 23°1'34.75"E
Deck	34°3'9.20"S 23°1'34.66"E
Water tanks	34°3'9.72"S 23°1'30.11"E
Treatment plant	34°3'18.55"S 23°1'27.29"E

*pipelines to follow existing tracks and as shown on the SDP

Camp rules:

General Camping Rules for Brenton Cove Camping.

Brenton Cove is within the Western Heads Goukamma Conservancy and needs to be treated as such.

1. Check-In and Check-Out Times

Arrival: Accommodation may be occupied from 14h00 on the day of arrival.

Departure: Sites must be vacated by 10h00 on the day of departure.

2. Noise Restrictions

No noise and loud music between 21h30 and 06h00 to maintain a peaceful environment.

3. Driving Regulations

Vehicles must remain on designated roads; off-road driving or driving on closed/no-entry roads is prohibited.

Speed Limits: 10 km/h inside the camping area and the 20km/h restriction in Brenton-on-Lake must be respected.

4. Wildlife Interaction

Feeding or disturbing wildlife can lead to animals becoming aggressive and dangerous.

Do not be fooled into thinking that the peaceful looking bushbuck are not extremely dangerous.

5. Flora and Fauna Protection

No removing, damaging, or possessing any plant, animal, or natural item.

6. Fire Regulations

Fires are only permitted in designated braai (barbecue) areas.

Knysna had an incredibly destructive fire on the 7th June 2017 and any fire must be very carefully monitored.

Collecting firewood from the environment is prohibited; purchase from local shop.

7. Safety Precautions

Be aware of your surroundings, including potential wildlife encounters. Store valuables safely.

8. Maintain Cleanliness

Dispose of waste properly using provided bins. Littering is prohibited to protect wildlife and the environment.

9. Pets

There are free roaming bushbuck in the area - **No pets are allowed in the camping area.** Guide dogs for visually impaired guests are an exception, but only with prior consultation. No feeding of wildlife.

10. Firearms and Dangerous Weapons

All firearms and dangerous weapons must be declared upon entry and will be safely stored for you.

11. Prohibited Items

The use of drones, motorbikes and power boats is prohibited.

12. Respect Fellow Campers

Be considerate of other campers by minimizing noise and sharing communal facilities respectfully.

13. Emergency Preparedness

Carry a basic first aid kit, know the location of the nearest medical facilities, and have emergency contact numbers accessible.

14. Canoeing/Kayaking

Canoeing/Kayaking is allowed on the Knysna Estuary. Kayaks are available for rent from office.

15. Knysna Salt Marshes

This accommodation site is surrounded by the salt marshes of the Knysna Protected Area Garden Route National Park and must not be trespassed.

16. Garden Route National Park

The Knysna Estuary is a Protected Area and the rules of the SANParks regarding the estuary and its use MUST be respected at all times. The adjacent Estuary Area is a QUIET ZONE in terms of the Estuary Management Plan and the rules of use must be respected at all times.

Access to the Knysna Estuary – it is important to note that the GRNP is on the boundary of the property however public access to the GRNP is subject to the SANParks rules in relation to public access.

Access to the water MUST comply with the SANParks requirements for watercraft and use areas in relation to the GRNP Estuary Management Plan. The owner intends to have a few canoes or kayaks that are duly registered with SANParks for guests to make use of.

In terms of the Knysna Estuary Management Plan the property lies adjacent to a “**Quiet Zone**” in the estuary and lies adjacent to and within sections of the Development Control Area of the GRNP which is a mapped 50m buffer zone around the estuary.



Map 4: The Knysna protected environment, showing the biodiversity control area (water body) as well as the development control area (50 m buffer area around the water body).

Figure 22 Map 4 from the GRNP - Knysna PE, showing the biodiversity control area on the water and the development control area 50m buffer around the water body.



Figure 23 Zoom in of the property in relation to the DCA (left) and Google overlay of the DCA on the property (right). Important to note that the man-made pond linked to the estuary has not been included in the Estuary Management Plan DCA as it is a manmade structure and is not considered part of the Estuary.

In terms of the neighbouring GRNP Estuary – the area is zoned as Quiet Zone, which has the following objectives, characteristics, visitor activities and experiences, limits of acceptable change and facilities:

Quiet zone

Quiet zone objective

The main objective of the tourist-orientated zone which comprises of both quiet marine (and estuarine) and terrestrial components is to provide non-motorised medium to high volume visitor access to areas whilst limiting impacts by not providing neither infrastructure for motorised access nor accommodation facilities.

Quiet zone characteristics

This zone is characterised by unaccompanied non-motorised access to areas which generally retain a natural appearance and character. Access is controlled. Visitors are allowed accompanied or unaccompanied access, mainly on foot, for a wide range of experiences. A larger number of visitors are allowed within the quiet zone, permitting more frequent visitor contact when compared to the primitive zone (which is not included in the zonation of the Knysna Estuary). For the quiet marine and estuarine zone, unaccompanied, non-motorised activities are allowed in the area but only for canoeing, sailing or non-motorised vessels / boats. Anchoring and/or overnighting by sailing vessels/boats is not allowed. Within this zone, more sensitive areas must be protected by precinct level planning, which should direct development and utilisation to more robust areas. This zone can also provide non-motorised access within low and high intensity leisure zones away from vehicular access roads.

Quiet zone visitor activities and experience

Estuarine activities are limited and experience equates to relaxation in a natural environment. Access is allowed for non-motorised/sailing vessels/boats only. No anchoring or overnighting is permitted by sailing vessels/boats. Only non-motorised activities (canoeing, sailing, etc.) are permitted. Interaction with other users: Infrequent interaction between user groups.



Quiet zone limits of acceptable change

Biophysical environment: Some deviation from a natural/pristine state is allowed, but care should be taken to restrict impacts on the environment by managing non-motorised users, vessel numbers, resource-use, etc.

Aesthetics and recreational environment: Activities which impact on the relative natural appearance and character of the area should be restricted, as the presence of larger visitor numbers and the facilities required may impact on the feeling of “wildness” experienced within this zone.

Quiet zone facilities

Type and size: Access by non-motorised/sailing vessels/boats only. No anchoring or overnighting is permitted by sailing vessels/boats. No infrastructure in the marine or estuarine areas, only zone demarcations.

Sophistication of facilities: only zone demarcations.

Audible equipment and communication structures: None. Allowed, but must be managed to retain a relative level of solitude.

Access: Access by non-motorised/sailing vessels/boats only. No anchoring or overnighting is permitted by sailing vessels/boats.

Quiet zone infrastructure

Limited permanent management infrastructure is permissible in this zone, to service tourist and management needs. Given the potentially high-volume tourist usage of the zone, park operations staff may need to service tourist facilities in this zone.

As extracted from the Knysna Estuary Management Plan

Based on the above, use outside the property boundaries MUST comply with the rules and regulations linked to the Quiet Zone and the internal manmade tidal pond must be respected for its link to the adjacent estuary.

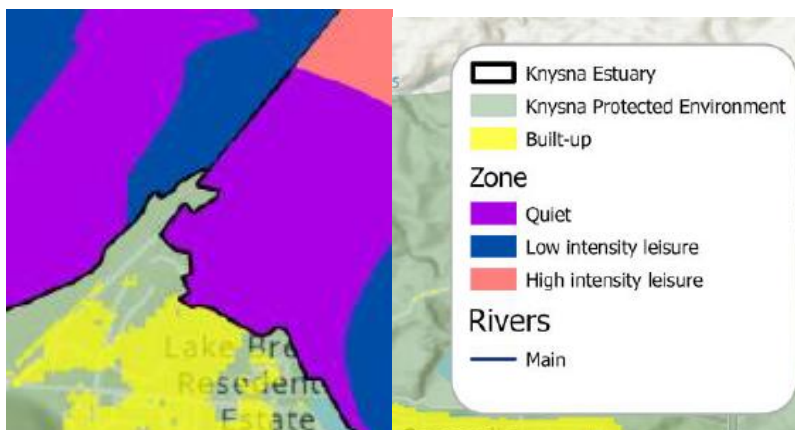


Figure 24 Extracts from the Estuary Management Plan showing the quiet zone adjacent to the property (As extracted from the Knysna Estuary Management Plan)

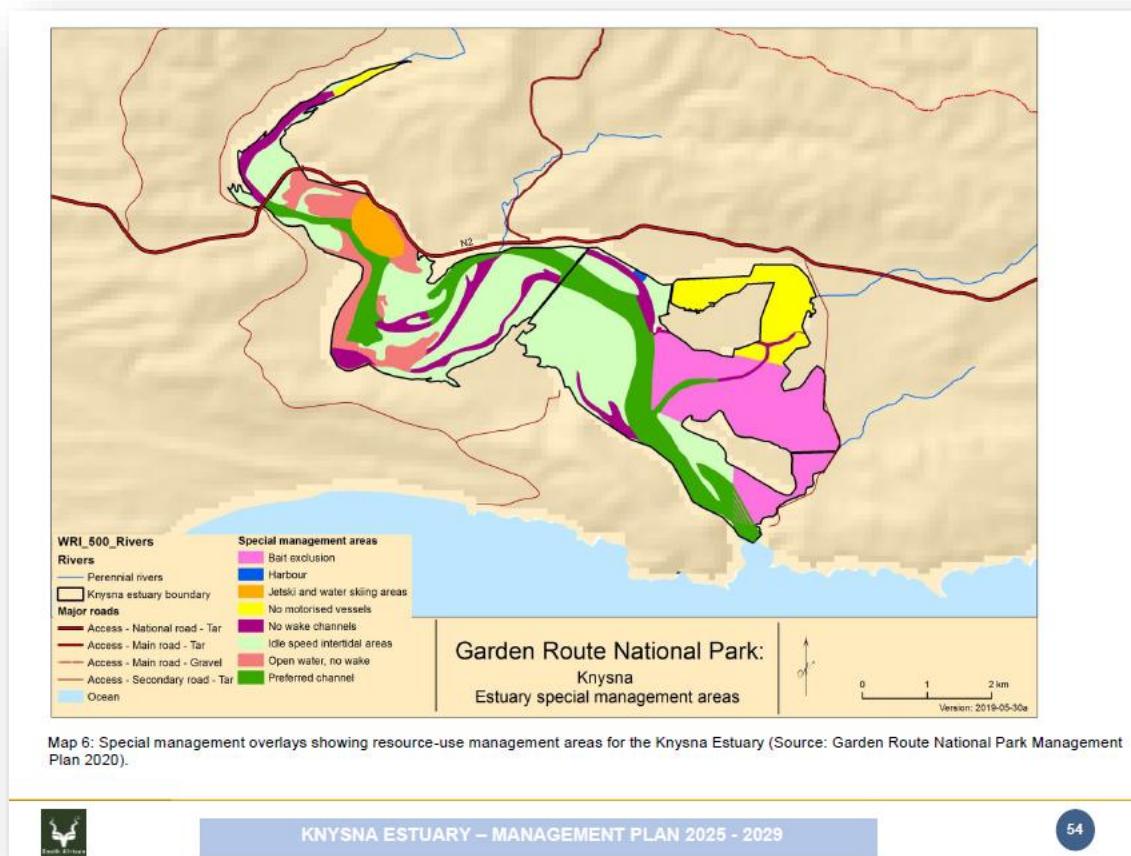


Figure 25 Map6 from the Estuary Management Plan showing the various overlay resource-use mangement areas (As extracted from the Knysna Estuary Management Plan).

Based on the Quiet Zone requirements – the proposed adjacent low impact tourism use, there is no conflict with the quiet zone objectives – “The main objective of the tourist-orientated zone which comprises of both quiet marine (and estuarine) and terrestrial components is to provide non-motorised medium to high volume visitor access to areas whilst limiting impacts by not providing neither infrastructure for motorised access nor accommodation facilities. “ **The tourist facility on the property adjacent to the Quiet Zone provides non-motorised low volume (although the quiet zone allows for medium to high volume visitor access) visitor access to the area – 25 camp site guests may access the area via canoe but may not make use of motorised vessels or moore or overnight in the Quiet Zone.**

Access will be controlled – visitors will need to comply with the SANParks rules in relation to vessel licences for access. “unaccompanied non-motorised access to areas which generally retain a natural appearance and character. Access is controlled. Visitors are allowed accompanied or unaccompanied access, mainly on foot, for a wide range of experiences. A larger number of visitors are allowed within the quiet zone, permitting more frequent visitor contact when compared to the primitive zone (which is not included in the zonation of the Knysna Estuary). For the quiet marine and estuarine zone, unaccompanied, non-motorised activities are allowed in the area but only for canoeing, sailing or non-motorised vessels / boats. Anchoring and/or overnighing by sailing vessels/boats is not allowed.”

The following activities are permitted and covered by the Rule of the camp site and SANParks – “Estuarine activities are limited and experience equates to relaxation in a natural environment. Access is allowed for non-motorised/sailing vessels/boats only. No anchoring or overnighing is permitted by sailing vessels/boats. Only non-motorised activities (canoeing, sailing, etc.) are permitted. Interaction with other users: Infrequent interaction between user groups.”

No fishing or bait collecting on the property will be permitted as the manmade pond is viewed as a “nursery area” for aquatic life.



Figure 26 Estuarine zone nursery – photo Envirosynergy, March 2026

The proposal is viewed as being fully compliant with the goals and objectives of the GRNP Estuary Management Plan.



Figure 27: Brenton-on-Lake public slipway and access – available to the general public clearly indicating the local rules and regulations. Similar signage will be requested to be installed on the property to inform any guests leaving the property and entering the estuary.

Table 4: Extract from the SANParks use zones and use zone characteristics as they could apply to the property considering its current status and adjacent estuarine Quiet Zone

	Remote: marine and estuarine	Remote: terrestrial	Primitive: terrestrial
General characteristics	Conservation orientated zone – retains intrinsic wild appearance	Conservation orientated zone – retains intrinsic wild appearance	Generally, retains wilderness qualities
	Quiet: marine and estuarine	Quiet: terrestrial	Low intensity leisure: marine and estuarine
General characteristics	Allows unaccompanied non-motorised access to areas generally retaining a natural appearance	Allows unaccompanied non-motorised access to areas generally retaining a natural appearance. Access not specifically controlled.	Motorised and non-motorised access. Numbers of visitors higher than remote, primitive and quiet zones. Camps without large commercial facilities.
Applicability to the property	The manmade tidal pond links to the adjacent GRNP quiet zone – use of non-motorised vessel access only proposed.	Proposed use for walking, hiking, bird watching etc as the area is adjacent to the GRNP quiet estuarine area.	
	Low intensity leisure: terrestrial	High intensity leisure: marine and estuarine	High intensity leisure: terrestrial
General characteristics	Motorised and non-motorised access. Numbers of visitors higher than remote, primitive and quiet zones. Camps without large commercial facilities.	High density tourist use node with commercial activities.	High density tourist development node with commercial activities
Applicability to the property	Proposed use for tourism accommodation and infrastructure for the small camp with low numbers.		

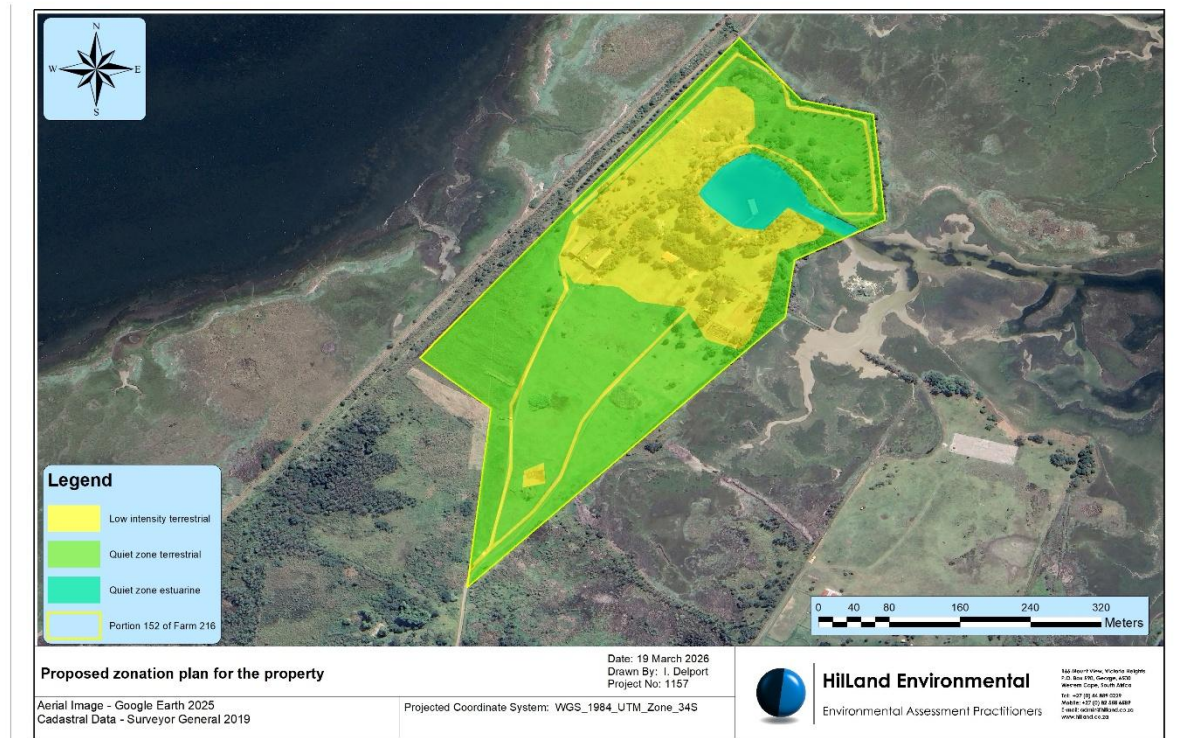


Figure 28 Potential zonation use map for the property. Yellow = low intensity terrestrial, Green = quiet zone terrestrial, Blue = quiet zone estuarine

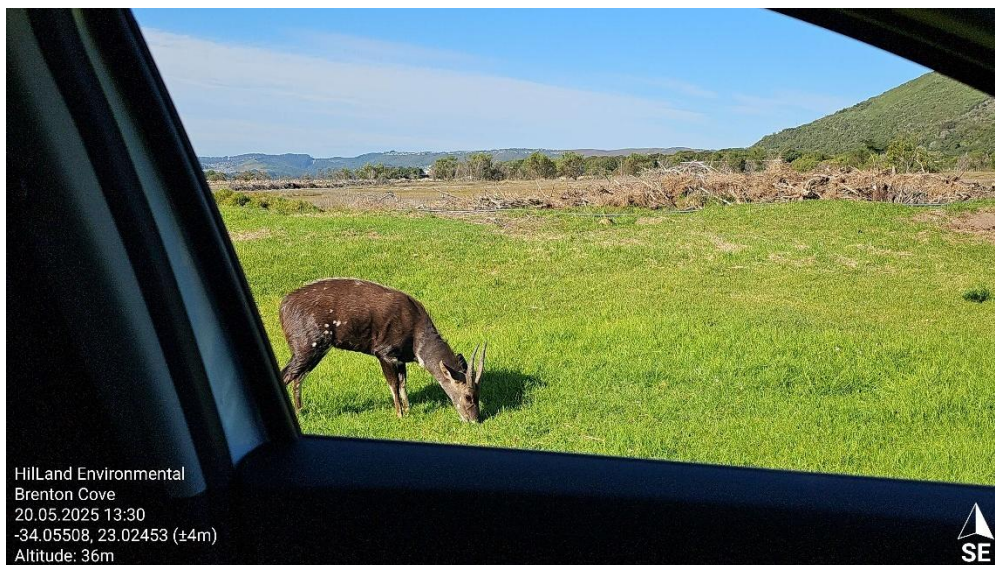


Figure 29 Free roaming wildlife on the property – slow speed within the entire area on the internal tracks and within Lake Brenton.



Figure 30 Free-roaming bushbuck on the property - photo EnviroSynergy March 2026

Access to the railway line – the Heritage Outeniqua Choe-Tjoe line runs adjacent to the property. This line is NOT accessible to guests in any way and guests are NOT permitted to walk along the line as this will be contrary to the safety requirements of the line. The line is in the process of being repaired and reinstated since being out of service since the 2006 flood event.

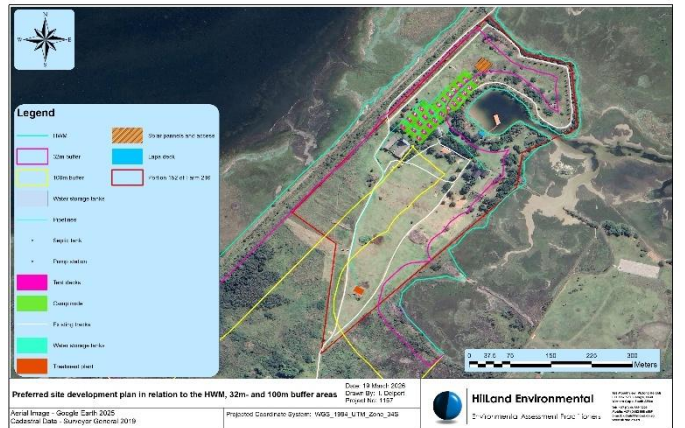
6. APPLICABLE LEGISLATION

6.1 NATIONAL ENVIRONMENTAL MANAGEMENT ACT AND REGULATIONS

The National Environmental Management Act (Act 107 of 1998, as amended) and NEMA: EIA Regulations (2014, as amended) applies to the proposal as listed activities are triggered.

Note – although the Estuary Management Plan excludes the manmade tidal pond from the highwater mark of the estuary, the precautionary principle has been applied to this application and the buffers listed in terms of NEMA have included the manmade tidal pond in assessment and consideration.

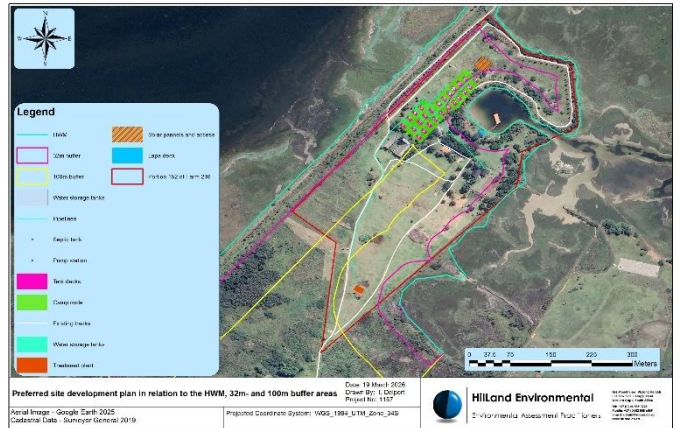
Listing Notice 1

NEMA: EIA Regulations: Listing Notice 1		
Activity Nr	Description	What is applied for and reason for inclusion
12	The development of— (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; — excluding— (aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such development occurs within an urban area; (ee) where such development occurs within existing roads, road reserves or railway line reserves; (ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of the development and where indigenous vegetation will not be cleared.	Activity 12 (ii) (c) The proposal will require the development of infrastructure (decks and associated infrastructure) exceeding 100m² within 32m of the HWM of the Knysna Estuary  Plan showing the proposal in relation to the 32m (pink line) from the HWM of the estuary (watercourse). Certain of the camping decks and infrastructure and the lapa deck will fall within 32m of the HWM and will exceed 100m². These will require Environmental Authorisation. Existing structures and infrastructure within this area pre-dates the NEMA EIA regulations. Calculations: Disturbance zones (permanent and temporary for services) within 32m of the HWM: Approximately 1375m²
17	Development— (i) in the sea; (ii) in an estuary; (iii) within the littoral active zone;	Activity 17 (v) (e)

	(iv) in front of a development setback; or (v) if no development setback exists, within a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater; in respect of— (a) fixed or floating jetties and slipways; (b) tidal pools; (c) embankments; (d) rock revetments or stabilising structures including stabilising walls; or (e) infrastructure or structures with a development footprint of 50 square metres or more — but excluding— (aa) the development of infrastructure and structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) the development of temporary infrastructure or structures where such structures will be removed within 6 weeks of the commencement of development and where coral or indigenous vegetation will not be cleared; or (dd) where such development occurs within an urban area.	The proposal will require the development of infrastructure (decks and associated infrastructure) exceeding 50m² within 100m of the HWM of the estuary  100m buffer from the HWM indicated with the yellow line. The camping decks and infrastructure and the lapa deck will fall within 100m of the HWM and will exceed 50m². These will require Environmental Authorisation. Existing structures and infrastructure within this area pre-date the NEMA EIA regulations. Calculations: Disturbance zones (permanent and temporary for services) within 100m of the HWM: Approximately 6490m²
19A	The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from— (i) the seashore; (ii) the littoral active zone, an estuary or a distance of 100 metres inland of the highwater mark of the sea or an estuary, whichever distance is the greater; or (iii) the sea; — but excluding where such infilling, depositing, dredging, excavation, removal or moving— (a) will occur behind a development setback; (b) is for maintenance purposes undertaken in accordance with a maintenance management plan; (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or (e) where such development is related to the development of a port or	Activity 19A (ii) The proposal will require the movement of material more than 5m³ within 100m from the HWC of the estuary – limited earthworks will be required as the proposal is limited to the planting of support poles for the camping decks and lapa, and the temporary earthworks associated with infrastructure, (pump stations, conservancy tank, sewage treatment plant and pipelines). 

	harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.	100m from the HWM of the estuary indicate with the yellow line. All earthworks (permanent and temporary) will require Environmental Authorisation within this area.
54	The expansion of facilities— (i) in the sea; (ii) in an estuary; (iii) within the littoral active zone; (iv) in front of a development setback; or (v) if no development setback exists, within a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater; in respect of— (a) fixed or floating jetties and slipways; (b) tidal pools; (c) embankments; (d) rock revetments or stabilising structures including stabilising walls; or (e) infrastructure or structures where the development footprint is expanded by 50 square metres or more, but excluding— (aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; or (bb) where such expansion occurs within an urban area.	Activity 54 (V) (f) The deck to be added to the existing lapa is likely to exceed 50m². Deck to be added – approximately 10m long and 5m wide. No other expansion to existing facilities is proposed.  Expansion of existing lapa 50m² of more within 100m of the HWM (yellow line)

Listing Notice 3

NEMA: EIA Regulations: Listing Notice 3		
Activity Nr	Description and applicability in the WC	What is applied for and reason for inclusion
6	The development of resorts, lodges, hotels, tourism or hospitality facilities that sleeps 15 people or more. i. Western Cape i. Inside a protected area identified in terms of NEMPAA; ii. Outside urban areas; (aa) Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; or (bb) Within 5km from national parks, world heritage sites, areas identified in terms of NEMPAA or from the core area of a biosphere reserve; - excluding the conversion of existing buildings where the development footprint will not be increased.	Activity (6) (i) (ii) (bb) The proposed 25 camping sites will be the development of tourism facilities that sleep 15 or more people, (ii) (bb) outside the urban area and within 5km of the GRNP.
14	The development of— (i) dams or weirs, where the dam or weir, including infrastructure and water surface area exceeds 10 square metres; or (ii) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour. i. Western Cape i. Outside urban areas: (aa) A protected area identified in terms of NEMPAA, excluding conservancies; (bb) National Protected Area Expansion Strategy Focus areas; (cc) World Heritage Sites; (dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as	Activity 14(ii)(c)(i)(i)(hh) The proposal will require the development of infrastructure 10m² or more within 32m from the edge of a watercourse, outside urban areas and within the estuarine functional zone.  32m from the edge of a watercourse (pink line) within the estuary functional zone. Calculations: Disturbance zones (permanent and temporary for services) within 32m of the HWM: Approximately 1375m²

	adopted by the competent authority; (ee) Sites or areas listed in terms of an international convention; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; (gg) Core areas in biosphere reserves; or (hh) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined.	
23	The expansion of— (i) dams or weirs where the dam or weir is expanded by 10 square metres or more; or (ii) infrastructure or structures where the physical footprint is expanded by 10 square metres or more; where such expansion occurs— (a) within a watercourse; (b) in front of a development setback adopted in the prescribed manner; or (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour. i. Western Cape i. Outside urban areas: (aa) A protected area identified in terms of NEMPAA, excluding conservancies; (bb) National Protected Area Expansion Strategy Focus areas; (cc) World Heritage Sites; (dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority; (ee) Sites or areas listed in terms of an international convention; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; (gg) Core areas in biosphere reserves; or (hh) Areas on the estuary side of the development setback line or in an estuarine functional zone	Activity 32(ii)(c)(i)(i)(hh) The deck to be added to the lapa will exceed 10m², is within 32m of a watercourse, outside an urban area and within the estuarine functional zone.  Expansion to the lapa within 32m of the watercourse (pink line)

	where no such setback line has been determined.	
Activities considered but NOT applicable		
LN1 activity 27.	The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for— (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.	Activity 27 The proposal will require the <u>use of</u> less than 1ha. The specialist confirmed that these areas do not support any sensitive habitat and/or species and is heavily transformed as garden areas. There will be limited clearing of lawn and garden vegetation will be required – no clearing of indigenous vegetation. For camping, the vegetation is mostly not disturbed at all – raised decks.
LN 3 activities 4 & 18	The development of a road wider than 4 metres with a reserve less than 13,5 metres. i. Western Cape i. Areas zoned for use as public open space or equivalent zoning; ii. Areas outside urban areas; (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or iii. Inside urban areas: (aa) Areas zoned for conservation use; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority	Internal roads and driveways proposed will make use of existing driveways and where new tracks are required these will be less than 4m in width. Expansion of any existing roads or tracks will not exceed 4m.
LN 3 activity 12	The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on even in urban areas; iv. On land, where, at the time of the coming into effect of this Notice or	Activity 12 (i) (i) and (iii) The proposal will require the clearance of 300m² or more of vegetation within an area mapped as CR Knysna Sand Fynbos however, the specialist has confirmed that the site does not support this vegetation type and that no Knysna Sand Fynbos will be cleared and that as the clearing is all existing gardens and lawns, any clearing of vegetation within 100m of the HWM of the estuary will not be indigenous vegetation but is limited to the existing gardens and lawn areas.

	thereafter such land was zoned open space, conservation or had an equivalent zoning; or v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.	
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No activities in terms of Listing Notice 2 will be triggered and require authorisation – please note that ONLY activities in Listing Notice 2 require a Scoping EIA process to be followed. All activities in terms of Listing Notices 1 and 3 require a Basic Assessment process to be followed in accordance with the NEMA EIA regulations.

6.2 NATIONAL WATER ACT (NWA, ACT 36 OF 1998)

The property is located within the estuarine function zone of the Knysna Estuary which is a saltwater system. The estuarine habitat was covered by the specialist assessment discussed later in this report.

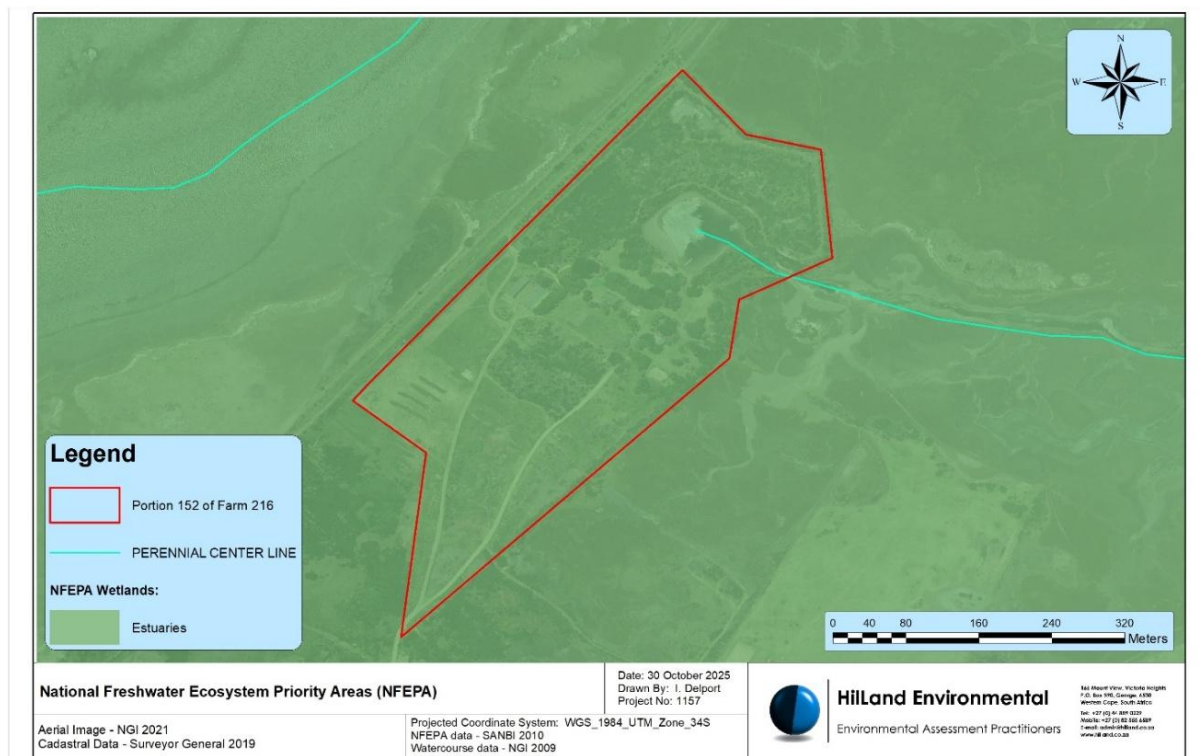


Figure 31: NFEPA map

A Water Use Licence (WULA; **WU44123**) application is being undertaken separately to this proposal for the following:

- **21 (a)** Abstraction of water from a borehole (9m³/day) (existing borehole)
- **21 (b)** Storage of water in a 100 m³ Damsak(from borehole) and then into JoJo tanks for use
- **21 (e)** On-site Irrigation with treated wastewater
- **21 (g)** Conservancy Tanks and Sewerage Processing/BAS Plant (Volume 8.6m³/day – under full occupancy)

Existing municipal supply of water and rainwater harvesting will supply the facility until the WUL to use the borehole water for domestic supply has been approved at which point they will abstract and treat borehole water for the required daily demand and required storage.

Sewage will be collected through the proposed system of pipes, septic tanks and a final package plant which will treat the wastewater to General Standards.

The water will form part of a **closed system** where it will be collected, treated and **recycled** for use for flushing of toilets. This ensures that the daily demand on potable supply remains low and increases the sustainability of the development as a whole. Any excess treated effluent not stored for toilet use on site will be removed from site via a commercial honey sucker until such time as the WUL for irrigation with the treated effluent is issued by BOCMA.

Once the WUL has been issued for irrigation use of any surplus treated effluent, the surplus treated effluent will be used as irrigation water. Sludge from the treatment plant will be collected and disposed of at the Municipal WWTW.



Figure 32 WULA site layout showing water uses (EnviroSynergy, 2026).

6.3 NATIONAL ENVIRONMENTAL MANAGEMENT BIODIVERSITY ACT (NEM:BA ACT 10 OF 2004)

An ACP in terms of NEMBA was approved in 2022 and alien clearing has been systematically undertaken since then. Most of the Port Jackson, Pine, Gum and Blackwood has been removed from the property.

Alien clearing will continue throughout the lifetime of the property.

6.4 NATIONAL ENVIRONMENTAL MANAGEMENT: PROTECTED AREAS ACT (NEM:PA, ACT 57 OF 2003)

The property is located within the Knysna National Lake's protected environment (PE). Approval in terms of Section 50(1) of NEM PA will not be required as the site falls within a PE and not Gazetted PA (the property is not in the GRNP but next to it). SANParks has been identified as a stakeholder and will provide comment in terms of the NEMA and subsequent OSCAE processes.

SANParks Protected Environment Development Control Area requires that activities proposed within 50m of the High-Water Mark of the Estuary will require approval from SANParks (section 8).

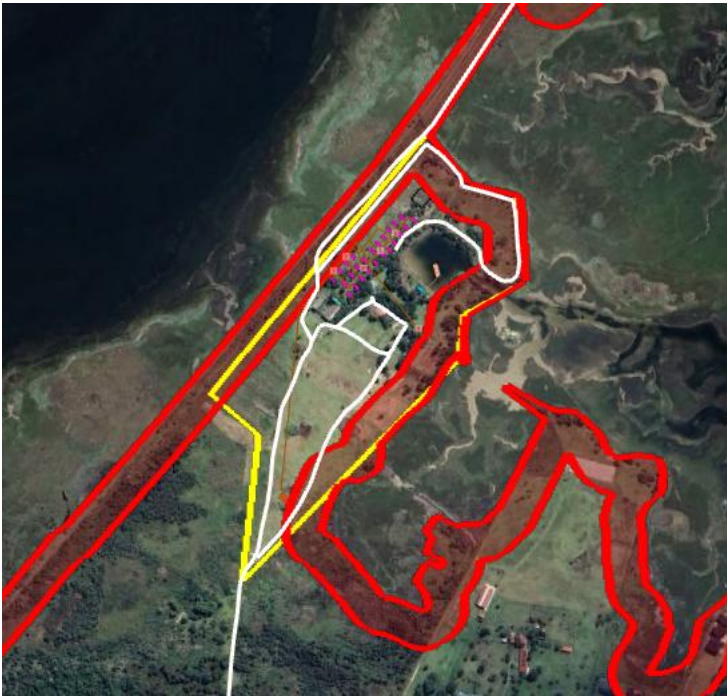


Figure 33 SANParks Development Control Area around the highwater mark as supplied by SANParks and as prescribed in the Estuary Management Plan.

SANParks provided comments on the initial planning application and their initial concerns were addressed through the revision of the proposal from 105 camping sites to 25 camping sites.

SANParks commented on the Draft BAR and their comments are included in the PPP comments and responses section of the PPP report. SANParks raised various concerns which have been addressed. They also proposed an alternative SDP which is not a viable / feasible alternative and has not been addressed further other than being included in the alternatives section of this report (see section 6).

6.5 NATIONAL HERITAGE RESOURCES ACT (NHR, ACT 25 OF 1998)

Heritage Western Cape (HWC) confirmed that the proposal triggers Section 38 of the Heritage Resources Act, as such, a Notice of Intent to Develop (NID) was submitted. The Visual assessment informed the NID. The NID was submitted to HWC (07 November 2025) and HWC responded confirming that no additional assessments are required and the application can be supported.

6.6 OUTENIQUA SENSITIVE COASTAL AREAS EXTENSION (OSCAE)

As the property is located within the OSCAE area of Knysna, and will have a NEMA EA, an OSCAE exemption application (for the clearing of vegetation and earthworks) will be submitted to Knysna Municipality together with the building plans once the Environmental Authorisation (EA) has been issued by DFFE. The EA and EMPr in terms of the NEMA process will inform the OSCAE exemption.

6.7 OTHER LEGISLATION AND POLICIES

The following list of legislation and policies are applicable to the proposal:

- Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013); - **the planning report confirms that the proposal is in line with the relevant stipulations in SPLUMA.**
- National Forest Act, 1998 (Act o. 84 of 1998) – **protected Milkwood and Yellowwood trees occur on site (planted by the previous owner). These will be completely avoided, however, should any removal, transplant, pruning and / or disturbance be required, a Licence Application will be required.**
- Western Cape Land Use Planning Act, 2014 (Act 3 of 2014); - **consent use application is in process in terms of this act.**
- Knysna Municipal Spatial Development Framework (SDF) – **the proposal is consistent with the SDF.**
- Knysna Municipal Integrated Development Plan (IDP) – **the proposal is consistent with the IDP;**
- Knysna Municipal By-Law – **a planning application is in process to allow for the proposal in terms of the by-law. The following is applied for:**
 - *An application in terms of Section 15(2)(o) for a Consent use for a "Camping Site" as indicated under the "Agricultural Zone I" zoning.*
 - *An application in terms of Section 15(2)(f) for the removal of Restrictive Conditions of Title*
 - *Approval of a Site Development Plan in terms of Section 15(2)(g) in compliance with the Knysna Zoning Scheme 2020 (VBGD Town Planners, 2024).*
- Western Cape Provincial SDF (2014) – **the proposal is consistent with the Provincial SDF;**
- Western Cape Spatial Biodiversity Plan (CapeNature, 2023) - **the proposal does not conflict with the WCSBP as the proposal will make use of existing transformed garden areas that do not support any sensitive habitats or species (as confirmed by the specialist, Dr D Hoare).**
- **Western Cape Land Use Planning Guidelines Rural Areas March 2019:**

The property is in a Core 1 area– the proposal is in line with the following guidelines provided by the report:

- *Essentially Core areas are 'no-go' areas from a development perspective. Accordingly, human impact must be restricted to ensure that there is no further loss of natural habitat. **The proposal will make use of existing transformed areas (garden) and there will be no "further loss". Any sensitive areas are avoided. The construction and operation of the camping will be done in accordance with an EMPr.***
- *Conservation management activities, such as alien clearing, research and environmental education should be encouraged. **Compliant alien clearing is ongoing on the property.***
- *Subject to stringent controls the following biodiversity-compatible land uses (i.e. those of very low impact) may be accommodated in Core 1 areas: restricted to a small percentage*

of the property while the remainder will be conserved ensuring no further loss of natural habitat, **Compliant – the proposal is for a low impact tourism activity within an existing transformed area. It makes use of existing infrastructure to serve as tourist facilities and locates the camping areas/ units within existing transformed areas. It will not result in the loss of any natural habitat as confirmed by the specialist.**

- Controlled livestock grazing and game farming must be informed by the habitat type, grazing potential and other site sensitivities. Where Core areas are identified on land that has no formal conservation status (e.g. private farm), no further loss of natural habitat should occur and lower than standard stocking rates are encouraged. **N/A. The existing lawns will remain irrigated.**

- Powerlines may be permissible under certain conditions. **N/A**

- Given the often high visual or aesthetic value of these landscapes, no large-scale eco-tourism developments to be permitted. **Not proposed – the proposal consist of a small-scale tourism camping resort. The visual impact of the proposal has been assessed by a visual specialist, VRM Africa. The report concluded that the proposal would have a low visual intrusion and will be of a medium significance.**

- Land consolidation should be encouraged and subdivision prohibited. **N/A.**

7. GUIDELINES

The following guidelines have been considered relevant to the proposed development.

Guideline	How the proposed development complies with and responds
DEA&DP (2013) Guideline on Public Participation (EIA Guideline and Information Document Series): Western Cape DEA&DP, March 2013 / DFFE PUBLIC PARTICIPATION GUIDELINE IN TERMS OF NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS (2017)/ DEAT (2005). Guideline 4: Public Participation, in terms of the EIA Regulations 2005, Integrated Environmental Management Guideline Series, Department of Environmental Affairs and Tourism, Pretoria.	The public participation process for the project will follow the requirements of the guideline and the guideline will be used to compile the Public Participation Report (Appendix E).
DEA&DP (2013) Guideline on Alternatives (EIA Guideline and Information Document Series): Western Cape DEA&DP, March 2013/ DEAT (2004). Criteria for determining alternatives in EIAs, Integrated Environmental Management, Information Series 11, Department of Environmental Affairs & Tourism, Pretoria.	This guideline was used to assess and determine alternatives for the project. Various alternatives have been proposed and rejected. The Preferred Alternative and No-Go Alternative have been assessed. The alternatives assessed in this report fall within the requirements of the guidelines. Other alternatives (for 105 / 50 / 15 camp sites) have been rejected – see section 7.
DEA&DP (2013) Guideline on Need and Desirability (EIA Guideline and Information Document Series): Western Cape DEA&DP, March 2013/ DFFE Need and Desirability Guideline (2017)	This guideline was considered when considering the need and desirability of the proposed project. The guideline was used to complete the section on need and desirability and the need and desirability assessed

	within this report fall within the requirements of the guideline.
DEA&DP (2005) Guideline on Environmental Management Plans / DEAT (2004). Environmental Management Plans, Integrated Environmental management, Information Series 12, Department Environmental Affairs & Tourism.	This guideline was considered for the compilation of the EMPr (Appendix G) and the EMPr falls within the requirements of the guideline.
Guideline for determining the scope of specialist involvement in EIA processes, guideline for the review of specialist input in the EIA process and guideline for involving biodiversity specialist in the EIA process (June, 2005)	The report falls within the requirements of these guidelines and was used to determine the need for specialist involvement and within the review process of the subsequent reports and inputs.
Integrated Environmental Management Information Series 5: Impact Significance (2002)	The impact significantly used within this report falls within the requirements of the guideline and the guideline was used to identify and evaluate the potential impact associated with the proposal.
Integrated Environmental Management Information Series 7: Cumulative Effects (2004)	The cumulative effects assessed within this report fall within the requirements of the guideline and the guideline was used to assess the cumulative effects of the identified impacts.
Department of Environmental Affairs Screening Tool and associated protocols	The screening tool was used to inform the need for specialist studies. Please refer to the screening tool report and applicability considerations and validation requirements in terms of the protocols.
National Environmental Management Act, 1998 (Act No 107 of 1998): Procedures to be followed for the assessment and minimum criteria for reporting of identified environmental themes in terms of Section 24(5)(a) and (h) of the National Environmental Management Act, 1998, when applying for environmental authorisation.	The general protocol and protocols for specialist assessments (terrestrial, plant and animal assessment and visual compliance statement) were followed.

7.1 PROTOCOLS AND SITE SENSITIVITY VERIFICATION

A screening tool report was generated in 2024, 2025 and 2026 with the Application Category being Services | Hospitality. A site sensitivity verification report is attached as Appendix H. Based on the verification undertaken by the EAP, the following specialists were appointed informing this assessment:

Theme	Screening Tool Sensitivity Rating (Very High / High / Medium / Low)	Specialist study undertaken yes or no, motivation if no	Specialist Responsible / Report Reference	Site Verification Sensitivity Rating (Post Assessment) EAP/Specialist
Biodiversity (Terrestrial)	Very high	Yes	Dr D Hoare	Very low
Aquatic Biodiversity	Very high	Yes	Dr D Hoare	Very low
Agriculture	No rating provided Only assessment recommended	Yes	Gert Malan	N/A – no sensitivity rating provided. The specialist supported the proposal
Archaeology & Heritage	Low	No, NID submission made to HWC that confirmed no further action is required	None required	N/A
Animal species	Medium	Yes	Dr D Hoare & Dr D Edge	Very low
Plant species	Medium	Yes	Dr D Hoare	Very low
Palaeontology	Medium	No, NID submission made to HWC that confirmed no further action is required	None required	N/A
Civil Aviation	Medium	No, the proposal has no impact on the listed civil aviation aerodrome. The proposal does not entail the establishment of the infrastructure that will affect the aerodrome or flight paths etc	None required	N/A
Defence	Low	No, the proposal has no impact on the defence theme, no further action required	None required	N/A
Landscape/Visual	No rating provided, assessment recommended	Yes	S Stead	Medium to low
Traffic	No rating provided, assessment recommended	No, due to the scale of the tourism activity proposed, a TIA is not required. Access will be made of the existing roads and the inclusion of 25 campers driving to the site is insignificant in relation to the general holiday traffic of the area. The Municipality further did not request a traffic impact assessment during the planning process.	None required Rein Hoffmeyr engineering confirmed	N/A
Socio-economic	No rating provided, assessment recommended	No, the proposal is for a small-scale camp site. The socio-economics of the proposal will be provided by the applicant and no specialist assessment will be undertaken. The planning motivation for tourism facilities adjacent to the National Park is supported by the SDF / IDP – the planning motivation is provided in the consent use application in progress.	None required	N/A

8. DESCRIPTION OF THE RECEIVING ENVIRONMENT

8.1 HISTORICAL CONTEXT

As per the terrestrial biodiversity specialist, Dr David Hoare Consulting “An aerial photograph from 1958 (Figure 10) shows that the site and surrounding areas were in a natural state and part of an extensive salt marsh area. On that date in 1958, the railway line was already in place and can be seen as a thin line through the salt marsh. Also clearly visible are the relatively large thicket areas between the hills and the salt marsh. Based on current remnant patterns, these would have been entirely milkwood-dominated mesic thickets. At that time Brenton did not yet exist, but some of the thicket areas had been cultivated, visible as rectangular cleared patches within the milkwood thicket areas.

A comparison with recent aerial imagery shows that many of the tidal channels and patterns have persisted over time and show similar arrangement in 1958 and in 2023. This means that the system was topographically relatively stable over relatively long periods of time. This is important because it means that patterns from 1958 can be ecologically interpreted as being currently valid.

The small very dark band along the south-western boundary of the site (against the railway line) is an excavated area that appears to have been water-filled on that date. This low area still persists on site today and is dominated by reeds.

The darker area near the centre of the site is probably an area that was slightly raised above the average salt marsh elevation, but not likely to have been significantly elevated. The remainder of the site would have been some variation on the current salt marsh patterns that remain in the areas surrounding the current site. It is clear from this analysis that almost the entire site has been raised by importing significant amounts of material onto the site. This is confirmed by the current existence of soil and other material on site that does not have a marine origin (undertaken by the previous landowner). There are some implications of this:

1. The **original vegetation** on site was estuarine, not fynbos. The current regional vegetation map showing Knysna Sand Fynbos on site is therefore **incorrect**. If any areas were historically above the tidal range, they would have contained coastal sand with strandveld similar to that found in other coastal areas of the Garden Route - good examples occur in the Plettenberg Bay area.
2. The **habitat that currently occurs on site is entirely man-made** (David Hoare Consulting, 2025).



Figure 34: 1958 historic aerial image(left) (Hoare, 2025) and the 1989 aerial (right) which shows the property with the infilling completed and the pond excavated (NGI)

Current context

The following photos give an indication of the current context of the site from 2022 to present.

Alien clearing on the site commenced in 2022 following the approval of the ACP.	
 Young pines on the lawns close to the wetland edge	 Piles of sawdust dumped historically on the property and Spanish reed.
 Lawns and palm trees around the manmade lagoon pond.	 Dense stands of Port Jackson now cleared as part of the alien clearing activities.

	
Lawns and Port Jackson stands.	
2023 – during alien clearing	
	
Retaining walls on the sides of the tidal chanel leading to the manmade tidal pond.	Alien clearing around pit dug by previous owner.
	
Garden lawns and planted trees.	
2025 current status	
	
Lawns in the proposed camping area with planted palm trees.	Alien Blackwood trees retained on the lawn area where camping is proposed.

 HillLand Environmental Brenton Cove 20.05.2025 11:52 -34.05262, 23.02739 (±3m) Altitude: 31m	 HillLand Environmental Brenton Cove 20.05.2025 11:53 -34.05262, 23.02739 (±3m) Altitude: 30m
Lawn in the garden area and planted trees and shrubs.  HillLand Environmental Brenton Cove 20.05.2025 11:54 -34.05271, 23.02747 (±3m) Altitude: 30m	Lawn in the garden area and planted trees and shrubs.  HillLand Environmental Brenton Cove 20.05.2025 12:00 -34.05257, 23.02754 (±3m) Altitude: 30m
Main house  HillLand Environmental Brenton Cove 20.05.2025 12:01 -34.05263, 23.02750 (±3m) Altitude: 30m	Existing lapa – proposed deck in the area where the braai is standing.  HillLand Environmental Brenton Cove 20.05.2025 12:28 -34.05260, 23.02751 (±3m) Altitude: 40m
Existing staff accommodation  HillLand Environmental Brenton Cove 20.05.2025 12:37 -34.05250, 23.02649 (±3m) Altitude: 31m	Existing building to be used as a convenience store coffee shop for campers.  HillLand Environmental Brenton Cove 20.05.2025 12:41 -34.05249, 23.02648 (±3m) Altitude: 30m
Manmade tidal pond area surrounded by planted trees.  HillLand Environmental Brenton Cove 20.05.2025 11:52 -34.05262, 23.02739 (±3m) Altitude: 31m	Lapa overlooking the manmade tidal pond with the existing jetty and pontoon.  HillLand Environmental Brenton Cove 20.05.2025 11:52 -34.05262, 23.02739 (±3m) Altitude: 31m
View of the channel leading from the Knysna Estuary into the manmade tidal pond.	

 Existing nursery area with seedlings from the collection of cycads on the property	 Area of lawn in front of the lapa where the deck is proposed.
 Extensive historic material cleared which needed to be removed as a fire hazard	 Extensive alien infestation – now removed reducing the fire load
 Old clearing remaining – removed as it was a fire risk	 Extensive stands of Port Jackson alien vegetation removed as part of the restoration project on the property in accordance with the ACP.
 Historic dumping being cleaned away by the new landowner.	

8.2 SURFACE WATER

The property is located on the southern banks of the Knysna Estuary and in accordance with the National Freshwater Ecosystem Priority Areas (NFEPA), the entire property is within the estuarine functional zone.

The high-water mark extends onto the property within the channel and pond that were created on the property in the 1980's.

Parts of proposal are located within 32m and 100m of the HWM of the estuary.

The proposed development is all outside of the mapped Development Control Area of the GRNP, although the DCA buffer line was not drawn to follow the high water into the manmade tidal pond and channel (similar as to how Thesen Island and the waterfront manmade tidal waters are not included in the DCA).

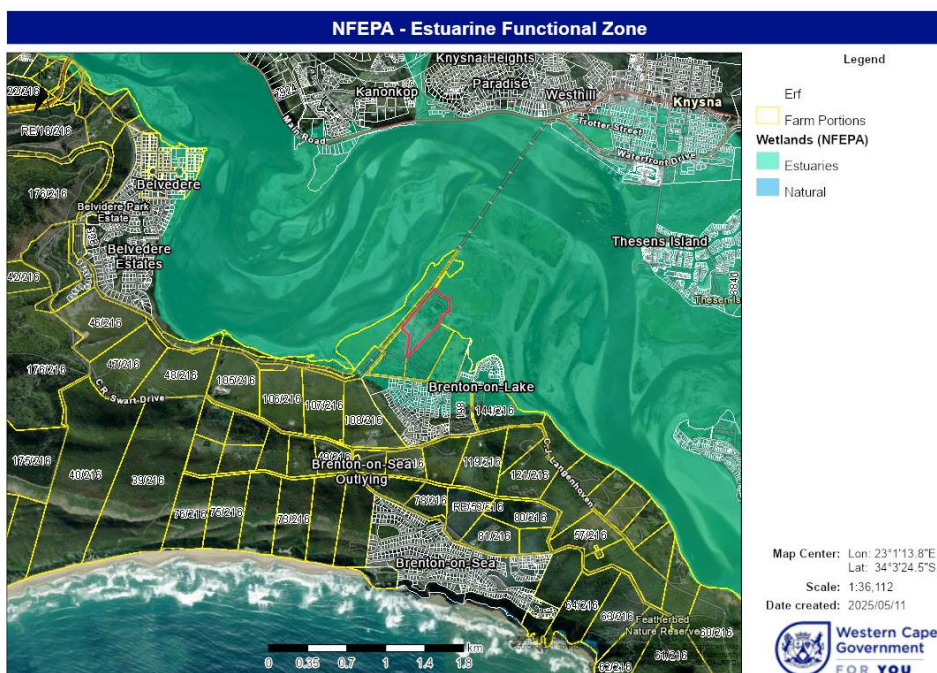


Figure 35: NFEPA map showing how the site and surrounding area falls below the 5m contour and is therefore within the Estuarine Functional Zone (CapeFarmMapper, 2025)

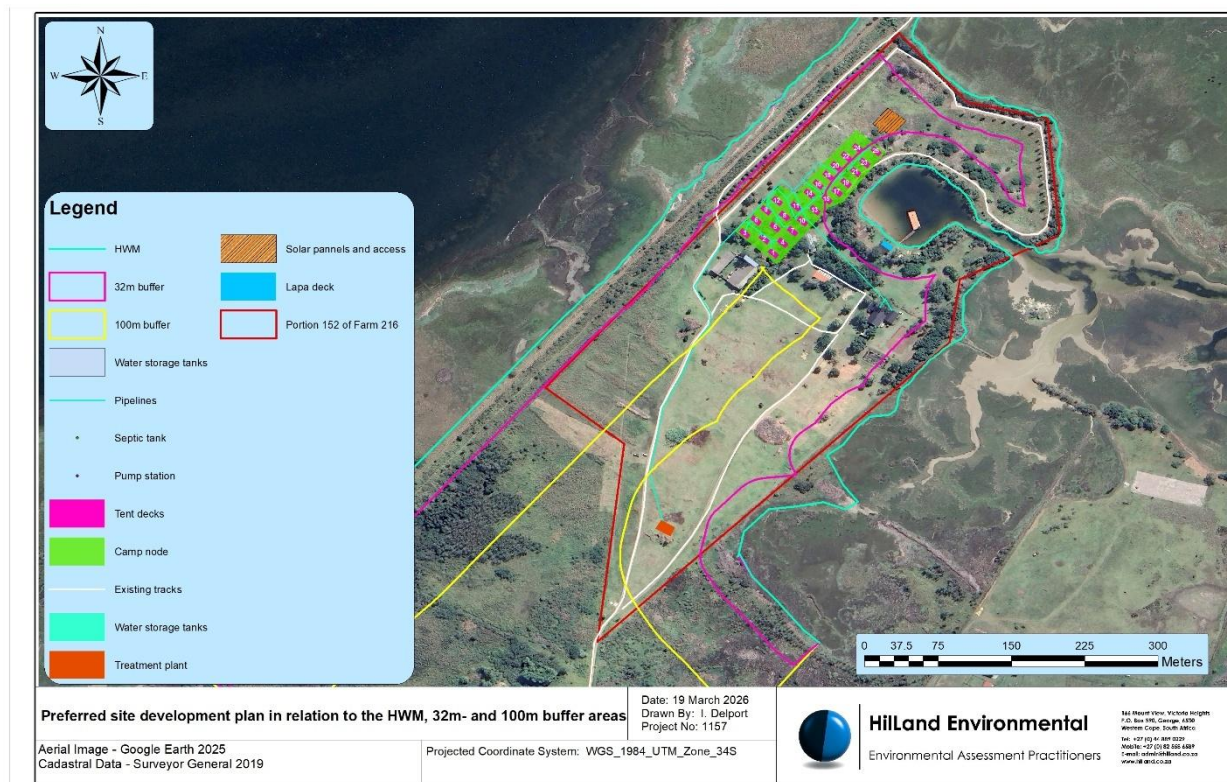


Figure 36 Site plan with the various buffer lines indicated.

As confirmed by the specialist: “The Knysna estuary has the largest meadows of the *Zostera capensis* in southern Africa, which provides a home to both the endangered Knysna seahorse *Hippocampus capensis* and Critically Endangered false limpet *Siphonaria compressa*. The sensitivity verification for the aquatic theme for Knysna Estuary and Wetlands is therefore confirmed as Very High **adjacent to the site**. However, the proposed development is low impact and will not encroach on the estuary itself, and therefore **it is verified that the aquatic theme has LOW sensitivity for the site** itself. Recommendations for minimizing the impact on the estuary are provided.

In terms of regional-Scale Aquatic Ecosystems, no other aquatic ecosystems as identified by the NFEPA or NWM5 occur within 500 m (i.e., the regulated zone of a watercourse as defined by the National Water Act (36 of 1998)) of the site.

In terms of local-Scale Aquatic Ecosystems: the field survey confirmed that no **freshwater** aquatic ecosystems occur on the study site or in its immediate vicinity” (Hoare, 2025).

8.3 BIODIVERSITY, PLANTS AND ANIMAL SPECIES

The Western Cape Biodiversity Spatial Plan (WCBSP, 2023 data) maps the property as forming part of the Knysna Lakes Area Protected Environment (PE). As such there is no CBA or ESA layer information. This indicates that the site is considered to be important for the conservation of biodiversity in the province due to its proximity to the estuary. The property is however, privately owned and does not form part of the GRNP Protected Area although there is mapping that incorrectly includes the property as falling within the GRNP.

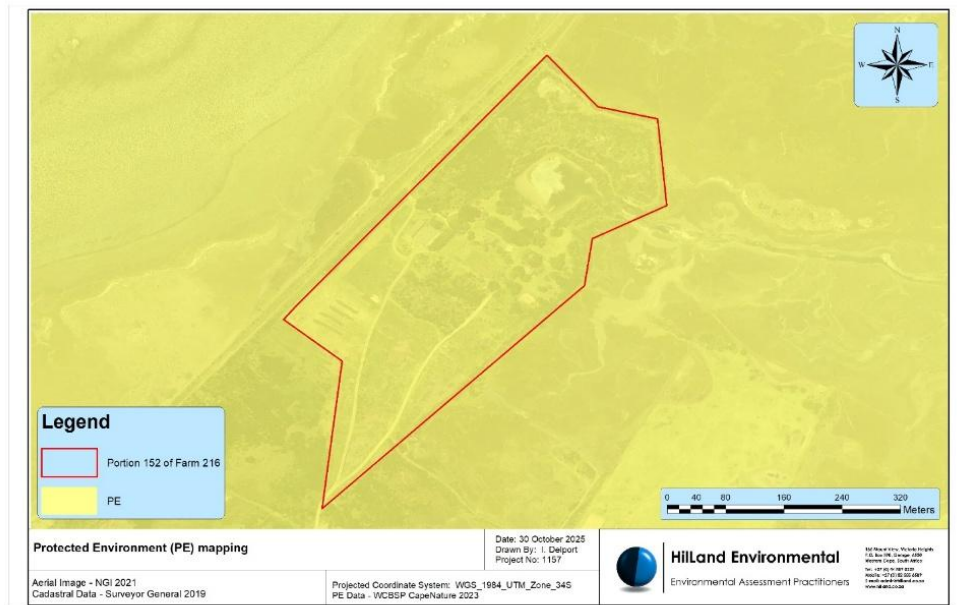


Figure 37: PE map

The National Biodiversity Areas (NBA) showing the “original extent” of threatened ecosystems has **incorrectly mapped** the property as forming part of the Critically Endangered Knysna Sand Fynbos Ecosystem. The specialist has confirmed that the site would originally have supported estuarine salt marsh vegetation which no longer exists on the site due to historical infilling on the property.

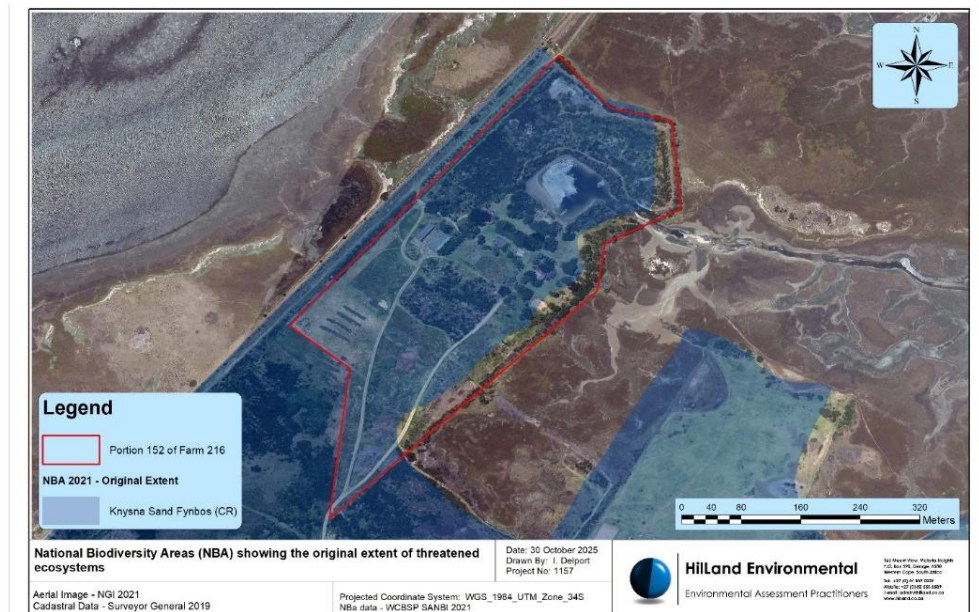


Figure 38: NBA original extent

“An aerial photograph from 1958 shows that the site and surrounding areas were in a natural state and part of an extensive salt marsh area. On that date in 1958, the railway line was already in place and can be seen as a thin line through the salt marsh. Also clearly visible are the relatively large thicket areas between the hills and the salt marsh. Based on current remnant patterns, these would have been entirely milkwood-dominated mesic thickets. At that time Brenton did not yet exist, but some of the thicket areas had been cultivated, visible as rectangular cleared patches within the milkwood thicket areas.

A comparison with recent aerial imagery shows that many of the tidal channels and patterns have persisted over time and show similar arrangement in 1958 and in 2023. This means that the system was topographically relatively stable over relatively long periods of time. This is important because it means that patterns from 1958 can be ecologically interpreted as being currently valid.

The small very dark band along the south-western boundary of the site (against the railway line) is an excavated area that appears to have been water-filled on that date. This low area still persists on site today and is dominated by reeds.

The darker area near the centre of the site is probably an area that was slightly raised above the average salt marsh elevation, but not likely to have been significantly elevated. The remainder of the site would have been some variation on the current salt marsh patterns that remain in the areas surrounding the current site. **It is clear from this analysis that almost the entire site has been raised by importing significant amounts of material onto the site.** This is confirmed by the current existence of soil and other material on site that does not have a marine origin. There are some implications of this:

1. The **original vegetation on site was estuarine, not fynbos. The current regional vegetation map showing Knysna Sand Fynbos on site is therefore incorrect.** If any areas were historically above the tidal range, they would have contained coastal sand with strandveld similar to that found in other coastal areas of the Garden Route. Examples occur in the Plettenberg Bay area.
2. The habitat that currently occurs on site is entirely man-made." (Hoare, 2025)

Milkwood and Yellowwood trees planted on the property by the previous owner, together with other feature trees planted in and around the garden, will remain undisturbed through the proposed camping area.



Figure 39 Trees marked in green by the specialist (Dr D Hoare)



Figure 40 Garden planting around the homestead



Figure 41 Garden planting around the homestead and adjacent to the manmade tidal pond.

The screening tool highlighted a number of potential sensitive species - of the sensitive species listed by the screening tool report, only one species, *Zostera capensis* (eelgrass), has been confirmed by the specialist to be present within the intertidal channels adjacent to the site. The proposal will however not impact any water bodies and will therefore have **no impact** on the eelgrass. The site contains no suitable habitat to sustain the rest of the species listed by the screening tool.

The eelgrass beds occur within the channels indicated as being in the

The plant species theme has been confirmed by the specilaist to have a low sensitivity rating based on the following:

1. "Suspected habitat for flagged species based either on there being records for this species collected in the past, prior to 2002, or being a natural area included in a habitat suitability model.
2. There are no species that are listed as Threatened on South Africa's National Red List that could have occurred in the study area.

For the aquatic species recorded **adjacent** to the site, the Plant Species Theme has HIGH sensitivity for this site" (Hoare, 2025).

- Animal species recorded on site

The terrestrial specialist, Dr D Hoare, confirmed that the property does not support any remaining natural and suitable habitat to support the species listed by the screening tool report.

The butterfly specialist, Dr D Edge, further confirmed that "the SCC butterfly A. t. orientis (Endangered) and its host ants Lepisiota capensis minuta (Small Black Sugar Ant) **do not occur** on Uitzicht 216-152, and no suitable habitat exists in the proposed disturbance footprint."

The animal species theme has been verified by the specialists to be of a low sensitivity for the site.

Maintaining ecological connectivity and ecological corridors for the existing free-roaming bushbuck and other wildlife on the property is essential. The existing wildlife will continue to make use of the 11 ha property together with the surrounding properties as part of their habitat range. The fixed area within the garden trees will not impact on this free movement of wildlife.

▪ **Habitat present on the property**

The specialist, Dr D Hoare, confirmed that most of the property consists of lawn, gardens and areas cleared of alien invasive vegetation on a man-made substrate historically imported to the site (by the previous landowner).

Five (5) habitats were identified on the property, the camping area is proposed within the ‘**degraded**’ habitat described below, while the identified salt-marsh, eelgrass habitat, tidal pond and thicket hedge will remain undisturbed/ unaffected by the proposal.

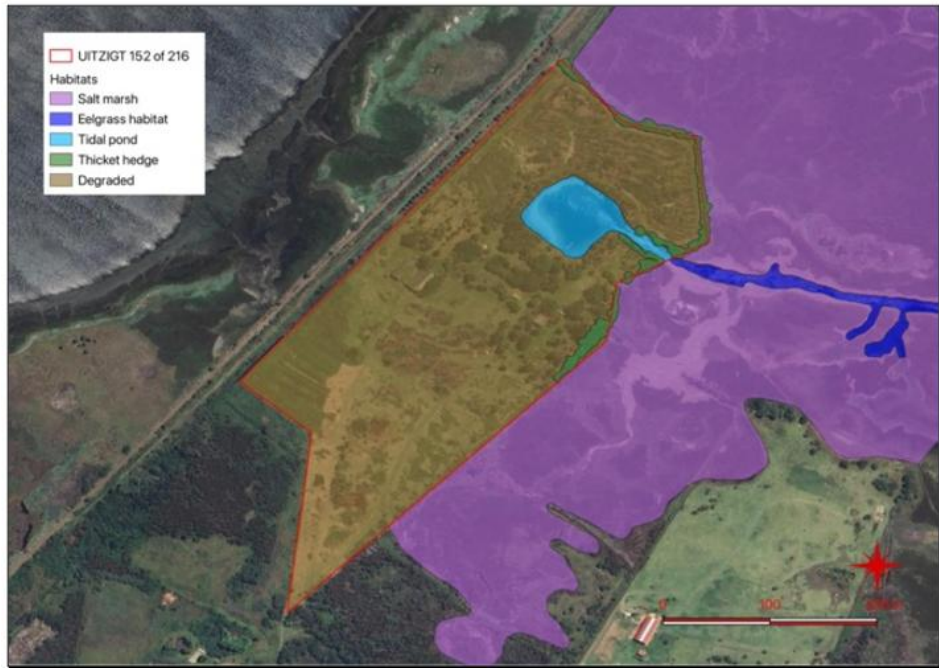


Figure 42: Specialist mapping of the habitats identified (figure 12, Hoare, 2025)

The site ecological importance of the habitats ranges from very low to very high. The proposal will be located within areas rating as having a VERY LOW site ecological importance emphasizing that the proposal will have no impact on any sensitive habitat.

Site ecological importance	Interpretation in relation to proposed development activities
Very low	Minimisation mitigation – development activities of medium to high impact acceptable and restoration activities may not be required.

**As extracted from specialist report, Dr D Hoare*

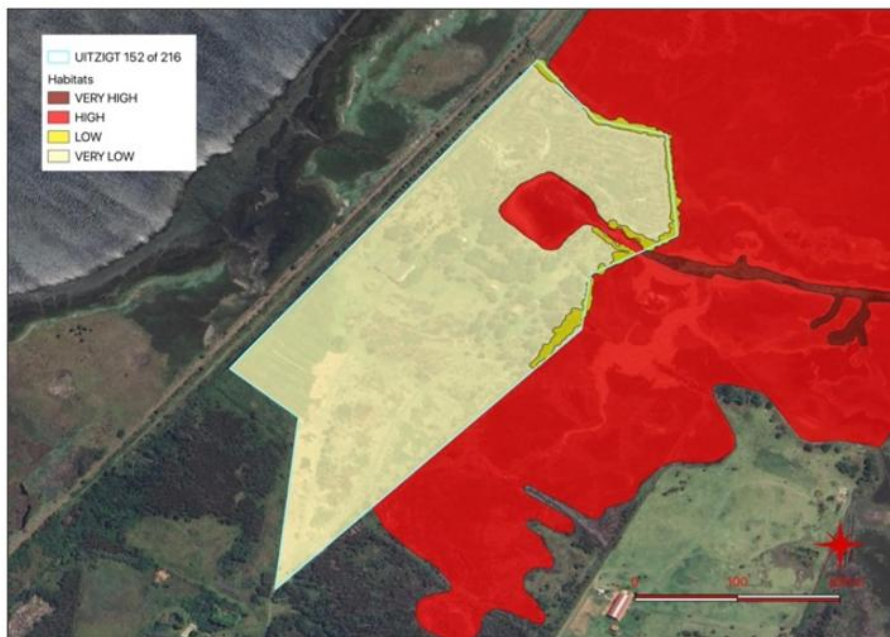


Figure 43: Site Ecological Importance (SEI) of the habitats identified on site (figure 13, Hoare, 2025)

8.4 GEOGRAPHICAL ASPECTS

The property is flat and situated on the southern banks of the Knysna Estuary within the Brenton-on-Lake area.

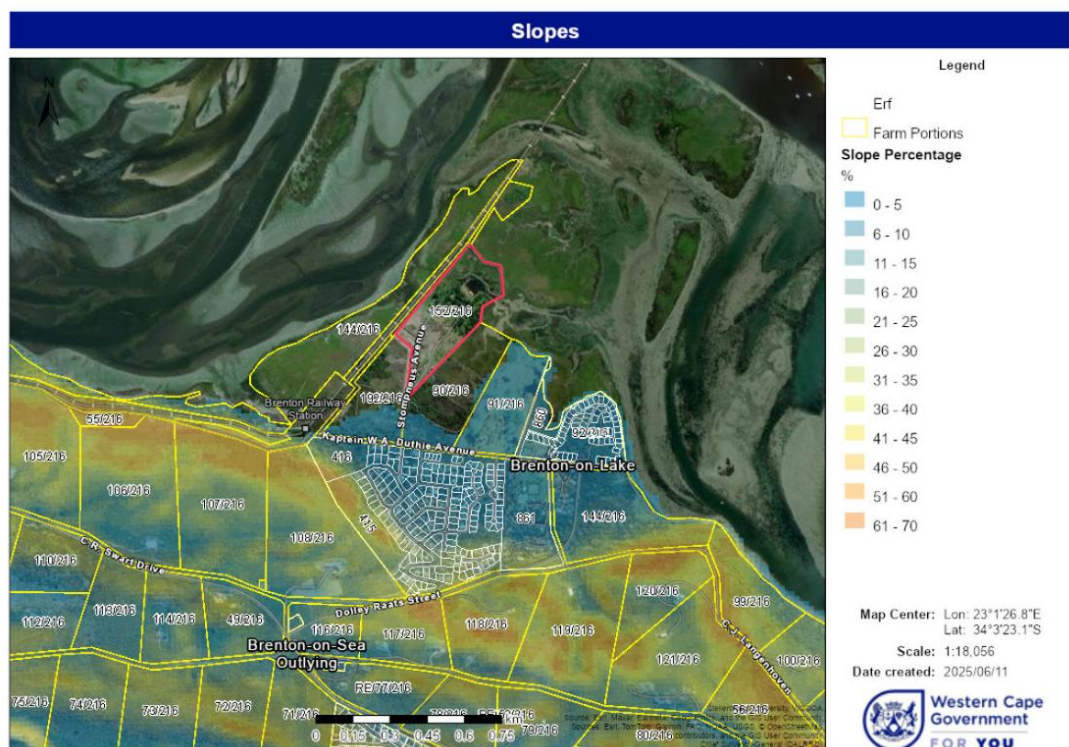


Figure 44: Slopes of the property and surrounds showing the flat nature of the site associated with the Knysna Estuary (CapeFarmMapper, 2025).

As confirmed by the visual specialist: “Although the site lies below the 5-metre contour, the low-impact nature of the proposed tented camp, with minimal fixed infrastructure, reduces vulnerability

to flooding. Additionally, the site offers clear potential for eco-tourism opportunities linked to the Knysna National Lake Area, without requiring significant built structures" (VRM Africa, 2025).

The proposal will have a low visual intrusion:

"Low visual intrusion due to the location of the proposed development in an area that is well screened by medium to large sized trees, with no new large structure developments" (VRM Africa, 2025).

The proposal will not impact the geographical aspects as earthworks are restricted to the planting of support poles, levelling where required and the installation of services. No geotechnical constraints have been identified. Any potential impacts will be mitigated through the implementation of the EMPr.

Erosion is not an anticipated impact due to the conditions of the site, vegetated nature of the site and limited slope where runoff would traditionally need to be slowed / protected to reduce erosion.

8.5 HERITAGE RESOURCES AND HISTORICAL AND CULTURAL ASPECTS

As the proposal will trigger activities in terms of Section 38 of the National Heritage Resources Act (Act No. 25 of 1999), in terms of the character of the area, a Notice of Intent to Develop (NID) has been submitted to Heritage Western Cape (HWC). Their comments will confirm if any further studies are required.

The site does not contain any buildings of historical significance as the existing buildings and infrastructure on the property originated in the 1980's during which time the site was significantly altered from its original condition. The site has been altered through historic infilling to raise the area above the estuarine influences.

The adjacent heritage railway line runs along the western boundary of the property and this will remain unchanged.



Figure 45: 1958 historic aerial image(left) indicating the property as untransformed adjacent to the railway line and the 1989 aerial (right) which shows the property with the infilling completed and the tidal pond excavated and homestead and terrestrial planting around the homestead (Dr D Hoare, 2025 and NGI, 2025).

8.6 PLANNING AND SOCIO-ECONOMIC ASPECTS

Portion 152 of Farm 216 is located adjacent to the Knysna Estuary and agriculturally zoned properties are located west, east and south. These properties are either in a natural or transformed state. Various tourism accommodation is provided for in the area including a new application on the neighbouring portion 192 where planning and environmental applications are currently in process for 7 stilted cabins and a primary dwelling.

Although the property is zoned Agriculture I, it has not been used for active cultivation purposes other than a private nursery for an extensive cycad collection started by the previous landowner. The existing lawn areas will remain irrigated, but not cultivation is planned.

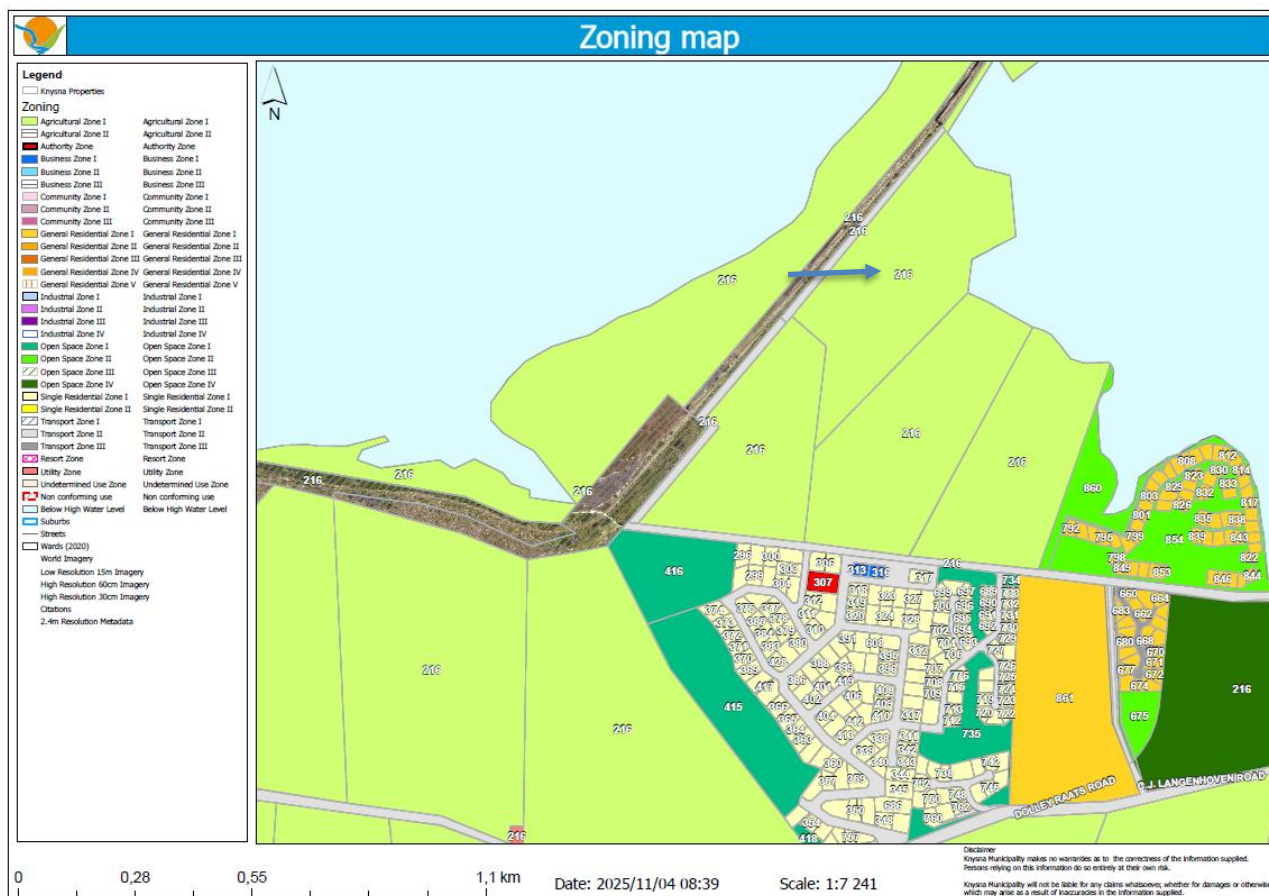


Figure 46: Map showing the zoning of the properties around the property in question (highlighted by the arrow) (Knysna Public Viewer, 2025).

Both the construction and operational phases will result in a number of short-and long-term job opportunities for the local community. The camping and tourism facility will attract a small number of tourists to the area which will result in a positive economic contribution in the area.

The proposal is also efficient use of the land by locating the camping area within existing disturbed areas and making use of existing infrastructure and services as far as possible.

In accordance with the Municipal SDF and IDP, Knysna's local economy is strongly tourism-dependent, with hospitality, leisure and small businesses forming the largest share of employment and local GDP in the town:

- The **main sectors** of the towns economy are tourism and hospitality, services, construction, public sector services, but tourism drives a large share of the income and informal employment.
- There is a high local reliance on small enterprises and informal trading for jobs and the Municipality flags that there is a need for job creation, skills development and support for SMME's.
- The Knysna Lagoon is one of the primary assets of the Municipality

Table 5: Impact of the proposal in terms of people's health and well-being (e.g. in terms of noise, odours, visual character, and sense of place)

Potential impact	Applicability of the proposal
Noise impact	The proposal will result in short-term insignificant noise during the construction phase. The operation of a camp will result in non-offensive noise generated by visitors, however, this will not be out of context. The camp will have rules to avoid offensive loud noises such as music etc being generated at certain times. The facility is a low-impact, eco-tourism facility where noise will not be tolerated.
Visual character and sense of place	As concluded by the visual specialist: “• <i>Alignment with the Knysna National Lake Area conservation initiatives where there is clear emphasis on ecological restoration with almost all of the alien tree species removed, and numerous indigenous tree plantings well established on the property.</i> • <i>Opportunities for eco-tourism related to the Knysna National Lake Area can be achieved without significant structural development and loss of Brenton sense of place (with mitigation).</i> • <i>Low visual intrusion due to the location of the proposed development in an area that is well screen by medium to large sized trees, with no new large structure developments” (VRM Africa, 2025).</i> Although the Brenton-on-Lake residents raised serious concerns relating to visual impact and character changes to the village, the tented camp will not be visually intrusive as it is located away from the Lake Brenton village, is concentrated in the middle of the property around the existing structures and dwellings within the existing garden that is characterised by mature trees which form effective screening. Additional tree planting for screening is proposed. Mitigation measures have been included in the EMPr for implementation.
Health impact	No negative health impacts will arise as a result of excising the proposal – likely to have a positive health outcome for the visitors, providing an area for holiday purposes that is beautiful and an area where they will be able to relax and rest. The sewage treatment plant proposed will ensure that there is no pollution risk and the mitigation measures to prevent accidental spillage from contaminating the system are proposed and included in the design. Impact from raised water levels or flood are also included in the design.
Traffic impact	The proposal will result in additional traffic to the area as a result of the visitors, however the small scale of the activity would not result in any significant impact to the area as the property is isolated and easily accessible. 25 additional guests driving to the property will have an insignificant impact on the surrounding residential area.
Air and water quality	The proposal will have no impact on the air quality and no water resources will be impacted.

Monitoring for water quality is proposed as part of the WUL and additional bunding and flood protection is proposed in the design.
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The Surrounding land uses include the built-up residential area of Brenton-on-Lake, and various tourist accommodation opportunities. The area has a history of a caravan and camping resorts which have mostly been converted over time into more permanent holiday and residential accommodation. Brenton Lake Estate is located southeast of the property which was previously a caravan park, now consisting of holiday chalets and associated facilities.



Figure 47: Google Earth Aerial Image showing the surrounding land uses (Google Earth, 2025)

The proposal will therefore be in line with surrounding land uses and will not be out of character. The visual specialist further confirmed that the proposal will result in *“opportunities for eco-tourism related to the Knysna National Lake Area can be achieved without significant structural development and loss of Brenton sense of place (with mitigation)”* (VRM Africa, 2025).

8.7 WESTERN CAPE PROVINCIAL SPATIAL DEVELOPMENT FRAMEWORK (PSDF, MARCH, 2014)

The Provincial SDF sets out the following resource management policy objectives:

- i. **Protect biodiversity** and agricultural resources
- ii. Minimise the consumption of scarce environmental resources, particularly water, fuel, and land – in the latter case especially pristine and other rural land, which is the Western Cape's 'goldmine-above-the-ground' (i.e. a non-renewable resource).
- iii. **Conserve and strengthen** the sense of place of important natural, cultural and productive landscapes, artefacts and buildings.”

The following policies are applicable to the proposal:

Policy R1: Protect biodiversity and ecosystem services
Policy R2: Safeguard inland and coastal water resources, and manage the sustainable use of water
Policy R3: Safeguard the Western Cape's agricultural and mineral resources, and manage their sustainable use
Policy R4: Recycle and recover waste, delivery clean sources of energy to urban consumers, shift from private to public transport, and adapt to and mitigate against climate change
Policy R5: Safeguard cultural and scenic assets
Policy E1: Use regional infrastructure investment to leverage economic growth
Policy S1: Protect, manage and enhance sense of place, cultural and scenic landscapes

How the proposal is in line with these objectives and policies:

The property is not located within the urban edge where more traditional residential uses area appropriate. Camping by its nature is not an urban land use, this sustainable tourism proposal will be located within transformed areas assessed by the relevant specialists. No natural habitat will be impacted, the proposal will not impact the estuary, and the rehabilitation of the property will result in a positive biodiversity impact. The proposal will further have no impact on agricultural resources (camping is a consent use for agriculturally zoned properties).

The operation of the camp will result in various positive socio-economic impacts through job opportunities, attracting tourist to the area etc. It will have a low visual impact as confirmed by the visual specialist.

Renewable resources will be used as far as possible.

Any other potential impacts on the environment will be mitigated through the implementation of the EMPr.

8.8 KNYSNA MUNICIPAL SPATIAL DEVELOPMENT FRAMEWORK (SDF, MAY, 2020)

The town planner refers to the municipal SDF as follows:

"The activities anticipated for the site are essentially for tourists who wish to spend their holiday at a camping site in the Knysna area.

The following extracts from the SDF are an endorsement and logic conclusion for Knysna as a tourist destination:

"The town of Knysna is the primary regional service centre and a prominent national tourist destination"

"The Knysna Municipal Area (KMA) is endowed with a spectacular natural setting. The Outeniqua Mountains running parallel to the coastline form the backdrop to an undulating natural and cultivated forested landscape, drained by a number of rivers with large water bodies in the low-lying areas and sandy beaches sheltered by rocky headlands and coastal dunes along the Indian Ocean coastline".

"Establish Knysna as an authentic place that works for all of its residents and continues to attract visitors."

As can be seen on the extract sketch overleaf from the Knysna Spatial Development Framework (SDF 2020), it is evident that site, while not in the Knysna Central Area it is still within Regional Centre of Knysna, and is identified as a key regional component in the Eden District.

It is widely recognised in policy frameworks across the Province, and particularly along the Garden Route, that tourism is a strong driving force behind growth, economic wellbeing and overall sustainability of Knysna and surrounding areas.

Hence, where appropriate, the establishment and retention of key tourist activities are encouraged as a common thread in driving development policy.

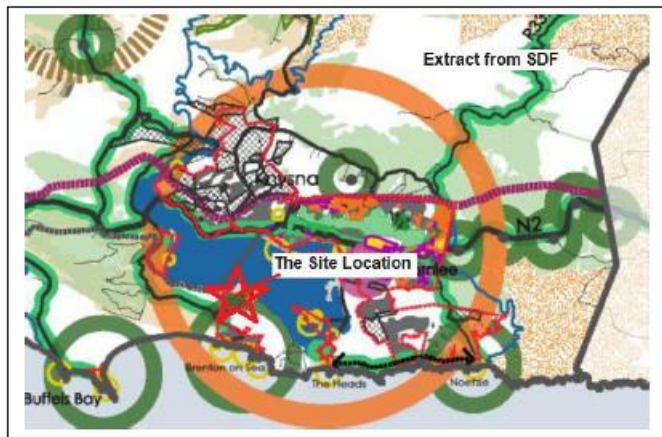


Figure 48:extract from SDF

By definition, the site falls **outside the urban edge** as defined in the Spatial Development Framework, which means the site is not available for urbanisation. It is also zoned "Agriculture I" which allows the proposed use with consent.

The use as proposed is an ideal use for land outside the urban edge as it has very low requirements for infrastructure services and also very low agricultural potential.

This site has a lot in common with other similar sites on the Garden Route such as the Wilderness SANParks camping area, the Lake Pleasant camping ground at Groenvlei near Sedgfield, and the Keurbooms camping site near Plettenberg Bay. These are all facilities for tourists, but which **fall outside the core development zones** of these towns. Brenton Cove has the same attributes when compared with these other facilities" (VBGD Town Planners, 2025).

The proposal is in line with the Municipal SDF.

8.9 KNYSNA MUNICIPAL INTEGRATED DEVELOPMENT PLAN (IDP, 2024/2025)

The following Strategic Objectives have been set out in the Municipal IDP:

Strategic objective	Applicability of the proposal
To create an enabling environment for social development and economic growth	The specialists confirmed that the proposal will not impact on any remaining natural areas and will have a low visual impact. The construction and operational phases will result in a number of positive socio-economic impacts – job creation, sustainable eco-tourism, economic contributions etc.
To promote a safe and healthy environment through the protection of our natural resources	The proposal will not result in a negative impact on natural areas as confirmed by the specialists. Natural resources and environment will therefore remain protected. Any potential

	impacts will be mitigated through the implementation of the EMPr.
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The proposal is in line with the Municipal IDP.

8.10 GARDEN ROUTE ENVIRONMENTAL MANAGEMENT FRAMEWORK (EMF, 2010)

There is no local EMF and as such the Garden Route EMF is applicable.

The proposal will not compromise the integrity of the priorities outlined within the Garden Route Environmental Management Framework (EMF), 2010. It will adhere to good environmental principles as well as following accepted norms and standards through the construction phase of its lifespan (covered by the EMPr).

A general principle highlighted in the EMF includes: "*disturbance of ecosystems and loss of biological diversity must be avoided or if that is not possible, minimised and remedied*" (Garden Route EMF, 2010). The proposal has been assessed and supported by the specialists and guidelines for proper process and the prevention, minimisation and mitigation of any negative impact of the development have been set out within the EMPr.

The proposal will, therefore, not compromise the integrity of the existing environmental priorities, but will rather add to the priorities through the selection of a site that is already transformed and disturbed.

The proposal will be in line with the General Principles outline in the EMF.

8.11 NEMA PRINCIPLES

Section 2 of the NEMA is referred to as the "NEMA principles" require the following:

Guideline highlighted in EMF (2010)	Comment
1. Disturbance of ecosystems and loss of biological diversity must be avoided or if that is not possible, minimised and remedied.	The proposal has been assessed by and is supported by the relevant specialists. Recommendations made by the specialist to avoid any potential impacts, are included in the EMPr.
2. Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures.	The proposal will not impact any coastal shores, estuaries or wetlands. This was confirmed by the specialist.
3. The development, use and exploitation of renewable resources and the ecosystem of which they are part, must not exceed the level beyond which their integrity is jeopardised. This means that an ecosystem must not be disturbed to the point that its health and functioning breaks down.	The proposal will not jeopardise the integrity or ecosystem health and functioning. Work will be limited to the defined areas. Potential negative impacts will be mitigated through the implementation of the EMPr.

NEMA principles are highlighted as part of the General Principles of the EMF and the following principles form part of the proposed development:

"4)

a) Sustainable development requires the consideration of all relevant factors including the following:

- (i) That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied;*
- (ii) that pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied;*
- (iii) that the disturbance of landscapes and sites that constitute the nation's cultural heritage is avoided, or where it cannot be altogether avoided, is minimised and remedied;*
- (iv) that waste is avoided, or where it cannot be altogether avoided, minimised and re-used or recycled where possible and otherwise disposed of in a responsible manner;*
- (v) that the use and exploitation of non-renewable natural resources is responsible and equitable, and takes into account the consequences of the depletion of the resource;*
- (vi) that the development, use and exploitation of renewable resources and the ecosystems of which they are part do not exceed the level beyond which their integrity is jeopardised;*
- (vii) that a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions; and*
- (viii) that negative impacts on the environment and on people's environmental rights be anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied."*

- The property and proposal have been assessed by the relevant specialists confirming that there is no natural habitat that will be impacted on by the proposal. Any remaining natural areas (beyond the property boundaries) will be unaffected by the proposal. There will be no loss of diversity.
- The proposal will have no impact on any cultural / heritage resources. Similar land uses surround the property and as such, the proposal will add to the sense of place. The visual impact will be low as confirmed by the specialist. The visual mitigation measures have been included in the EMPr for implementation.
- Mitigation measures are included in the EMPr minimise the impact of any negative impacts that cannot be avoided.
- Renewable resources will be used as far as possible.

As such, the proposal is in line with the Garden Route EMF (2010) and NEMA Principles.

8.12 COMPATIBILITY WITH THE GRNP KNYSNA ESTUARY

The table extract below from the *Garden Route National Park Management Plan 2020 – 2029* – showing a similar “camping” association in Wilderness adjacent the river – the camping area is within the GRNP while this application, the camping would be adjacent to the GRNP on privately owned land. There are no camping sites within the Knysna Estuary GRNP for comparison purposes.

Wilderness section			
Ebb and Flow – North			
Camp site	35	Camping – budget accommodation – power	HIL
Camp site	27	Camping – budget accommodation – no power	
Rondavel	15	Self-catering – serviced – budget accommodation	
Ebb and Flow – South			
Camp site	69	Camping – budget accommodation – power	HIL
Camp site	8	Camping – budget accommodation – no power	
Family cottage	5	Self-catering – serviced – economy accommodation	
Forest cabin	20	Self-catering – serviced – economy accommodation	
Log cottage	9	Self-catering – serviced – economy accommodation	

- **Rest Camp Separation:** While Ebb & Flow Rest Camp (North and South) is a high-intensity area, the surrounding forest, particularly upstream on the Touw River, acts as a buffer into quieter zones.

Table 6: Comparison between camping in the GRNP

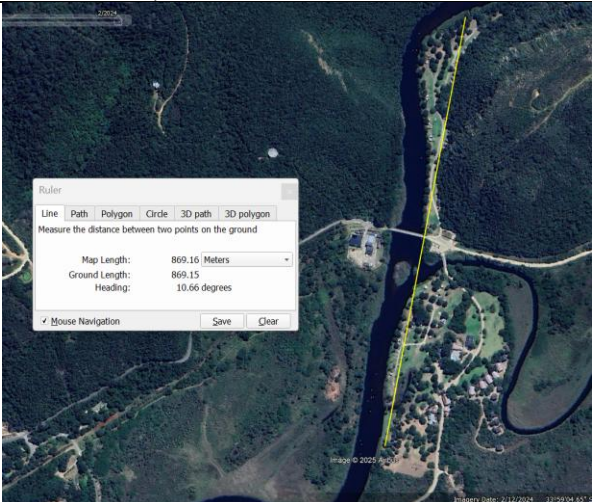
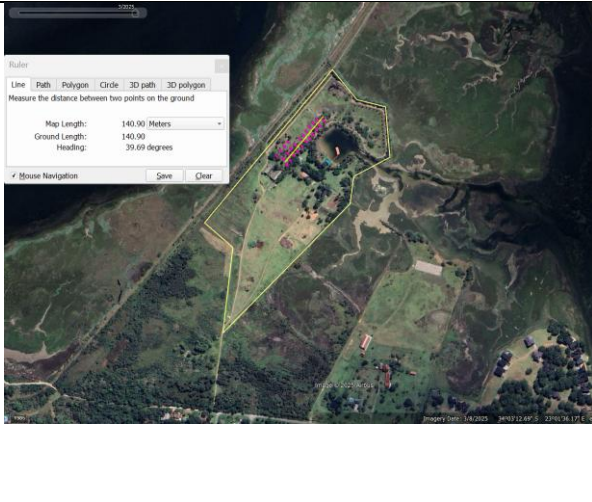
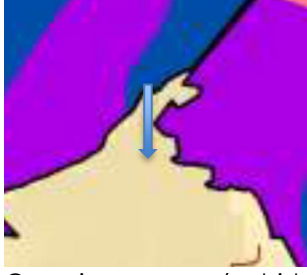
Ebb & Flow campsite Wilderness GRNP	Proposed Brenton Cove Camp site adjacent to the Knysna GRNP
139 camp sites inside the GRNP, adjacent to the water 49 self-catering units Closest campsite to the water – 4m Furthest campsite from the water – 74m	25 camp sites 158m set back from the GRNP on private property Closest camp site to the water – 13m Furthest from the water – 95m
	

 Image © 2025 Maxar Technologies Image ID: 121075119 - 3359236 m"	 Brenton Cove adjacent to the GRNP Knysna proposed camping sites
 Camping area (within the GRNP) adjacent to Quiet zone and Low intensity leisure (purple and blue)	 Camping area (outside the GRNP) proposed adjacent to quiet zone (purple) and Low intensity leisure (blue)

The proposed camping adjacent to the Knysna Estuary, although far fewer camping opportunities proposed than at Ebb& Flow, complies with the use requirements and restrictions linked to the adjacent quiet zone within the GRNP.

8.13 WATER USE LICENCING

Extract from the WUL application (Envirosynergy, 2026)- Appendix Q.

Water Uses applied for

The application includes the following water uses.

Table 7:Water Use Applied for

Water use(s) activities	Purpose	Capacity/ Volume (m ³ ,tonnes and/or m ³ /annum)/ dimension	Property Description	Co-ordinates WG284
Section 21 (a): Taking water from a water resource				
Abstraction of groundwater through Borehole (on-site)	Tourism	9 m ³ /day 3285 m ³ /a	Portion 152 Of The Farm Uitzigt Knysna, WC	34° 3'20.59"S 23° 1'25.29"E
Section 21 (b): Storage of water				
Storage of Borehole Water	Tourism	2 x 10 m ³ 20m ³ (total)	Portion 152 Of The Farm Uitzigt Knysna, WC	34° 3'9.68"S 23° 1'30.27"E
Section 21 (g): Disposing of waste in a manner which may detrimentally impact on a water resource				
Septic Tank 1	Tourism 21 (g) Septic Tank 1 (3.6m ³)	1 x 3.6 m ³ /tank 1314 m³/a	Portion 152 Of The Farm Uitzigt Knysna, WC	34° 3'6.72"S 23° 1'33.30"E
Septic Tank 2	Tourism	1 x 3.6 m ³ /tank 1314 m³/a	Portion 152 Of The Farm Uitzigt Knysna, WC	34° 3'7.47"S 23° 1'32.48"E
Septic Tank 3	Tourism	1 x 3.6 m ³ /tank 1314 m³/a	Portion 152 Of The Farm Uitzigt Knysna, WC	34° 3'8.27"S 23° 1'31.57"E
Septic Tank 4	Tourism	1 x 3.6 m ³ /tank 1314 m³/a	Portion 152 Of The Farm Uitzigt Knysna, WC	34° 3'7.74"S 23° 1'30.63"E
Septic Tank 5	Tourism	1 x 3.6 m ³ /tank 1314 m³/a	Portion 152 Of The Farm Uitzigt Knysna, WC	34° 3'10.96"S 23° 1'34.57"E
Central Septic Tank (Tank 6) (Sewerage Pump Station)	Tourism	1 x 5 m ³ /tank 1825 m³/a	Portion 152 Of The Farm Uitzigt Knysna, WC	34° 3'8.39"S 23° 1'29.96"E
On-Site Treatment Plant Fluidco	Tourism	8.6 m ³ /day	Portion 152 Of The Farm Uitzigt Knysna, WC	34° 3'15.95"S 23° 1'28.18"E
Section 21 (e): Irrigating with treated water				
On-site Irrigating with treated wastewater	Agricultural/Domestic	8.6 m ³ /day	Portion 152 Of The Farm Uitzigt Knysna, WC	34° 3'13.21"S 23° 1'30.25"E (property centre co-ordinate)

Water demand and water supply

• Water demand

Total water demand for 25 camp sites, 2 persons per site, 150 litres per day = 7500 litres per day and household and staff of 1500 litres per day = **total potable demand of 9000 litres (9m³) per day.**

• Water supply

Based the constant rate aquifer test a total of 20 695.5 m³/or 56.7 m³/day can be sustainable abstracted from BC-BH1 over a 7-hour period with a 17-hour rest period. However, based on the reserve determination and the water demand of the site, **only 9m³/day or 3 285m³/a is required.** According to NIWIS catchment A50B is unstressed (GRA2) and a surplus is available for groundwater (GWR). From the sub-catchment preliminary water balance calculation, large scale abstraction (<60% of the recharge – category A) is taking place.

Table 8: Quaternary Catchment K50B Reserve

Quaternary Catchment	Available (GRA2)	Recharge (GWR)	Reserve (GWR)	Abstracted (WARMS)	Surplus (GRA2)	Surplus (GWR)
	[m ³ /a]	[m ³ /a]	[m ³ /a]	[m ³ /a]	[m ³ /a]	[m ³ /a]
K50B	4 652 940	14 400 000	1 055 000	2 430 310	2 222 630	10 914 690

[m³/a] cubic meters per annum

Any catchment management strategy applicable to the relevant water resource - In terms of Section 27(1) of the National Water Act 36 of 1998 (NWA), consideration must be given to, inter alia, the efficient and beneficial use of water in the public interest, the socio-economic impact of the water use, the need to redress past discrimination, and the protection of water resources. The proposed water use has therefore been assessed against the objectives and priorities of the **Breede Olifants** Catchment Management Strategy (CMS).

- **Strategic Context of the Breede Olifants Water Management Area (WMA):** The **Breede Olifants** WMA covers the Breede and Olifants river systems, including the southern coastal catchments such as the Knysna area. The CMS for the WMA is founded on principles of:
 - Sustainable water resource protection;
 - Equitable and efficient water allocation;
 - Protection of ecological infrastructure (rivers, estuaries, wetlands and aquifers);
 - Adaptive management in response to climate variability and water scarcity; and
 - Participatory water governance.
- Lake Brenton is hydrologically linked to the Knysna Estuary system and associated coastal aquifers. The protection of groundwater quality, estuarine ecological integrity and coastal wetlands is a strategic priority within the southern coastal catchments of the WMA.
- **Resource Protection and Ecological Sustainability:** A key objective of the **Breede Olifants** CMS is the protection of water resources in line with the Ecological Reserve and Resource Quality Objectives (RQOs). The proposed water use has been designed to:
 - Avoid contamination of surface water and groundwater resources;

- Prevent deterioration of water quality entering the Knysna estuarine system
- Limit abstraction to sustainable yields where groundwater is involved; and
- Ensure that stormwater management measures prevent erosion and sediment transport.
- Where applicable, abstraction volumes are modest and aligned with local aquifer characteristics, and no significant alteration of natural flow regimes is anticipated. As such, the proposed use is consistent with CMS objectives aimed at maintaining ecological integrity within the southern coastal sub-catchments.

- **Efficient and Beneficial Use of Water:** The **Breede Olifants** CMS promotes water conservation and demand management (WC/WDM) to address regional water constraints and climate variability in the Western Cape. The proposed development incorporates:
 - Water-efficient fixtures and infrastructure;
 - Monitoring of abstraction volumes (if applicable);
 - Implementation of leak detection and maintenance protocols; and
 - Responsible water management practices to avoid waste.

These measures support Section 27(1)(c) of the NWA regarding efficient and beneficial use of water in the public interest and align with CMS goals promoting sustainable resource utilisation.

Socio-Economic Considerations: The CMS recognises the importance of balancing ecological protection with socio-economic development. The proposed water use:

- Supports lawful land use and local economic activity in the Lake Brenton area;
- Contributes to local property development and municipal rates base;
- Does not compromise downstream users or existing lawful water uses; and
- Is limited in scale relative to regional water availability.

The application therefore aligns with Section 27(1)(b) and (d) of the NWA, as the socio-economic benefits are positive and no material adverse impacts on other users are anticipated.

Equity and Lawful Water Use: The **Breede Olifants** CMS promotes transparent regulation of water use through registration, licensing and compliance monitoring. This application:

- Seeks lawful authorisation under the National Water Act;
- Enables regulatory oversight by the BOCMA; and
- Ensures compliance with licence conditions and monitoring requirements.
- By applying for authorisation, the applicant contributes to improved water governance and equitable water management within the WMA.

The proposed water use at Brenton Cove is consistent with the objectives and strategic priorities of the **Breede Olifants** Catchment Management Strategy. The development:

- Protects water resources and ecological integrity;
- Promotes efficient and beneficial use of water;
- Supports local socio-economic activity without compromising other users; and
- Aligns with integrated water resource management principles within the **Breede Olifants** WMA.

It is therefore respectfully submitted that the application satisfies the relevant Section 27 considerations of the National Water Act and is compatible with the strategic direction of the BOCMA

Likely effect of the water use to be authorized on the water resource and on other water users.

From the sub-catchment preliminary water balance calculation, medium scale abstraction (category B) are proposed. A Groundwater Quality Management Index of 4 was estimated for the study area from the ratings for the Aquifer System Management Classification. According to this estimate a medium level groundwater protection is required for the aquifer. DWS's water quality management objectives are to protect human health and the environment. Therefore, the significance of this aquifer classification is that measures must be taken to limit the risk to the following environments.

- The protection of the underlying aquifer.
- Groundwater users downstream of the site

The recent status of a groundwater resource unit can be assessed in terms of sustainable use, observed ecological impacts or water stress. Since no information about ecological impacts of groundwater abstraction is available, the concept of water stress was applied for the classification process.

The concept of stressed water resources is addressed by the National Water Act but is not defined. Part 8 of the Act gives some guidance by providing the following qualitative examples of 'water stress':

- Where demands for water are approaching or exceed the available supply.
- Where water quality problems are imminent or already exist; or
- Where water resource quality is under threat.

To provide a quantitative means of defining stress, a groundwater stress index was developed by dividing the volume of groundwater abstracted from a groundwater unit by the estimated recharge to that unit (Parsons and Wentzel, 2007).

$$\begin{aligned}\text{Stress Index} &= \text{Groundwater Abstraction} / (\text{Recharge} - \text{Baseflow}) \\ &= 95.43 \text{ m}^3/\text{day} / (404.34 - 293.47) \text{ m}^3/\text{day} \\ &= 0.73\end{aligned}$$

The stress-index and classes described in Table 8-5 is a guide for determining the level of stress of a groundwater resource unit, based on abstraction, baseflow and recharge (modified after Parsons and Wentzel, 2007).

Table 9: Ratings – Aquifer System Management and Second Variable Classifications

Present Status Category	Description	Stress Index
A	Unstressed or low level of stress	<0.05
B		0.05-0.2
C	Moderate levels of stress	0.2 – 0.5
D		0.5 – 0.75
E	Stressed	0.75 – 0.95
F	Critically stressed	>0.95

Due to the current abstraction volumes, the groundwater resource unit is classified as stressed, monitoring is therefore necessary to ensure that no detrimental impact on the underlying resource occurs. The hydrogeological investigation details the relevant water management issues and

assesses the risk of each activity on the environment and outlines the mitigation measures to be adhered to.

The following impact from activities are relevant:

- Groundwater users abstracting groundwater through a borehole;
- Contamination of Table Mountain aquifer due to absence of buffer (highly permeable recharge zones) Slow recharge, fractured structure and interconnection amplify risks;
- Saltwater intrusion;
- Ecological stress due to over abstraction;
- Total Coliforms were detected and in exceedance with the SANS 241 drinking water standard in borehole BC-BH1 (microparticles). However, no Faecal Coliforms or Escherichia coli (E. coli) were detected;

Class and the resource quality objectives of the water resource

Quaternary Catchment K50B comprises coastal drainage systems in the southern Cape, including groundwater systems and surface water resources that ultimately discharge to the region's estuarine environments (including the Knysna coastal system where applicable).

Within this coastal context, water resources are generally managed to:

- Maintain high ecological functioning due to estuarine connectivity;
- Protect groundwater quality, particularly shallow coastal aquifers;
- Safeguard freshwater inflows sustaining estuarine processes; and
- Prevent deterioration from urban and diffuse pollution pressures.

The management intent for K50B is aligned with maintaining a largely natural to moderately modified condition, with strong emphasis on ecological protection given the sensitivity of downstream estuarine environments.

Water resource

Chapter 3 of the National Water Act (NWA, Act 106 of 1998) provides for the protection of water resources through the implementation of Resource Directed Measures (RDM) which includes the Classification of water resources, setting the Reserve and Resource Quality Objectives (RQOs). Classification of water resources aims to ensure that a balance is reached between the need to protect and sustain water resources on one hand and the need to develop and use them on the other. Resource Quality Objectives (RQOs) are defined for each prioritised RU for every IUA in terms of water quantity, habitat and biota, and water quality. The determination of a management class for a water resource represents the first stage in the water resource protection process. The MC essentially describes the desired condition of the resource, along with the degree to which it can be utilised. In terms of the WRCS, the MCs will range from minimally used to heavily used. Regulation 810 (Government Gazette No. 33541, September 2010) that establishes the WRCS defines three water resource MCs:

- Class I - minimally used and configuration of ecological categories of that water resource minimally altered from its pre-development condition;

- **Class II - moderately used and configuration of ecological categories of that water resource moderately altered from its pre-development condition; and**
- Class III - heavily used and configuration of ecological categories of that water resource significantly altered from its pre-development condition.

A Class II resource is managed to:

- Balance ecological protection with sustainable water use;
- Maintain the resource in a condition that is largely natural to moderately modified;
- Prevent unacceptable ecological degradation; and
- Ensure long-term sustainability of abstraction and water quality.

Ecological category:

Within K50B, water resources contributing to the Knysna Estuary are typically regarded as having high ecological importance and sensitivity and are commonly managed at an ecological category approximating Category B (largely natural).

This means:

- Ecological functioning must be largely maintained.
- Only limited modification from natural conditions is acceptable.
- Water quality deterioration and excessive abstraction are not permissible.

Groundwater Monitoring

It is recommended that the groundwater levels of the production borehole be monitored using automated monitoring equipment (e.g., data-loggers) to allow for the frequent monitoring of groundwater levels.

Furthermore, it is recommended that groundwater quality monitoring also be conducted on borehole, BC-BH1. The groundwater sample that is collected on site must be submitted to a SANAS accredited laboratory where analyses are carried out in accordance with the methods prescribed by the South African Bureau of Standards.

The sample should be analysed as per Table 10-1. The frequency of laboratory analysis should be bi-annually, while field parameters (pH, TDS and EC) should be conducted monthly to act as early detection of potential saltwater intrusion.

Table 10: Monitoring Programme

Monitoring point	Frequency	Analysis
Proposed production borehole	Bi-annually	SANS 241-1:2015 drinking water quality parameters
	Monthly	pH, Electrical Conductivity and Total dissolved solids by means of field probe.

Data is to be interpreted by a hydrogeologist in order to establish trends in the groundwater levels and chemical data.

Strategic importance of the water use to be authorised

The **Breedse Olifants** Catchment Management Agency (BOCMA) strategy focuses on sustainable water resource management in a water-stressed region, with a vision of "Healthy water resources, for all, forever".

Key strategies include implementing water conservation, clearing invasive plants, verifying lawful water use, and improving compliance to ensure equitable, efficient, and sustainable water allocation:

Key Strategic Areas:

- **Water Resource Protection:** Maintaining the health of rivers, groundwater, wetlands, and estuaries.
- **Water Allocation Reform:** Ensuring fair access to water resources for both existing users and to support new economic development.
- **Management & Compliance:** Enhancing monitoring, controlling water quality, and enforcing water use licenses.
- **Stakeholder Engagement:** Actively collaborating with users and communities to manage water demand, particularly during droughts

The quality of water in the water resource which may be required for the Reserve and for meeting international obligations

Based on the National Integrated Water Information System (NIWIS) (2024), the reserve within quaternary catchment K50B is not stressed (GRA2), and a surplus is available for groundwater (GWR).

Due to the current and proposed abstraction the groundwater resource unit is classified as stressed, monitoring is therefore necessary to ensure that no detrimental impact on the underlying resource occurs.

Several general and specific mitigation measures are proposed in order to reduce negative impacts and incorporate some potentially positive impacts from the proposed development. Some of the most pertinent recommendations include:

- Groundwater monitoring on-and off site:
 - Groundwater levels;
 - Groundwater Quality; and
 - Abstraction volumes.
- Increase water-use efficiencies
- Implement water recycling practices, where possible
- Irrigation water should be carefully timed to minimize the risk of nutrients in stormwater runoff. Ideally, irrigation should take place when the soil is not saturated and rain not expected.

- *Irrigation should take place when lawn is actively growing to ensure nutrient uptake and to minimise losses of runoff;*
- *Irrigation should not cause waterlogging or excess drainage below the plant roots zone. If the nutrients within the irrigation water are applied at sustainable rates (i.e., using smaller amounts frequently rather than large volumes occasionally), water logging should not be a problem. This method also helps to maximise nutrient uptake and minimize loss of leaching;*
- *Vegetative cover in the buffer area between the irrigated area and any watercourse should be maintained wherever possible, particularly riparian vegetation, to minimise the movement of nutrients rich runoff and eroded soil into surface waters.*

9. ALTERNATIVES CONSIDERED

9.2 PREFERRED PROPERTY AND SITE AND ALTERNATIVES

The preferred property is Portion 152 of Farm 216. No alternative property has been considered or assessed as this is the property owned by the landowner and the proposal is efficient use of the land.

The preferred sites were selected based on the following:

- Making use of a property that has tourist attractions and that is in a transformed state, avoiding impact on any natural habitat.
- The property is flat and therefore ideal for camping.
- The property and individual sites are easily accessible.
- Camping can be easily facilitated within the existing lawned areas in the extensive gardens which have been reinstated following the alien vegetation removal taking place on the property since 2022
- The property is adjacent to the Garden Route National Park and falls within the Knysna Protected Environment which calls for sustainable, non-consumptive land uses. Eco-tourism camping for 25 sites is viewed as an appropriate land use where existing buildings are re-purposed, disturbance footprints are limited, landscape fragmentation is reduced which promotes landscape connectivity. Uses are low density, with small estuary user number and small site servicing requirements as indicated as being the preferred land use by SANParks for this area
- The visual specialist confirmed that the proposal will have a low visual impact on the surrounding area and mitigation measures recommended by the specialist will be implemented.

9.3 PREFERRED ACTIVITY AND ALTERNATIVES

The preferred activity entails the establishment of a camping resort on the property consisting of the following:

PREFERRED ALTERNATIVE - 25 TENTED DECKS EACH WITH A SMALL PRIVATE BATHROOM

Based on the comments received on the Draft BAR and the changes to the proposal by the applicant the preferred alternative has been amended to twenty five (25) permanent wooden

decks, each with a small bathroom will be constructed on which a more luxury tent will be erected, associated services, access track and grass parking will be provided.

Landscaping with indigenous species between the decks will allow for the creation of privacy for the guests.

Parking for guests will be on the grass near their tents.

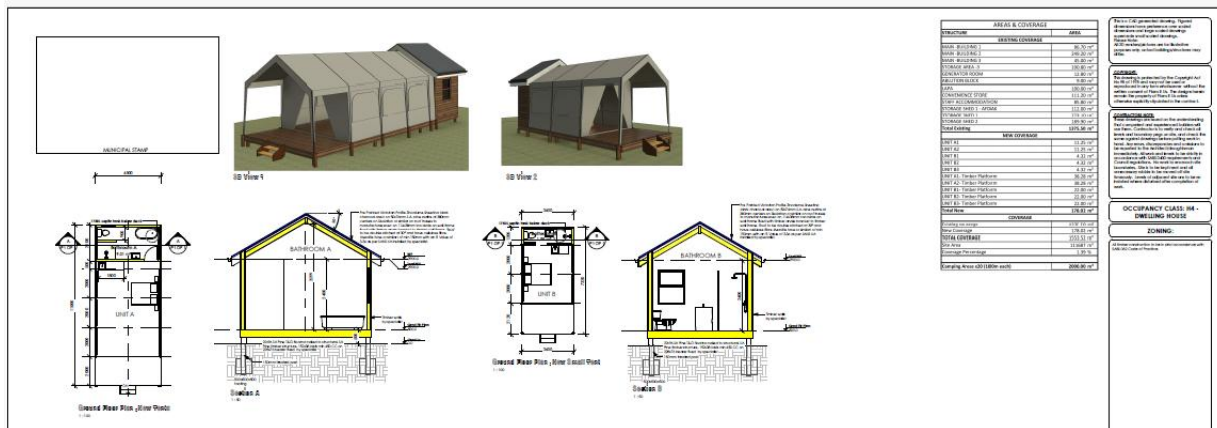


Figure 49: All 25 proposed camping sites will be created on raised wooden decks with a small private bathroom – two alternative size tents can be erected on the decks – for purpose of this assessment the larger size is used in calculations.



Figure 50: Proposed site plan showing the 25 camping decks, the proposed camping node of 0.9ha (green) which will be landscaped with indigenous species and the proposed expansion to the existing Lapa with a wooden deck (blue).



Figure 51 Plan showing the new proposed services - note all services fall outside of the SANParks Development Control Area (green hatching) (EnviroSynergy, 2026)

- By controlling the tent for each of the 25 sites, the exact numbers of guests can be limited and the potential of guests arriving with “non-conforming” camping equipment can be completely eliminated. Guest will pre-book and arrive with their tented accommodation ready and waiting for them.
- All tents are on a fixed raised wooden deck, reducing the physical disturbance to the ground associated with the camping and preventing “camping sprawl” linked to multiple tents being installed within an individual camp “site” at conventional camp sites where the camping rules allow for multiple tents.
- The more luxury tented camp option changes the profile of guests anticipated to make use of the facility which should address certain of the safety and security and noise / nuisance concerns raised by the adjacent village residents.



Figure 52 3D representations of the proposed decks with a permanent bathroom and space for tent to be erected – note the two different sizes.

- Existing farm structures will be renovated where required and used by the landowner where indicated for tourist facilities based on municipal approvals.
- A small deck area will be added to the existing lapa at the pond and the lapa will act as the dining facility for the camping resort.

Associated services for the preferred alternative will entail the following:

Summary on the potable water:

- Total water demand is 9000 litres per day for the 25 camping sites
- Required storage – 2x 9000 litres = 18 000 litres or 2x 10 000 litre jojo tanks.
- Water supply –
 - Rainwater harvesting – from all existing roof structures – the current rainwater storage capacity already exceeds the required 18 000 litres. Water will be chlorinated in the rainwater tanks and pumped to the 2 main supply tanks.
 - Borehole – has a supply of 18 000 litres per hour. This means 0.5 hrs of pumping will provide the entire daily demand requirements. Water from the boreholes will be sterilized with chlorine or UV before being pumped to the storage tanks.
 - Municipal supply – the property has existing municipal potable water supply that services all the existing water uses on the property.
- Water reticulation – water will be pumped in 75mm ring main with 20mm connections to all structures and buildings.
- Toilet and garden water – a separate recycling system will be used for water for toilet flushing and garden irrigation from the treated effluent at the sewage treatment package plant as part of the recycling of treated effluent. The sustainability of the project in terms of wise water use, will be maximised through the recycling of the treated effluent for flushing toilets and through not using potable water for garden irrigation.

Summary on the sewage:

- Sewage daily treatment 8600 litres (when at 100% occupancy)
- Internal sewage reticulation will be collected in sealed below ground plastic tanks of 5 x 3 600 litre capacity – (approximately 1 for every 5 tents / structures),

- Outflow from the tanks piped to a sealed underground sewage pump station of 5000 litre capacity
- Sewage will be pumped from the sealed tank to the sealed package plant with the capacity to treat 8 600 litres per day (at full occupancy).
- Water will be treated to General Standards
- Treated water will be sterilized and pumped to 2x 10 000 litre storage tanks
- From the tanks the water is recycled for use in garden irrigation and toilet flushing
- The treatment plant will be a Fluidco installed and managed and maintained system.
- As a precaution, all tanks will have a sump to ensure that should there be any overflow or accidental spillage or leakage, this cannot pollute any surrounding water body or ground water. This is the planned redundancy requested by the authorities.

WULA – note:

- Any surplus water from the water treatment plant that is not recycled (closed treatment and use cycle) for toilet flushing must be discharged by municipal honey sucker tanker / private honey sucker tanker to the municipal sewage treatment works **until such time as the Water Use Licence for irrigation use of the treated effluent has been issued.**
- Potable water for the project will make use of ONLY the captured rainwater harvesting and existing potable municipal supply **until such time as the use of supplementary borehole water has been granted a Water Use Licence.**

Electrical supply

- The property has an existing electrical connection, however, the proposed facilities will connect to **solar power** that will be installed (infrastructure shown on the SDP).
- Municipal electrical supply is available and used on site currently.
- All cooking and water heating will be done using gas appliances.

Access

- The additional 25 cars making use of the camping site will access from the existing municipal roads in Brenton-on-Lake.
- The engineers confirm that this will not have any impact of traffic flow in Brenton-on-Lake.
- Existing roads and tracks on the property will be used, supplemented with a G5 or grass blocks where necessary. The intent is to retain narrow informal farm tracks to keep the rural feeling, reduce speed and ensure that the free-roaming wildlife is not impacted by vehicles accessing the site.
- Stormwater will not be concentrated and will be dissipated in the existing garden areas (grass swales).

Refuse

- Refuse will be collected on site and divided into general waste (black bags), recyclable waste (blue bags) and compostable waste (plant matter) and this will be collected by the municipality as part of the weekly refuse collection service available in the area. Compostable materials will continue to be composted and used on site in the landscaping.
- A contingency storage in an existing onsite building will be in place in the event that the municipality skip a collection date and to ensure that there is no litter or illegal dumping taking place.
- Where necessary management will take the refuse to the municipal dump site.
- Ongoing cleanup of the property from historic dumping will continue.

Camping accommodation types:

"A consideration, even in the first amendment, was to consider more luxurious tent accommodation commonly known as "glamping".

In these types of accommodations, tented layouts are developed with permanent tents comprising of the usual accommodation facilities found in resort or hotel suites, the main difference being that the suite is within a tent. This type of resort accommodation occurs throughout the country, mainly in game reserves or locations with high tourist potential.

While this form of accommodation is appealing when compared with conventional camping, it is not inexpensive and requires a high initial capital investment, as the suites become permanent facilities.

Having discovered that the definition of a "camping site" in the Knysna Zoning Scheme 2020, specifically excludes permanent tented camps, it was decided to look at alternatives to the "glamping" model.

The alternative option to permanent "glamping" tents is to look at a hybrid option, whereby certain permanent pods are created mainly for ablution facilities, and where the tents are erected on demand. It was decided that this option will be pursued.

The hybrid versions as described above will be available in two types of units, the one being larger than the other." Planning report, 2025.

The proposal will:

- It will have a minimal footprint and seasonal use.
- It aligns with eco-tourism and nature-based recreation.
- It has the ability to support local economic development without compromising ecological integrity.

ALTERNATIVE 1 - 105 CAMPING SITE ALTERNATIVE

- Considered the establishment of 105 camping sites - the camping area was spread across the entire site. This alternative was rejected based on the comments received in the initial planning application. Concerns related to visibility, change in the character of the area, noise, increase in traffic, etc.

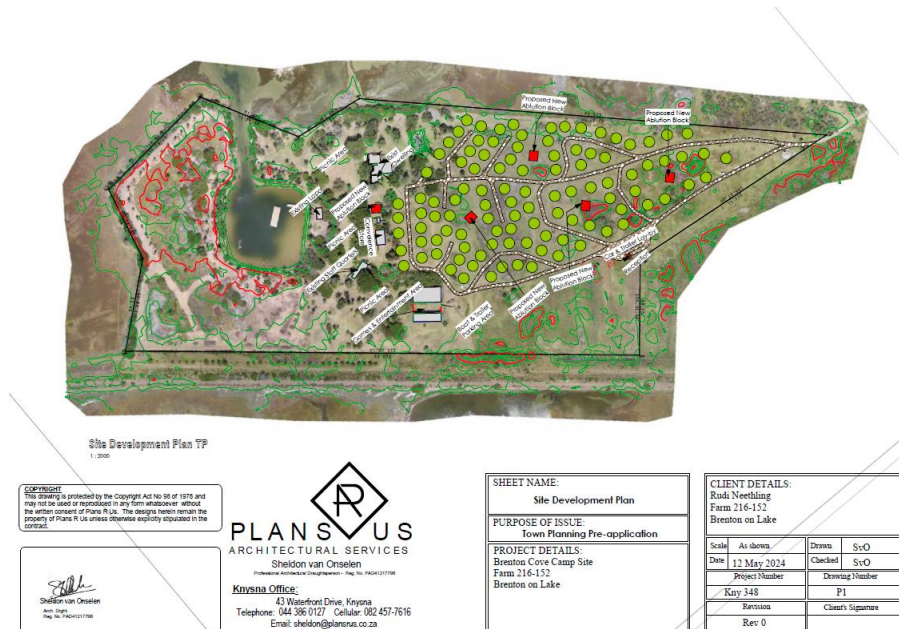


Figure 53: SDP showing 105 camp areas

ALTERNATIVE 2 - 50 CAMPING SITES ALTERNATIVE

Considered the establishment of 50 camping sites - the camping area restricted to closer to the main dwelling. This alternative was rejected based on the visibility from Brenton-on-Lake's elevated areas.

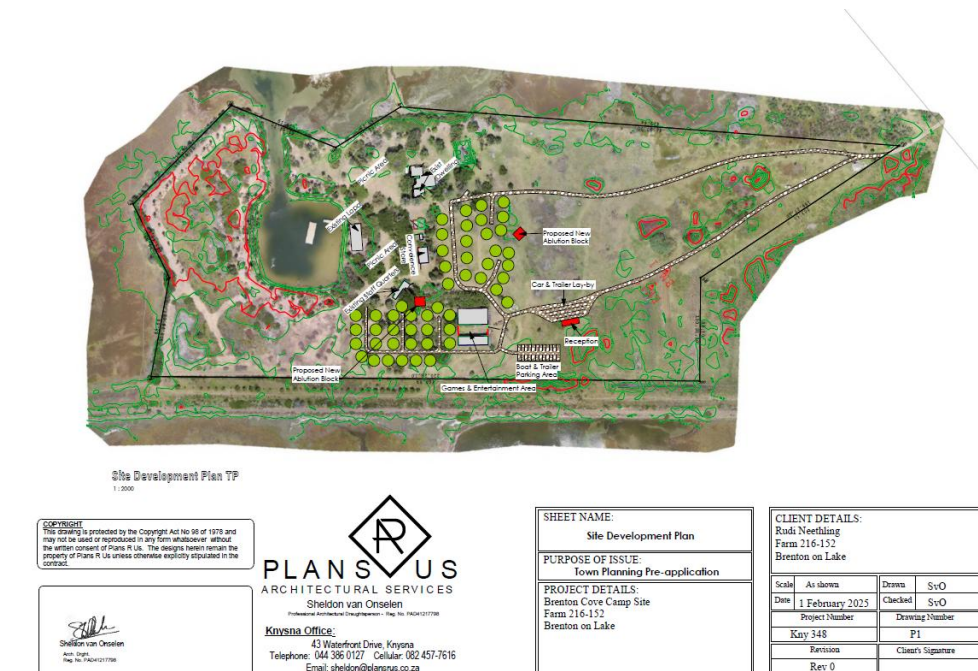


Figure 54: SDP showing 50 camp areas

ALTERNATIVE 3 – 5 TENTED DECKS AND 20 CAMPING SITES

The draft BAR indicated alternative 1 as the preferred alternative – this has been amended based on the comments received and the modification of the proposal by the applicant.

- Five (5) permanent wooden decks with a small bathroom on which tents can be erected, associated services are described below. Vehicle access using existing tracks will lead to a small central grass parking area for the 5 sites. Landscaping, through the planting of additional indigenous trees to create more privacy between the camp sites, will be introduced.



Figure 55: Extract from the SDP showing the five (5) wooden decks with permanent bathrooms and the temporary tents erected on the wooden decks, the 20 conventional camping sites, parking either in the small parking area provided for the 5 deck sites or at each camp site, a small abluion for the 20 camp sites, new solar panel array, batteries and inverter and the required sewage pump stations and sewer line, roof water storage tanks and a damsak for water storage. Vehicle access along the existing farm roads and new tracks (in red). Existing farm buildings to remain and be used where necessary for the tourism facility. The existing lapa will serve as a dining area, the outbuilding will be converted to a small convenience store for guests. Existing lawn areas will be available to guests for relaxation. Access to the private lagoon will be via the existing jetty for non-motorised small watercraft and use of the barge / pontoon / houseboat will be by arrangement with the owner.



Figure 56: Conceptual layout over the aerial photo – purple showing the camping areas and parking which will be set out between the existing trees, green the additional screen planting and landscaping to provide privacy for the campers, grey the facilities (roof water storage, ablutions, solar panels) and the small addition of a wooden deck to the lapa



Figure 57: The proposed alternative location of the sewage conservancy tank and pipeline route in response to limiting the potential cumulative impact on the adjacent mapped wetland on the neighbouring property portion 192 of 216.

ALTERNATIVE 4 - SANPARKS RECOMMENDED CAMPING ALTERNATIVE

SANParks indicated that *"In principle SANParks is willing to support the development proposal, however, for only 15 camping sites (sleeping 2 each); comprising 10 permanent, with an ablution block, and five on raised decks, which must be self-sustaining and non-serviced. SANParks acknowledges efforts made by the applicant to reduce the number of campsites from the initial 105 camping sites proposed."* *"The five-decked camping sites must be self-sustaining with compost toilets and must be non-serviced."*

This recommendation for 15 camping sites, 5 of which are on raised decks, is however not supported by any form of reasoning or justification for the further reduction in camping numbers from 25 (reduced from 105 initially). The number appears to be a "random" number and the servicing requirements seem unattainable. How would ablutions be "self-sustaining" while being "non-serviced"? Having "composting toilets" which are "non-serviced" makes no logical sense – where will the occupants shower or wash? Who will manage the composting toilets if the unit is non-serviced?

The number of camp sites does not have any relation to the similar camping area within the GRNP Wilderness section at Ebb & Flow which is used as a comparative example above, where camping site numbers far exceed the proposed 25 sites, and where occupancy per camp site is not restricted to 2 persons.

The concerns raised by SANParks in their response to the proposal in the Draft BAR have been addressed in the revised proposal and are itemised in the comments and responses tables.

The alternative as proposed by SANParks is not economically viable or feasible.

SUMMARY OF ALTERNATIVES

Alternative 1 - rejected	Alternative 2 - rejected
150 camp sites on the flat lawn areas	50 camp sites on the flat lawn areas and in the garden area near the home
Caravan, trailers and tents	No caravans only tents
Guests can bring boats and trailers but no launching on site, only remote launching	No power boats
New buildings for reception, ablutions and roads required	All activities at the camping site will be in repurposed existing buildings , and the only new buildings will be ablution facilities and a small reception, as required
No permanent residents	No permanent residents
No day visitors	No day visitors
No recreational fishing on site	No recreational fishing on site

Alternative 3 - 25 camp sites – 5 deck and 20 normal – rejected due to comments received and changes by the applicant	25 camp sites – decks only	Alternative 4 - 15 camp sites – 10 normal and 5 decks SANParks option – rejected by applicant.
25 camp sites restricted to the garden area not visible from any outside location	25 camp sites restricted to the garden area not visible from any outside location	15 camp sites restricted to the garden area not visible from any outside location
Deck tents and normal tents only 5 tents limited to 2 persons, 20 sites for families – not limited.	Deck tents only – numbers limited 2 per tent. Max 50 persons.	Deck tents and normal camping with limited numbers. Max 30 persons – 2 per site.
No power boats	No power boats	No power boats
All activities at the camping site will be in repurposed existing buildings , and the only new buildings will be ablution facilities for the 20 camp sites	All activities at the camping site will be in repurposed existing buildings, no new buildings	All activities at the camping site will be in repurposed existing buildings . New ablution needed for the 10 camp sites.
No permanent residents	No permanent residents	No permanent residents
No day visitors	No day visitors	No day visitors
No recreational fishing on site	No recreational fishing on site	No recreational fishing on site

The two higher density camping alternative SDPs (105 and 50) were rejected during the planning process and were not assessed further in the NEMA process.

The SANParks alternative was rejected as it is not a viable, practical or feasible alternative.

Various other commenting parties suggested reduction in density of the tented camp in order to be more "low key". On analysis of the consent use for camping, it would appear that less than 10 units do not require a consent use as they are deemed compatible with the Agricultural zone, between 10 and 20 units is seen as the norm for consent use agriculture camp sites, while in excess of 20 is considered under special circumstances. The planning authority has yet to consider the consent use

application and have not commented on the NEMA application, as such it is unknown whether the application of 25 would be approved or if they will require a reduction in number.

9.4 PREFERRED TECHNOLOGY AND ALTERNATIVES

Alternative technology considered:

Conservancy tank with removal to municipal WWTW and separation of grey and black water with the grey water used for irrigation purposes after filtration. Two different locations for the conservancy tank were considered, the first proposed by the engineer was rejected and shifted as it was too close to the buffer zone defined around a wetland on the adjacent property.

- This alternative was not supported, even as an interim measure, due to the unknown potential for pollution into the adjacent estuary. **This alternative has been rejected in its entirety.**

Waste Water Treatment package plant and recycling of treated effluent for toilet flushing and excess treated effluent to be used for garden irrigation.

- This alternative is the preferred alternative as it confirms that wastewater will be treated, BOCMA will decide on the standard for the treated effluent (General or Special Standard) and the recycling of the water assists in ensuring that the project is sustainable and self sufficient which increases climate resilience. The WUL will determine the standard of the treated effluent water as well as the conditions relating to the irrigation of the wastewater. It is anticipated that due to the sensitivity of the Knysna Estuary and the fact that the estuary already has water quality issues, BOCMA will request Special Standard for the treated effluent. Special standard quality allow for complete recycling and unrestricted release into the water resource.

Electrical supply – there is an existing municipal electrical connection is available which will continue to be used. The camping will install a small solar pv area to supply the camp sites with the required power for low level lighting and plugs. The bathrooms are likely to make use of gas water heaters.

Potable water supply - Rainwater harvesting will continue and municipal water supplies the existing buildings. The WUL to make use of the borehole water for supply needs is in progress. The recycling of treated effluent for flushing toilets further reduces the water demand and makes the application sustainable.

9.4 NO-GO OPTION – NO IMPLEMENTATION OF THE ACTIVITY

The no-go alternative would imply no establishment of a camping site on the property or the conversion of the existing structures into tourism facilities, this is not the preferred alternative for the following reasons:

- The **preferred alternative** makes use of **already transformed areas** (existing lawns and disturbed zones) and **completely avoids any natural or sensitive habitats** as confirmed by the biodiversity and visual specialists.
- The **proposed development** will create **short- and long-term job opportunities** for local residents during both the construction and operational phases.

- It will contribute to **sustainable tourism growth, local economic development, and socio-economic upliftment** within the Knysna area — objectives supported by the **Municipal IDP, SDF, and Provincial SDF**.
- The **No-Go Alternative** would **forfeit these socio-economic benefits**, resulting in a lost opportunity for local employment and tourism expansion.
- The proposal is consistent with the **Knysna SDF, Provincial SDF, and Garden Route EMF**, which promote **eco-tourism** and **sustainable land use** outside the urban edge where infrastructure demands are low.
- The **No-Go Alternative** would not contribute toward achieving these planning goals or the **NEMA principles** of sustainable development and optimal land use.
- The preferred alternative uses **low-impact, sustainable technologies** (solar power, rainwater harvesting, water reuse via package treatment plant).
- It is designed to be **small-scale, reversible, and mostly seasonal**, with **low visual and noise impacts**.
- The **No-Go Alternative** does not provide a more sustainable or environmentally superior outcome since the current land is already disturbed and underutilized.

9.5 HOW THE MITIGATION HIERARCHY WAS APPLIED TO REACH THE BEST PRACTICABLE ENVIRONMENTAL OPTION

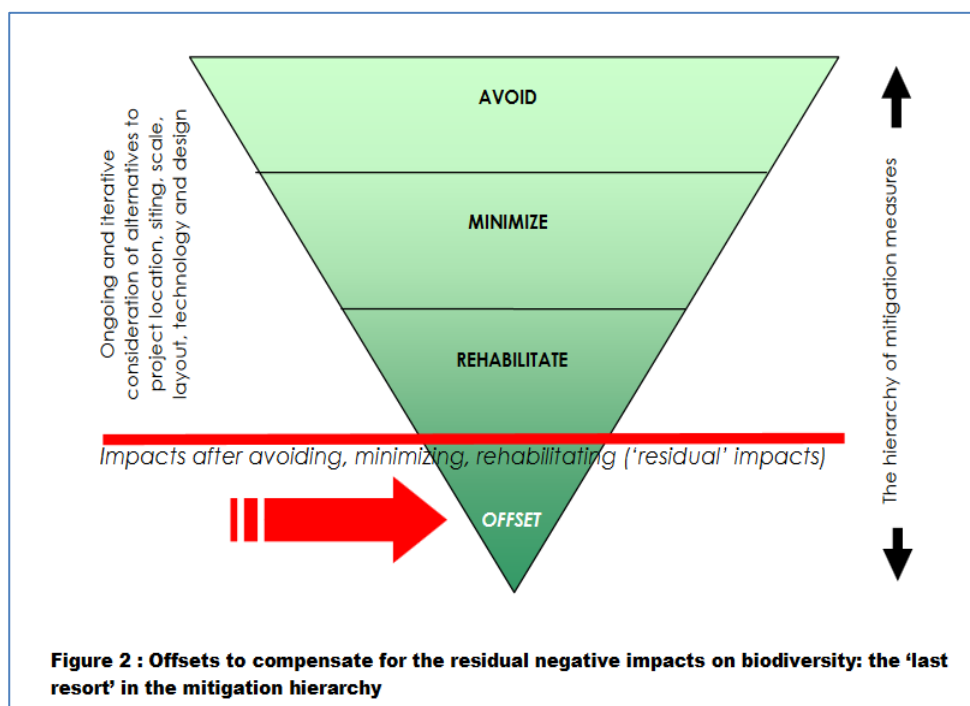


Figure 58: Figure extracted from the Western Cape Guideline on Biodiversity offsets, 2015. This figure visually shows the mitigation hierarchy that was applied to this project

- Avoid impacts

The proposal avoids the disturbance of natural habitats, sensitive estuarine environments and protected plant species as confirmed by the specialist. The camp will be established on existing transformed areas (lawn and garden).

The existing infrastructure will be used for tourism facilities, storage etc., avoiding the addition of more infrastructure.

- Minimise impacts

The design incorporates low impact construction methods which as using raised wooden decks limiting earthworks. This minimises the physical disturbance.

All potential impacts (construction and operational phases) will be minimised through the implementation of the EMPr.

Ongoing alien clearing and management.

- Off-set

None applicable as there is no loss of natural habitat as confirmed by the specialist.

9.6 SUMMARY OF ALTERNATIVES CONSIDERED

Table 11: Table providing a summary of the alternatives considered

Alternative	Description	Environmental Considerations	Socio-Economic Considerations	Outcome / Motivation
Preferred Alternative	Establishment of a small-scale camp resort consisting of a maximum of 25 permanent units on existing transformed lawn and garden areas . Infrastructure includes solar power, rainwater harvesting, and on-site wastewater treatment.	Avoids all natural and sensitive habitats as confirmed by specialists; located in disturbed areas ; low visual, noise, and ecological impact ; includes ongoing alien clearing and EMPr implementation. Raises all units off the ground and ensures total control of the visual impact of the site.	Creates local employment opportunities , supports eco-tourism , aligns with Knysna SDF, IDP, and Provincial SDF objectives; promotes sustainable land use outside the urban edge.	Preferred alternative – represents the best practicable environmental option balancing environmental protection and socio-economic benefit. The final number of fixed sites to be defined by the competent authorities
20 + 5 alternative	Establishment of a small-scale camp resort consisting of 20 camp sites and 5 permanent units on existing transformed lawn and garden areas . Infrastructure includes solar power, rainwater harvesting, and on-site wastewater treatment.	Avoids all natural and sensitive habitats as confirmed by specialists; located in disturbed areas ; low visual, noise, and ecological impact ; includes ongoing alien clearing and EMPr implementation.	Creates local employment opportunities , supports eco-tourism , aligns with Knysna SDF, IDP, and Provincial SDF objectives; promotes sustainable land use outside the urban edge.	Amended based on comments received.
Alternative SDPs (Rejected)	Earlier proposals for 50 or 105 camp sites across the property with broader use of the site.	Larger development footprint would have increased visual impact, disturbance, and infrastructure demand ; less alignment with specialist recommendations.	Would generate higher visitor capacity and jobs but at the cost of higher environmental risk and non-compliance with NEMA hierarchy of avoidance.	Rejected – not environmentally feasible and inconsistent with low-impact design intent.
Alternative Activity / Technology Options	Considered permanent units or fully permanent tented suites; Alternative services (package plant vs. conservancy tank; municipal vs. solar energy). Municipal water vs borehole water and rainwater in addition to municipal water.	Permanent “glamping” tents would increase permanent infrastructure . Hybrid system (current proposal) offers flexibility. All 25 to be on raised decks. Alternative water and sewage linked to the WUL allows for sustainability targets to be achieved to be “off grid” in the long term.	Hybrid system remains economically viable and supports sustainable resource use .	Hybrid design selected – low-impact, cost-effective, and compliant with NEMA sustainability principles.
No-Go Alternative	No establishment of the camp resort; property remains in current state.	No change to existing transformed environment. No opportunity for the public to use and enjoy the property as it would remain completely private residential use.	No socio-economic benefit (loss of jobs, tourism growth, and land-use efficiency).	Not preferred – does not achieve sustainable development objectives or provide environmental or socio-economic benefits.

10. IMPACT AND RISK FOR EACH ALTERNATIVE

10.2 METHODOLOGY TO DETERMINE THE SIGNIFICANCE RATINGS OF THE POTENTIAL ENVIRONMENTAL IMPACTS AND RISKS ASSOCIATED WITH THE ALTERNATIVES

Seven rating scales are considered when assessing potential impacts. These include:

- extent;
- duration;
- intensity;
- status of impact;
- probability;
- degree of confidence; and
- significance.

In assigning significance ratings to potential impacts before and after mitigation the following approach presented below is to be adhered to:

1. The core criteria for determining significance ratings are “extent”, “duration” and “intensity”. The preliminary significance ratings for combinations of these three criteria are given.
2. The status of an impact is used to describe whether the impact will have a negative, positive or neutral effect on the surrounding environment. An impact may therefore be negative, positive (or referred to as a benefit) or neutral.
3. Describe the impact in terms of the probability of the impact occurring and the degree of confidence in the impact predictions, based on the availability of information and knowledge.
4. Additional criteria to be considered, which could “increase” the significance rating if deemed justified, with motivation, are the following:
 - Permanent / irreversible impacts (as distinct from long-term, reversible impacts);
 - Potentially substantial cumulative effects; and
 - High level of risk or uncertainty, with potentially substantial negative consequences.
5. Additional criteria to be considered, which could “decrease” the significance rating if justified, with motivation, is the following:
 - Improbable impact, where confidence level in prediction is high.
6. When assigning significance ratings to impacts after mitigation:
 - First, consider probable changes in intensity, extent and duration of the impact after mitigation, assuming effective implementation of mitigation measures, leading to a revised significance rating; and
 - Then moderate the significance rating after taking into account the likelihood of proposed mitigation measures being effectively implemented. Consider:
 - Any potentially significant risks or uncertainties associated with the effectiveness of mitigation measures;
 - The technical and financial ability of the proponent to implement the measure; and
 - The commitment of the proponent to implementing the measure, or guarantee over time that the measures would be implemented.
7. The cumulative impacts of a project should also be considered. “Cumulative impacts” refer to the impact of an activity that may become significant when added to the existing activities currently taking place within the surrounding environment.
8. Where applicable, assess the degree to which an impact may cause irreplaceable loss of a resource. A resource assists in the functioning of human or natural systems, i.e. specific vegetation, minerals, water, agricultural land, etc.

A. Significance

The significance ratings are based on largely objective criteria and inform decision-making at a project level as opposed to a local community level. In some instances, therefore, whilst the significance rating of potential impacts might be “low” or “very low”, the importance of these impacts to local communities or individuals might be extremely high. The importance which I&APs attach to impacts must be taken into consideration, and recommendations should be made as to ways of avoiding or minimising these negative impacts through project design, selection of appropriate alternatives and / or management.

The relationship between the significance ratings after mitigation and decision-making can be broadly defined as follows (see overleaf): substance

Significance rating	Effect on decision-making
VERY LOW; LOW	Will not have an influence on the decision to proceed with the proposed project, provided that recommended measures to mitigate negative impacts are implemented.
MEDIUM	Should influence the decision to proceed with the proposed project, provided that recommended measures to mitigate negative impacts are implemented.
HIGH; VERY HIGH	Would strongly influence the decision to proceed with the proposed project.

B. Extent

“Extent” defines the physical extent or spatial scale of the impact.

Rating	Description
LOCAL	Extending only as far as the activity, limited to the site and its immediate surroundings. Specialist studies to specify extent.
REGIONAL	Southern Cape. Specialist studies to specify extent.
NATIONAL	South Africa
INTERNATIONAL	

C. Duration

“Duration” gives an indication of how long the impact would occur.

Rating	Description
SHORT TERM	0 - 5 years
MEDIUM TERM	5 - 15 years
LONG TERM	Where the impact will cease after the operational life of the activity, either because of natural processes or by human intervention.
PERMANENT	Where mitigation either by natural processes or by human intervention will not occur in such a way or in such time span that the impact can be considered transient.

D. Intensity

“Intensity” establishes whether the impact would be destructive or benign.

Rating	Description
ZERO TO VERY LOW	Where the impact affects the environment in such a way that natural, cultural and social functions and processes are not affected.

LOW	Where the impact affects the environment in such a way that natural, cultural and social functions and processes continue, albeit in a slightly modified way.
MEDIUM	Where the affected environment is altered, but natural, cultural and social functions and processes continue, albeit in a modified way.
HIGH	Where natural, cultural and social functions or processes are altered to the extent that it will temporarily or permanently cease.

E. Loss of resources

“Loss of resource” refers to the degree to which a resource is permanently affected by the activity, i.e. the degree to which a resource is irreplaceable.

Rating	Description
LOW	Where the activity results in a loss of a particular resource but where the natural, cultural and social functions and processes are not affected.
MEDIUM	Where the loss of a resource occurs, but natural, cultural and social functions and processes continue, albeit in a modified way.
HIGH	Where the activity results in an irreplaceable loss of a resource.

F. Status of impact

The status of an impact is used to describe whether the impact would have a negative, positive or zero effect on the affected environment. An impact may therefore be negative, positive (or referred to as a benefit) or neutral.

G. Probability

“Probability” describes the likelihood of the impact occurring.

Rating	Description
IMPROBABLE	Where the possibility of the impact to materialise is very low either because of design or historic experience.
PROBABLE	Where there is a distinct possibility that the impact will occur.
HIGHLY PROBABLE	Where it is most likely that the impact will occur.
DEFINITE	Where the impact will occur regardless of any prevention measures.

H. Degree of confidence

This indicates the degree of confidence in the impact predictions, based on the availability of information and knowledge.

Rating	Description
HIGH	Greater than 70% sure of impact prediction.
MEDIUM	Between 35% and 70% sure of impact prediction.
LOW	Less than 35% sure of impact prediction.

I. Significance

“Significance” attempts to evaluate the importance of a particular impact, and in doing so incorporates the above three scales (i.e. extent, duration and intensity).

Rating	Description
VERY HIGH	Impacts could be EITHER: of high intensity at a regional level and endure in the long term; OR of high intensity at a national level in the medium term; OR of medium intensity at a national level in the long term.
HIGH	Impacts could be EITHER: of high intensity at a regional level and endure in the medium term; OR of high intensity at a national level in the short term; OR of medium intensity at a national level in the medium term; OR of low intensity at a national level in the long term; OR of high intensity at a local level in the long term; OR of medium intensity at a regional level in the long term.
MEDIUM	Impacts could be EITHER: of high intensity at a local level and endure in the medium term; OR of medium intensity at a regional level in the medium term; OR of high intensity at a regional level in the short term; OR of medium intensity at a national level in the short term; OR of medium intensity at a local level in the long term; OR of low intensity at a national level in the medium term; OR of low intensity at a regional level in the long term.
LOW	Impacts could be EITHER of low intensity at a regional level and endure in the medium term; OR of low intensity at a national level in the short term; OR of high intensity at a local level and endure in the short term; OR of medium intensity at a regional level in the short term; OR of low intensity at a local level in the long term; OR of medium intensity at a local level and endure in the medium term.
VERY LOW	Impacts could be EITHER of low intensity at a local level and endure in the medium term; OR of low intensity at a regional level and endure in the short term; OR of low to medium intensity at a local level and endure in the short term.
INSIGNIFICANT	Impacts with: Zero to very low intensity with any combination of extent and duration.
UNKNOWN	In certain cases it may not be possible to determine the significance of an impact.

J. Degree to which impact can be mitigated

This indicates the degree to which an impact can be reduced / enhanced.

Rating	Description
NONE	No change in impact after mitigation.
VERY LOW	Where the significance rating stays the same, but where mitigation will reduce the intensity of the impact.
LOW	Where the significance rating drops by one level, after mitigation.
MEDIUM	Where the significance rating drops by two to three levels, after mitigation.
HIGH	Where the significance rating drops by more than three levels, after mitigation.

K. Reversibility of an impact

This refers to the degree to which an impact can be reversed.

Rating	Description
IRREVERSIBLE	Where the impact is permanent.

PARTIALLY REVERSIBLE	Where the impact can be partially reversed.
FULLY REVERSIBLE	Where the impact can be completely reversed.

Determination and ranking of potential impacts are based on years of experience working on similar developments across the same area as well as applying sound environmental knowledge informed by available information on site, vegetation, development type, current condition and other relevant factors that could/ will influence such a development.

Specialist impact assessment methodology (Dr D Hoare):

The Impact Assessment Methodology assists in evaluating the overall effect of a proposed activity on the environment. Impact assessment must take account of the nature, scale and duration of effects on the environment and whether such effects are positive (beneficial) or negative (detrimental). The rating system is applied to the potential impact on the receptor. The impact assessment methodology provided below explicitly takes into account the value and condition of the biodiversity resources affected. In assessing the significance of each issue the following criteria (including an allocated point system) is used:

CRITERIA	SCORE 1	SCORE 2	SCORE 3	SCORE 4	SCORE 5
BIODIVERSITY VALUE / SENSITIVITY CRITERIA					
Irreplaceability (I) The biodiversity value of the affected resource	Resource is widespread and common and /or regenerates itself (LC)	Resource is uncommon, endemic to a restricted area, moderately rare, or is already noticeably affected but still relatively widespread (e.g., NT, ESA)	Resource is naturally rare, restricted to limited localities, ephemeral, or is approaching a threshold of persistence (VU, CBA2)	Resource is highly localised / loss has already exceeded persistence thresholds (EN, CBA1)	Resource is critically rare / loss has already well exceeded persistence thresholds (CR, Protected)
Threshold (T) The scale of the impact relative to the overall distribution of a resource, therefore the degree to which the impact contributes towards exceeding an ecological threshold	Impact affects a negligible proportion of the overall biodiversity resource	Impact affects a proportion of the biodiversity resource that is within 6 orders of magnitude of the total extent / number of the resource (0.001-0.1%)	Impact affects a proportion of the biodiversity resource that is within 4 orders of magnitude of the total extent / number of the resource (0.1-1%)	Impact affects a proportion of the biodiversity resource that is within 2 orders of magnitude of the total extent / number of the resource (1-10%)	Impact affects a proportion of the biodiversity resource that is within 1 order of magnitude or more of the total extent / number of the resource ($\geq 10\%$)
Condition (C) The integrity of the resource in terms of its intactness and functionality, the coherence of its ecological structure and function	Resource in very poor condition, displaying advanced degradation		Moderately affected resource, functional but displaying obvious signs of minor degradation		Fully functional and in a state expected in a completely natural state, unaffected by human influence.
Reversibility (R) The ability of the environmental receptor to rehabilitate or restore after the activity has caused environmental change	Reversible: Recovery without rehabilitation	Mostly reversible: requires minor mitigation	Partly reversible: Recoverable with more intense mitigation	Barely reversible: unlikely to be reversed, even with intense mitigation	Irreversible: Not possible despite action
IMPACT MAGNITUDE CRITERIA					
Extent (E) The geographical extent of the impact on a given environmental receptor	Site: Within site boundary only	Site & surroundings: Extends for a limited distance beyond site boundaries	Landscape: Outside activity area	Regional: Affects patterns at a regional or provincial scale	Global: Across borders or boundaries

CRITERIA	SCORE 1	SCORE 2	SCORE 3	SCORE 4	SCORE 5
Duration (D) The length of permanence of the impact on the environmental receptor	Immediate: On impact, 0-1 years	Short term: 1-5 years	Medium term: 5-10 years	Long term: Project life, 10-25 years	Permanent: Indefinite
Magnitude (M) The degree of alteration of the affected environmental receptor	Very low: No impact on processes	Low: Slight impact on processes	Medium: Processes continue but in a modified way	High: Processes temporarily cease or continue in a highly modified way	Very High: Permanent cessation of processes
Probability of Occurrence (P) The likelihood of an impact occurring in the absence of pertinent environmental management measures or mitigation	Improbable	Low Probability	Probable	Highly Probability	Definite
Significance (S) is determined by combining the above criteria in the following formula:	$S = [(E + D + M)/3 \times (R + I + T + C)/4 \times P]/25$ $Significance = (Extent + Duration + Magnitude)/3 \times (Reversibility + Irreplaceability + Threshold + Condition)/4 \times Probability$				
IMPACT SIGNIFICANCE RATING					
Total Score	0 - 1	1 - 2	2 - 3	3 - 4	4 - 5
Environmental Significance Rating (Negative (-))	Very low	Low	Moderate	High	Very High
Environmental Significance Rating (Positive (+))	Very low	Low	Moderate	High	Very High

10.3 ASSESSMENT OF EACH IMPACT AND RISK IDENTIFIED FOR EACH ALTERNATIVE

• Impacts identified by specialist Dr Hoare:

"The site is an existing property with formal gardens and lawns. There are areas that were previously degraded by alien vegetation, but these are in the process of being cleared (following an approved alien invasive management plan). There is no fynbos on site, despite the area being mapped as containing Knysna Sand Fynbos. The proposal is to use the existing infrastructure on site for camping and associated activities. This will require maintenance of existing lawns and gardens. No expansion of the site into the salt marsh is proposed or expected.

In terms of the sensitivities flagged for the site, the only confirmed sensitivity under the Plant Species Theme is the existence of eelgrass (*Zostera capensis*) in adjacent salt marsh areas. This species is listed as Endangered in South Africa and Vulnerable internationally. No other plant species of concern were found on site, and the habitat on site is not suitable for any other flagged plants of conservation concern.

In terms of the Terrestrial Biodiversity Theme, any sensitivities (from a terrestrial perspective) would be linked to the existence of any remaining areas of flagged ecosystems, in this case, Knysna Sand Fynbos. None was found to occur on site. It has been assessed in a section above in this report that no terrestrial habitat historically occurred on this site and that the regional vegetation map is incorrect in showing Knysna Sand Fynbos as occurring here.

In terms of the legal definition of natural vegetation, any area where the soil has not been legally disturbed in the previous 10 years is considered to be in a natural state. However, none of the

substrate on site is natural - it has all been created through infilling with imported material. There is therefore no original soil on site upon which terrestrial vegetation occurs. No impacts on Knysna Sand Fynbos are therefore assessed here.

In terms of both the Terrestrial Biodiversity Theme and the Aquatic Biodiversity Theme, the estuary is an important and sensitive ecosystem. This is represented by the extensive salt marsh areas adjacent to the site. Any possible impacts on these areas need to be carefully controlled. The possible impact of the proposed activity on these estuarine habitats is therefore also assessed here.

The impacts assessed here are therefore as follows:

- **IMPACTS ON ESTUARINE HABITATS.**
- **IMPACTS ON EELGRASS (ZOSTERA CAPENSIS).**

10.3.1 IMPACTS ON ESTUARINE HABITATS

Resource irreplaceability

The estuarine habitat is mapped as a protected ecosystem. Score = 5.

Threshold

Any potential impact from the site will probably be related to edge effects from the property, including trampling, erosion, runoff, spread of alien invasive plants, and similar indirect impacts. It is assumed that no construction impacts will occur within the estuary. The estuarine environment in the vicinity of the site has already been impacted to some degree, so additional indirect impacts would probably only exacerbate this. Score = 2.

Resource condition

The estuary in the vicinity of the site is in very good condition on the northern side, but moderately impacted on the south-western side, and along the railway line. Score = 4.

Reversibility of impact

The salt marshes in the estuary are sensitive ecosystems that are vulnerable to physical disturbance. Physical impacts can also be long-term to permanent. Impacts are therefore considered to be BARELY REVERSIBLE, and require that ecological conditions are well-managed. Score = 4.

Extent of impact

The impact will occur within the site boundary and in surrounding areas. It is possible that there will be slight spillover effects into surrounding areas, due to the ecological connectivity between different parts of the estuary. Score = 2.

Duration of impact

Loss of estuarine salt marshes on site and in surrounding areas, if it occurs, is assessed as being long-term to permanent. Score = 5

Intensity of impact

Given the proposed activities on site, it is not expected that any impacts on estuarine areas will occur. However, if any construction-related impacts occur, it could result in some localised impacts on the estuary beyond the site. At worst, it is not expected that this would cause more than a modification of ecological processes. The potential impact is therefore scored as being of MEDIUM intensity, at worst. Score = 2.

Probability of occurrence

The impact is **IMPROBABLE**, on condition estuarine areas are protected. Score = 1.

Confidence

There is a high understanding in the identity and on-site value of the vegetation, as well as the nature and extent of the proposed activity. No measures are therefore required to improve the confidence in the assessed impact.

Significance of impact

The significance is a combination of the value of the biodiversity resource, the magnitude of the expected impact and the probability of the impact occurring.

Biodiversity value score: $(5 + 2 + 4 + 4) / 4 = 3.75$

Impact magnitude: $(2 + 5 + 2) / 3 = 3.00$

Impact probability: 1.00

The calculation of the significance of an impact uses the following formula:

Significance = (Biodiversity value) x (Magnitude) x (Probability).

On this basis, the impact is calculated as $(3.75 \times 3.00 \times 1.00 = 7.6) / 25 = 0.5 = \text{VERY LOW significance}$

Possible mitigation measures

Possible mitigation measures that can be applied are as follows:

- Ensure no impacts on estuarine areas, especially salt marsh areas and tidal channels. This includes any physical impacts, one of which would be trampling of salt marsh vegetation. Indirect impacts from the site need to be managed, including limiting access to salt marsh areas, and controlling alien invasive species on site. No additional earthworks should be permitted that would expand the existing non-tidal parts of the site.
- Create on-site buffers between activities on site and the estuarine environment. One possibility is to enhance and maintain the thicket hedges on site.
- Control access by pedestrians and machinery into the estuary to limit possible trampling impacts. This does not mean prohibiting access, only controlling it to minimise impacts.

10.3.2 IMPACTS ON EELGRASS (ZOSTERA CAPENSIS)

Resource irreplaceability

The plant species (*Zostera capensis*) is listed as Endangered in South Africa and Vulnerable internationally. Score = 4.

Threshold

The potential impact affects a small proportion of the population of eelgrass in the Knysna Estuary and is unlikely to affect population structure or processes. Score = 1.

Resource condition

The population of eelgrass adjacent to the site (within proximity to the proposed development footprint) is in good condition. Score = 5.

Reversibility of impact

There are small amounts of eelgrass in the channel of the artificial pond, which indicates that it is capable of colonising new areas, if ecological conditions are suitable. There are also healthy populations in the tidal channels that feed the pond. These tidal channels appear to have been stable for several decades, despite on-site modifications of the landscape. The loss of any populations of eelgrass on site (within the activity footprint) is therefore considered to be PARTLY REVERSIBLE with mitigation, on condition ecological conditions are well-managed. Score = 3.

Extent of impact

The impact will occur within the site boundary and in surrounding areas. It is possible that there will be slight spillover effects into surrounding areas, due to the ecological connectivity between different parts of the estuary. Score = 2.

Duration of impact

Loss of populations of eelgrass on site, if it occurs, is assessed as being long-term. Score = 4

Intensity of impact

Given the proposed activities on site, it is not expected that any impacts on eelgrass will occur. However, if any construction-related impacts occur, it could result in some localised impacts on tidal channels beyond the site, or even within the artificial pool on site. At worst, it is not expected that this would cause more than a modification of ecological and population processes. The potential impact is therefore scored as being of MEDIUM intensity, at worst, but it is more likely that it will be VERY LOW. Score = 1.

Probability of occurrence

The impact is IMPROBABLE, on condition estuarine areas are protected. Score = 1.

Confidence

There is a high understanding in the identity and on-site value of the vegetation, as well as the nature and extent of the proposed activity. No measures are therefore required to improve the confidence in the assessed impact.

Significance of impact

The significance is a combination of the value of the biodiversity resource, the magnitude of the expected impact and the probability of the impact occurring.

Biodiversity value score: $(4 + 1 + 5 + 3)/4 = 3.25$

Impact magnitude: $(2 + 4 + 1)/3 = 2.33$

Impact probability: 1.00

The calculation of the significance of an impact uses the following formula:

Significance = (Biodiversity value) x (Magnitude) x (Probability).

On this basis, the impact is calculated as $(3.25 \times 2.33 \times 1.00 = 7.6)/25 = 0.3 = \text{VERY LOW significance}$

Possible mitigation measures

Possible mitigation measures that can be applied are as follows:

- *Ensure no impacts on estuarine areas, especially tidal channels. This includes limiting any impacts that would cause erosion or siltation of tidal channels, or effects on water quality, salinity, or average quantity. No on-site floodwater disposal should be directed primarily into the tidal channel.*

10.3.3 VISUAL IMPACTS

The property is visible from the higher lying areas of Brenton-on-Lake. As such the activities on the property have the potential to facilitate visual change. To date the change on the property has been linked to the removal of the extensive areas of alien vegetation, which has made the property "more" visible.

The proposed camping area is located between the existing trees, which implies that other than vehicles accessing the property on the existing roads, the activity will not be easily observed.



Figure 59: View of the property from the Brenton-on-Lake access road showing that the camping area will not be visible or visually obstructive.

VRM Africa – undertook a Visual Impact Level 1 assessment and concluded as follows:

***“In terms of regional and local planning fit for planned landscape and visual related themes, the expected visual/ landscape policy fit of the landscape change is rated High. The proposed development aligns well with local and regional planning objectives, particularly in support of conservation and eco-tourism. The site reflects a strong emphasis on ecological restoration, with alien vegetation largely cleared and indigenous species successfully re-established. Although the site lies below the 5-metre contour, the low-impact nature of the proposed tented camp, with minimal fixed infrastructure, reduces vulnerability to flooding. Additionally, the site offers clear potential for eco-tourism opportunities linked to the Knysna National Lake Area, without requiring significant built structures.*”**

CONCLUSION

The finding of this Level 1 LVIA is that the proposed development should be authorised with Mitigation for the following reasons:

- Alignment with the Knysna National Lake Area conservation initiatives where there is clear emphasis on ecological restoration with almost all of the alien tree species removed, and numerous indigenous tree plantings well established on the property.
- Opportunities for eco-tourism related to the Knysna National Lake Area can be achieved without significant structural development and loss of Brenton sense of place (with mitigation).
- Low visual intrusion due to the location of the proposed development in an area that is well screen by medium to large sized trees, with no new large structure developments.

MITIGATIONS

- No blue, white, red or bright colours should be used for the tenting fabric as this will result in strong colour contrast. Grey, grey-green, grey-brown or dark khaki colours should be used.

- *The roof structures for the ablution portions of the fixed campsites should have roof material that is mid-grey or grey-green in colour so as to reduce colour contrast.*
- *Additional tree plantings around the vehicle parking area, as well as to the west and north of the proposed site, need to be included in the site development plan.*
- *Light spillage could negatively set a precedent in close proximity to the lagoon. No over-head lighting should be utilised, with campsite lighting downward facing and low to the ground (Refer to Annexure C for generic light mitigations).*
- *All existing medium to large indigenous trees will need to be retained."* VRM Africa, 2025 (see appendix F)

10.3.4 OTHER IMPACTS

Other "smaller" impacts have been captured and summarised in the table below. These include heritage impacts – where none are anticipated as the site has been transformed through previous land uses such as infilling and excavation and residential agricultural use.

Social through the creation of long-term sustainable job creation associated with the required maintenance and management at a tourism facility. In addition to providing the broader community the opportunity to enjoy the site through the proposed tourism activities.

Aspects such as soil erosion are limited due to the flat topography and the limited required disturbance of soil.

Impacts on agricultural potential are limited as camping does not affect agricultural potential of land – it is a non-permanent change in use of the resource.

Noise linked to camping will be limited through the implementation of of the camping rules to be implemented.

Maintenance of services – these will need to be continually ensured in order to ensure that there are no leaks or pollution occurrences (pump stations, package plants, spillage from conservancy tanks etc) – EMPr to ensure sound management.

Alternative:	Alternative 1: Implementing the preferred SDP – 25 camp units and associated services, and infrastructure	No-Go Alternative: No camp resort establishment, continue with current operation.
Potential impact and risk:	The potential uncovering of cultural / heritage resources	
Heritage Impact		
Nature of impact:	Negative	Neutral, limited vegetation clearance and earthworks will be required
Extent and duration of impact:	Local (site-specific) and short-term (during vegetation clearance and earthworks)	Site specific – limited vegetation clearance and earthworks required
Consequence of impact or risk:	Potential discovery of cultural /heritage resources when clearing vegetation and excavating for trenches and foundations	Limited potential for impact as resources are not anticipated in this area.
Probability of occurrence:	Improbable – as the area is not anticipated to support finds. The previous landowner already infilled various material into the property which has further degraded the conditions.	
Degree to which the impact may cause irreplaceable loss of resources:	Low, unlikely impact	
Degree to which the impact can be reversed:	Not necessary to reverse	
Indirect impacts:	Disturbance of cultural / heritage resources	
Cumulative impact prior to mitigation:	Low	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low	
Degree to which the impact can be avoided:	High	
Degree to which the impact can be managed:	High	
Degree to which the impact can be mitigated:	High	
Proposed mitigation:	As per the EMPr, if any historical / cultural items are uncovered, work will cease in order to contact HWC prior to continuation	
Residual impacts:	None	
Cumulative impact post mitigation:	Low	
Significance rating of impact after mitigation (e.g. Low, Medium, High, or Very-High)	Very low	

Medium-High, High, or Very-High)		
Potential impact and risk:	Creation of short-term job opportunities during construction Creation of long-term job opportunities during the operational phase	
Socio-economic Impact	Creation of additional tourism accommodation within Knysna	
Nature of impact:	Positive	Same as with the preferred alternative.
Extent and duration of impact:	Local and short-and long-term	
Consequence of impact or risk:	Job creation to the local community (for home construction), which will result in the earning of valuable income	Limited job opportunities created for management of the property, but this will have a negative social impact as the need and desirability of the landowner and area is not met.
Probability of occurrence:	Definite	
Degree to which the impact may cause irreplaceable loss of resources:	Low, no loss in resources	Low
Degree to which the impact can be reversed:	No need to reverse	Reversible
Indirect impacts:	Increase in skills development and economic growth	Limited increase in skills development No additional tourism camping in the area
Cumulative impact prior to mitigation:	Medium	Medium
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium	Medium negative
Degree to which the impact can be avoided:	Not necessary to avoid a positive impact	Medium
Degree to which the impact can be managed:	High	Medium
Degree to which the impact can be mitigated:	No mitigation necessary	N/A
Proposed mitigation:	No mitigation necessary, however, as per the EMPr- the appointment of a local contractor and labour is recommended	
Residual impacts:	People moving to the area for potential employment – due to the scale of this minor home build is unlikely	
Cumulative impact post mitigation:	None anticipated	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium (positive)	Medium negative

Potential impact and risk:		
Potential for soil erosion during construction		
Physical impact		
Nature of impact:	Negative	Neutral, limited vegetation clearance and earthworks will be required
Extent and duration of impact:	Local (site-specific) and short-term (during vegetation clearance and earthworks)	Site specific – limited vegetation clearance and earthworks required
Consequence of impact or risk:	Potential for soil erosion and disturbance of surrounding natural areas/estuary	Limited potential for impact
Probability of occurrence:	Improbable – as this will be managed through implementation of the EMPr and design of the camp and site selected	
Degree to which the impact may cause irreplaceable loss of resources:	Low, unlikely impact	
Degree to which the impact can be reversed:	Medium	
Indirect impacts:	Sedimentation of the estuary	
Cumulative impact prior to mitigation:	Low	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low	
Degree to which the impact can be avoided:	High	
Degree to which the impact can be managed:	High	
Degree to which the impact can be mitigated:	High	
Proposed mitigation:	Implement recommended designs Implement all recommendations outlined in the EMPr	
Residual impacts:	None	
Cumulative impact post mitigation:	Low	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very low	

Potential impact and risk:		
Impact on agricultural areas		
Agriculture impact		
Nature of impact:	Neutral – not currently cultivated therefore no loss (garden area)	Neutral – no change

Extent and duration of impact:	Local (site-specific) and long-term	N/A
Consequence of impact or risk:	No change	
Probability of occurrence:	Definite	
Degree to which the impact may cause irreplaceable loss of resources:	Low, unlikely impact	
Degree to which the impact can be reversed:	High, removal of the decks	
Indirect impacts:	None anticipated	
Cumulative impact prior to mitigation:	Low	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low	
Degree to which the impact can be avoided:	High	
Degree to which the impact can be managed:	High	
Degree to which the impact can be mitigated:	Not required as there is no impact	
Proposed mitigation:	None required	
Residual impacts:	None	
Cumulative impact post mitigation:	Low	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Very low to insignificant	

7.2.5 POTENTIAL GROUNDWATER ABSTRACTION IMPACTS

The following extracts from the WULA are included.

Potential Impacts of Groundwater Abstraction (Envirosynergy, 2026) – Appendix Q

In line with CMS objectives and Section 27 considerations of the NWA, the potential impacts associated with groundwater abstraction include:

- Aquifer Depletion Excessive or sustained abstraction exceeding recharge may result in declining static water levels and long-term reduction in aquifer storage.*
- Impacts on Surface Water Systems Where hydraulic connectivity exists, abstraction may reduce baseflow contributions to nearby rivers, wetlands, or estuarine systems.*
- Impacts on Other Lawful Water Users Drawdown effects may affect neighbouring boreholes if abstraction rates are not appropriately managed.*
- Water Quality Deterioration Lowered groundwater levels may mobilise poorer quality water from deeper strata or induce lateral migration of contaminants.*

- *Saline Intrusion (Coastal Context, if applicable)* In coastal aquifers within the WMA, over-abstraction may disturb the freshwater-saltwater interface, leading to salinisation of boreholes.

Assessment of Proposed Abstraction

The proposed groundwater abstraction has been assessed with due consideration of:

- Aquifer characteristics and expected yield;
- Estimated recharge rates;
- Sustainable abstraction volumes;
- Separation distance from sensitive ecological features and neighbouring users;
- Monitoring requirements to ensure adaptive management.

The anticipated abstraction volume is modest relative to aquifer capacity and is not expected to result in regional drawdown or measurable reduction in ecological baseflow contributions. No significant impacts on other registered or lawful users are anticipated. However, monitoring of groundwater levels and quality remains important.

Mitigation and Monitoring Measures

In accordance with the Breede Olifants Catchment CMS principles, the following measures are proposed:

- Limiting abstraction to licensed volumes;
- Installation of a calibrated water meter for abstraction monitoring;
- Periodic measurement of static water levels;
- Immediate reporting of abnormal drawdown trends;
- Implementation of water conservation and demand management practices.

These measures ensure that groundwater use remains within sustainable limits and supports compliance monitoring by the BOCMA. Breede Olifants Catchment CMS promotes the sustainable and equitable utilisation of groundwater resources through precautionary management and ongoing monitoring.

Based on the scale of abstraction, aquifer characteristics, and proposed mitigation measures, the anticipated impacts of groundwater abstraction are considered low and manageable. The proposed activity is therefore consistent with the strategic objectives of the BOCMA and aligns with the sustainable groundwater management principles of the National Water Act.



Figure 60: K50B Quaternary catchment

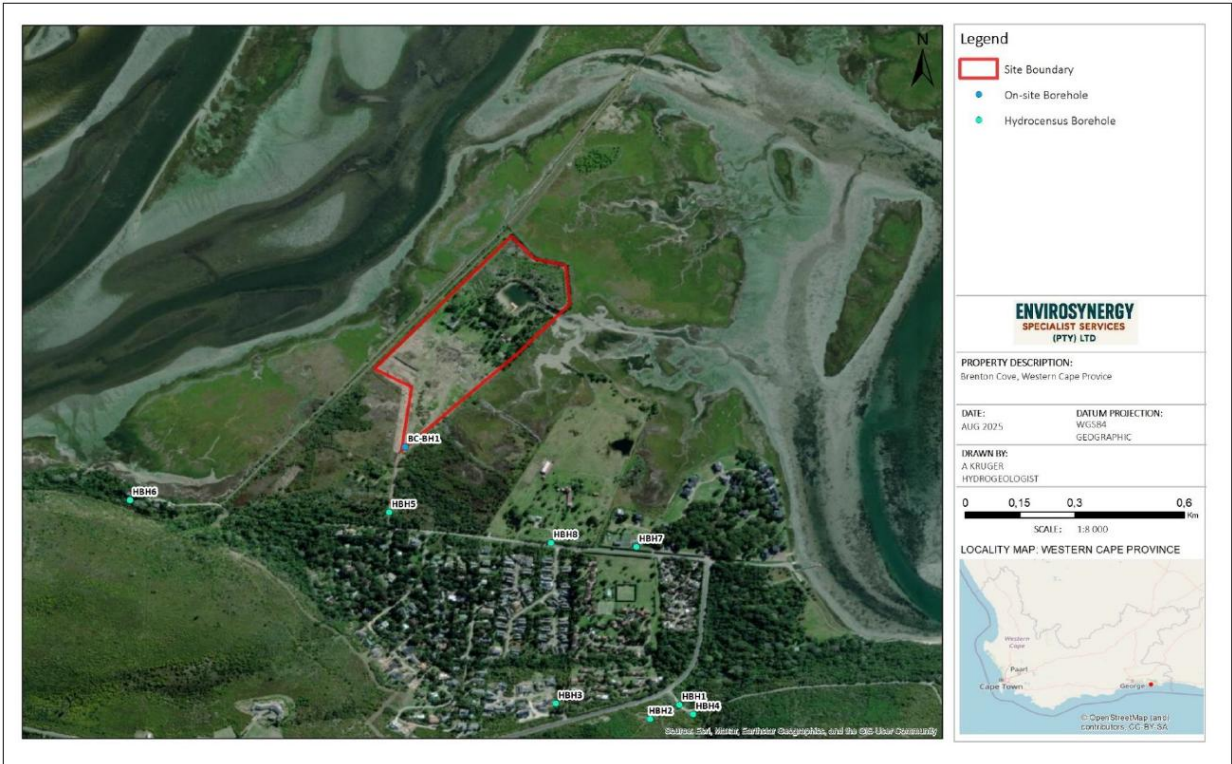


Figure 61: Spatial Distribution of Boreholes (On-site and Surrounding properties)

10.3.5 WATER QUALITY IMPACTS

Extract from the WULA – (Envirosynergy, 2026)

The quality of water in the water resource which may be required for the Reserve and for meeting international obligations

Based on the National Integrated Water Information System (NIWIS) (2024), the reserve within quaternary catchment K50B is not stressed (GRA2), and a surplus is available for groundwater (GWR).

Due to the current and proposed abstraction, the groundwater resource unit is classified as stressed, monitoring is therefore necessary to ensure that no detrimental impact on the underlying resource occurs.

Several general and specific mitigation measures are proposed in order to reduce negative impacts and incorporate some potentially positive impacts from the proposed development.

Some of the most pertinent recommendations include:

- Groundwater monitoring on-and off site:
 - Groundwater levels;
 - Groundwater Quality; and
 - Abstraction volumes.
- Increase water-use efficiencies
- Implement water recycling practices, where possible
- Irrigation water should be carefully timed to minimize the risk of nutrients in stormwater runoff. Ideally, irrigation should take place when the soil is not saturated and rain not expected.
- Irrigation should take place when lawn is actively growing to ensure nutrient uptake and to minimise losses of runoff;
- Irrigation should not cause waterlogging or excess drainage below the plant roots zone. If the nutrients within the irrigation water are applied at sustainable rates (i.e., using smaller amounts frequently rather than large volumes occasionally), water logging should not be a problem. This method also helps to maximise nutrient uptake and minimize loss of leaching;
- Vegetative cover in the buffer area between the irrigated area and any watercourse should be maintained wherever possible, particularly riparian vegetation, to minimise the movement of nutrients rich runoff and eroded soil into surface waters.

Impacts and mitigation measures

The potential impacts and mitigation measures that are expected from the proposed activities are presented in Table 3.

Table 12:Summary of impacts and mitigation measures

Water Use activity	Possible causes of the impacts of the activities Impacts to the water resources	Possible Impacts to the water resource and other water users	Mitigation Measures
Section 21 (a)	Over abstraction, depletion of aquifer	Deterioration of water quality and quantity downstream unfit to use	Water metering to ensure client does not over abstract. Do not use fertilizers
		Dewatering of aquifer	Groundwater level monitoring
	Saltwater intrusion	Salinisation of aquifer	Water quality and level monitoring
Section 21 (e)	Groundwater contamination	Deterioration of water quality	Water quality monitoring
Section 21 (g)	Surface and groundwater contamination	Deterioration of water quality	Nutrient leaching risk, water quality monitoring

The following mitigations will be used to ensure efficient and non-wasteful water use:

- *The development optimises water use and discourages wasteful water use. The water is used for the low impact luxury tented camps.*
- *Water is stored in closed tanks and a damask (from rooftops) which minimises evaporation loss. Daily routine water infrastructure inspections and leak assessments will be implemented to ensure that no unnecessary leaks occur.*
- *The treatment plant will be a Fluidco¹ installed and managed and maintained system. Grey and black water will be treated on-site and re-used as per the Wastewater limit values specified in Government Notice 665 in Government Gazette 36820, dated 6 September 2013 of the NWA.*
- *As a precaution, any tank will have a sump to ensure that should there be any overflow, this cannot pollute any surrounding water body or ground water.*
- *Any surplus water from the water treatment plant that is not recycled for toilet flushing must be removed by municipal honey sucker tanker / private honey sucker tanker to the municipal sewage treatment works.*
- *A separate reticulation will be laid for gardening and toilet flushing using treated effluent from the sewage treatment works.*
- *Potable water for the project will make use of ONLY the captured rainwater harvesting and existing potable municipal supply until such time as the use of supplementary borehole water has been granted a Water Use Licence.*

10.4 CUMULATIVE IMPACTS

Based on the development proposed on the neighbouring property (portion 192), their specialist identified a wetland area and recommended a 15m buffer zone around the wetland area. It is assumed that that wetland would have extended over the property cadastral boundaries historically had the area not been disturbed through the importation of foreign materials (infilling).

In order to respect this adjacent wetland area, the 15m wetland buffer proposed will be expanded onto portion 152. Engineering services proposed on site will need to be revised by the engineers to respect this area and avoid the wetland buffer area.

¹ <https://fluidco.africa/sewage/>



Figure 11: Map of the delineated estuarine wetland and the recommended 15 m buffer.



Figure 4: Alternative 2 (preferred) site layout (Planning Space, 2025)

Figure 62: Extracts from r3Green's November 2025 Draft BAR for portion 192.



Figure 63: Proposed changes to the sewage infrastructure order to reduce the potential cumulative impact on the adjacent wetland area. **Blue line** is the current proposed sewage line linking the camping area to the proposed conservancy tank and future package plant, **red line** is the proposed alternative route to an alternative conservancy tank site that is located in an existing disturbed area.

Other cumulative impacts highlighted during the public participation process include the addition of other tourism developments in the area, specifically those indicated above on portion 192.

- **Cumulative impact on resources** – the site will be making use of solar power and rainwater harvesting in order to reduce the demand on municipal supplies. Borehole water adds to this reduction in demand on municipal potable water, but requires the aquifer to be monitored for the cumulative impact of multiple abstractions from the resource. Recycling of treated effluent further reduces the impact and demand on municipal services and allows the project to become self-sufficient.
- **Cumulative impact on traffic** – the 25 additional vehicles potentially generated for this project need to be added to the potential 7 additional vehicles generated for the neighbouring property's proposed cabins. The local authority will consider the applications holistically

and will indicate in their service level agreements if any changes to the road system is required. The local authority will also be in an informed position in terms of any other developments or issues in relation to traffic in the area. The speed limits imposed in the village due to the free-roaming wildlife, reduces the design requirements as vehicles are already travelling slowly.

- **Cumulative impact on sense of place** – the community opposition to development in and around their village comes across as an important concern to the local community. They do not wish to see any form of change in their area. The application aims to reduce the concerns of these residents by ensuring that the 25 sites have a similar attraction and ethos to the village – conservation, quiet, non-intrusive, open for free-roaming wildlife etc. The eco-tourism in permanent tents that can be controlled to prevent “camping sprawl or untidiness” for 2 persons per tent, aims to address these concerns and retain the sense of place and sense of community, even though the property is not in the residential area but is outside the urban edge.
- **Cumulative impact on wildlife movement** – there is no intention to change the wildlife movement on the property and between the various properties. The open space on portion 192 joins to and is expanded on portion 152 – ensuring the potential for habitat expansion between the two properties. Wildlife will continue to be free to move between the residential homes in the village, the open space on the farms and between the structures in and around the homestead.
- **Cumulative impact on ground water harvesting** – covered in the WUL and requires long term monitoring of the resource which will be included as conditions of approval should the licence be issued.

11. CONCLUSION AND RECOMMENDATIONS MADE BY THE SPECIALISTS

Terrestrial- and aquatic biodiversity, plant and animal species specialist – David Hoare Consulting, Dr D Hoare:

“Desktop information, field data collection and mapping from aerial imagery provides the following verifications of patterns for various themes:

1. *No natural vegetation occurs on site. The site is an area where material has been imported historically to raise the site above the tidal range. This means that the original vegetation on site (probably salt marsh vegetation) has been historically lost and the substrate no longer has the characteristics for this to return. It is considered highly unlikely that any form of fynbos ever occurred within the boundaries of the property. The historical presence of Knysna Sand Fynbos on site is disputed since ecological conditions for it to occur there never existed.*
2. *The site falls within a protected area, mapped accordingly in the Western Cape Biodiversity Conservation Plan.*
3. *There are no threatened terrestrial plant species that could possibly occur within the types of habitats that are found on site. However, the estuarine species, *Zostera capensis* (listed as Endangered in South Africa) occurs in tidal channels adjacent to the site and marginally into the artificial pond on site.*
4. *An impact assessment was undertaken that determined that the impact of the proposed activities on the estuarine environment and on eelgrass, *Zostera capensis*, are likely to be of*

VERY LOW significance, on condition possible indirect impacts are controlled. Some recommended mitigation measures are suggested to protect surrounding natural estuarine habitats, as well as populations of Zostera capensis.

Recommendations:

1. The salt marsh areas adjacent to the site must be protected. No high-impact activities must be allowed to occur within these areas. They have significance beyond the site and are critically important to the health of the Knysna Estuary as a whole. Any visitors to site must be encouraged to treat these as sensitive areas.
2. The tidal pond should be retained and managed as an ecological resource. It also has recreational value, but this is not inconsistent with management of biodiversity and ecosystem processes in the Knysna Estuary.
3. The milkwood hedge along the northern and eastern boundaries of the site should be retained and enhanced. To develop a good thicket microhabitat within this area it will probably be necessary to allow this thicket area to expand into a slightly wider zone. This can be deliberately managed, or else allowed to happen through natural succession of thicket. The objective is to create a self-sustaining canopy with protected (closed) margins.
4. Alien invasive species need to be strictly managed on site. This is currently being successfully achieved and the landowner is encouraged to persist.
5. Any landscaping should make use of site-appropriate indigenous species. For example, a suitable tree species on site is obviously the milkwood, although other species may also be appropriate" (Hoare, 2025).

Butterfly specialist, Dave Edge and Associates, Dr D Edge:

"The SCC butterfly *A. t. orientis* (Endangered) and its host ants *Lepisiota capensis minuta* (Small Black Sugar Ant) do not occur on Uitzicht 216-152, and no suitable habitat exists in the proposed disturbance footprint" (Edge, 2025).

Visual specialist, VRM Africa, S Stead:

"CONCLUSION

The finding of this Level 1 LVIA is that the proposed development should be authorised with Mitigation for the following reasons:

- Alignment with the Knysna National Lake Area conservation initiatives where there is clear emphasis on ecological restoration with almost all of the alien tree species removed, and numerous indigenous tree plantings well established on the property.
- Opportunities for eco-tourism related to the Knysna National Lake Area can be achieved without significant structural development and loss of Brenton sense of place (with mitigation).
- Low visual intrusion due to the location of the proposed development in an area that is well screen by medium to large sized trees, with no new large structure developments.

MITIGATIONS

- No blue, white, red or bright colours should be used for the tenting fabric as this will result in strong colour contrast. Grey, grey-green, grey-brown or dark khaki colours should be used.

- *The roof structures for the ablution portions of the fixed campsites should have roof material that is mid-grey or grey-green in colour so as to reduce colour contrast.*
- *Additional tree plantings around the vehicle parking area, as well as to the west and north of the proposed site, need to be included in the site development plan.*
- *Light spillage could negatively set a precedent in close proximity to the lagoon. No over-head lighting should be utilised, with campsite lighting downward facing and low to the ground (Refer to Annexure C for generic light mitigations).*
- *All existing medium to large indigenous trees will need to be retained" (VRM, 2025).*

12. IMPACT MANAGEMENT OUTCOMES

Table 13: Impacts, actions and outcomes

Environmental impact	Impacts to avoid	Impact management actions	Impact management outcomes
Biodiversity loss and habitat disturbance	Disturbance of the estuarine habitat or natural habitat beyond the property boundary Disturbance of milkwood trees	Confine new disturbances to the lawn and garden areas Implement EMPr which outlines the specialist recommendations: 1. <i>"The salt marsh areas adjacent to the site must be protected. No high-impact activities must be allowed to occur within these areas. They have significance beyond the site and are critically important to the health of the Knysna Estuary as a whole. Any visitors to site must be encouraged to treat these as sensitive areas.</i> 2. <i>The tidal pond should be retained and managed as an ecological resource. It also has recreational value, but this is not inconsistent with management of biodiversity and ecosystem processes in the Knysna Estuary.</i> 3. <i>No modification of the estuarine edges or channels must take place.</i> 4. <i>Quality of water in the estuary must be protected by not allowing sewerage or irrigation run-off into the estuary. Fertilisers must not be used on the property.</i> 5. <i>The planted milkwood hedge along the northern and eastern boundaries of the site should be retained and enhanced. To develop a good thicket microhabitat within this area it will probably be necessary to allow this thicket area to expand into a slightly wider zone. This can be deliberately managed, or else allowed to happen through natural succession of thicket. The objective is to create a self-sustaining canopy with protected (closed) margins. Under the National Forests Act of 1998 (Act No. 84 of 1998) cutting or pruning of milkwoods requires a license, except if less than 25% of the crown is pruned, but not for the topping of such trees, and not for new development or redevelopment.</i> 6. <i>Alien invasive species need to be strictly managed on site. This is currently being successfully achieved and the landowner is encouraged to persist.</i> 7. <i>Any landscaping should make use of site-appropriate indigenous species. For example, a suitable tree species on site is obviously the milkwood, although other species may also be appropriate" (Hoare, 2025).</i>	Sensitive remain undisturbed No impact to the estuary Biodiversity is being preserved

		The following figure represents the working areas map. Specific guidance in the EMPr is provided for each of the areas where work will be undertaken. The camp areas will be on lawn, therefore, no vegetation clearing or working areas are specified.  Plan showing the working areas associated with this proposal in green. The remainder of the property will be regarded as 'no-go' areas associated with the proposal	
Water resource degradation	Contamination of estuary; over-abstraction from borehole; untreated wastewater discharge	- Implement conditions of the WULA when issued - Implement EMPr - Irrigate with treated water - Maintain infrastructure	Adequate protection of the estuary
Noise, nuisance and visual impacts	Disturbance of the surrounding area Negative visual impact Negative impact to the sense of place	- Implement and enforce camp rules that prohibits powerboats, motorbikes and drones - Limit construction to normal working areas - Implement EMPr that outlines the visual specialist recommendations: • No blue, white, red or bright colours should be used for the tenting fabric as this will result in strong colour contrast. Grey, grey-green, grey-brown or dark kharki colours should be used. • The roof structures for the ablution portions of the fixed campsites should have roof material that is mid-grey or grey-green in colour so as to reduce colour contrast.	Reduced noise and nuisance impacts

		• Additional tree plantings around the vehicle parking area, as well as to the west and north of the proposed site, need to be included in the site development plan. • Light spillage could negatively set a precedent in close proximity to the lagoon. No over-head lighting should be utilised, with campsite lighting downward facing and low to the ground (Refer to Annexure C for generic light mitigations). • All existing medium to large indigenous trees will need to be retained • Large remaining alien trees to remain (under permit) for shade and screening until the newly planted indigenous trees replace the alien tree.	
Soil erosion and land degradation	Sedimentation, erosion and pollution	- Implement EMPr - Ensure adequate stormwater management	Adequate stormwater management No erosion and or sedimentation No impact on the estuary
Encroachment into the GRNP	Guest breaking SANParks GRNP estuary use rules.	- Camping rules ensure that all guests respect the GRNP and SANParks rules.	Good working relationship between the tourism facility and the SANParks
Conservation management on the property and continued alien invasive species control	Destruction of the areas that can be restored.	- Implementation of the ACP - Management according to the Quiet Zone requirements of the Estuary Management Plan - Continue with the restoration activities on site with a view towards habitat restoration - Research in the estuarine zone in terms of the nursery role that the manmade tidal pond holds.	Expansion of the conservation management goals of the adjacent GRNP.
Fire management	Uncontrolled fires or accumulation of fire risk materials	- Maintain firebreaks - Remove high fuel load items - Ongoing FPA membership and advice	Remain compliant in terms of the Fire Act and FPA membership.

12.2 POSITIVE AND NEGATIVE IMPACTS

The following positive and negative impacts are associated with the property, site, activity and technology alternatives and that it will have on the environment and community:

Positive:

- Efficient use of the property that will add to the sense of place and form part of surrounding land-uses
- Efficient use of the property by providing small scale eco-tourism accommodation within a landscape that attracts visitors in an existing transformed garden area.
- Selection of a sites supported by the specialists. No impact on the estuary and /or natural habitats.
- Incorporating energy efficient technologies and water saving features where possible – this promotes climate change resilience, sustainability and self-sufficiency.
- Expansion of the ecological corridors and conservation management areas through sound site management and alien control.

Negative:

- Minimal visual impact
- Minimal operational nuisance impacts
- Possible impact to the adjacent wetland or saltmarsh areas which will require ongoing co-operation with SANParks and compliance with their Estuary Management plan.
- Potential pollution requiring ongoing monitoring and control of the sewage treatment plant and water quality.

13. NEED AND DESIRABILITY

This section references the Department's guideline on the Need and Desirability (March 2013) and DEA's Integrated Environmental Management Guideline on Need and Desirability.

- Need for the proposal

Aspect considered	Description/ proposal applicability
Socio-economic need	The Knysna area is a key tourism node along the Garden Route, identified in the Knysna Spatial Development Framework (2020) and Integrated Development Plan (2024/2025) as a primary regional tourism destination. There is an increasing demand for affordable, low-impact, nature-based accommodation. The proposed camp resort will address this need by offering an alternative to traditional high-impact resort facilities, thereby supporting local economic development, employment, and tourism diversification. The construction and operational phases will result in a number of short- and long-term job opportunities and economic contribution within the area. The proposal will result in a positive impact on the landowners' economic needs.
Environmental need	The proposal makes efficient use of already transformed land and promotes rehabilitation through alien clearing and active management. It aligns with NEMA principles by ensuring sustainable use of land, promotion of eco-tourism, and long-term environmental stewardship. The development model (low-impact, small-scale, seasonal) will ensure compatibility with the surrounding natural environment. The relevant specialists assessed the property and the proposal which was supported by the assessments/statements.
Planning need	The proposed land use aligns with the Knysna SDF (2020) and Provincial SDF (2014), which promote eco-tourism and sustainable land use outside the urban edge. The activity is permissible as a Consent Use under the Agricultural Zone I zoning and represents a logical, policy-aligned use of the property.

- Desirability for the proposal

Factor	Consideration and Response
Location appropriateness	The property is located in Brenton on Lake, an area characterised by existing tourism and residential land uses. The site is already disturbed and thus suitable for low-impact development without encroaching on any natural or sensitive habitat. This was confirmed by the specialist. There are no camping sites in the area.
Environmental sensitivity	All sensitive areas (e.g., estuarine edge, milkwood trees, and salt marshes) will be avoided. The biodiversity specialist confirmed that the development footprint has a very low ecological importance rating, making it environmentally suitable.
Compatibility with surrounding land uses	The surrounding properties consist of tourism accommodation and low-density residential uses (e.g., Brenton Lake Estate). The proposed camp resort will be in keeping with the character of the area and will enhance the existing tourism offering. Based on the proximity to the estuary and the pond present on the property it is the ideal location for a tourism 'development'/facility.

	
Infrastructure and services	There are existing services available, and additional services will be installed incorporating solar power, rainwater harvesting, and on-site wastewater treatment. These sustainable technologies minimise reliance on external infrastructure.
Economic and social benefits	The project will create short-term employment during construction and long-term job opportunities during operation. It will contribute to local tourism, business growth, and economic resilience in the Knysna area.
Contribution to municipal and provincial goals	The project supports the Knysna IDP objectives of promoting a healthy environment, sustainable tourism, and social upliftment. It also aligns with the Western Cape PSDF policy of encouraging tourism-related economic opportunities while protecting environmental assets.

As per the planning application: “General Consideration: Specifics for Consideration

Need and Desirability is a core consideration when evaluating any land use application, to assess the context of the development proposal, within the broader societal needs and public interest.

There are many interpretations of the concept of Need and Desirability, however in the context of a land use application, it embodies the considerations which must be given to introduce a new land use into an area, or the change of land use in an existing environment.

All of the discussion points above in this memorandum, have relevance in the assessment of whether the proposed use is both necessary and desirable on the site.

Considerations include whether the use is compatible with the area in which it is to be located, whether there is a justifiable need to accommodate the proposal, whether there will be negative impacts, the availability of necessary services, economic and social implications and whether the proposed use will contribute to the overall spatial policy ideals pronounced for the area.

As a guiding element, the Chapter 2 guidelines in SPLUMA, which speak to elements such as Sustainability, Resilience, Efficiency and Flexibility, are core considerations in viewing whether a proposal is indeed desirable. The components of this memorandum have discussed all reasonable aspects relating to the need and desirability of the proposed use and it can be concluded that the consent use as proposed is a desirable use" (VBGD Town Planners, 2025).

The proposed activity adheres to the environmental management principles contained in **Section 2 of NEMA**:

- **Avoidance:** The layout avoids all sensitive habitats and ecological features.
- **Minimisation:** Disturbance is restricted to transformed areas; construction is low-impact.
- **Mitigation:** All potential impacts will be mitigated through the EMPr and specialist recommendations.
- **Rehabilitation:** Alien clearing and ongoing management will enhance ecological value.
- **Sustainable use:** Renewable resources and low-impact technologies are prioritised.
- **Social benefit:** The proposal promotes equitable access to natural tourism experiences and supports local livelihoods.

The proposed camp resort:

- Is **environmentally appropriate**, as it occurs within **disturbed, low-sensitivity areas** and avoids all critical biodiversity features;
- Is **socially and economically desirable**, creating employment, supporting local tourism, and contributing to municipal development objectives;
- **Aligns with all relevant planning instruments**, including the Knysna SDF, IDP, Provincial SDF, and NEMA principles; and
- Promotes **sustainable development**, resource efficiency, and environmental protection.

Accordingly, the proposed development is considered to be both needed and desirable in the context of the local, regional, and environmental setting and represents the best practicable environmental option for the site.

Need and Desirability – camping sites in the Knysna area and surrounds

Existing camp sites in the area are as follows:

Camp site	Private or institution	Location
Ebb and Flow	SANParks	Wilderness
Island Lake	Private – adjacent to SANParks	Wilderness
TAO Forest Campsite	Private	Wilderness Heights
Afri eco resort	Private	Wilderness-Sedgefield
Swartvlei Caravan Park	District Municipality	Sedgefield
Lake Pleasant Caravan Park	Private	Sedgefield
Buffelskop Caravan Park	Private	Buffalo Bay
Monks Holiday Park	Private	Knysna
Charlesford River Camp Site	Private	Knysna
Woodbourne Resort	Private	Knysna
Oriole Camp Site	Private	Harkerville
Dune Park Caravan Park	Private	Plettenberg Bay
Aventura Keurbooms River	Private – adjacent to CapeNature	Plettenberg Bay
Arch Rock Resort	Private	Plettenberg Bay
Plet Primary School	Private – school holidays only	Plettenberg Bay
Tsitsikamma Sunrise Caravan Park	Private	Natures Valley

There is a shortage of campsites readily available to campers in the George to Plet area with none available in Brenton-on-Lake or on the Western Head. Unfortunately due to the significant objections received from the neighbouring residents, conventional camping has been completely removed from the application proposed. All accommodation will now be in “luxury” tented camp opportunities.

SANParks – no campsites in the Knysna Lake Area and one camp site in the GRNP Wilderness Lake Area at Ebb and Flow.

CapeNature campsites are all located in the western part of the Western Cape (only a bush camp on Goukama) with camping available at Aynsberg, Boosmansbos, Gamkaberg, Groodvadersbosch, Cederberg and Limietberg

Knysna has an ample supply of holiday homes, guest houses, AirBnB's, tourism accommodation in the form of chalets or cabins, however, although the area was a traditional camping holiday destination, over time most of the camping sites have been converted to residential or fixed holiday units, including the camping resorts previously in Brenton-on-Lake.

Location of Brenton Cove vs Old Camping Site(2003Photo):



Figure 64: Extract from the planning memorandum showing the Lake Brenton Camping area 2003 which is no longer a camping area

14. PUBLIC PARTICIPATION PROCESS (PPP)

All public participation undertaken are included in Appendix E. The draft Basic Assessment Report (BAR) was available for a 30-day commenting period – 07 November – 8 December 2025.

The **revised** Draft BAR is now available for another 30-day commenting period (**20 March – 22 April 2026**).

All comments received are incorporated in the attached in the public participation process report – refer to **appendix E**.

It is felt that the negative sentiment towards the proposal could be resolved through communication and understanding the concerns and how best to address the concerns raised. Any residents have been welcomed to visit the property in order to understand the scale and location of what is proposed.

Based on the comments received, it is likely that the planning authority and environmental authority, may limit or reduce the maximum number of opportunities being created in order to phase in the application and possibly address the sense of place concerns.

15. PERIOD OF ENVIRONMENTAL AUTHORISATION (EA)

Commencement of the listed activities should occur within 3 years from the date of authorisation and construction of infrastructure is to be concluded within 10 years of issuing (period of EA, 2036).

- Period of which the EA is required for development of infrastructure – 3-8 years;
- Date of which the activity will be concluded –ongoing – tourism is operational activity;
- When post-construction monitoring requirements should be finalised – 3-8 years.

16. REASON FOR AUTHORISATION AND RECOMMENDATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (EAP) SUMMARY OF FINDINGS THE ENVIRONMENTAL IMPACT ASSESSMENT (EIA); ENVIRONMENTAL IMPACT STATEMENT AND CONDITIONAL APPROVALS

The proposal should be environmentally authorised for the following reasons:

- The preferred alternative / SDP is the best practical environmental option;
- The proposal has been assessed by a terrestrial- and aquatic biodiversity, plant and animal species and butterfly specialists;
- The proposal has been assessed by a visual specialists;
- The Water Use Licence application is underway and allows the concurrent implementation of the preferred services.
- All of the specialists provided their support for the proposal and recommendations made by the specialists will be implemented;
- The sites selected for disturbance is transformed garden and lawn areas, voiding any natural habitat. There will be no impact on the remaining natural habitats on or around the property;
- The proposal will have various positive socio-economic impacts;
- Any potential impacts associated with the proposal will be mitigated through the implementation of the EMP which includes recommendations made by the specialists.

As all potential impacts have been assessed, avoided and mitigation measures provided to reduce indirect impacts. There are no reasons to for not granting approval of the listed activity in terms of NEMA.

The applicant commits to making financial provisions to ensure that rehabilitation and ongoing alien clearing is implemented as per the EMP.

The EAP recommends that the following should be added to the conditions of the EA:

- The implementation could be phased so that success can be evaluated over time to ensure that the local community support is obtained and retained
- EMPr must be implemented and adhered to
- A neighbour agreement between SANParks and Brenton Cove should be signed in relation to access to the estuary via the tidal water channel
- WULA issued for package plant and irrigation with treated effluent and use of borehole water for the tourism facility prior to being implemented.

17. CONCLUSION

The proposal for the establishment of a low-impact camping resort and associated infrastructure on the property has been comprehensively assessed in accordance with NEMA and NEMA EIA Regulations. The project represents a sustainable land use that balances ecological integrity with socio-economic benefit and contributes positively to the local tourism economy while respecting the environmental sensitivities of the Knysna estuarine system.

Local residents have raised concerns in relation to the change and future use of the property in relation to their sense of place in the adjacent “village” – the intention of the landowner, who lives on the property, is that he can share this unique and special property with a few select guests so that other can also enjoy the area and not only those lucky enough to be able to afford to purchase a property in the area.

The preferred SDP avoids sensitive habitat; it utilises existing infrastructure where possible and transformed lawn and garden areas. Various specialists were appointed and assessed the proposal. Support for the development has been highlighted in their assessment/statements. All mitigation measures recommended by the specialists have been incorporated into the EMPr and will be implemented.

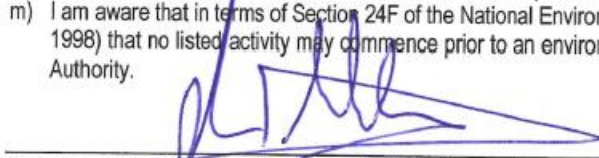
EAP recommendations include strict implementation and adherence to the EMPr attached.

18. DECLARATIONS

DECLARATION OF APPLICANT

I, **Rudi Neethling** declare that –

- a) I am, or represent¹, the applicant in this application;
- b) I have appointed a valid, EAPASA registered Environmental Assessment Practitioner (EAP) to act as the independent EAP for this application / have obtained exemption from the requirement to obtain an EAP²;
- c) I will take all reasonable steps to verify whether the EAP and specialist/s appointed are independent, affiliated with the relevant professional body e.g. EAPASA/SACNASP etc and have expertise in conducting environmental impact assessments or undertaking specialist work as required, including knowledge of the Act, the EIA Regulations and any guidelines that have relevance to the proposed activity;
- d) I will provide the EAP and the Competent Authority with access to all information at my disposal that is relevant to the application;
- e) I will be responsible for the costs incurred in complying with the EIA Regulations, including but not limited to –
 - costs incurred in connection with the appointment of the EAP or any person contracted by the EAP;
 - costs incurred in respect of the undertaking of any process required in terms of the Regulations;
 - costs in respect of any fee prescribed by the Minister or MEC in respect of the Regulations;
 - costs in respect of specialist reviews, if the Competent Authority decides to recover costs; and
 - the provision of security to ensure compliance with conditions attached to an environmental authorisation, should it be required by the Competent Authority;
- f) I will inform all registered interested and affected parties of any suspension of the application as well as of any decisions taken by the Competent Authority in this regard;
- g) I am responsible for complying with the conditions of any environmental authorisation issued by the Competent Authority;
- h) I hereby indemnify the Government of the Republic of South Africa, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action which the applicant or EAP is responsible for in terms of these Regulations;
- i) I will not hold the Competent Authority responsible for any costs that may be incurred by the applicant in proceeding with an activity prior to obtaining an environmental authorisation or prior to an appeal being decided in terms of these EIA Regulations;
- j) I will perform all obligations as expected from an applicant in terms of the EIA Regulations;
- k) All the particulars furnished by me in this form are true and correct;
- l) I am aware of what constitutes an offence in terms of Regulation 48 and that a person convicted of an offence in terms of Regulation 48(1) is liable to the penalties as contemplated in section 49B of the NEMA Act; and
- m) I am aware that in terms of Section 24F of the National Environmental Management Act, as amended (Act No. 107 of 1998) that no listed activity may commence prior to an environmental authorisation being granted by the Competent Authority.


Signature of the applicant/ Signature on behalf of the applicant

Click or tap here to enter text.

Name of company (if applicable)

BRENTON COVE CC

20 March 2026

Date

DECLARATION OF EAP AND UNDERTAKING UNDER OATH OR AFFIRMATION

I, Inge Delpont, declare that –

- a) I act as the independent, registered in terms of EAPASA, environmental assessment practitioner in this application;
- b) I have expertise in conducting environmental impact assessments, including knowledge of the Act, EIA Regulations and any guidelines that have relevance to the proposed activity;
- c) I will comply with the Act, EIA Regulations and all other applicable legislation;
- d) I am aware that I must be registered with Environmental Assessment Practitioners Association of South Africa (EAPASA) in terms of Regulation 14 of Section 24H Registration Authority Regulations, 2016, as amended.
- e) I am aware that a candidate EAP may only assist the registered EAP and work under the supervision of a registered EAP (regulation 14(6) in the S24H Registration Authority Regulations, 2016, as amended) such as myself. I take full responsibility for the work conducted.
- f) I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- g) I will take into account, to the extent possible, the matters listed in Regulation 13 of the EIA Regulations and Regulation 14 of S24H of Section 24H Registration Authority Regulations, 2016, as amended, when preparing the application and any report relating to the application;
- h) I undertake to disclose to the applicant and the Competent Authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the Competent Authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the Competent Authority, unless access to that information is protected by law, in which case it will be indicated that such information exists and will be provided to the Competent Authority;
- i) I will perform all obligations as expected from an environmental assessment practitioner in terms of the EIA Regulations and S24H of NEMA ; and
- j) I am aware of what constitutes an offence in terms of Regulation 48 and that a person convicted of an offence in terms of Regulation 48(1) is liable to the penalties as contemplated in Section 49B of the Act and EIA Regulations and Regulation 18 and 20 of S24H Registration Authority Regulations, 2016, as amended.

Disclosure of Vested Interest (delete whichever is not applicable)

- k) I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the EIA Regulations;
- l) I have a vested interest in the proposed activity proceeding, such vested interest being:
None



Signature of the registered environmental assessment practitioner

HillLand Environmental

Name of company:

Friday, 30 May 2025

Date

UNDERTAKING UNDER OATH/ AFFIRMATION

I, Inge Delpoit swear under oath / affirm that all the information submitted or
to be submitted for the purposes of this application is true and correct.

Delpoit

Signature of the registered Environmental Assessment Practitioner

HillLand Environmental
Name of Company

30 May 2025
Date

LR NOORDMAN
7247365-7

CONSTABLE
Signature of the Commissioner of Oaths

2025/05/30
Date



Specialist declarations attached to Appendix J.