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PUBLIC PARTICIPATION PROCESS

and

COMMENT AND RESPONSE REPORT

In terms the National Environmental Management Act (NEMA Act No 107 of 1998, as amended) and Environmental Impact Regulations, 2014 (as amended)

THE PROPOSED SMALL CAMP RESORT, ASSOCIATED INFRASTRUCTURE AND TOURISM FACILITIES

PORTION 152 OF FARM 216 KNYSNA

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PUBLIC PARTICIPATION and COMMENT AND RESPONSE REPORT
in terms of Section 56 of
NATIONAL ENVIRONMENTAL MANAGEMENT ACT

For
PORTION 152 OF FARM 216

Submitted for:

Public review and comment – submission with Revised Draft BAR

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INTRODUCTION

HilLand Environmental, independent Environmental Assessment Practitioners (EAP), have been appointed by the applicant, **Brenton Cove**, to ensure compliance with the regulations contained in the National Environmental Management Act (NEMA, No. 107 of 1998, as amended) and the Environmental Impact Assessment Regulations, 2014 (as amended) for the proposed construction of a primary house and cottage on Portion 113 of Farm 216, Knysna.

This report serves as the Public Participation Process (PPP) and Comment and Response Report that accompanies the Final Basic Assessment Report (BAR). It highlights all public participation undertaken as part of the process and guides I&AP's through the PPP process and its requirements.

- The **Draft BAR** and associated appendices were available for a 30-day commenting period **(7 November – 8 December 2025).**
- In terms of Section 19(1)(b) of the NEMA EIA Regulations (2014, as amended), the EAP are making use of the additional 50-days in order to notify and allow a 30-day commenting period on the revised Draft BAR to all registered I&AP's. Letter as submitted to DFFE attached to Annexure F.
- The **Revised Draft BAR** and associated appendices are available for a 30-day commenting period (**20 March – 22 April 2026**).

All comments received during the public participation process for the Draft BAR have been incorporated into this report. Additional comments received in response to the Revised Draft BAR will be added to this report and submitted to the competent authority for their decision-making process.

REQUIREMENTS OF THE PUBLIC PARTICIPATION PROCESS (PPP)

Section 41 of NEMA specifies that a person conducting a public participation process must comply with the following minimum requirements as stipulated in the Regulations:

(a) fixing a notice board (of a size at least 60cm by 42cm; and must display the required information in lettering and in a format as may be determined by the competent authority) at a place conspicuous to the public at the boundary or on the fence of (i) the site where the activity to which the application relates is or is to be undertaken; and (ii) any alternative site mentioned in the application;

A site notice was placed, on the entry gate to the property – 6 November 2025.
The notice called for registration of I&APs and provided details of where the documents (BAR) could be accessed (website link) during the process and details of EAP (HilLand Environmental) facilitating the NEMA EIA process (see Annexure B).

(b) giving written notice to

(i) the owner or person in control of that land if the applicant is not the owner or person in control of the land;

The owner is the applicant

(ii) the occupiers of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;

The occupier is the applicant

(iii) owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;

Landowners of all adjacent cadastral properties were notified on 7 November 2025. Proof of notification attached (Annexure A). Only registered adjacent landowners will be notified further in the process.

(iv) the municipal councilor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;

Ward councilor was notified via email on 7 November 2025.

(v) the municipality which has jurisdiction in the area;

The Knysna Municipality was notified on 7 November 2025.

(vi) any organ of state having jurisdiction in respect of any aspect of the activity; and

All organs of state and state departments were notified on the 7 November 2025

(vii) any other party as required by the competent authority;

No other requests to date

(c) placing an advertisement in (i)one local newspaper; or (ii)any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;

An advert appeared in the Knysna Plett Herald – 6 November 2025 (see Annexure B).

(e) using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desiring of but unable to participate in the process due to (i)illiteracy; (ii) disability; or (iii)any other disadvantage

As included in all notification letters.

Only registered Interested and Affected Parties and NGO's will be notified further in the process.

ROLES OF INTERESTED AND AFFECTED PARTY (I&AP)

In terms of Section 42 of NEMA EIA Regulations, a registered interested & affected party (I&AP) is entitled to comment, in writing, on all written submissions, including draft reports made available to the competent authority by the applicant or the Environmental Assessment Practitioner (EAP) managing an application, and to bring to the attention of the competent authority any issues which that party believes may be of significance to the consideration of the application, provided that –

a) comments are submitted within (i) the timeframes that have been approved or set by the competent authority; (ii) any extensions of a timeframe agreed to by the Applicant or EAP.

b) A copy of comments submitted directly to the competent authority is served on the Applicant or EAP; and

The I&AP discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application, via an advert in the local press.

Sections 43 & 44 of NEMA further specify that all written comments received by the EAP from a registered I&AP must accompany the (public participation) report when the report is submitted to the competent authority with the Final BAR.

All comments received to date are included and responded to in this report. Additional comments in response to the revised Draft BAR will be added and will be submitted to DFFE for their decision-making process.

LIST OF REGISTERED INTERESTED AND AFFECTED PARTIES (I&AP'S), ORGANS OF STATE AND STATE DEPARTMENTS

NAME	ORGANISATION	DESIGNATION
Applications, Case Officer - Ms Zamalanga Langa	Department of Forestry, Fisheries and Environment (DFFE) (CA)	State Department
Admin Email	DFFE: Biodiversity Department	State Department
T Nethononda	DFFE: PA Department	State Department
I Mapokgole	DFFE: Forestry	State Department
Cor van der Walt	Department of Agriculture	State Department
N Jacobs	Department of Health	State Department
Mercia Liddle	DEADP: Coastal Management	State Department
Admin Email	DFFE: Oceans and Coast	State Department
A Sam	BOCMA (Department of Water and Sanitation)	Organ of State
Megan Simons	CapeNature	Organ of State
Admin Email	Department of Environmental Affairs and Development Planning (DEADP)	State Department
Admin Email	Heritage Western Cape (HWC)	Organ of State
Vanessa Weyer	SANParks	Organ of State
Nina Viljoen	Garden Route District Municipality	Regional Authority
P Booth, M Musekene & K Southey	Knysna Municipality: Environmental Department	Local Authority
H Stroebel	Ward Councillor, Ward 5	Local Authority
J Labuschagne / D Edge	Western Head Goukamma Conservancy	NGO
R Erasmus	Transnet	Organ of State
Allan McVitty	The Outeniqua Choo Tjoe (Pty) Ltd	Neighbouring Landowner - owner of the railway line
Admin Email	Knysna Rate Payers Association	NGO
Admin Email	Lake Brenton Residents Association	NGO
Frank Unger	Landowner of Portion 87 of Farm 216	Neighbouring Landowner
Lee and Tia Naidoo	Landowner of Portion 192 of Farm 216	Neighbouring Landowner
Theunis Smit	Landowner of Portion 90 of Farm 216	Neighbouring landowner

Albert Owgan	Landowner in Brenton on Lake	I&AP
Alana Mitchell	Interested and Affected Party (I&AP)	I&AP
Andrew Moffat	Interested and Affected Party (I&AP)	I&AP
Adrian Young	Lake Brenton Resident	I&AP
Ashley Burns	Interested and Affected Party (I&AP)	I&AP
Dirk and Barbie Verster	Interested and Affected Party (I&AP)	I&AP
Brendan	Interested and Affected Party (I&AP)	I&AP
Brian Paterson	Interested and Affected Party (I&AP)	I&AP
Christo de Klerk	Interested and Affected Party (I&AP)	I&AP
Claire Reid	Local resident	I&AP
Corinne Geldenhuys	Interested and Affected Party (I&AP)	I&AP
Craig Barthus	Interested and Affected Party (I&AP)	I&AP
David Burns	Lake Brenton Resident	I&AP
Deon Joubert	Lake Brenton Resident	I&AP
Edward	Lake Brenton Resident	I&AP
Elaine Coates	Interested and Affected Party (I&AP)	I&AP
Elizabeth Goodall	Interested and Affected Party (I&AP)	I&AP
P. Papadakis	Brenton on Lake resident	I&AP
Freddie	Interested and Affected Party (I&AP)	I&AP
Gary Brown	Interested and Affected Party (I&AP)	I&AP
Gavin Whitfield	Interested and Affected Party (I&AP)	I&AP
Gary Hulbert	Interested and Affected Party (I&AP)	I&AP
Glen Polley	Lake Brenton Resident	I&AP
Hendrika de Klerk	Interested and Affected Party (I&AP)	I&AP
Henk van der Merwe	Lake Brenton Resident	I&AP
Hester Hickey	Interested and Affected Party (I&AP)	I&AP
Hannah Green	Lake Breton Resident	I&AP
Isabella Erasmuss	Interested and Affected Party (I&AP)	I&AP
Jacqui Drobczyk	Brenton on Lake resident	I&AP
Jakes van der Merwe	Lake Brenton Resident	I&AP
Johan Blignaut	Interested and Affected Party (I&AP)	I&AP
Johann Badenhorst	Interested and Affected Party (I&AP)	I&AP
Lauren Brauer	Interested and Affected Party (I&AP)	I&AP

Lawrence Coates	Interested and Affected Party (I&AP)	I&AP
Lianda Magson	Interested and Affected Party (I&AP)	I&AP
Magda Smit Properties info	Interested and Affected Party (I&AP)	I&AP
Marcel Duvenage	Lake Brenton Resident	I&AP
Michelle Botha	Interested and Affected Party (I&AP)	I&AP
Michelle Zeidler	Interested and Affected Party (I&AP)	I&AP
Elizabeth Avril Paterson	Interested and Affected Party (I&AP)	I&AP
Noel Paterson	Interested and Affected Party (I&AP)	I&AP
P Burchell and V Barsdorf	Interested and Affected Party (I&AP)	I&AP
Picca de Bruin	Lake Brenton Resident and Wildlike Portfolio Manager	I&AP
Rozanne Hulbert	Interested and Affected Party (I&AP)	I&AP
Rodger Clay	Interested and Affected Party (I&AP)	I&AP
Rodney Zeidler	Interested and Affected Party (I&AP)	I&AP
Sean	Interested and Affected Party (I&AP)	I&AP
Steuart Charles Doig	Brenton on Lake resident	I&AP
Tony Geldenhuys	Interested and Affected Party (I&AP)	I&AP
Wynand and Leonie du Preez	Lake Brenton Resident	I&AP
F Z Meneses	Brenton on Lake resident	I&AP
Alistair Reid	Lake Brenton Resident	I&AP
Annemarie Luck	Interested and Affected Party (I&AP)	I&AP
Ashley Norie and Hannah Green	Lake Brenton Resident	I&AP
Chris	Interested and Affected Party (I&AP)	I&AP
Beverley and Clive Bradnick	Brenton on Lake resident	I&AP
Danielle Smit	Interested and Affected Party (I&AP)	I&AP
Deven Pillay / Lydia Holmes	Lake Breton Residents	I&AP
Kevin Mullin	Interested and Affected Party (I&AP)	I&AP
Doug and Anne David	Interested and Affected Party (I&AP)	I&AP
Eliem Lombard	Interested and Affected Party (I&AP)	I&AP
The Fred Human Trust, Freddie Human	Brenton on Lake resident	I&AP
Gabriele Freitag-Lau and Kurt Walter Lau	Interested and Affected Party (I&AP)	I&AP
Hannelie Watt	Interested and Affected Party (I&AP)	I&AP
Lee Theresa Blasich	Lake Brenton Resident	I&AP
Lourens and Elmien Lombard	Lake Brenton Residents	I&AP

Mark Ackermann	Lake Brenton Resident	I&AP
Rowan Strydom	Interested and Affected Party (I&AP)	I&AP
Sunè Greef	Interested and Affected Prty (I&AP) 144/216	I&AP
Ulrike Strydom	Interested and Affected Party (I&AP)	I&AP

COMMENTS AND RESPONSES

The comment and response table is divided into 3 sections.

1. Comments from Organs of State and State Departments
2. Comments from adjacent properties
3. Comments from other registered I&AP's in the area

The key issues raised during the process are summarised as follows:

- Impact on biodiversity
  - Impact on the surrounding estuary
  - Impact on biodiversity
- Impact linked to the proposed sewage system
  - Risk of sewage contamination reaching the estuary
- Tourism impacts
  - Addition of 25 camping families / couples in the area
- Misunderstanding the NEMA EIA process and regulations
  - Listed activities triggered are from Listing Notices 1 and 3 – NEMA EIA Regulations (2014, as amended) specifies that these activities are required to follow a Basic Assessment Process**, no** listed activities in Listing Notice 2 are triggered and as such Scoping EIA is NOT the appropriate process for this application as requested by certain individuals.
- Regulatory impacts
  - Estuary Functional Zone
    The property, as will all other properties below the 5m contour, falls within the Estuary Functional Zone.
  - Coastal Management Lines
  - SANParks Development Control Areas – the camping areas fall outside of the DCA as mapped in the Knysna Estuary Management Plan.

- Community concerns – residents within Brenton-on-Lake that are concerned about change in their area

STATE DEPARTMENT, ORGAN OF STATE OR REGIONAL/ LOCAL AUTHORITY COMMENTS:

COMMENTING PARTY	Responses – EAP / specialist / technical / applicant
DFFE - Competent Authority Ms Z. Langa, 9 December 2025	
This letter serves to inform you that the following information must be included to the final BAR: (a) Participation Process concede • Please ensure that all historical comments received for this proposed project forms part of this application.	All comments received in terms of this NEMA application are included in Annexure E as part of the Public Participation Process. Comment received with registration of I&AP's or comments submitted on the Draft BAR, and any other comments submitted to the EAP in terms of the NEMA process are included. Comments in terms of previous planning applications do not form part of this NEMA application.
• Please ensure that all issues raised, and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction (including this Department's Biodiversity Section, Protected Areas Management Section and Ocean and Coast, SANParks, Knysna Municipality, Cape Nature, SAHRA and DEA&DP) in respect of the proposed activity are adequately addressed in the Final BAR.	All comments received from all parties are included in this report, comments and responses tables and addressed in the Final BAR where relevant. • DFFE Biodiversity Conservation – attached below • DFFE Protected Areas Management – notified and reminded – no comments received • DFFE Ocean and Coast - notified and reminded – no comments received • SANParks – attached below • Knysna Municipality - notified and reminded – no comments received (GRDM comments provided and included below) • CapeNature - notified and reminded – no comments received • SAHRA (Heritage Western Cape) – attached below no additional comment or requirements • DEADP Biodiversity and Coastal Management – attached below • DEADP George office notified and reminded – no comments received
• Proof of correspondence with the various stakeholders must be included in the Final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.	All proof of **notification and reminder** notification sent included in Annexure A.

• The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.	The report highlights compliances with these regulations.
• A comments and response trail report (C&R) must be submitted with the final BAR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report, and the format must be in the table format. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.	This table serves as the comments and response table all comments submitted in terms of NEMA for this process are included in the PPP report comments and response table.
• The final BAR must provide evidence that all identified and relevant commenting authorities have been given an opportunity to comment on the proposed development.	Comment on the Draft BAR or submitted with registration are tabulated and included. There are no historical comments in terms of NEMA for this property or application. Comments are included "verbatim" and are responded to clearly in addition to the full comment being included in the annexure E to the report Included in Annexure A.
(b) Listed activities	
• Please ensure that the relevant listed activities are applied for, and they are specific and can be linked to the development activity or infrastructure as described in the project description. Please provide a full description of how the listed activity is triggered by the proposed development, including the threshold where necessary whilst ensuring that the project description is correct and relevant to the project for each listed activity.	All activities potentially triggered by the proposal and its associated infrastructure are included in the application and included in the descriptions of the various listed activities. See section 4.1. of the BAR.
• If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted for final review and decision making. Please note that the Department's has been amended and can be downloaded from the department's website.	At this stage the activities included in the application and draft BAR remain unchanged.
• The relevant authorities must be continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.	Relevant authorities are involved through the BA process.
• Take note that, it is the responsibility of the Environmental Assessment Practitioner (EAP) to ensure that all listed activities triggered by the proposed project are correctly identified and included in the Basic Assessment Report (BAR). Please note that if a listed activity is omitted, it cannot be added through an amendment process. In such cases, a new application for Environmental Authorisation (EA) will be required to obtain approval for the omitted activity.	As EAP we have identified all possible listed activities associated with the proposal and these are all included in the BAR.

(c) Specialist Assessment	
•It is brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were published in Government Notice No. 320 of 20 March 2020 (i.e., "the Protocols"), and in Government Notice No. 1150 of 30 October 2020, have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols unless proof is provided to demonstrate that the specialist assessments were commissioned before the date on which the protocols came into effect, in which case Appendix 6 of the Environmental impact Assessment Regulations, 2014, as amended, will apply to such applications. Please indicate in the report whether the protocols were applied.	Specialist assessments comply with the protocols as required.
• In addition to the above, you are hereby drawn to the following:	
➢ Specialist studies conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of proposed rehabilitation, and all other proposed structures that they have assessed and are recommending for authorisations.	Specialist assessments include details of their methodology, rehabilitation and assessment and recommendations linked to the proposal.
➢ The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.	Specialist assessments include a description of limitations or assumptions.
➢ Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defendable reasons; and where necessary, include further expertise advice.	Any contradictions are addressed in the BAR.
➢ The Specialist Declaration of interest forms must be attached for all specialist studies to be conducted in the final BAR. The forms are available on Department's website (please use the Department's template).	Specialist declarations are included in the BAR (Appendix J)
➢ Please note further that the protocols require certain specialists' to be registered with SACNASP. Refer to the relevant protocols in this regard.	Specialists are registered as required.
➢ The Department notes that a Site Sensitivity Verification Report (SSVR) has been included in the Basic Assessment Report (BAR). However, the SSVR does not indicate whether an Agricultural Impact Assessment (VIA) is considered unnecessary for the proposed project. You are therefore required to amend the SSVR to address the requirement of Agricultural Impact Assessment, as it was identified as a requirement in the Screening Tool Report. Please ensure that you comply with the agricultural protocol.	Agricultural compliance statement, complying with the protocols, was included in App F of the BAR as required.
➢ Further to the above, a Traffic Impact Assessment has been identified as a required specialist study for the proposed project. However, the SSVR does not provide any motivation for why this study is considered unnecessary. You are therefore required to amend the SSVR to include a clear justification for the exclusion of this study. Please note that it is the responsibility of the EAP to ensure that the Site Sensitivity Verification Report for all themes, as well as all specialists identified by the screening tool, is included in the BAR. Further, it is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site	SSVR has been amended to include the motivation that 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. BAR has been updated to include this motivation.

situation.	
➢ Please ensure that the Site Verification assessment, as required by the relevant environmental themes and assessments, complies with the requirements of the protocols. Should it be determined that there is a need for additional specialist studies to be undertaken based on the outcome of public participation, these must be commissioned and be included in the final BAR reports for public comment.	All additional assessments are included in the revised draft BAR which is available for public comment and will be included in the Final BAR for submission. Sewage and traffic motivation.
➢ The content of the BAR must include a table summarising the specialist studies required by the Screening Tool and the sensitivity rating of the Screening Tool (very high, high, medium, low), another column indicating the sensitivity of the site after the EAP/Specialist conducted the Site Verification Assessment and a column indicating whether these studies will be conducted or that compliance statement is submitted. If other themes have been addressed as part of a specific specialist study, you must clearly indicate this and reference the specialist that covered the requirements of that theme.	Included in the BAR – see section 5.1
➢ Please be reminded that section 2(3) of NEMA requires developments to be socially, environmentally and economically sustainable, while section 2(4)(i) of NEMA requires the social, economic and environmental impacts of activities, including disadvantages and benefits, to be considered, assessed and evaluated.	Included in the BAR – social, environmental and economic sustainability. See section 6, 10 and 11
➢ Summary and recommendations of all specialist studies conducted must be included in the BAR and EMPr.	All specialist recommendations are included in the BAR and in the EMPr. – see section 8 of the BAR and throughout EMPr Appendix G.
➢ Please ensure that the BAR indicates any recommendations of the EAP or specialists, which are to be included as conditions of authorisation, per Appendix 1(3)(1)(n).	Included in section 14
(c) Environmental Management Programme	EMPr is attached as Appendix G
•Please ensure that the mitigation measures specified in the BAR and specialist reports are also incorporated into the EMPr.	Included in the EMPr – see appendix G
• In addition, ensure that the facility EMPr complies with the content of the EMPr in terms of Appendix 4 of the EIA Regulations, 2014, as amended.	Included in the EMPr – Appendix G, Page 5
• Please also include in the EMPr, a recommended frequency for the auditing of compliance with the conditions of the EA and EMPr, and for the submission of such compliance reports to the competent authority.	Included in the EMPr – see section 9
• EMPrs must include an environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.	Included in the EMPr – Appendix G, Annexure C
• A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.	Included in the EMPr – Appendix G, Annexure C

• The EMPr must include measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.	Included in the EMPr – see section 7
• Please also include in the EMPr, a recommended frequency for the auditing of compliance with the conditions of the EA and EMPr (for the construction and post-construction monitoring phases), and the submission of such compliance reports to the competent authority.	Included in the EMPr – see section 9
(d) Layout & Sensitivity Maps • They layout map submitted with the draft BAR must be amended and must indicates the following: ➢ Position of all proposed infrastructure ➢ The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines, Flood lines, protected areas etc. that will be affected. ➢ Buffer areas; and ➢ All "no-go" areas.	Included on the layout – see appendix C
• The map for different alternatives as presented in the BAR must be submitted and attached under the folder for maps	Only one alternative considered, refer to Section 7 and alternatives rejected included in Appendix N
• The above maps must also be overlaid with a sensitivity map. The Department notes that a different sensitivity map is attached to the draft BAR; however, the Department requires that the site development plan be integrated into a single sensitivity map showing the various sensitivity levels. All available biodiversity. This must be addressed for all three alternatives that were assessed.	Included in the BAR – see appendix B and C. With regards to the alternatives – the other alternatives were rejected and no assessed, therefore overlay maps were not provided.
•Ensure that similar colours are not used to differentiate between infrastructure. i.e., items must be easily distinguishable in the Legend. •Google maps will not be accepted for decision-making purposes.	Maps include colours and legend - easily distinguishable. All mapping is done on GIS
• The BAR must include the precise coordinates of all proposed infrastructure. While the Department notes that the center coordinates of the project area have been provided, it is required that the coordinates for all associated infrastructure (e.g., 20 camping sites, wooden decks, etc.) be included in the final BAR submission.	Co-ordinates provided for all aspects of the proposal. – coordinates provided of the four corners of the camp node, a coordinate for the deck to be added at the lapa, associated infrastructure positions.

	Tent sites (green tents), solar, existing roads (white), railway line (purple), GRNP Development Control Area (red lines – as received from SANParks and included in their Estuary Management Plan)
General If any services will be obtained from the municipality, the BAR must include an official letter from the municipality confirming that it has sufficient capacity to accommodate the proposed development.	No municipality will be used. The Municipality are to confirm the services report which proposes self sufficient infrastructure.
You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority –	
(a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority."	Draft BAR and all associated appendices and annexures were available for 30 days The revised Draft BAR and various associated appendices and annexures are now available for another 30-day commenting period . Note specialist report and EMPr are attach to the report and subject to PPP.
Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended which states: "the applicant must, within 90	Clarification information was available for an additional 30 days (in the revised Draft BAR)

days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in sub-regulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days". Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse. You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.	Final BAR to be submitted 140 days as required due to the additional 50 days. Section 19 (1) (b) notification submitted to the Department on 30 January 2026
DEADP Coastal Management 26 November 2025 M Liddle/I Bekko	
2. COMMENT 2.1 The sub-directorate: Coastal Management ("SD: CM") has reviewed the information as specified above and have the following commentary: 2.1.1. The proposal entails the development of 25 camping sites, associated infrastructure and services located within the gardens of the existing home on Farm 152/216. All infrastructure required for the tourism camping area is within existing transformed area, avoiding all sensitive habitats. The landowner indicated that the subject property is ideally suited for camping (tents only) due to the extensive lawn and garden areas and the camping sites are a consent use on Agricultural I zoned land, and as such the use is compatible with the planning for the property.	Correct -
2.1.1.1. The proposed new infrastructure will include a small area for solar panels, batteries and inverters to supply electricity for the campers, 5 wooden decks with associated bathrooms, a grass parking area for 5 vehicles near the wooden decks, a camping area for 20 camping sites where guests park next to their tents, a small communal ablution for the 20 camping sites, additional water tanks for the collection of roof water off existing roof areas, a 'damask' for additional water storage, the required pipelines for water and sewage reticulation, a small sewage pump station, a conservancy tank which can be emptied using a conventional 'honey sucker' for treatment at the Knysna municipal waster water treatment works and which	Correct as proposed – comments received have resulted in minor changes to the proposal, but the intent remains the same.

will be fitted with a water treatment mini-package treatment unit once approved so that the tourism facility can be self-sufficient and off grid. Roads and tracks on site will be grass block surfaces where necessary to improve the existing tracks.	
2.1.2. The applicant has considered all critical biodiversity and ecological support areas in accordance with the to the Western Cape Biodiversity Spatial Plan (2023) and indicated that the proposed camp resort is environmentally appropriate as it occurs within disturbed, low-sensitivity areas and avoids all critical biodiversity features. The proposed camp resort is said to align with all relevant planning instruments, including the Knysna SDF, IDP, PSDF and NEMA principles and promotes sustainable development, local tourism, job creation, resource efficiency and environmental protection.	Correct – the camp sites are restricted to transformed areas of lawn in the existing gardens of the homestead.
2.1.3. The SD: CM notes that, with the subject property being located in the OSCAE area of Knysna, the applicant will be applying for an OSCAE exemption application should the application be successful and all potential impacts will be mitigated through the implementation of the EMPr.	Correct -
2.1.4. Be advised that Farm 152/216 is located within the Coastal Protection Zone ("CPZ") as defined in Section 16 of the NEM: ICMA. The purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes, including the risk of sea level risks.	Correct – as such the camp sites are limited to existing lawn areas and proposed on slightly raised wooden decks. Initially on 5 sites were proposed to be on raised decks with the remaining sites on the grass, however, they can all be accommodated on slightly raised wooden decks should this be required.
2.1.5. Farm 152/216 is located seaward of the Garden Route District's Coastal Management Line ("CML"). The technical delineation of the CML was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk flooding, wave run-up modelling, *inter alia* and was delineated in conjunction with and supported by organs of state. The principal purpose of the CML is to protect coastal public property, private property, and public safety; to protect the coastal protection zone; and to preserve the aesthetic value of the coastal zone. The use of CMLs is of particular importance in response to the effects of climate change, as it involves both the quantification of risks and pro-active planning for future development. Due to the subject proximity to the CML, it is essential that the applicant obtains comments from SANParks on the proposed activity as well its position on the subject property.	Correct – the proposal limits all activities to the existing transformed areas of garden, areas deemed as appropriate in terms of the sensitivities identified. Raised wooden decks for the camp sites reduces the impact of any potential climate change effects. SANParks comments have been obtained
2.1.6. The applicant accurately identified the subject property's proximity to the Knysna Estuary, and it should be noted that Farm 152/216 in its entirety is located within the estuarine function zone ('EFZ') which equates to the 5m contour around an estuary as it encapsulates the most dynamic areas influenced by long-term estuarine sedimentary processes. It provides a buffer zone that allows an estuary to swell within the floodplain of an estuary in the event of flood events, inundation as well as sea-level rise due to climate change, it also allows for the inclusion of some terrestrial fringe vegetation that contribute detritus to the system and refuge	Correct – camping on the existing lawn areas in the gardens on slightly raised wooden decks, reduces any long-term impacts on the estuarine processes. If the need arises the decks and services can simply be removed with no long-term impact on any processes. The existing gardens have provided for the establishment of terrestrial fringe

areas for many animal species during floods.	vegetation which will be expanded on in order to provide shade and privacy to the campers.
2.1.7. In terms of the Departmental Circular, DEA&DP 0004/2021, regarding '*The consideration of coastal risk in land use decisions as well as the way forward with respect to the establishment and implementation of Coastal Management Lines in terms of the NEM: ICMA*', a precautionary approach must be adopted with respect to land use decisions within risk areas. The Circular also suggests that development parameters be considered within general estuarine risk areas. Furthermore, it is advised that any new development be set far back from the estuarine functional zone ('EFZ') as possible and that existing coastal processes and indigenous vegetation within the EFZ must be maintained. The Circular further states that historic development within the EFZ has resulted in an increased need to actively manipulate ecological processes, such as breaching of an estuary to protect human life. To ensure the resilience of coastal communities, especially within the EFZ, development and densification of urban areas within this zone should be prohibited.	The proposed land use is a non-urban related land use, within the consent use rights linked to the current zoning. Camping is seen as a temporary recreational activity within an area already transformed and is not "densification within an urban area" This proposed use fully aligns with the EFZ uses it does not result in any change to the current estuarine processes nor impact on any indigenous vegetation. It does not place any requirement on the need to artificially manipulate any ecological processes to protect human life. In the event of any significant event within the Estuary Functional Zone, the applicant simply closes the camping area until the threat has passed, and the area is safe for camping once again.
2.1.8. Additionally, be advised that the Western Cape EMFIS Best Practise Activity Guidelines (2019) recommends in item 1.3. that, *no development should be approved to take place in the EFZ or the highly dynamic littoral active zone*. These Guidelines further recommend that developments must take into consideration any adopted coastal management lines and applicable controls, and/or coastal risk lines where high risk areas are identified. Avoiding development in at-risk or sensitive areas will help to maintain the ecological integrity of the estuarine environment, prevent disruption of the natural coastal processes, maintain aesthetic quality, and ultimately protect coastal developments and people. Any infrastructure, regardless of its intention must be in accordance with the Estuary Management Plan ('EMP').	The infrastructure is in line with the Estuary Management Plan – all activities are proposed outside of the GRNP Development Control Area – see the area between the red lines below extracted from data provided by SANParks from the Knysna Estuary Management Plan.
2.1.9. As the proposal including associated infrastructure and services, the SD: CM advises that pipelines and service conduits should not be placed in eroding or sediment dispositional areas in rivers, estuaries and dune environments. Sewer pipelines and pumpstations must be kept out of floodplains, due to risk of pollution emanating from leakages. All pumpstations must be designed with the built-in redundancy, to ensure continuous operation.	All pipelines are designed within existing access tracks in order to be easily accessible. All infrastructure is designed with the required "built-in redundancy" to ensure continuous operation. See engineering report which has expanded on this requirement in order to ensure that there is no risk of pollution threat or contamination.

2.1.10. The SD: CM notes that the applicant's designs for the proposed units are elevated which is ideal given the nature of the environment. However, the SD: CM fails to understand why the preferred location for these units on the subject property (apart from the fact that it is in a disturbed area) could not be located in the centre or south eastern position of the subject property, as this area is further away from the estuary as per the suggestion in item 2.1.7. above, to set any new development as far back from the EFZ as possible in order to maintain existing coastal processes and indigenous vegetation within the EFZ. Properties located along estuaries or riverbanks are subject to natural processes such as flooding, storm surges and inundation, and as such adequate buffers must be preserved to allow natural processes to be unrestricted.	The proposal has been modified to allow for all 25 camping sites to be located on raised wooden decks as recommended – all within the existing garden areas which form a "terrestrial buffer" between the camping sites and the highwater mark. The location of the sites has been chosen to fall within the existing garden and buildings on the property, outside of the Knysna Estuary Development Control Area and within an area that is not visually obtrusive from the higher lying Brenton-on-Lake community. The location within the gardens allows for the existing trees to screen the camping sites from surrounding neighbours and the estuary users. Relocating the camping site to the area indicated in the centre or south eastern position, would result in them being highly visible from Brenton-on-Lake elevated properties, which has been raised as a key issue from those residents.
2.1.11. It is noted that on page 12 of the DBAR that the specialist studies have confirmed that the proposed camping area on Farm 152/216 has low ecological sensitivity and that the proposed activity will not impact estuarine systems or any protected vegetation. However, the SD: CM must caution the applicant to consider placement of the proposed units within the centre of Farm 152/216 so that it is sheltered between the existing buildings.	The proposed camping area within the gardens is located close to the existing buildings. The lawns around the existing buildings could be used for camping as long as they are not visible from Brenton-on-Lake. It is possible to create a more "informal" camping area between the existing buildings as part of the final plan – spreading the 25 campsites out more within the property, however this is currently not proposed as specific co-ordinates are required from DFFE for the application.
2.1.12. Based on the information provided, the SD: CM does not object the proposed activity but given Farm 152/216's position within the EFZ, CML and CPZ, advises that the applicant reconsiders the position of the proposed activity to a more suitable position landward from the actual estuary, as per the DEA&DP Circular 0004/2021, noting that the suitability of the proposed activity in its proposed location is at the discretion of the competent authority.	The proposal has been modified slightly, all camp sites are proposed on wooden decks to take the comments from Coastal Management into account, and all will be placed outside of the Knysna Estuary Development Control Area (50m) and within the existing gardens and buildings.
DFFE – Directorate: Biodiversity Conservation Portia Makitla / Orefemetse Ramantsi, 2 December 2025	
The proposed development is situated in a very highly sensitive area due to the site overlays entirely in a Protected Area. In accordance with the report, most of the development area has been largely transformed, therefore development in sensitive areas is prohibited to preserve the ecological function of the area and SANParks must issue written permission per the National Environmental Management Protected Areas Act 2003 (Act 57 of 2003), NEMPAA section 50(5).	The property falls within the Knysna Lake Area but not within the GRNP as it is privately owned. As indicated, the development proposal is all restricted to the transformed areas and all sensitive areas are avoided.
In addition, the Directorate supports the alternatives of the proposed development as they are	This support is noted and is the basis of the application.

anticipated to result in a minimal ecological footprint and are characterized by seasonal operational demands. The alternatives are consistent with eco-tourism and nature-based recreational land uses and are considered capable of contributing to local economic development without undermining the ecological integrity of the receiving environment.	
To ensure that continued persistence of ecosystems and that national conservation targets are achieved, it is essential that impacts on very highly sensitive i.e. highly localised habitats are minimized or avoided altogether. Furthermore, the following recommendations must be considered in the final report:	
The salt march areas adjacent to the site must be protected. No high-impact activities must be allowed to occur within these areas.	Correct – there will be no impacts on the surrounding saltmarsh areas which fall within the Garden Route National Park. No high impact activities are proposed and any access into the National Park MUST comply with the SANParks rules and regulations and the Estuary Management Plan.
The tidal pond should be retained and managed as an ecological resource. It also has recreational value, but is not inconsistent with management biodiversity and ecosystem processes in the Knysna Estuary.	The tidal pond will be retained and managed as an ecological resource. The recreational value is not inconsistent with the management of the biodiversity and ecosystem processes – only non-motorised, low impact recreation is proposed (swimming and canoe) – Estuary management plan for the adjacent area is indicated as a quiet zone which allows for medium to high volume visitor access – although the estuary management plan does not extend onto the property, this similar zone will be implemented on the property.
The milkwood hedge along the northern and eastern boundaries of the site should be retained and enhanced.	Agreed – the intent is to retain and enhance this hedge. All alien trees within this hedge have already been removed and the milkwood trees are responding well.
An alien invasive control management plan for regular monitoring and removal of invasive plant species must be implemented and prohibit all invasive alien plant species (as per NEMBA AIS Regulations).	The ACP in terms of NEMBA has been submitted 6 June 2022 and is being implemented rigorously. A resubmission was made in 2024 to obtain the approval letter. This letter of approval is attached to the EMPr, see appendix G
Disturbed areas must be rehabilitated as soon as possible after construction with locally indigenous plants to enhance the conservation of existing natural vegetation on site.	This is included in the EMPr. Although the area is all within the existing gardens, there will be very minimal "construction" other than the installation of services which will be immediately rehabilitated and the construction of the small raised wooden decks for the camping. Planting of indigenous vegetation is already in progress to act as privacy screening between the individual tents.
A construction-phase monitoring program must be developed to assess and document the impacts of infrastructure installation on local bird communities.	EMPr is included. See Appendix G
Implement no-go area along the estuary, clearly demarcated before construction begins.	The estuary no-go will be clearly demarcated prior to any construction commencing.
Protect estuarine birds by preventing disturbance in the salt marsh and mudflat foraging areas.	The saltmarsh and mudflat foraging areas are all within the Garden Route National Park and as such there is no access permitted to those areas without SANParks approval in accordance with the Estuary Management Plan. Guests will be obliged to follow the SANParks rules at all times when leaving the property.
Avoid high-noise activities during peak bird breeding/foraging seasons where possible.	There are no high-noise activities proposed. The activity is for high class, dedicated camping as an Eco experience which quiet as the main activity.
A stormwater management plan must be implemented to ensure all runoff is pre-treated before reaching the estuary.	There will be no stormwater generated from the activity – tents are on raised wooden decks within the lawn areas. The driveway is existing and permeable. Existing roof water is directed into rainwater tanks, and any overflow is directed into the gardens. The areas around each tent will remain garden ensuring infiltration and no runoff directed towards the estuary.

Implementation of an Estuarine Buffer Protected Plan, including fencing, demarcation and no-go areas to ensure no work, stockpiling or access within the estuarine functional zone.	An Estuarine Buffer Protection Plan will be added into the EMPr to ensure fencing, demarcation, no-go areas, stockpiles and access within the estuary functional zone is all adequately addressed.
Heritage Western Cape Wassefa Dhansay / Chiara Singh 18 November 2025	
Heritage Western Cape is in receipt of your application for the above matter received. This matter was discussed at the Heritage Officers Meeting held on 17 November 2025. You are hereby notified that, since there is no reason to believe that the proposed development for small camping resort, associated infrastructure and tourist facilities consisting of 20 camping sites and five wooden decks on Portion 152 of Farm 216, Farm Uitzicht, Brenton-on-Lake, Knysna, will impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required. HWC chance finds procedure to be included in the environmental authorization. However, should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and Heritage Western Cape must be notified without delay. This letter does not exonerate the applicant from obtaining any necessary approval from any other applicable statutory authority.	EMPr contains the requirements in the event of a Heritage resource being located on site.

SANParks
Vanessa Weyer
8 December 2025

Uitzicht 216 Portion 152 is situated in the Buffer Zone of the Garden Route National Park (GRNP), and in the Knysna Protected Environment (KPE), with some parts of the property situated in the KPE Development Control Area (DCA), i.e., 50m from the high-water mark **(Fig.1)**.

The Estuarine Functional Zone (EFZ) **(Fig.2)**, Coastal Management Line (CML), and Coastal Protection Zone (CPZ) **(Fig.3)** extend well landward of Portion 152. The CML was included in the Knysna Spatial Development Framework, is shown on the Knysna GIS Viewer and the Western Cape Environment and Development Planning Atlas. Risks associated with developing in this area are known and have been published. The CPZ is designated in terms of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008) (NEM: ICMA). The CPZ is established to manage, regulate, and restrict the use of land that is adjacent to Coastal Public Property (CPP), or that plays a significant role in the coastal ecosystem. Portion 152 falls below the 5m contour line **(Fig.4)**.

Critical Biodiversity Areas (CBAs) in terms of the 2023 Western Cape Biodiversity Spatial Plan (WC BSP), which was adopted on the 13 December 2024 (Gazette Extraordinary 9017) in alignment with the Western Cape Biodiversity Act (Act No. 6 of 2021), are no longer shown as mapped for the KPE, as this area is declared in terms of the National Environmental Management: Protected Areas Act (Act No. 57 of 2003) (NEM: PAA), all areas in the KPE are however in fact considered a CBA. Conservation status is high, due to the property's location in the estuarine landscape, and its EFZ. Vegetation is mapped by Mucina and Rutherford, 20061 and as revised by SANBI, 20182, as Critically Endangered (CE) Knysna Sand Fynbos (FFd10).

Development Control Area of the GRNP as extracted from the SANParks Knysna Estuary Management Plan (data supplied by SANParks). Area within the red lines is the 50m DCA as referenced.

No parts of the proposed Camping area fall within the DCA.

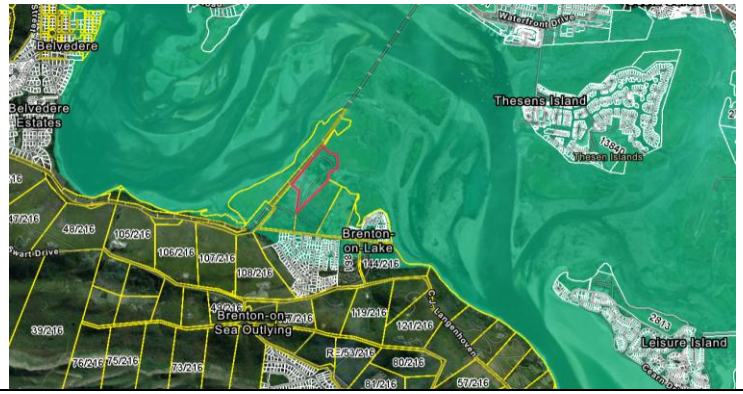
Mapping areas mentioned are all included in the BAR and the proposed landuse is confirmed by DFFE: Biodiversity Conservation. "*the Directorate supports the alternatives of the proposed development as they are anticipated to result in a minimal ecological footprint and are characterized by seasonal operational demands. The alternatives are consistent with eco-tourism and nature-based recreational land uses and are considered capable of contributing to local economic development without undermining the ecological integrity of the receiving environment.*"

2017 WC Biodiversity Spatial Plan

The 2023 Western Cape Biodiversity Spatial Plan (WC BSP) was formally adopted into law on the 13th of December 2024 (Gazette Extraordinary 9017) in alignment with the Western Cape Biodiversity Act (No. 6 of 2021). This marks the replacement of the 2017 WC BSP with the 2023 WC BSP.

Please do note that all investigations, studies and/or legal processes initiated prior to the 13th Dec 2024 will still recognise the 2017 WC BSP as the official biodiversity prioritisation data informant.

The specialist study undertaken for the site is dated May 2024 which requires the

	2017 WC Biodiversity Spatial Plan to be used for identifying the CBA and ESA's. The property does not fall within an CBA or ESA mapped areas. It does fall within the estuary functional zone, within the Knysna Lake Area Protected Environment (PE) and the buffer zone of the GRNP. 2017 surrounding ESA and CBA's. The whole property falls within the Estuary functional zone as do all properties in Knysna that are below the 5m contour. 
This vegetation status is as listed in the Revised National List of Ecosystems that are Threatened and in Need of Protection (GN. No. 2747, 18 November 2022). Some Estuarine vegetation occurs along the property's eastern boundary **(Fig.5)**. SANBI mapping is based among other on conservation targets, as well as on landscape functionality and connectivity metrices, not necessarily on what vegetation is present on the property. Portion 152 is in the protected area expansion footprint of the GRNP and in the Knysna Sand Fynbos Coastal Corridor, which is the subject of a conservation initiative being supported by SANParks, CapeNature, Table Mountain	The on-site vegetation is confirmed by the specialist to be incorrectly mapped and to NOT support any Critically Endangered Knysna Sand Fynbos as the area has been historically infilled saltmarsh area that would never have naturally supported Sand Fynbos. The property supports a completely artificial vegetation composition of garden planting, including the planting of a hedge of protected Milkwood trees on the property boundary with the estuary.

Fund, WWF, and the Western Heads Goukamma Conservancy (WHGC). Achieving a conservation outcome on this property is important to SANParks.	The property's importance as a buffer and as part of a connecting corridor is confirmed and the proposal to include a small camping area within the transformed gardens on small raised wooden decks will not alter this connectivity in any manner. The removal of all alien vegetation has been systematically taking place on the property since the owner took transfer together with the general cleaning up of the property. This management, together with proposed future planting will ensure that the role as a corridor is retained and conservation outcomes can be achieved.
The property is zoned, "Agricultural Zone I", Knysna Municipality GIS viewer **(Fig.6)**. The property is situated outside the Urban Edge **(Fig.7**), is 11.17ha in extent and is owned by Rudi's Roses CC (Brenton Cove CC).	Correct – the zoning is Agriculture zone 1 and falls outside the urban edge as indicated in the BAR.
SANParks has conducted two formal site visits **(Figs. 11 - 22)**; (1) 18 November 2024, attended by Dr. V. Weyer, Ms. J. Hayes and Ms. E. Petersen of SANParks, Mr L. Druce (VBGD Town planners), and the landowner Mr. R. Neethling; and (2) 21 November 2025, attended by Dr. V. Weyer, Ms. J. Hayes, Ms. E. Petersen, Ms. C. Mortlock, Mr. T. Kgaphola of SANParks, and the landowner Mr. R. Neethling.	Site inspections noted.

Fig.1. Uitzicht 216 Portion 152, location (CapeFarmMapper3).

Fig.2. The Estuarine Functional Zone extends across all parts of Uitzicht 216 Portion 152 (CapeFarmMapper3).

Fig.3. The Coastal Management Line (green dotted line) and Coastal Protection Zone (red line) extend well landward of Uitzicht 216 Portion 152 (DEA&DP Coastal Management Map Viewer).

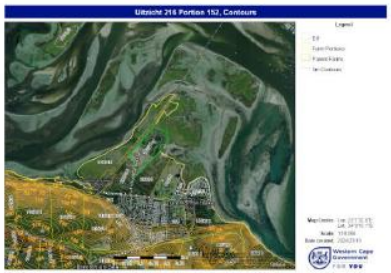


Fig.4. Uitzicht 216 Portion 152 is below the 5m contour line (CapeFarmMapper3).

Fig 1 – no comment required.

Fig 2 – Estuarine Functional Zone – all areas below the 5m contour irrespective of land use.

Fig 3 – Coastal Management Line and Coastal Protection Zone – important to take climate change aspects into account.

Fig 4 – 5m contour which defines the Estuary Functional Zone (fig 2) – no comment necessary.

Fig.5. Knysna Sand Fynbos (FFd10) (CE) is mapped on Portion 152, with some Estuarine vegetation present along the property's eastern boundary (CapeFarmMapper3).

Fig.6. Zoning is, "Agricultural Zone I" (light green) (Knysna Municipality GIS Viewer).

Fig.7. Uitzicht 216 Portion 152 is located outside the Urban Edge (Knysna Municipality GIS Viewer).

Fig.8. Aerial photo (1974) showing first emergence of dredged/ man-made estuary inlet area, undertaken by previous landowner/s prior to the 1997 EIA Regulations (Photo supplied by Mr. R. Neethling).

Fig 5 – Knysna Sand Fynbos – the area is incorrectly mapped as supporting KSF – the area was historically infilled estuarine vegetation.

Fig 6 – Agricultural Zone 1 as indicated in the BAR – no comment necessary – the proposed land use is a consent use in terms of the zoning.

Fig 7 – outside the Urban edge as indicated in the BAR. Land use proposed is specific to areas outside the urban edge – camping is not an urban land use.

Fig 8 – historically man-made estuarine pond dating back as far as 1974

Fig.9. Google Earth Pro Image Date: 10/18/2003. Note: Dredged/ man-made estuary inlet area present.

Fig.10. Google Earth Pro Image Date: 3/8/2025. Note: Alien Invasive Vegetation Clearing has been undertaken.

Fig 9 – 2003 aerial showing the man-made estuarine pond and surrounding infilling.

Fig 10 – 2025 aerial showing the current status with alien vegetation clearing

Fig.11. The previous landowner/s in-filled large parts of Portion 152 above the natural estuarine level. Note: Raised area starts on eastern property boundary (right).

Fig.12. Main dwelling renovated (2025).

Fig.13. Man-made estuary inlet/ dredged area's exit channel. The area was dredged in 1974 by a previous landowner/s (Refer to **Fig.8**). Retaining wall structures were pre-existing.

Fig.14. Entry channel into man-made estuary inlet/ dredged area.

Fig.15. Man-made estuary inlet/ dredged area with building present on bank. Floating pontoon/houseboat present x 2 (2024).

Fig.16. Man-made estuary inlet/ dredged area with floating pontoon/houseboat present x 2, one is roofed (2025).

Fig 11 - Milkwood trees planted along the edge or the historic infilling. Saltmarsh falls inside the GRNP.

Fig 12 - Main dwelling – no comment required.

Fig 13 & 14 – Man-made inlet with retaining structures – no changes proposed.

Fig 15 – Man-made tidal pond with pre-existing slipway and jetty (repaired like for like) and new pontoon (licenced with SANParks)

Fig 16 – SANParks Licenced pontoon fitted with a roof.

Fig.17. Palm trees on banks of man-made estuary inlet/ dredged area (2025).

Fig 17 – Palm trees planted by previous landowner in the gardens around the man-made tidal inlet.

Fig.18. Workshop/ farm maintenance buildings.

Fig 18 – Workshop and farm maintenance buildings will be used as entertainment area for the camping.

Fig.19. Low lying area, previously infilled/ dumped with garden refuse, and now with stagnant standing water. This area could potentially be rehabilitated to a freshwater borehole fed pond, to provide a bird habitat (2025).

Figure 19 – Excavated hole used by the previous owner for dumping various items (steel, wood, tyres etc). Being systematically cleaned out by the current landowner.

Fig.20. Farm Manager's/ staff quarters.

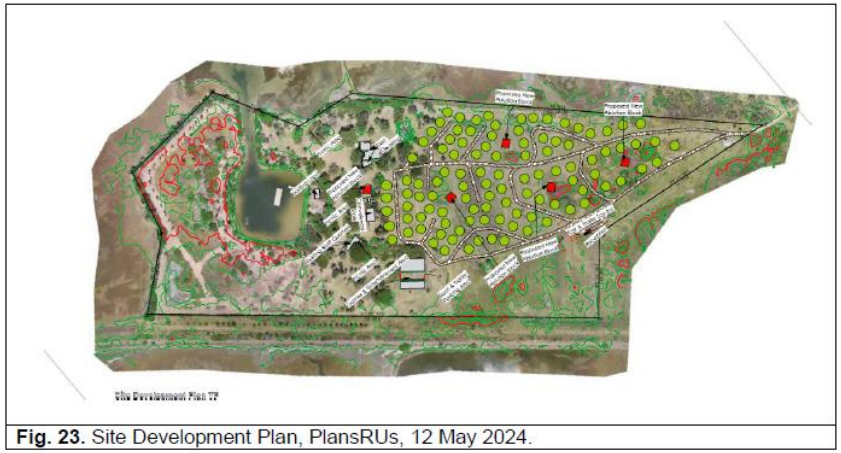
Figure 20 – Existing farm manager accommodation

Fig.21. Kikuyu grass was recently removed from the north-western corner of the property, with some ground leveling occurring and the planting of indigenous plant material.

Fig 21 – Area where previous owner historically excavated holes (for dumping) and left heaps of excavated material being cleaned and reinstated by current landowner.

Fig.22. Exposed soil areas in the north-western corner of the property comprise beach sand material, possibly emanating from when the man-made estuary inlet area was dredged.

Fig 22 – Area where previous owner historically excavated holes (for dumping) and left heaps of sand, which have now been cleaned by the new owner and levels restored.

SANParks commented on a Land Use Application (LUA) on the 17 December 2024. The details of which shown below are as extracted from the "*Memorandum in Support of the Application for Consent Use and Removal of Restrictions: Portion 152 Farm Uitzicht 216*"	SANParks' comments on the Land Use Application (December 2024) informed the changes made to the SDP. The new SDP is the subject of the NEMA assessment and is included in the NEMA application.
The site is zoned "AGRICULTURE ZONE 1" and as such, the necessary applications are: • 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 as described herein. • Approval of a Site Development Plan in terms of Section **15(2)(g)** in compliance with the Knysna Zoning Scheme 2020.  **Fig. 23.** Site Development Plan, PlansRUs, 12 May 2024. The part of the site **in the centre** contains existing structures to be used, including a house, sheds, a lapa and other outbuildings as shown in the diagram below. This is the part where the main activities associated with the camping site will be exercised.(SEE ANNEXURE C)	Fig 23 – Rejected SDP for 105 camping sites spread over the property. Rejected due to: • Highly visible from Brenton-on-Sea • Density perceived to be too high

The part of the site **in the centre** contains existing structures to be used, including a house, sheds, a lapa and other outbuildings as shown in the diagram below. This is the part where the main activities associated with the camping site will be exercised.(SEE ANNEXURE C)

2.3 Components of the Camping site:

The definition of a camping site as detailed above, indicates that a range of associated supporting uses are permitted. These include **tents and caravans, facilities for outdoor food preparation, resort shop, road accesses, picnic facilities, ablutions, laundry and waste disposal,**

Development parameters applicable to "**tourist accommodation**" applies, the most relevant of which is the submission of a Site Development Plan.

2.3.1 **Extent and use of Proposed camping site**:

The camping site and its associated facilities will comprise of the following:

2.3.1.1.	Camping and Caravaning sites:	105
2.3.1.2.	Ablutions	5
2.3.1.3.	Resort Shop	1
2.3.1.4.	Games/Entertainment	1
2.3.1.5.	Picnic Areas	1
2.3.1.6.	Boat /Trailer parking area	1
2.3.1.7.	Reception	1
2.3.1.8.	Staff Quarters	1

It is envisaged that the camping resort will be **used for between 50 and 60 days a year and** is therefore not a significant use in off-peak times.

2.3.3. **Ablution facilities**:

The proposal is to erect 5 new ablution blocks, which will be fitted to comply with all health standards applicable to camping site facilities.

Four ablution blocks are located in close vicinity to the camping sites and dispersed throughout at suitable positions.

The 5th ablution block is to be positioned in the communal area, where it can be used for general use associated with the picnic area and other communal activities.

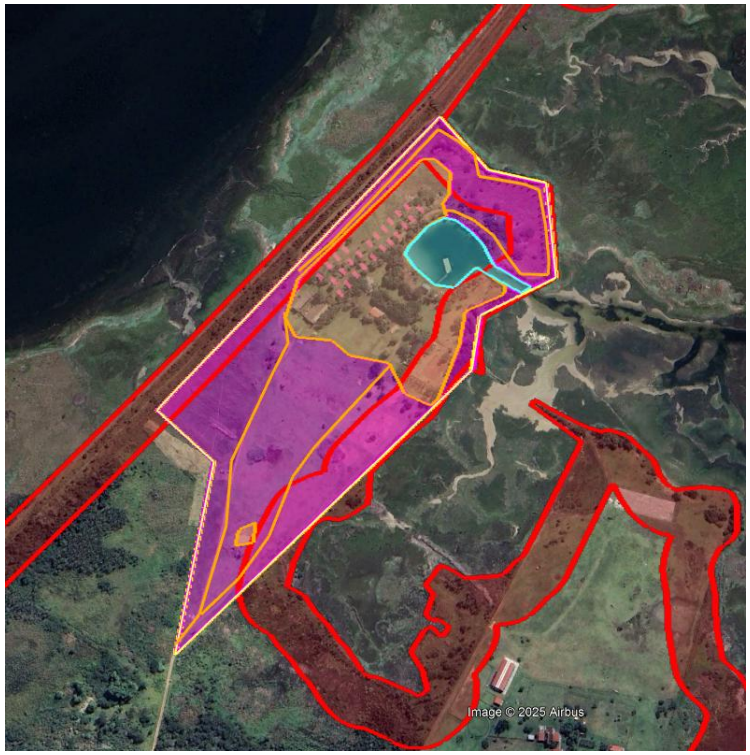
Even the existing roadway will be used and improved with grass paving bricks to keep the environment as natural as possible.

Brenton Jetty and slipway: The above facility will be used by those staying at the new camping site, as it is the most convenient access point to the lagoon in the area.	

7.1 Services and infrastructure: Accompanying the application for a camping site with associated facilities, is an engineering report by Hofmeyr Associates, detailing the provision of services for the proposed uses. (SEE ANNEXURE E) They can be summarised as follows: 7.1.1. **Water supply to the site**: The report confirms that water will be supplied by various sources including boreholes, rainwater harvesting, as detailed in the report. 7.1.2. **Sewer Treatment**: Sewer treatment was proposed in the report to be a sewage treatment package plant. Effluent from the ablution blocks will be pumped to the treatment plant where it will be sterilized and then used for irrigation in the campsite as described in the report. 7.1.3. **Electricity supply**: Electricity supply will be from the owners own electricity supply and will not use municipal/ESKOM power for the camp site. 7.1.4. **Refuse Removal:** Refuse will be collected on site and sorted into recyclable and/or refuse material and will be stockpiled in a collection facility at the entrance of the camping ground for collection. **1. GENERAL INTRODUCTION:** The site is exceptional and is available for a number of activities, however it will be necessary to do a space planning exercise or site development plan, and position the various uses such as the caravan/camping site plus facilities, site for events, a restaurant, cycling attractions, and whatever else is deemed suitable.	
In summary, given the information provided, SANParks did not support the proposed development in its current form. SANParks response to the specific LUA items included: 1. Consent Use for a Camping Site - Not supported by SANParks. 2. Removal of Restrictive Conditions – SANParks may support conditional modifications of Restrictive Conditions. 3. Approval of Site Development Plan - Not supported by SANParks	SANParks comments were taken into account by the planners and the applicant in the formulation of the SDP for 25 camping sites, which is the subject of the NEMA application.
The following was noted: [*Uitzicht 216 Portion 152, although highly transformed by previous landowners is of high*	The SDP was amended to ensure that the connectivity is retained and impact on

conservation value, due to its position in the landscape, and connectivity with the sensitive Knysna Estuary. The property is situated within the Knysna Sand Fynbos Coastal Corridor, the subject of a conservation initiative supported by SANParks, CapeNature, Table Mountain Fund, WWF, and the Western Heads Goukamma Conservancy. Achieving a conservation outcome on this property and ensuring no adverse impacts occur to the Knysna Estuary is important to SANParks.	the estuary is minimised.
SANParks commended the current landowner for alien clearing and rehabilitation works being undertaken on the property.	
SANParks main concerns included:	
• *105 camping sites will have a significant negative impact on the estuary in terms of large numbers of estuary users.*	105 camping sites reduced to only 25 sites of 2 persons per site. Max of 50 persons with minimal estuary use limited to the GRNP rules and regulations.
• *SANParks Brenton on Lake slipway and parking area does not have capacity to cope with increased users.*	Campers to the site are unlikely to make use of the SANParks Brenton on Lake slipway unless complying with the rules applicable to the general public. Camping site rules regulate use of water craft.
• *SANParks does not support the use of the dredged out/ man-made estuary inlet for the launching and mooring of boats.*	No launching or mooring of boats in the man-made tidal pond is proposed.
• *SANParks would not support extensive use and increased activity within this area.*	Use and activity is regulated by the GRNP Estuary Management Plan that covers all uses in the Estuary.
• No new jetties are supported.	No new jetties are proposed.
• *No expansion works to or dredging of the man-made lagoon or its approach channel will be supported by SANParks.*	No expansion works or dredging is proposed to the man-made tidal pond.
• *Maintenance of existing structures would need to follow the 'like for like' principal and attain the necessary approvals from the relevant Competent Authority and a Section 8 KPE DCA SANParks authorisation.*	Maintenance of existing structures has followed the "like-for-like" approach. With municipal approval. No new works are proposed for the SANParks DCA
• *Further concerns include traffic, visual, loss of tranquillity, landscape character changes, and noise.*	Traffic is considered minimal – 25 users visual has been addressed by the visual assessment and confirmed to have no impact, No "loss of tranquillity" is proposed or associated with a quiet camping site for 25 sites. No changes to the landscape character proposed – the whole camp site is within the existing gardens screened by existing trees, No increase in noise is anticipated linked to 25 camp sites in an existing garden located a great distance from neighbouring receptors
• *The property is situated adjacent to a "Quiet Zone" in terms of the GRNP Management Plan Zonation.*	The proposed use aligns with the "quiet zone" in terms of the GRNP Management Plan Zonation. Camping within the GRNP at Ebb and Flow falls within the similar "quiet zone" and is acceptable with 139 camping sites and 49 self-catering units.

• *Any development on the property will likely be subject to climate change risks, mostly unpredictable flooding and storm surges, with the site being situated in the proposed CML and below the 5m contour line. Development will need to be climate change smart, i.e., demonstrate climate change resilience and adaptation.*	The design is adapted to specifically be "climate change smart" – camping sites are on raised wooden decks and all services are designed to be sealed units. The existing boundary of the property protection berm is in place.
• *Further infilling of the property due to its situation in the EFZ would not be supported by SANParks.*	No infilling is proposed on the property.
• *Should coastal erosion stabilisation structures be required to safeguard any buildings/ infrastructure now or in the future, the landowner would need to adhere to Section 15 of NEM: ICMA.*	No coastal erosion stabilization structures are proposed.
• *Servicing of the property was a concern, particularly sewage management.*	Sewage management has been specifically addressed – see engineering report.
• *SANParks was concerned that the borehole water may not be of the required drinking standard, and borderline brackish. Further testing was recommended. The need for a WUL was to be confirmed with the relevant Competent Authority. The use of a water storage bladder could necessitate the importation of 900m3 of soil to achieve a platform 5m high.*	Borehole water has been tested and is not "borderline brackish" – any drinking water will be treated to the required standard. BOCMA have confirmed that no WUL is required and that the borehole water is Generally Authorised. Water storage will be in 2 x 10000 litre plastic jojo tanks. An additional water bladder for water storage, if used, does not require any infilling or platform creation
• *Only two specialist studies were undertaken.*	The required specialist studies have been undertaken. Terrestrial biodiversity, plants, animals and aquatic, agricultural, visual,
SANParks believed that alternative low-impact site landuses were not investigated. SANParks may support the repurposing of existing buildings into other forms of tourist offerings, subject to perusal of proposals, and SANParks' comments on these.	Alternatives considered. Reuse or repurposing of existing buildings – should this be a requirement of the applicant in future, an application to that effect will be lodged for consideration.
As Portion 152 is in the protected area expansion footprint of the GRNP, the property may qualify for a formal Contract National Park stewardship agreement, provided that the property's land use is of a low impact conservation type and aligns with the GRNP's zonation and objectives.	The landowner is not currently wishing to pursue any form of Contractual National Park stewardship agreement as the property is transformed and does not meet any of the biodiversity criteria required for Stewardship. The proposed landuse is a "low impact" camping within the current transformed garden areas on the property. Conservation outcomes are currently being achieved through the extensive alien clearing that the landowner has been undertaking.
Parts of Uitzicht 216, Portion 152 (including among other, the dredged/man-made lagoon area) that are submerged by coastal waters could be deemed CPP, which is held in trust by the State for the benefit of all South Africans.	The GRNP Estuary Management Plan specifically excludes the man-made tidal pond from the designations within the Estuary. The DCA of the Knysna Estuary does not include the man-made tidal pond. See attached extract from the EMP and the google earth overlay of the DCA lines as received from SANParks. The property is private property and does not form part of the CPP.
The KPE DCA extends 50m from the high-water mark into Portion 152, and as such SANParks'	The KPE DCA is indicated on the attached SANParks plan does not overlay with the proposed camping area or associated structures.

authorisation is required for development to proceed in this area.]	

The current development proposal as extracted from the Draft Basic Assessment report, HilLand Environmental, 7 November 2025 includes:	Plan slightly modified based on the comments received in the Draft BAR PPP.

The proposal entails the establishment of a camping resort 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. *Figure 13: Proposed preferred alternative SDP of the camping area on the property*	Proposal still entails the establishment of a camping resort for 25 tents. Changed to have all 25 sites on raised decks with a fixed bathroom and an attachable tent section. No "ablution block" to be constructed. Services detail provided by the engineers – a sealed pipe and tank system with pumps which will take all waste water to an on-site sewage treatment plant that will treat all water to general standard for reuse. The on-site plant will be designed such that it cannot be flooded from the Knysna Estuary and will have sufficient storage capacity for emergency situations to ensure pollution does not occur. Layout plan slightly modified
 Figure 15: Plan showing the new proposed services - note that the sewage lines are recommended to be amended based on the potential cumulative impact in relation to wetlands identified on the neighbouring property portion 192. – see cumulative impact section 8.3 below.	Services plan modified.

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

- 20 camping sites, ablution block, associated services, and access tracks will be established on the northwestern side of the property. The sites will entail camping on the lawn (already transformed areas) or a small deck, where the guests will pitch their own tent or the landowner will provide the tent and pitch it for the campers.

Figure 16: Extract from the SDP showing the 20 camping sites close to the existing sheds and staff accommodation

- Five (5) 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.

Figure 17: Extract from the SDP showing the five (5) permanent decks for camping.

Plan slightly modified

- *"The development property currently has a domestic **water** supply connection. The Developer proposes to position two 5000 litre water tanks on his property close to his metered water connection.*

  These tanks will fill from the Municipal connection with the inflow controlled by a ball valve. The internal water reticulation for the proposed development will be fed from these 2 tanks through an electric pressure pump" (Hofmeyr and Associates, 2025). The damsak will also be used and filled with Municipal or purchased water. Additional 5 x 5000 litre rainwater harvesting tanks are to be installed near the sheds to capture roof water.

Figure 19: Extract from the SDP showing the rainwater harvesting tanks in blue and blue connections to be made to the bathrooms

It is proposed to use water from the existing borehole for the tourism facilities in future – this use is subject to a Water Use Licence Application (WULA) which is being run as a separate application in process by specialist. Once a WUL is issued, borehole water will replace municipal water use.

- 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).

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Water from a borehole and rainwater harvesting and use of treated effluent water.

Plan modified.

sewage treatment through an onsite treatment package plant treating water to General Standards, subject to a WUL and with the treated effluent water used in a closed recycling system to flush toilets and irrigate (if approved for such use in terms of the WUL.

BOCMA confirmed WUL application in progress – borehole water to supply the required 9000 litre per day, stored in 2 x 10 000l tanks to ensure adequate capacity.

Solar will be installed to supplement supply in order for the facility to be sustainable.

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- *"Wastewater from the development will be separated into grey water and **sewage**.*

  The grey water will be used to irrigate lawn areas and the sewage from the development will be collected in a gravity sewer reticulation, which will discharge into a 12000-litre conservancy tank.

  The Municipal sewage tanker service will empty the conservancy tank as required.

  Upon receipt of a water use license from the Department of Water and Sanitation, the Developer will revert to the use of borehole water and a package sewage treatment plant to service his development" (Hofmeyr and Associates, 2025).

The construction- and operational phase 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.

No power boats will be allowed to access the Knysna Estuary from the property or moore in the pond area.

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

Sewage - no grey and black water separation – all water to the on-site sewage package plant for treatment to general standards and reused for recycling to flush toilets.

• **Sewage** – at full capacity approximately 8600 litres of sewage could be generated per day. It is proposed to pump this sewage from the camping area to a central conservancy tank that can be pumped by honeysucker and treated at the municipal wastewater treatment works. The intention is to install a small package plant that can treat wastewater on site to General Standards for use in irrigation – this will require a WUL. The wastewater on site will be separated into grey (showers and basins) and black water (toilets and kitchen). Black water will be directed to the conservancy tank, while grey water will be filtered and used for garden irrigation. The position of the conservancy tank will be adjusted based on the requirements of this draft BAR – taking into account the potential cumulative impact on the neighbouring wetland on portion 192/216 (see section 8.3 below) HilLand Environmental –Draft BAR – Portion 152 of 216 Uitsight **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. If a guest arrives with an own non-motorised watercraft – it must be in possession of any necessary SANParks permit or approval. No fishing from the property is permitted. **Access to the railway line** – the Heritage Outeniqua Choo-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.	Access to the Knysna Estuary – no change – compliance with SANParks estuary use applies to all users. Non-motorised watercraft ONLY subject to SANParks registration requirements. No change – no public access to the railway line / rail reserve area.
Point 1: Conservation Stewardship Portion 152 Uitzicht 216 falls within SANParks' protected area expansion footprint and Land Inclusion Plan for the GRNP. The property is within the Western Heads Knysna Sand Fynbos Coastal Corridor, which is the subject of a collaborative conservation initiative being supported by SANParks, CapeNature, Knysna Municipality, the Table Mountain Fund, WWF, the Western Heads Goukamma Conservancy (WHGC), and landowners. Several biodiversity stewardship categories exist that a landowner can opt into; these are described in tabular form in **Fig. 24**. Stewardship categories in the top-tier of the table require the greatest commitment level from a landowner but receive the greatest support from conservation authorities and greater financial incentives Portion 152 qualifies as a SANParks Contract National Park (CNP) property (top-tier). A CNP is an area of privately owned land that is declared as part of a National Park in terms of NEM: PAA. The landowner retains ownership of their property but commits the property to formal conservation and co-manages the property with SANParks. In return, the landowner may derive financial benefits, such as income tax deductions and municipal property rate exclusions. The property may similarly qualify as nature reserve or protected environment status. Discussions in this regard can be held with CapeNature. Should the landowner not wish to opt into a protected area, other stewardship mechanisms are possible. These may take the form of: (1) a conservation servitude registered against the	Stewardship – the landowner is currently not proposing entering into any form of formal stewardship arrangement with SANParks or CapeNature. The property is completely transformed through historic activities (infilling, excavation and gardens) and does not meet any of the biodiversity requirements for a stewardship agreement. The area will be retained as an agricultural I zoning and there is no application for rezoning a "spot zone open space III or IV) on the property. Alien clearing will continue on the property and all gardens will be maintained. There are no remaining natural areas on the property that would warrant it becoming zoned for any form of protection status. It is possible that ongoing research in the man-made tidal inlet as a "nursery area for estuarine organisms" will continue.

undeveloped portion of the land in favor of SANParks, CapeNature or a conservation organisation; or (2) a biodiversity agreement with SANParks, CapeNature or a conservation organisation for the management of the undeveloped portion of the land. Both options involve a legally binding conservation management plan (CMP). It is further recommended that all stewardship options are accompanied by the spot zoning of the undeveloped land as "Open Space III or IV".	

Table 1 - Biodiversity stewardship categories

Increasing biodiversity importance
Increasing support from conservation authority
Increasing commitment to conservation

TYPE OF AGREEMENT	LEGAL MECHANISM	DESCRIPTION
BIODIVERSITY STEWARDSHIP CATEGORY 1: PROTECTED AREAS		
Nature Reserve or National Park	National Environmental Management: Protected Areas Act (Act 57 of 2003)	• Suitable for sites with highest biodiversity importance • Binding on property: declaration of Nature Reserve, and a title deed restriction • Binding on landowner: contract with landowner usually for 99 years/in perpetuity** • Considered to be part of South Africa's protected area estate, and contributes to meeting protected area targets
Protected Environment	National Environmental Management: Protected Areas Act (Act 57 of 2003)	• Suitable for declaration over multiple properties • Less restrictive land use than Nature Reserve or National Park • Binding on property: declaration of Protected Environment. Optional title deed restriction. • Binding on landowner • Considered to be part of South Africa's protected area estate, and contributes to meeting protected area targets
BIODIVERSITY STEWARDSHIP CATEGORY 2: CONSERVATION AREAS		
Biodiversity Management Agreement	National Environmental Management: Biodiversity Act (Act 10 of 2004)	• Less restrictive than protected area declaration • Must have a Biodiversity Management Plan (in terms of Biodiversity Act) on all/part of the property • Binding on landowner: contract with landowner for a minimum of 5 years, or longer in 5 year increments
Biodiversity Agreement	Contract law	• Less restrictive than protected area declaration • Binding on landowner: contract with landowner for a minimum of 5 years or longer
Conservation Servitude	Property	• Less restrictive than protected area declaration • Binding on landowner: notarial deed registered at the Deeds Registry for a minimum of 99 years or in perpetuity • Binding on successor in title • Provides management conditions particular to the area in question
Business, Industry and Biodiversity initiatives		**Examples:** • Conservation Champions Programme • Water Stewards • Sustainable Farming
Conservation agreements		• Offers direct incentives for conservation through a negotiated benefit package in return for conservation actions by communities. • Signed for a 3-year duration (with the option for renewal)
BIODIVERSITY STEWARDSHIP CATEGORY 3: PARTNERSHIP AREAS		
This is an informal category of biodiversity stewardship which involves a registration of a site within this category by the provincial conservation authority or conservation NGO. • No legal certainty, duration and intent • Involves collective action by landowners or communities • Biodiversity conservation management benefits without formal agreements or accountability • Registration of mechanisms is advised		**Examples of such include (but are not limited to):** • Conservancies • Buffer Zones and Transition Zones of Biosphere Reserves • Sites of Conservation Significance • Community conservation areas

** Eligibility for tax incentives requires a minimum of a 99 year or in perpetuity title deed restrictions

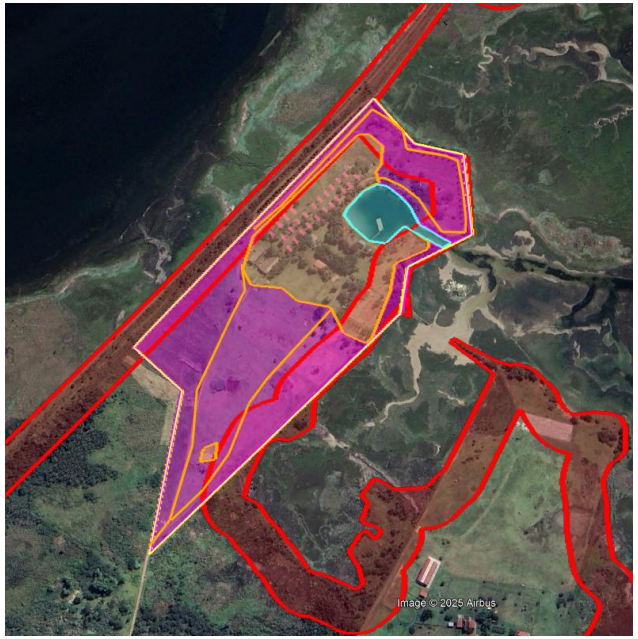
Fig. 24. Biodiversity stewardship categories, as extracted from Pg.3 SANBI 2018 Stewardship Guideline[3].

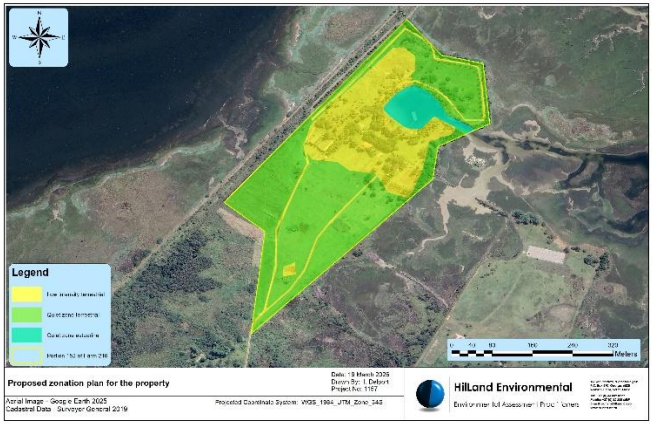
[3]SANBI. 2018. Biodiversity Stewardship Guideline. A guideline produced for the Department of Environment, Forestry and Fisheries. Developed by Wilson, N., Kershaw, P., Marnewick, D. and Purnell, A.

These mechanisms ensure that the conservation status of the property is transferred to any new landowner on the sale of a property.

It is uncertain whether this recommendation is a legal prerequisite to construction?

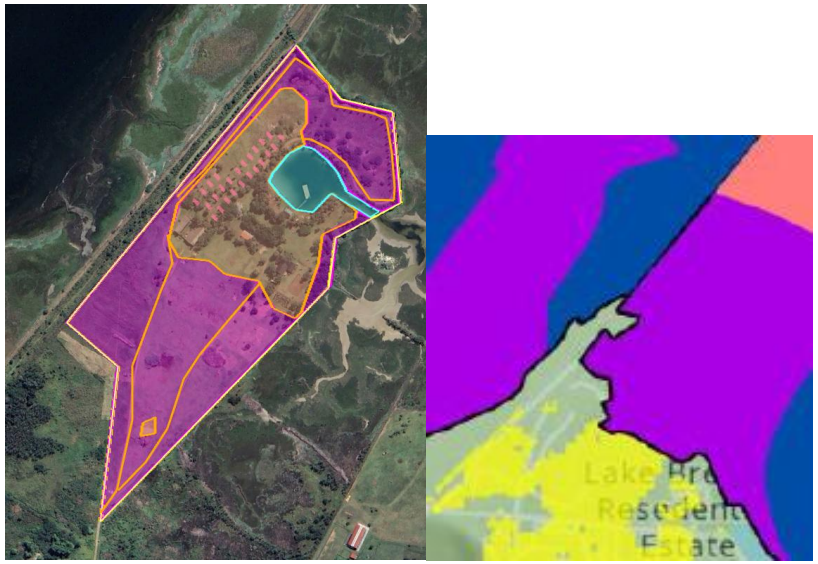
It is recommended that formal or informal biodiversity stewardship actions be progressed to a binding status, prior to any construction activities being permitted to take place on the property.	
Point 2: SDP & Zoning	
SANParks will support a total of 15 camping sites, i.e., accommodating 30 people, with seasonal occupations. These would comprise of 10 permanent camping sites on the north-western side of the property serviced with an ablution block; and five decked camping sites on the grassed area on the north-western bank of the man-made dredged estuary inlet area. The five-decked camping sites must, however, be self-sustaining and non-serviced. They should each have their own stand-alone compost toilet and should not be connected to sewerage infrastructure.	The alternative of 15 camp sites proposed by SANParks where the 5 on decks are non-serviced and self-sustaining, using compositing toilets, while the 10 other sites share an ablution is not a feasible or viable alternative to the landowner. There is no explanation or reason provided for the change in number. The owner has done his feasibility calculations with the various changes already considered as alternatives. 25 more exclusive camping sites are necessary to make the project viable. It is assumed that the SANParks concern relates to sewage treatment and as such the proposal has been amended to have each camp site on a raised deck, with a small bathroom and a sealed water and sewage treatment proposal. This allows the entire property to become self-sustaining with recycled water being used to flush toilets.
The ablution facility next to the man-made dredged estuary area is not supported.	The ablution facility is an existing building next to the lapa and not part of this application.
Positioning of any buildings/ infrastructure within 50m from the estuary waterbody requires careful consideration.	The SDP has been adjusted to ensure that the KPE DCA is completely avoided. There are no new structures or activities proposed within he DCA lines as contained in the Estuary Management Plan (see lines as supplied by SANParks) – please note that the SANParks Estuary Management Plan specifically excludes the small man-made tidal inlet.
Ideally a protective buffer zone should be applied.	The 50m DCA as mapped by SANParks in the Estuary MP is respected and there is a buffer set around the man-made tidal inlet of approximately 15 m
It is suggested that sections of Portion 152 are demarcated for appropriate use zones. For example, SANPark zonation types, as described in the GRNP Management Plan (GRNP MP) could be applied. A '*High Intensity Leisure*' Zone may be applicable to the main camp site area, and support buildings, whilst a '*Low intensity Leisure*' Zone may apply to the main dwelling/ farm managers dwelling/ workshops. Essentially these two zones could form the central core of the property, where disturbance has occurred. The remaining perimeter areas of the property, i.e., the north-east-west portion on the northern side of the man-made estuary inlet area, and the eastern site boundary adjoining the undisturbed/ vacant Portion 90 Uitzicht 216 could be demarcated as '*Primitive*'. This would assist with transitioning to the adjacent, '*Quiet*' estuary zone, which has an objective to, "*provide non-motorised medium to high volume visitor access to areas whilst limiting impacts by not providing both infrastructure for motorised access and accommodation facilities*". The objective of the '*Primitive*' zone is, "*to protect sensitive environments from development impacts by limiting the size, number and sophistication of infrastructure, and by reducing tourism pressure through controlled access and visitor numbers'*.	A zonation map has been prepared as indicated. • **High intensity leisure zone** – camp site and support buildings and infrastructure – this would be the 25 camp sites and the associated infrastructure. • **Low intensity leisure zone** – main dwelling, managers dwelling, gardens and workshop • **Primitive zone** – rest of the property including the man-made tidal inlet where sensitive environments are protected from development impacts by limiting the size, number and sophistication of infrastructure, and reducing tourism pressure through controlled access and visitor numbers (visitor numbers limited to the small camping facility). • **Quiet zone** - Neighbouring SANParks area as per the Estuary Management Plan. where **non-motorised <u>medium to high volume visitor access to areas</u> whilst limiting impacts by not providing both infrastructure for motorise access and accommodation facilities** – this will allow no-motorised access to the GRNP based on the current public access requirements – walking, canoe etc.

SANParks further recommends that all '*Primitive*' areas be rehabilitated/ restored via guidance of a property conservation management plan. These areas, although infilled/reclaimed, have the potential for rehabilitation and would enhance the nature-based tourism offerings of the proposed development application. The current development proposal states that the property's municipal zoning will remain as Agriculture I. It is recommended that the property rather be rezoned to Open Space III or IV for the undeveloped land.	The rest of the farm is currently being restored through alien clearing. It is not certain what "nature-based tourism" other than walking in the fields and canoeing on the water could be achieved in these areas, but they do provide a sense of open space and access to the GRNP Quiet zone. There is no rezoning application associated with this proposal. Should that be a condition of the approval in terms of town planning – that would have to be undertaken. The zoning map for Quiet zone terrestrial, low intensity use terrestrial and estuarine as per the SANParks guideline would be as follows:  Zonation plan as included in the revised Draft BAR:

	
Point 3: Operational Aspects SANParks seeks evidence on whether the houseboats/ pontoons x2 have been registered with the South African Maritime Safety Authority (SAMSA) and if a boat permit has been issued by SANParks. It is unclear whether these structures may be classified as a 'Houseboat', 'Pontoon' or, as a 'Floating Jetty'. It is noted that no boats are moored to the floating structures, and no mooring is planned.	The pontoon/houseboat is a licenced vessel with SANParks as required. see attached registration, Appendix O of the BAR.
Should structures be deemed a 'Floating Jetty', Listing Notice 1, Activity 17 (v) (a), among other of the EIA Regulations (2014 as amended) of the National Environmental Management Act (Act 107 of 1998, as amended) may be applicable, and would need to specifically be included in the EIA application. Confirmation from the Competent Authority should be sought.	There is no mooring proposed or planned
Any usage of the houseboats/ pontoons/ floating jetties would need to be aligned with the adjacent SANParks 'Quite' zonation. Use of these as a floating restaurant/bar for public use is not supported by SANParks. Clarity is required on how sewage will be managed emanating from structure users.	The pontoon is a vessel is registered as such and not a floating jetty in terms of NEMA. See App O.
The application refers to two concrete strips in the 'lagoon' as a slipway. It should be noted that this is not a registered formal slipway and has not been recorded in the GRNP MP, which is a legal requirement. Any formalization of this would be for SANParks approval and may further trigger a listed activity in terms of the NEMA EIA Regulations 2014 as amended.	The use is aligned with the adjacent Quiet zone – non-motorised There is no sewage emanating from the structure. Its use is private. Existing site toilets are used on the property The slipway and jetty are evident in the aerial photos since the creation of the man-made tidal inlet which pre-dates any NEMA listed activities. The GRNP MP does not recognise the man-made tidal inlet as part of the estuary. It falls outside of the KPE DCA.
All other SANParks estuary user licensing requirements must be complied with.	The SANParks estuary user licensing requirements have all been met.

Point 4: Sewerage Infrastructure SANParks does not support the temporary/ Phase 1 approach of using a conservancy tank that must be emptied by a honeysucker truck by the Knysna Municipality, nor the proposed greywater irrigation on elevated fill. A further concern is the proposed ablution block next to the man-made dredged estuary inlet area, which is not supported. Septic tanks are neither supported Risks of nutrient seepage, and eutrophication are likely. The high-water table will reduce the natural filtering capacity of the soil. In addition, the proposed conservancy tank, pipelines and future treatment plant heighten long-term risks of system failure and pollution of the estuary. The development should aim to be sustainable, and long-term sewerage solutions should be finalised and presented to SANParks for approval. Sewerage solutions should design for peak season camp site users, as well as for any anticipated day visitors, numbers of these are to be stipulated. Designs must consider the high-water table, salinity, wear and tear on infrastructure due to wet saline conditions, and climate change risks. SANParks encourages that Section 4 risk management measures applicable for new infrastructure seaward of the CML and existing infrastructure in areas at risk to dynamic coastal process be applied, as per the Coastal Management Line for the Garden Route National Park notice (GNR. No. 3668, 14 July 2023).	The sewage alternative has been amended to be a fully integrated package plant solution which allows for the recycling of all the treated effluent to reuse for flushing toilets. Water will be treated to general standards and once a WUL is issued any surplus water after recycling, will be used for irrigation. Such wate will be free of nutrients which could result in eutrophication. The toilet near the lapa is not part of the application – it is an existing structure. The proposed deck tents will all be linked to a waterborne sewage system making use of recycled treated effluent for flushing toilets. The system has been designed for full occupancy and to take the site specific conditions into account.
Point 5: Summary and Way Forward 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.	Alternative noted – however the option has been considered and rejected by the applicant as there is no justification or motivation linked to the suggestion. The servicing and sewage suggestions make no sense and are not practical or possible to implement without risking pollution to the environment. The camping numbers do not comply with similar camp sites within the GRNP itself and there is absolutely no justification for the limited numbers proposed. The alternative suggested is not viable commercially nor feasible to manage or operate.
Final SANParks support, and a KPE Authorisation letter will however only be issued once the following issues are addressed and with the following approval conditions: 1. A long-term sustainable sewerage solution must be finalised and presented to SANParks for approval. SANParks does not support the temporary/ Phase 1 approach of using a conservancy tank, nor the proposed greywater irrigation on elevated fill. The ablution facility next to the man-made dredged out estuary area is not supported. The five-decked camping sites must be self-sustaining with compost toilets and must be non-serviced.	Noted – the sewage alternative has been amended to be a fully integrated package plant solution which allows for the recycling of all the treated effluent to reuse for flushing toilets. Water will be treated to general standards and once a WUL is issued any surplus water after recycling, will be used for irrigation. The toilet near the lapa is not part of the application – it is an existing structure. The proposed deck tents will all be linked to a waterborne sewage system making use of recycled treated effluent for flushing toilets. Composting toilets are not an option – especially not as "non-serviced" toilets. The level of servicing required for a composting toilet at this location, where they will

	need to be serviced after each use, will result in pollution to the surrounding system as there will be no manner of treatment of the sewage waste taken out of the composting toilet.
2. Positioning of any buildings/ infrastructure within 50m from the estuary waterbody requires careful consideration. Ideally a protective buffer zone should be applied.	The SDP has allowed for no structures or infrastructure within the 50m Development Control Area as mapped in the Estuary management plan. Positioning of decks within 50m of the waterbody as raised structures with careful consideration to the services has been taken into account.
3. SANParks encourages that Section 4 risk management measures applicable for new infrastructure seaward of the CML and existing infrastructure in areas at risk to dynamic coastal process be applied, as per the Coastal Management Line for the Garden Route National Park notice (GNR. No. 3668, 14 July 2023).	Raising all the tents onto a wooden deck in terms of risk management and making use of tents which are temporary in nature to avoid risk has been applied. The services have been designed to take risk into account with a sealed system and double bunding to ensure no pollution risk in the event of leakage.
4. The landowner should commit the remaining portion of the property to a biodiversity conservation stewardship mechanism, which could comprise several options: 4.1 SANParks CNP NEM:PAA declared property. 4.2 CapeNature nature reserve or protected environment. 4.3 Conservation servitude registered against the undeveloped portion of the land in favor of SANParks, CapeNature or a conservation organisation. 4.4 Biodiversity agreement with SANParks, CapeNature or a conservation organisation for the management of the undeveloped portion of the land. Options (3.3) and (3.4) involve a legally binding conservation management plan. It is further recommended that all stewardship options are accompanied by the spot zoning of the undeveloped land as "Open Space III or IV". These mechanisms ensure that the conservation status of the property is transferred to any new owner on the sale of a property. It is recommended that formal or informal biodiversity stewardship actions be progressed to a binding status, prior to any construction activities being permitted to take place on the property.	At this stage the property is a completely transformed garden which has a proximity to the GRNP but does not have any of the biodiversity informants necessary for a conservation agreement motivation. The zoning is Agricultural and the use proposed is a consent use in terms of Agriculture. No rezoning is proposed. When an option for some form of conservation agreement is possible on land that does not have biodiversity value is available, the owner may consider this. The proposal is that the EMPr and Alien Control Plan cover the use of the undeveloped portions of the land and over time they may be rehabilitated to the point of having biodiversity value. The EMPr will be binding on the owner as is the ACP.
5. Voluntary SANParks zonation types could be applied to the property, i.e., a 'High Intensity Leisure' Zone for the main camp site area, and support buildings; 'Low intensity Leisure' Zone for the main dwelling/ farm managers dwelling/ workshops; and for the remaining outlying areas of the property, a 'Primitive' zonation could apply. This would not only assist with conservation management of the property, and integration into the adjoining GRNP, but could alleviate different user conflicts that may arise. This could be stated in a CMP.	A suggested zonation map has been defined for the property making use of the SANParks zones. These will be used in the EMPr for ongoing management. **Left** - Potential zonation use map for the property. Orange = low intensity terrestrial, Purple = quiet zone terrestrial, Blue = quiet zone estuarine

	 Right – existing surrounding estuarine zonation is Purple= quiet, Blue = low intensity estuarine, Pink = high intensity estuarine
6. SANParks recommends that all designated 'Primitive' areas be rehabilitated/ restored via guidance from a CMP.	There are no areas on the property that qualify in terms of the "primitive zone" as they are no untransformed biodiversity areas on the property.
7. It is recommended that the property be rezoned from Agriculture I to Open Space III or IV for undeveloped land.	There is no proposal to rezone the property as camping is a consent use in terms of the Agricultural zone.
8. SANParks seeks clarity on whether the houseboats/ pontoons x2 have been registered with SAMSA and if a boat permit has been issued by SANParks. It is unclear whether these structures may be classified as 'Houseboat', 'Pontoon' or, as a 'Floating Jetty'. Confirmation from the Competent Authority should be sought.	The pontoon is registered with SANParks and as been since 2023 when it was built See appendix O The jetty has been in existence since the manmade tidal pond was created which pre-dates any NEMA and ECA legislation.
9. Any usage of the houseboats/ pontoons/ floating jetties would need to be aligned with the adjacent SANParks 'Quite' zonation type. Use of these as a floating restaurant/bar for public use is not supported by SANParks. Clarity is required on how sewage will be managed emanating from structure users.	The pontoon is registered with SANParks and is a non-motorised vessel. Use of the pontoon is private. The existing toilets on the property are used.
10. The application refers to two concrete strips in the 'lagoon' as a slipway. It should be noted that this is not a formal slipway and has not been recorded in the GRNP MP, which is a legal requirement. Any formalization of this would be for SANParks approval and may further trigger a listed activity in terms of the NEMA EIA Regulations 2014, as amended.	The slipway into the manmade tidal pond have been in existence since the pond was excavated predating NEMA legislation. The manmade tidal pond is not reflected in the GRNP MP – it is mapped as falling outside of the Estuary MP area as it is on private land.
11. All other SANParks estuary user licensing requirements would need to be complied with.	Noted and this will be included in any use of the GRNP by guests according to the Estuary MP.

12. Compliance is required with the GRNP Management Plan 2020-2029, and the Knysna Estuary Management Plan 2025-2029.	Noted and agreed.
13. Measures to mitigate visual impact as suggested by VRM Africa, Mr. S. Stead, should be implemented.	These have all been included.
14. Any proposed fencing must be to SANParks approval. Fencing must not inhibit wildlife movement.	Noted and agreed.
15. The EMPr, HilLand Environmental, 7 November 2025 must be implemented.	Noted and agreed – the EMPr has been updated.
16. A suitably qualified Environmental Control Officer (ECO) must be appointed to monitor the EMPr.	Noted and agreed – included in the EMPr
17. The Invasive Alien Plant Control Plan, HilLand Environmental, 6 June 2022, must be adhered to.	Noted and agreed – the ACP has been implemented and is being continually maintained.
18. Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. The owner should join the local Fire Protection Association, if not already a member.	Noted and agreed – the owner is an active member of the FPA.
19. A permit from the Department of Forestry, Fisheries & the Environment (DFFE) must be attained should any protected tree species be disturbed on the property, as per the National Forests Act, 84 of 1998, as amended.	Noted – should this be necessary a licence will be applied for. No proposed disturbance to protected trees.
20. Should any resources of suspected heritage value be uncovered during clearing, Heritage Western Cape (HWC) must be contacted immediately for instructions.	Noted and included in the EMPr
21. Should coastal erosion stabilisation structures be required to safeguard any buildings/ infrastructure now or in the future, the landowner's attention is drawn to Section 15 of NEM: ICMA, which states: (1) No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or such other coastal public property, or of land adjacent to coastal public property, unless the erosion is caused by an intentional act or omission of that organ of state or other person; and (2) No person may construct, maintain, or extend any structure, or take other measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided for in this Act, the National Environmental Management Act, or any other specific environmental management Act.	Noted and agreed – no such structures planned and any maintenance to existing structures will be on a like for like basis unless otherwise authorised.
22. Parts of Uitzicht 216, Portion 152 (including the man-made estuary inlet area) that are submerged by coastal waters could be deemed Coastal Public Property (CPP), which is held in trust by the State for the benefit of all South Africans.	Noted – however, the manmade tidal pond is on private land which does not form part of the CPP. The area has been specifically excluded from the Estuary MP.
SANParks is responsible for the Proper Administration of the Knysna Protected Environment (KPE) (GN 1175 of 2009) Regulations, and for the authorisation of any development (as defined in the Regulations) in the DCA, as per Section 8. The KPE DCA extends 50m from the high-water mark into Portion 152, and as such SANParks' authorisation is required for development to proceed in these DCAs. SANParks comments are based on the information pack, emailed by HilLand Environmental, 18 October 2024. SANParks reserves the right to revise initial comments if additional information becomes available.	Noted – the Development Control Area has been indicated on all the maps for the property as obtained from SANParks and as reflected in the Estuary MP. There are no structures or infrastructure proposed within the DCA.

L Herwels, Garden Route District Municipality, 2 December 2025	
The office subjected to the following conditions has no objection to the proposed activity.	
- Ensure that no Municipal Health Nuisance occurs during the development of the camping site	Noted – all health issues will be addressed.
- Standby generator to be position and operated without causing a Nuisance	Noted – if required, a standby generator will be operated without causing a nuisance.
- The water tanks and 'damsak' filled by rainwater to be marked as non-potable if not treated to comply with SANS 241: 2015 Specifications for Drinking Water.	Adequate signage on tanks will be used for potable and non-drinking water.
- The grey water used for irrigation – This office recommends that the water be used for irrigation outside of the area allocated for camping purposes where the resident cannot have contact with the grey water. And furthermore, ensure that the greywater is not disposing into the Knysna Estuary.	Noted – the irrigation use of treated effluent is subject to a WUL from BOCMA and once approved the irrigation area is located away from the camping area. No greywater disposal proposed.
- The owner of the two planned food premises on the site must ensure that the food premises have a valid Certificate of Acceptability in terms of Regulation 638 of 2018 as promulgated under Foodstuffs, Cosmetics and Disinfectant Act 1972 (Act 25 of 1972)	Noted – the owner will comply.
- All waste to be safely stored and secured that the area is animal proof. All waste to be disposed AT AN APPROVED SITE WITHOUT CAUSING A Municipal Health Nuisance. Recycling should be encouraged as far as possible.	Noted – the owner will comply.
- The area around the conservancy tank be banded to ensure all spillages can be contained and treated.	Bunding is proposed around all tanks – the conservancy tank has been replaced with a site package plant.
Comments on the addendum for the provision of water and sanitation The Municipal Health Section take note that an application for Water Use License has been submitted for a borehole and packaged plant on the premises. Comments subject to the approval of the boreholes and wastewater disposal system - The borehole water to be treated before utilizing the water as potable water to ensure compliance with SANS 241:2015 (Specifications for drinking water). - The Municipal Health Section will comment on the approval of the Water Use license and the conditions of the license, especially on treated effluent be used for irrigation purposes.	Correct – the WUL is in progress. Borehole water will be treated as required. Municipal health will comment on the WUL
The EAP have made mention that the Environmental Management Program will address the irrigation as part of the impact management. We hereby request that the above recommendations be incorporated into the Environmental management Program.	Noted and included.

NGO COMMENTS

Picca de Bruin, Lake Brenton Resident Association, 8 December 2025	
I, Picca de Bruin owner of Erf 405, Roman Avenue, Brenton-on-Lake, hereby lodge this formal objection of the Knysna Municipality application for "The Camping Site: Portion 152 of Farm Uitzigt No. 216", as notified in your letter dated 07 November 2025. I have fulfilled the role of Wildlife Representative and first responder for the Brenton Ratepayers Ass and Lake Brenton Ratepayers Aas for the past eight years, working closely with the community, veterinarians, and relevant government authorities. While I acknowledge the proposal and BAR prepared by professionals, **I must raise a serious concern: there is no reference to wildlife—including mammals, birds, and reptiles—nor any consideration of the potential impact on established wildlife corridors and local biodiversity.** This omission is a significant oversight and raises major red flags regarding the adequacy of the environmental assessment.	There is no proposal to change any aspects in relation to the wildlife on the property. No additional fencing is proposed and the naturally occurring wildlife are free to continue to roam over the property and make use of the natural corridors. The BAR specifically indicates that due to the wildlife naturally occurring, no pets will be permitted as these would interfere with such wildlife. The specialists have confirmed that there is no risk or impact to wildlife as a result of the proposal. The author refers to all the specialist assessments which form part of the environmental assessment.
Lake Brenton is a CONSERVANCY ***Environmental Conservation Act 73 of 1989:*** *To prevent deterioration of the natural environment, safeguard animal conservation, and protect vulnerable aquatic/estuarine ecosystems.* **National Environmental Management: Biodiversity Act (NEMBA) 10 of 2004**: *This Act provides for the management and conservation of the country's biodiversity, including the protection of species and ecosystems that warrant national protection.* **"All infrastructure required for the tourism camping area is within existing transformed areas, avoiding all sensitive habitats."** Statement made by HilLand Environmental I respectfully contest the assertion that the proposed infrastructure avoids sensitive habitats. Wildlife corridors should be regarded as critical *environmental infrastructure*, shaped not only by human planning but also by the agency of wildlife over generations. These corridors are ecological pathways established through repeated movement by ancestral bushbuck, caracal, bushpig, porcupine, mongoose, snakes and various smaller mammals. As long as populations remain intact, this knowledge is transferred intergenerationally, ensuring continuity of movement patterns. These corridors have existed long before any current development proposals and represent ancestral routes used in response to seasonal availability of resources, breeding requirements and safe transit through the landscape. Fragmentation or disturbance of these corridors would therefore not only impact current wildlife movement, but also disrupt long-standing ecological patterns essential for species survival.	The proposed development is restricted to transformed gardens and avoids all sensitive habitats. There is no change to any wildlife corridors. Wildlife is free to continue to roam through the gardens as they have done for years and will continue to do for years. Brenton-on-Lake is a great example of a "peaceful co-existence" between the free roaming wildlife and the human residential population. 25 campers are not going to change this behaviour of the wildlife in the area that freely walk between all the homes in Brenton-on-Lake. The camping within the existing gardens takes over less than 1ha of the 11.29ha property.
How Tourism Development Can Negatively Impact Wildlife Corridors • **Habitat fragmentation and loss:** The development of accommodation and associated infrastructure—including roads and access points—creates physical barriers, restricts movement areas, and increases stress on wildlife. Clearing of undergrowth,	There is no change to the existing gardens within which the camping will be created. Additional landscaping is proposed which will increase the "shelter". Only alien vegetation has been cleared which is a legal requirement. There is no proposal to remove any indigenous trees.

thicket, vegetation, and trees further removes essential cover used by animals for shelter and breeding, leading to significant habitat degradation.	There is no natural habitat affected by the proposal – it is all within the existing garden. Tracks are all existing – no change proposed.
• **Disruption of natural behaviour:** Wildlife tourism and general human activity may alter animal behaviour, particularly during breeding seasons. Close proximity to tents and units may lead to separation of mothers and young. The area on the applicant's farm is known to be used as a nursery site for bushbuck.	There is no difference between the residential homes in Brenton-on-Lake and the wildlife behaviour within the urban area and the behaviour within the gardens in which the tents will be located. Planting indigenous vegetation will increase the habitat available to animals on site. The local bushbuck population breeds within the whole area, not exclusively within the applicants front garden.
• **Increased human–wildlife conflict:** An increase in human activity substantially heightens the risk of zoonotic disease transmission. Lake Brenton Conservancy previously supported a thriving rabbit population which, although not indigenous, played a significant role in the local food chain. In June 2023, Rabbit Haemorrhagic Disease (RHD) was detected following carcass samples submitted to the State Veterinarian in compliance with protocol. The entire population was wiped out. Testing confirmed the presence of the virus, which is believed to have been introduced from the Karoo region. Furthermore, heightened traffic volumes increase the likelihood of wildlife–vehicle collisions. Wildlife in this area has no road-sense, and impacts often result in severe injuries such as fractures. Injured animals are tracked until veterinary assistance is available, but this process can take one to two days depending on coordination efforts. Wildlife may also wander into camping or tourism areas in search of food or due to habitat disturbance. Such encounters could lead to animals being viewed as a nuisance or danger, increasing the risk of retaliatory actions against them. During rutting season, wildlife—particularly rams—are highly vulnerable, with regular reports of serious injuries and fatalities. While local residents are generally aware of this behavioural pattern and take precautionary measures, visitors are unlikely to possess this knowledge, thereby increasing risks to both wildlife and public safety.	The rabbit population was invasive to the region and is irrelevant to a small camping site application. Traffic will increase by 25 vehicles during peak occupancy. This is an insignificant change to the traffic through Brenton-on-Lake. The speed limits and signage within Brenton-on-Lake regarding the wildlife needs to be enforced. Wildlife behaviour and rules will be communicated to guests as part of their environmental education awareness.
• **Noise and disturbance:** Continuous human presence, vehicle movement and tourism-related noise can cause stress, leading to avoidance of key habitat areas.	The garden area is not a "key habitat". Rules for camping will ensure that "tourism related noise" is kept to the minimum. The type of guest that will frequent the camp sites is not likely to be making excessive noise as they will be seeking peace and tranquility.
• **Environmental degradation:** Development introduces additional waste, increases water and energy consumption and may disturb soil and vegetation.	These concerns have all been addressed. Recycling and sustainable energy are key to the application. Minimal to no soil or vegetation disturbance will take place as a result of the application.
• **Land pressure ("land grabs"):** Tourism-driven land use in protected or conservation areas may lead to incremental expansion, damaging the Lake Brenton Conservancy through cumulative footprint and access route expansion.	25 camping sites within a garden area are unlikely to lead to incremental expansion. There is no requirement for "access route expansion".
• **Behavioural disruption from tourism:** Feeding or close interaction with wildlife alters natural behaviour patterns and social dynamics. Disturbances at critical life stages (mating, nurturing) significantly reduce breeding success.	The rule "no feeding of wildlife" is standard practice and will be enforced.
• **Financial gain in rezoning:** Although a development application for rezoning may be presented by the current owner in a favourable manner, there is no guarantee that the property will not later be sold to a developer who deviates from the approved plans for financial gain. The current owner purchased the property under its existing	There is no proposal to rezone or change from the current Agricultural zoning. Camping is a consent use in terms of Agriculture. The Environmental and Planning regulations govern any future land use changes.

agricultural zoning, fully aware of the permitted land uses and the sensitivity of the surrounding environment.	
Biodiversity Considerations Biodiversity is foundational to ecosystem functioning. The proposed development threatens: • Sensitive habitats • Movement ecology of multiple species • Soil stability and vegetation integrity • Wetland-associated species and marshland functionality Loss of biodiversity directly undermines ecological resilience and long-term sustainability.	The specialist has confirmed the following : There is no impact to sensitive habitats or changes to "movement ecology of multiple species". There is no change to the soil stability or vegetation integrity. And there is no change to wetland associated species and marshland functionality. The development is within an existing garden area which is transformed. There is no "loss of biodiversity" associated with the application.
Additional Concerns **Key Environmental and Management Concerns:** • **Oversight in Environmental Assessment:** The current environmental assessment fails to consider mammals, birdlife, and reptiles, leaving significant gaps in understanding the ecological impacts.	The terrestrial biodiversity specialist has covered the impacts to mammals, birdlife, reptiles and ecological impacts. The site is a transformed garden area where there will be minimal to no change through the introduction of 25 camping sites in the garden.
• **Rezoning and Land Use Changes:** The applicant's development intentions remain unclear, including the total number of beds (cots and bunk beds) and expected visitor numbers during peak season.	The application is clear – there will be 25 camping sites. The application has been amended to be for 25 small raised wooden decks which will support a tent with fixed accommodation. Peak season full occupancy is likely to have 50 persons making use of the facility.
• **Destruction of Wildlife Habitats:** The presence of more than 100 visitors on the estuary can cause severe habitat degradation. Activities such as children playing, digging, fishing without permits, and canoeing lead to soil compaction and permanent damage over a short period. • **Inadequate Incentives for Conservation:** There are no clear measures or benefits in place to promote conservation of local biodiversity.	Visitors visit the Knysna Estuary and are controlled through the SANParks rules and regulations. 25 camping sites with non-motorised access to the water falls within the use requirements of the "quiet zone" of the Estuary Management Plan. The benefits to conservation of local biodiversity are already being realised on the property through the extensive alien clearing programme that has been followed and the removal of years of accumulated dumped material on the property.
• **Lack of Local Partnership:** Protected area management does not involve local stakeholders, which is critical for sustainable outcomes.	The area falls within the Knysna Protected Environment. Not certain what involvement or critical sustainable outcomes are being expected. The property will have sound environmental management practices. Local stakeholders are more than welcome to get involved.
• **Absence of Management Plans:** There is no clear management plan detailing how the site will be monitored and maintained.	There is an EMPr in place for the property and an existing Alien Control Plan that is being implemented. These are clear and detailed monitoring and maintenance. Refer to Appendix G.
• **Need for Assessment of Management Effectiveness:** Without ongoing monitoring, it will be impossible to evaluate whether conservation objectives are being met.	Monitoring is included in the EMPr and will be a condition of approval.
• **Human–Wildlife Conflict and Compensation:** There are insufficient mechanisms to mitigate conflicts between wildlife and visitors or to compensate for wildlife losses.	It is unclear what mechanisms to mitigate the current conflicts between wildlife, and the Brenton-on-Lake residents are compensating for "wildlife losses". The proposed camping site will have rules in place for guests, and they will be expected to follow the

	rules or they will be requested to vacate the premises. It would be the same for any guest visiting the area.
• **Pollution:** Increased human activity poses risks of soil, water, and general environmental pollution.	Pollution controls will be in place in terms of the operational management of the facility.
• **Fire Risk:** The development increases the likelihood of fire, particularly during dry seasons.	It is unclear how this assumed conclusion has been reached. The property is a member of the FPA and is managing the property accordingly. Through the development there will be additional fire fighting capacity on the property, not less.
• **Noise Pollution:** Tourism activities may disrupt wildlife and degrade the natural environment.	It is unclear how tourism activities differ from the local resident's activities. A quiet camp site is unlikely to disrupt or degrade the very environment that they are visiting to enjoy its peace and tranquility.
In Conclusion Environmental infrastructure such as wildlife corridors cannot simply be excluded from impact consideration on the basis that construction occurs within "transformed areas." These corridors are living ecological systems, evolving over generations and essential to biodiversity preservation. I strongly recommend that: • A specialist wildlife corridor impact assessment be carried out • A full ecological and behavioural study be commissioned • Seasonal and breeding cycles be integrated into development planning • Long-term management and monitoring obligations be mandated before consideration of approval Protection of these corridors is crucial not only for current wildlife populations but for the preservation of ancestral ecological knowledge and sustainable coexistence between humans and wildlife. Protect Lake Brenton as a Conservancy!	The ecological corridors remain across the property within excess of 95% remaining undisturbed. The biodiversity specialists have assessed the site. There will be no changes to the corridors – they will continue to function as they currently do.
Suggestion: Given the applicant's background in rose farming, may I propose an alternative that would complement both the surroundings and his expertise? A small nursery combined with a daytime coffee shop or pizza café (operating between 8:00 and 17:00) could provide a sustainable, low-impact business model that aligns with the area's environmental sensitivity while still offering economic opportunity.	A nursery would result in disturbance of soil, additional traffic, and the need for fencing to keep wildlife out of the nursery areas which would result in disruption of the ecological corridors and animal behaviours. Such an activity would require environmental authorisation and would need to go through a NEMA Environmental Assessment process. Such an alternative is beyond the scope of this assessment.
Johan Labuschagne, Western Heads Goukamma Conservancy, 8 December 2025	
The following are comments and objections pertaining the DBAR Uitzicht 152 of Farm 216 as submitted by HilLand Environmental on 7 November 2025 **<u>Background</u>** The Western Heads Goukamma Conservancy, hereafter referred to as the, "WHGC" is supported by a Table Mountain Fund (TMF) project, specifically towards strengthening one of the WHGC's mandates for the conservation and restoration of the Knysna Sand Fynbos (KSF). The WHGC covers the area from the western bank of the Knysna Estuary to the eastern bank of the Goukamma Estuary, and from the beach (high water mark) inland to the N2	Background noted –

national highway (more at https://westernheadsgoukamma.co.za/)	
Portion 152 is situated within an exceptionally sensitive biodiversity area, with large portions of the property and adjoining properties classified as CBA or Protected Area (PA). This property falls in □ the Buffer Zone of the Garden Route National Park (GRNP), □ the Estuarine Functional Zone (EFZ), □ the Coastal Protection Zone (CPZ) as per Integrated Coastal Management Act 24 of 2008 □ Knysna Protected Environment (KPE) as per Regulations 2009 Gaz 23797 □ Fall outside of the urban edge Other specific aspects for consideration in evaluating the proposal: □ The property originally consisted of very valuable wetland & estuarine area has been infilledwith foreign material (pre 1998) to create an "island". The property is therefore surrounded by sensitive estuarine wetland and estuary habitat that will be directly affected by activities on the said property. □ Dredged/ man-made area called "Private Lagoon" was constructed in the 1980's. A drenched channel creates an artificial connection to the Knysna Lagoon (Quiet Zone) □ Property bordering sensitive estuarine wetlands of the Knysna Estuary (GRNP) with specific classification of a "Quiet Zone" □ The property is located below the 5m contour line with some sections that are submerged by coastal waters that could be deemed Coastal Public Property (CPP) □ The property has a substantial number of existing (historic) building infrastructure that already far exceed current regulatory allowances for such a sensitive area. o This includes a houseboat, barge and pontoon moored in the lagoon □ The property is Zoned as Agricultural with title deed restrictions pertaining tourism use □ The proposal is in direct conflict with the Western Cape Biodiversity Spatial Plan (WCBSP) and Western Cape Land Use Planning Guidelines Rural Areas (WCLUPGRA). □ The property is in the estuary basin at the foot of the Knysna Western Heads and therefore highly visible and hearable from many vantage points surrounding the Knysna Estuary □ The Adjacent property Portion 192 (DFFE REF: 14/12/16/3/3/1/3218) propose also a tourist development with 7 cabins □ Specific guidance from the expert studies as part of the DBAR for adjacent Portion pointing out highly sensitive Wetland and habitat that border the access road to the proposed campsite. □ Lake Brenton neighbourhood critical unresolved sewage challenge reference DFFE EA - 14-12-16-3-3-1-3000 □ Aquatic Biodiversity specific to the Dredged/ man-made channel and artificial pond o In the channel, the presence of the Endangered eelgrass (*Zostera capensis*) that is important for the Knysna Seahorse (*Hippocampus capensis*).	There are no adjoining CBA areas as the entire area falls within the PE of the WCBSP linked to the Knysna Lake Area. Aspects as indicated in the draft BAR report are repeated for clarity and acknowledged.

o In the artificial pond, the presence of the blue stingrays during pupping season (Oct-Nov) The Stingrays are regarded as vulnerable.	
The following specific aspects that are being commented on and objected to: 1. No approval was submitted by the applicant as per Knysna Protected Environment (KPE) regulations. This is a regulatory requirement, and the development cannot be approved without the official Approval from the authority.	An approval cannot be submitted – an application is submitted and SANParks, as part of the NEMA application and any subsequent planning approval or building plans will require SANParks approval where appropriate. The 50m Development Control Area is specifically linked to this comment raised and is addressed in the NEMA BAR report.
2. The proposal is in direct conflict with the principles of Western Cape Biodiversity Spatial Plan (WCBSP) and Western Cape Land Use Planning Guidelines Rural Areas (WCLUPGRA) specific in a CORE 1 (Critical Biodiversity or Protected AREA). a. The proposal of 25 camping sites and related infrastructure exceed consent use limits in respect of the Agricultural Zoning use as the primary intended land use for the property will be tourist accommodation. The proposal would require Rezoning to Resort Zone. b. CORE 1 guidelines: non-consumptive low impact eco-tourism activities, such as recreation and tourism (e.g. hiking trails, bird and game watching, and visitor overnight accommodation); Given the often high visual or aesthetic value of these landscapes, no large-scale eco-tourism developments to be permitted c. The development proposal cannot be argued as small as it includes 25 camping sites (5 permanent), parking area, solar system, ablution block, associated services, access tracks and small convenience store d. There might be even more unknown organic additions over time e.g. the mentioned "small deck area will be added to the existing lapa at the pond"	The property is not CORE 1 as it is privately owned and is not part of the GRNP. The rural guidelines allow for camping in a buffer around the National Park. The 25 camping sites are applied for as a consent use in terms of Agricultural Zone. No rezoning is applied for. The primary intended land use will not be tourist accommodation, the 25 camping sites are located in a small area of the property. Had the applicant continued to pursue the application for 105 camping sites over the entire property – that would have required a rezoning to resort. The proposed consent use complies with the non-consumptive low impact ecotourism which <u>includes overnight visitor accommodation</u> definition as it is only 25 camp sites (compared to the 188 camp sites and 49 self-catering units contained in the Wilderness GRNP PE Ebb & Flow tourist facility inside the National Park). The services proposed for the 25 sites (now all proposed on raised decks) include parking on the existing lawns, no ablution block, underground services, existing access tracks and a small convenience store in an existing structure. The lapa deck is being applied for – it is part of the application – it is not an "unknown organic addition over time".
3. The BAR and associated studies have not considered or provided key information with regards to the potential number of beds/visitors and the potential impact thereof a. The number of visitors is unknown, specific to the permanent structures called "Camping pods" b. The visitors will attempt to access the Estuary via unofficial access points as the closest official access to the Estuary is more than a km away from the campsites.	The camp sites are clearly defined. 25 camp sites – on a raised wooden deck with the "pod" being the bathroom and 2 guests per site. 50 guests as full occupancy. Visitors will not "attempt to access the estuary via unofficial access points" – guests will access the estuary via the existing tidal channel which falls within a designated "quiet zone" where access is recorded as being: "*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 <u>low volume</u> (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 overnighting 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 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."*
4. The National Heritage Resources Act is applicable, as the development will change the character of the site and will be extremely visible from various access and tourism routes (Section 38(1)(c) of the Act). A Notice of Intent to Develop and/or a Heritage Impact Assessment may be required for submission and approval to Heritage Western Cape. The triggers for this requirement are: a. The construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier over 300m in length. (Section 38(1)(a) of the Act) b. A development or activity that will change the character of the site. (Section 38(1)(c) of the Act) i. Exceeding 5,000m² in extent. ii. Involving three or more existing erven or subdivisions thereof. iii. Involving three or more erven or divisions thereof which have been consolidated within the past 5 years	An application, Notice of Intent to Develop (NID), was submitted to HWC in terms of the ACT and HWC have indicated that no future requirements need to be met as indicated in the draft BAR.
5. The information about proposed sewage works and effluent discharge/distribution are high level and concerning in a CBA and proximity to the Estuarine Wetland and tidal river. a. Grey water and Treated wastewater will be discharged into sub-surface soil via an underground soakaway or irrigated on the "grassy lawn". The final effluent will contain bacteria (e.g. E. coli) and very high concentrations of nutrients (nitrogen, phosphorus and potassium). Given the porous nature of the infill that is elevated over the adjacent Estuarine Wetland & relatively high-water table throughout the estuarine zone, combined with sandy soils throughout the site, it is highly likely that release of treated wastewater could contaminate and enrich ground water with bacteria and nutrients, respectively. Nutrient enrichment could potentially lead to enhanced growth of vegetation, thereby altering the vegetation community within the estuarine wetland area. b. Given the sandy soils and high-water table, use of conservancy tanks to temporarily store the final treated effluent is likely to be the most effective means of minimising this impact.	The sewage proposed for the site has been amended to include the package treatment plant on site which will treat effluent to general standard and recycle the treated effluent for flushing toilets. A WUL is being applied for to irrigate with any excess treated effluent. There will be no reliance on or contribution to "the Lake Brenton sewage challenge".

c. The conservancy tank must be routinely inspected and pumped timeously by a licensed sewage disposal operator. d. Lake Brenton neighbourhood has a critical sewage challenge that is not resolved – reference EA - 14-12-16-3-3-1-3000 e. As per BAR; Approximately 8600L/day of sewage could be generated at peak season. This equates to one "honey sucker" truck per day. Lake Brenton also experience peak season at the same time. Currently, Lake Brenton has a serious unresolved sewage challenge during peak season f. It is critical that Confirmation from the Knysna Municipality is obtained that the additional volume can handle.	
6. Water supply to the prosed development is unknown i. Confirmation that the Municipality water supply can accommodate the additional demand ii. WUL might be a challenge considering the location of the site (Wet land) and proximity of the proposed Sewage treatment and effluent location	Water supply proposed through rainwater harvesting, existing municipal supply and future use of ground water, in addition to the recycling of treated effluent for flushing toilets. A WUL for the use of borehole water is in progress with BOCMA.
7. The required rehabilitation potential of the disturbed CBA was not considered even though it is a requirement as per WCBSP a. Clarity is required regarding the proposed tree planting; Is the tree planting in line with the rehabilitation & restoration of this specific CBA?	There is extensive restoration and rehabilitation taking place on the property currently through the systematic removal of alien invasive vegetation. The development is proposed in the existing gardens while the remainder of the property remains unchanged. As indicated by the specialist, the site would originally have been salt marsh, which has been irreversibly transformed historically. Establishment of riparian thicket forest, as occurs along the lagoon edge and which is evident in Brenton-on-Lake, is the appropriate restoration habitat for the area.
8. The visual, noise and loss of tranquillity consideration of the impact on Lake Brenton, neighbours and estuary of the substantial number of visitors/tourists/holidaymakers. a. Consideration must be given to the potential impact on community as they are part of the receiving environment.	The visual impact has been assessed and is supported. Noise and loss of tranquility will be negligible with 25 tents due to the nature of the guest. Guests making use of these facilities will be seeking peace and tranquility. The community, who are neighbours in the receiving environment, have been considered through the changes to the application and design and layout and proposed model to the camping an the location of the camping area so that it is not visible to the community at all.
9. Visual Impact Statement a. There is no mention made of i. the solar facility and the associated visual impact – to be amended. ii. the large roofed over structure on the floating jetty – to be amended. iii. the roofed over water storage bladder – to be amended. b. The Visual Statement refers to new trees to be planted – these should be mapped for future monitoring. c. How can the colour scheme of private tents on the grass (by tourists/campers) be controlled.	The small solar facility is located furthest away from Brenton-on-Lake and will be screened by the existing and future trees within the camping site. The pontoon, with its roof, is a registered vessel on the estuary and is not subject to this application. There is no "roofed over water storage bladder", the water storage bladder is a bladder which will be located in the existing plastic lined depression on the property. New trees will be planted as part of the visual mitigation and screening and forest thicket creation. They will be monitored during implementation. There will be no private tents and no colour scheme issues – the tents, within the trees, will all be erected by the owner operator as per the design.

10. Absence of a Traffic Impact Assessment a. Access Road Assessment and potential upgrading would be required. The planned access of the development is via a single lane dirt road. This section of the road service three residential properties and one farm. The additional traffic on this road would be doubled by the proposed development	The engineers have confirmed that 25 camping sites do not require any upgrades to roads or any impact assessment. The existing tracks on the property will remain as they currently are with the addition of a G5 subbase or grassblocks where necessary and cars will be able to pass each other on the mowed grass next to the track should then meet on the road.
Conclusion Portion 152 of Uitzicht 216 falls outside of the Urban Edge, in a CBA and adjacent to the Knysna Estuary (National Park). Given the high conservation status and ecological importance of the Knysna Estuary (as indicated by NFEPA, the Western Cape Spatial Biodiversity Plan and the desktop eco-classification of estuaries of South Africa), it is important that any development that is proposed be scrutinised and if possible being avoided as per WCSBP. The WHGC main concerns: 1) Underestimating or ignoring the location in which the property is located in evaluating the environmental impact and risk of the proposed human infrastructure and activities. There are a high pollution and ecological disturbance risk affecting the adjacent Estuarine Vegetation & Estuarine Functional Zone. a. The property is located as an "island" within the highly sensitive and protected estuary wetland habitat of the Knysna Estuary. i. Portion 192 on the western border has a classified wetland with protected grass owl as ecological report - BAR for portion 192 - November 2025 ii. Portion 90 on the eastern border has tidal Estuarine Wetland that is in pristine condition. iii. Knysna Estuary on the Northern border is the most important and ecologically sensitive estuaries in South Africa b. High risk of pollution by effluent. i. The property was historically the estuarine area (as per App H) that has been infilled with foreign material of unknown origin ii. Due to the raised and porous platform being created by the infill, the adjacent estuary wetland is the receiving habitat of all effluent that poses a High Risk	 The activity proposed is an activity required to be outside of an urban edge – camping on an agriculturally zoned property is not an urban use. T The property is not in a CBA, but is within the Knysna PE (as is the whole of Knysna and Brenton-on-Lake) and is adjacent to the GRNP. The conservation status and ecological importance of the Knysna Estuary is recognised and as such the application is for a small scale tourism facility that will not impact on this valuable resource. Pollution risks have been evaluated and avoided. Ecological disturbance affecting the adjacent estuarine vegetation and the estuarine functional zone has been taken into account and impacts avoided. The property is a unique property and the uniqueness has been respected in the changes made to the application over time. This area is respected and avoided and over time the habitat of the owl may expand now that the alien vegetation has been removed. The estuarine saltmarshes are completely avoided and will remain as such. The Knysna Estuary (surrounding the property) will remain important and ecologically sensitive and the application respects that status. The pollution risks from the property have been avoided through the changes proposed to the treatment of sewage effluent. Correct and the current landowner has already spent a substantial sum in clearing the property of alien vegetation and in removing dumped foreign material as it is exposed. Resulting in a significant improvement to the property. Effluent treatment and control to prevent any form of pollution is included in the application.

c. Historically a man-made "lagoon and tidal channel" created, link into the highly sensitive Estuary wetland channels of the Knysna Lagoon (Zoned Quiet Area by SANParks)	The historical manmade tidal pond and channel linking to the estuary are acting as an incredibly valuable nursery area for estuarine organisms. This warrants ongoing research.
i. The proposed access for guests via this man-made channel directly into estuary wetland channels in a Quiet area of the Estuary. This proposal carries a very high risk for further ecological disturbance and irreversible damage one of the most important and ecologically sensitive estuaries in South Africa.	The Quiet Zone uses as described in the Estuary Management Plan exceed the proposed use that may arise from the proposed tourism accommodation. Occasional non-motorised vessels making use of the channel will not impact or irreversibly damage the estuary or result in further ecological disturbance. SANParks rules will be strictly complied with.
d. High risk to Estuarine Wetlands with the proposal bordering wetlands as well as large area of protected grass owl and forest buzzard habitats.	The camping sites are not going to have any impact on the bordering wetlands or habitats of the grass owl or forest buzzard. The grass owl habitat is likely to expand due to the removal of alien invasive vegetation and the additional planting of the riparian forest species is likely to provide additional habitat for the forest buzzard over time.
The BAR completely underestimates and ignores the extremely high ecological risk and sensitivity for the receiving surrounding environment.	This has not been ignored or underestimated. The impacts are being avoided and controls being put into place to ensure compliance with the SANParks requirements.
2) Existing infrastructure is already substantial and exceed the guidelines pertaining rural and biodiversity areas. a. Residence; Main building consisting of 3 parts b. Three Outbuildings (3 buildings) – one building used for unofficial coffee shop c. Staff Quarters d. Two Sheds e. Lapa with a deck f. Access roads g. Man-made lagoon with jetty, floating platform & slipway and houseboat.	Existing infrastructure is existing infrastructure approved for a farm in the rural area.
This infrastructure should be sufficient to establish a viable low impact tourist facility.	The applicant is making application for a consent use camping area on the property. Existing infrastructure will be used to support the viable low impact tourist facility.
The WHGC are of strong opinion that the proposed development exceeds the guidelines as set in the Western Cape Biodiversity Spatial Plan 2023 and Western Cape Land Use Planning Guideline – Rural Areas (2019) and therefore poses a high risk for the Protected Environment and will set a dangerous development precedent for neighbouring agricultural properties.	Each application needs to be evaluated on its merits.
3) Severe threat to the undeveloped Western Estuary shore by various Development proposals and applications. The Cumulative Ecological Impact of two adjacent tourism development proposals located in the Estuarine Functional needs to be considered. a. Portion 192 (adjacent to Portion 152) that has entered a public participation for DBAR pertaining an application for tourist facilities. b. Proposal for 7 cabins (28 guests), a residence (possibly used for guest accommodation)	Each application is evaluated on its merits and how it complies with the planning frameworks for the area. The cumulative ecological impact of two adjacent tourism developments will be considered by the authorities. The neighbouring property is proposing rebuilding the primary home which was burnt in the fires and new cabins on their property as guided by their site sensitivity and the camping area has been guided by the sensitivity of the site and concerns raised by neighours who do not want to see the campers. The impact of these activities on the estuarine functional zone have been

	evaluated.
4) Future incremental expansion/deviation of infrastructure, activities and use that exceed the authorization.	
a. There is a real and high risk of incremental expansion of the proposed facilities in the future as the Knysna Municipality rarely act or enforce future incremental growth that deviate from historic approvals.	It is unclear what is being implied here – activities and uses cannot exceed their authorisations and if they do, they will be accountable for such contraventions.
b. The proposed campsite rules are applauded, however, the following are not clear:	
i. Who will ensure that the owner/operator implement, operate and enforce the promised camping rules that make this application viable? SANParks, Municipality, DFFE?	The owner will enforce the camping rules for their facility, just like the rules of use of any facility are managed by management. The conditions of the environmental authorisation will be managed by DFFE and will be monitored by an ECO and external environmental auditing as required in the Environmental Authorisation. The planning conditions of approval will be monitored by the Knysna Municipality and the entire neighbouring community will be acting as "watchdog" to report of any contraventions.
ii. It is clear from the set of rules that there are various challenges with potential visual, noise and access transgressions and impact by visitors that has to be managed	The challenge highlighted is not clear? Visual will be strictly controlled as the camp sites are fixed and predetermined. Access will be strictly controlled to the site – guests with bookings will be permitted to access their allocated tented accommodation and will receive all rules at reception. Noise – management will be permanently on site so any noise will be immediately noted and stopped. Access to the water will be controlled through the requirements set by SANParks. Trespass onto surrounding property will be clearly signposted.
5) Leverage historic wrongs for development that could cause further ecological damage	Historic activities on site were not unlawful at the time that they were undertaken. It would be like saying there should be no housing, tourism or agriculture in the Knysna area as the areas were historically forest and fynbos and they would not get permission under the current NEMA legislation.
a. The historic (pre 1998) ecological damage caused by the infilling of the estuary wetland habitat as well as the dredging of a "lagoon and channel" would not be allowed under the current NEMA legislation.	The Heritage railway line and N2 and the entire area of Knysna and Brenton-on-Lake below the 5m contour line are all causing similar "obstructions" within the Estuary Functional Zone – the point of the comment is not understood.
b. The historic infilling of the property hinder the surrounding Estuarine Wetland functionality. For example, a specialist study for neighbouring Portion 192 concluded that man-made barriers on the applicants portion 152 and portion 91 are hindering the full ecological function of the Estuary wetland on Ptn 192	The applicant has made significant progress in removing dumped rubble on the property which is not acknowledged. And has made significant progress in alien removal unlike surrounding properties. The development area is a small portion of the property and allows for "restoration" of the surrounding areas.

c. This BAR, expert studies and proposal make no effort to propose any rehabilitation (except alien clearing) to recover or restore some of the lost very valuable Estuarine ecological functionality. Therefore, the WHGC □ is not supportive of the development in its current form. □ would be supportive of a proposal that make use of the existing infrastructure for a truly low impact tourism facility that are aligned with the WCBDSP, support the protection of the bordering Estuarial Functional Zone and align the character of the Lake Brenton neighbourhood. The WHGC reserves the right to revise its initial comments and to request further information based on any additional information that may be received.	The changes to the application made in response to comment made will hopefully address this issue. The application will make use of the existing infrastructure as part of the tourism camping facility. The current application does support the protection of the bordering Estuarine Functional Zone and camping does align with the character of the Lake Brenton neighbourhood that historically provided camping (all of which subsequently transformed to urban uses).

DIRECT NEIGHBOURING LANDOWNER COMMENTS:

Tayari Naidoo, 10 December 2025	
If you require, you may refer to 'specifically' OUR notorised deed of servitude as on OUR title deed (copies can be made on request) state the following: 1. My title deed concerning the right of way servitude is persons specific for the purposes of unfettered use of the right of way. 2. No persons outside of those mentioned on my notorised title deed may have access through my property. 3. Any persons outside of those mentioned on my notorised title deed traversing through the property may be regarded as trespassers and may be prosecuted. 4. I intend developing my property and when this is underway, I fully intend to restrict entry into my property to those persons mentioned on my deed of servitude and nobody else.	The servitude conditions are noted and access to private property will be respected at all times. Additional private property signage can be installed so that people who can read can respect private property and wildlife can continue to move without restrictions. Servitudes on the SG diagrams are noted as follows:

5. To allow exceptions in regard to point 4 will mean my property becomes public property. To this end I draw your attention to the 'private property" board at the entrance. NB: this board was placed there by the user of the servitude and not by me. 6. I have no objection to reasonable amendment of the right of way usage but this is the responsibility of the previous owner of the right of way user. 7. The transfer then should be restricted to the new owners being the users of the right of way servitude on my property.	
In so far as the planned resort on Portion 152 please take note of the following. I am in full support of Rudis plan to develop his property in any way he decides. It is his property after all. My concerns are as follows 1. If this plan is realised, it changes the right of way from restricted specifically, to public access for the purpose and benefit of Portion 152. To this end I will lose ownership of any portion of the existing right of way to beneficiate portion152 2. The road MUST be developed to ensure proper drainage and that no environmental damage is incurred either to my side of the property or to the surrounding ecosystems. 3. The width of the road must be restricted to a minimum for safety and environmental reasons. It is my belief that any use beyond the width of 5 meters is inviting environmental disasters 4. My property is designated sensitive by the authorities that be, hence comment no.3. I am in full support of the preservation of this sensitive zone. I require adequate fencing/protection to prevent any access by users of the right of way to portion 152. I do not wish any further damage to these sensitive zones on my property.	The correct legal terminology will undoubtedly form part of the planning consent use application conditions of approval. Noted and agreed. The engineering report covers the requirements for the access tracks and associated stormwater controls – the intention is to no alter any drainage patters and to install grass blocks or gravel where necessary but to keep the access rural. The tracks will remain as "twee spore" tracks to keep traffic moving slowly. Noted and agree – the sensitivity of the site must be preserved. A solution that does not require fencing that would restrict animal movement should be agreed between the two neighours. Possible demarcation markers for the boundaries without any fencing and associated signage indicating "animal access only – no trespassers"

Please take it to account the following: • Multiple specialist investigations have been undertaken on my property for our proposal. These have shown that the majority of the property, extending to Portion 152 is a wetland. It is concerning therefore that your specialist reports explicitly state that there are no wetlands on the property. This seems unlikely given that Portion 152 is located closer to the Knysna estuary than ours, and we know that the reeds (plants commonly associated with wetlands) have been brushcut entirely on the servitude road.	The property has been affected by historic infilling which has impacted on the natural wetland areas. The areas where the reeds emerge are wetland areas, although no longer in a natural state. Brushcutting reeds does not destroy or remove reeds – they are grasses and simply regrow. Only the alien Spanish reeds are being physically removed on the property.
• In addition, the Animal specialist identified the African Grass Owl as being a resident on our property. The short graminoid wetland vegetation has been given as the reason for its habitation. There is no reference to any important species in the reports provided, which seems unusual given the presence of this owl just a few meters away. The presence of the owl requires certain mitigation measures to be implemented to address lighting and noise concerns, as well as movement of vehicles at night. This is a concern for us as the servitude road will be used by a large number of people, likely at night, and will increase the impact on the owl, which we are trying very hard to accommodate.	It is anticipated that the grass owl habitat will extend into the grassland areas as the alien vegetation is removed. Vehicle movement will remain restricted to the existing tracks and specific signage to warn visitors to drive with care for the wildlife will be installed. Monitoring cameras are proposed in the long run which will assist in tracking the presence and movements of the owls and hopefully provide an indication of expansion of habitat.
• There is no indication in the engineering report regarding the changes that will be required to the servitude road. It has always been a two track dirt road and it is assumed that this will be upgraded and increased in size. This detail must be provided as the type of materials used, drainage etc will directly affect us.	The engineering report indicates that the roads and tracks will remain two track roads. They will have the addition of a gravel (G5) or grass blocks where necessary, but the intention is to keep them low key tracks.
• What sort of access control is being proposed? And is a gate proposed at the WA Duthie Drive? This affects us directly, being on our land and creating a potential area for noise and disturbance in the vicinity of our proposed dwelling.	Access control can be agreed between the two landowners and the other servitude user to come up with a workable plan that limits nuisance or interference while ensuring safety of private property.
•	
• There is also an issue of fencing. We are committed to establishing a stewardship agreement with SANParks for our property, and incorrect fencing will isolate our property from the GRNP which will affect animal movement and be unsightly.	There is no plan to fence areas that are not already fenced. Co-operative management can definitely be agreed between the parties.
In the process of developing Portion 152, my private property becomes access to public. This is a major impact on my own preference since I do not wish to reside in a busy thoroughfare . In regards to the right of way , I lose ownership of this privacy entitlement. To this end I expect to be financially compensated by the owners of portion 152 for any area that becomes public access into portion 152.Therefore reducing the size of the road will be in the interest of the owner of Portion 152.	This would need to be part of a legal agreement in relation to the servitude.
Finally, I am also intent on development of my property and the limits placed upon me by the powers that be is irksome and restrictive to say the least. It can be gleaned by my proposal that I remain intent on preserving a major portion of my property and I will not damage eco sensitive zones. I am sure you understand my stance.	Noted

I trust that my position is self explanatory and understood clearly by all concerned.	

INTERESTED AND AFFECTED PARTIES COMMENTS:

Alana Mitchell, 21 November 2025
Andrew Young, 3 December 2025
Ashley Burns, 21 November 2025
Ashley Norie and Hannah Green, 7 December 2025
Dirk and Barbie Verster, 26 November 2025
Brian Paterson, 25 November 2025
Christo de Klerk, 25 November 2025
Clare Reid, 20 November 2025
Corinne Geldenhuys, 26 November 2025
Craig Barthus, 25 November 2025
Danielle Smit, 7 December 2025
David J Burns, 21 November 2025
Deon Joubert, 1 December 2025
Deven Pillay/Lydia Holmes, 8 December 2025
Elaine Coates, 30 November 2025
Elizabeth Goodall, 25 November 2025
Elmien Lombard, 7 December 2025
Gabriele Freitag-Lau and Kurt Walter Lau, 8 December 2025
Gary Brown, 25 November 2025
Gary Hulbert, 27 November 2025
Hannah Green, 7 December 2025
Hannelie Watt, 8 December 2025
Hendrika de Klerk, 25 November 2025
Henk van der Merwe, 25 November 2025
Isabella Erasmus, 26 November 2025
Jacqui Drobczyk, 25 November 2025

Johan Blignaut, 25 November 2025 **Lawrence Coates, 30 November 2025** **Lourens Lombard, 7 December 2025** **Marcel Duvenage, 21 November 2025** **Michelle Botha, 30 November 2025** **P Burchell and V Barsdorf, 25 November 2025** **Rozanne Hulbert, 27 November 2025** **Tony Geldenhuys, 26 November 2025** **Noel Paterson, 25 November 2025**	
1. The "Low Sensitivity" Claim is a Dangerous Flaw in Logic The developer's application is based on a logical flaw: claiming the site footprint has low sensitivity while ignoring its impact on the highly sensitive area it sits in. The application rests on a claim of" avoiding all sensitive habitats." This is an impossible claim given given the location and context of the property. The Knysna Estuary is one of the most important and ecologically sensitive estuaries in South Africa. It's a critical part of the Garden Route National Park.	The site has been assessed in terms of its site sensitivity – the position of the development proposed on the property avoids all sensitive habitats which lie mostly on the surrounding properties – SANParks and private. The impacts on the surrounding sensitive areas have been assessed and avoided and function within the SANParks Estuary Management Plan use zones – Quiet zone and Limited Intensity zones that are near to or adjacent to the property are respected and complied with. Camping on a transformed garden area clearly indicates avoidance of sensitive areas.
1.1 Under-scoring Risk - Footprint versus Context The The Site Sensitivity Report (SSVR) states "it is verified that the aquatic theme has LOW sensitivity for the site itself". The same report then confirms the site is "adjacent to" the Knysna Estuary, which is rated "Very High" sensitivity and is home to the "endangered Knysna seahorse *Hippocampus capensis* and Critically Endangered false limpet *Siphonaria compressa*". These species are extremely vulnerable to any changes in water quality, siltation, or human disturbance. In addition, the application fails to acknowledge the high risk neighbouring property which has a large area of protected grass owl and forest buzzard habitats very close to the proposed development site. This property is also applying for DFFE approval for a resort. The cumulative affect of these applications is a significant negative impact on these habitats. Even limited construction and ongoing noise and light pollution is enough to degrade habitats and reduce breeding success. This is a dangerous and misleading distinction. A development's impact is not confined to its footprint. This is like claiming a lit match has "low sensitivity for the match itself" while ignoring that it is" adjacent to" a pool of petrol. The "low sensitivity" infill is a platform to discharge pollution directly into the "Very High Sensitivity" estuary.	The whole Knysna Estuary is home to the endangered Knysna Sea Horse including them living within the channels within Thesen Island. 25 camping sites where the campers may take a canoe onto the water following the rules of the GRNP and Quiet Zone, is not a significant impact on the sea horse or the lagoon. The water quality in the inlet is tidal and linked to the rest of the estuary. The sewage on site will be treated and managed to ensure that it does not result in pollution to the system. Such is the cased with sewage from every property in the entire Knysna basin and the problems with the municipal system are well known and documented and as such this small camping site will be operating an on site sewage treatment plant to ensure that there is no pollution entering the estuary from this property. The sewage treatment plant will be managed by a private company on contract and reporting will be required to both the municipality and BOCMA in terms of the WUL. The habitat of the grass owl is likely to expand due to the alien clearing on the property which will be a nett positive outcome and planting of additional forest thicket tree species will increase the habitat of the forest buzzard. Breeding success by camping sites on the front lawn is not going to be impacted. All impacts are evaluated with the "cumulative and residual impacts" on the adjacent estuary and sensitive habitats and avoidance is key to the assessment.

By compartmentalising and limiting the risk to only the footprint of the site, the BAR has underestimated the actual risk and environmental impact. The site is not low risk; it has been underscored and is a high risk property.	The impacts associated with 25 camp sites in a transformed garden area where cumulative and residual impacts have been considered and avoided and mitigated, does not render the activity "high risk" – if the intention was to develop a fuel station on the property the "match and pool of petrol" scenario would be more appropriate.
1.2 The "Cumulative Impact" Assessment is Limited and Flawed The developer knowledges the presence of neighbouring protected wetland, but the only proposed mitigation is to... "shift the proposed conservancy tank". This specific action itself is inadequate, but furthermore, why are there no other assessments or risk mitigation measures? The developer has failed to assess the true cumulative impact of placing a high-intensity tourism camp, with its associated pollution, on artificial infill directly next to a known sensitive wetland. Moving a tank does not solve the problem of 8,600 litres of grey-water being irrigated into the ground next to it. The BAR states that while the site itself is "low sensitivity", it is "adjacent to" the "Very High Sensitivity" estuarine habitat and salt marshes. High-impact human activity (camping) will cause direct and indirect impacts through "edge effects," such as polluted water run-off, waste and litter, human disturbance, light and noise pollution.	The tourism camp is not a "high intensity tourism camp" it is a low intensity camp. Similar camp site at Ebb & Flow, within the Wilderness section of the GRNP PE has 188 camp sites as close as 4m from the water within the serpentine floodplains in addition to 49 self-catering units – this site has 25 proposed in addition to a home, and staff accommodation that is existing on the property. The sewage treatment plant (previously proposed temporary conservancy tank) was shifted specifically in response to the adjacent wetland area identified into an area of low sensitivity. The use of grey water is acknowledged and has been amended to be only treated effluent at General Standard – or as designated by BOCMA as part of the WUL application. Treated effluent will be retained within a closed system to recycle and use for flushing toilets. Edge effects – are contained within the surrounding transformed garden areas. Polluted water runoff – it is uncertain as to from where the polluted runoff is anticipated to originate. Waste – will be strictly controlled on site by management as is the rest of Brenton-on-Lake Litter - will be strictly controlled within an exclusive camping area – management will ensure that there is zero litter. Human disturbance – 25 camping sites in a quiet area where guests come for the peach and tranquillity are hardly likely to cause more "disturbance" than the neighbouring residents within Brenton-on- Lake. Lights – the facility will be making use of low level solar lighting within the camp sites within the trees where additional screening trees will be planted and nurtured over time – the light impact will be negligible. Noise – the facility is not likely to result in excessive noise as the guest are visiting for the peace and quiet of the area and its surrounds.
2. The "Transformed Land" : The Site is Unsuitable for Development The developer states the project is only on "existing transformed areas", specifically calling it a garden. The developer's specialist report (App H) states the "property was originally part of the estuarine area which was in-filled in the 1950's". The "private lagoon" was created in the 1980s. The Site Sensitivity Report (SSVR) confirms the original vegetation was "estuarine..." and that the "habitat that currently occurs on site is entirely man-made".	The historical activities, similar to most other historic surrounding activities, were not unlawful at the time that they took place. The facts are that the site is transformed and that the proposal is in a transformed area.

The (BAR), when discussing the neighbouring plot (Portion 192), states that "their specialist identified a wetland area" and that "it is assumed that that wetland would have extended over the applicants property... had the area not been disturbed".	This is correct and the assumption is supported by the historical photography which confirms that the area was historically estuarine.
This in-filling, while environmentally destructive, happened before the current environmental laws (like NEMA, 1998) existed, however this cannot be used as legal basis to further degrade or risk the area. Had this in-fill or dredging of the private cove occurred after 1998, the current land owner would have a duty to completely reinstate the property to its original estuarine state.	The current regulations would have prevented the action from taking place without authorisation. The proposed camping sites do not "further degrade" the area, they are on the lawn and only the support poles will extend into the ground.
This "existing transformed land" is not a stable, low-sensitivity garden. It is artificial, unconsolidated in-fill dumped on top of a highly sensitive estuary wetlands. The land is not "low sensitivity". It is a destroyed "Very High Sensitivity" wetland. This artificial infill has no natural indigenous soil structure and no established capacity for natural water filtration. In addition, this in-fill poses significant risk to the estuary which is why it would be illegal if it was completed today.	The stability of the land is not an issue. The infill has been in existence for over 40 years and there is no indication of any "significant risk" to the adjacent estuary which is fully functional estuarine wetland.
The developer is proposing to "irrigate lawn areas" with 8,600 litres per day of nutrient-rich grey-water. These lawn areas consists of porous, unconsolidated artificial infill with no natural soil structure or filtration capacity. This makes it completely unsuitable for the high-impact sewage and grey-water plan proposed.	The treated effluent will be stored in tanks and will be used for the flushing of all toilets on the property, any surplus will be used for irrigation. The treated effluent will be treated to General Standard / Special Standard, depending on the requirements imposed by BOCMA, as part of the WUL application. no irrigation with treated effluent will take place without the WUL.
The proposal will directly leach high risk water into the adjacent, legally-protected wetland (on Portion192) and the Knysna Estuary. This plan guarantees the pollution that the specialists warn against.	The application is to treat effluent on site and to recycle the treated effluent which will be at General Standard (or higher as directed by BOCMA in the WUL) in order to reuse the water for flushing toilets. The application is being made to irrigate with any excess water that has not been used in recycling. The treated effluent water will not leach any "high risk water" into the adjacent systems.
3. The Sewage & Greywater Plan (Appendix M)	
The developer's plan for handling 8,600 litres of daily wastewater is unworkable, high-risk, and a direct threat to the estuary.	The proposal is to treat waste water on site and to use the treated waste water for recycling in order to flush toilets and any excess is being applied to discharge as irrigation water once the WUL has been issued.
The developer admits that getting a full Water Use License is a "lengthy process". They are therefore proposing an "interim services solution". As this is the plan that will be implemented, it must be considered as the primary plan as there is no guarantees the developer will obtain a water licence or then implement the long term solution and as such the application must be assessed according to the interim plan only.	The package treatment plant is a closed system, no treated effluent water can leave the system, it is stored and recycled for flushing toilets. Irrigation is only acceptable once the WUL is issued and in the absence of the WUL any surplus water will need to be disposed of at the municipal waste water treatment works. Grey and black water will NOT be separated, the treatment plant, storage tanks and duel pipe system for toilet flushing will be installed from the outset.
3.1 Greywater:	
The plan explicitly states: "Wastewater from the development will be separated into	This proposed interim measure has been amended and will NOT take place. Recycling in a closed

grey water and sewage. The grey water will be used to irrigate lawn areas..." . This is a proposal for a direct pollution pipeline into the surrounding wetlands and estuary which guarantees pollution. The site is low-lying, flat, and consists of porous man-made infill. Irrigating lawns with grey-water (containing phosphates, nitrates, fluorides, faecal coliforms and other chemicals from soaps, detergents and toothpaste etc) on this site will leach these pollutants directly into the groundwater, wetlands and estuary. The Knysna Estuary is a highly sensitive "oligotrophic" (nutrient-poor) system. Any nutrient enrichment is known to cause algal blooms which kill the Eelgrass (*Zosteracapensis*) and destroy the habitat for the Endangered Knysna Seahorse and False Limpets. High nitrate levels are also highly toxic to fish. The man-made cove has established itself as a crucial part of the estuary and has transformed into a safe breeding ground for many endangered fish species. Any nitrates leaching into the cove will degrade the water quality and fish stocks. The cove is also sealed off (from replacement water) for up to 18hours per day, and as such excess nitrates will build up in this semi-enclosed environment, compounding the problem further.	system will take place and irrigation with treated effluent will only take place once authorised to do so and then only at the standard proposed.
3.2 Sewage/Blackwater The plan is to collect sewage in a "12000 litre conservancy tank" , which will be "emptied by the Municipal sewage tanker service... as required". This is logistically unfeasible and presents a high risk of overflow. The report's own data shows the development (25 sites at 2+ people/site + 10 staff) will generate 8,600 litres of sewage per day. This means the 12,000 litre tank will be full in less than 36 hours (under 1.5 days) or even less during peak season. The idea of a "honeysucker" truck navigating the site every single day (including holidays and peak season) is unsustainable. The risk of a tank overflow during a rain event or a missed collection is unacceptably high and would pump raw sewage directly into the estuary. Knynsa Municipality does not have the resources to adequately provide this service efficiently or effectively. It has a long track record of failed service delivery including an already existing problem of sewage collection from the Woods in Lake Brenton where overflow and spillages are common.	This proposed interim measure will NOT be installed. The sewage treatment plant will be installed and recycling of treated effluent will take place.
3.3 Report Contradictions The Report Contradicts Its Own Specialist's Advice. This is a critical procedural and scientific failure. The EAP (Hilland) has ignored the primary warning from their own experts. The BAR (Section 10) quotes their own specialist's recommendation that the "Quality of water in the estuary must be protected by not allowing... irrigation run-off into the estuary". The EAP's Contradiction: The Engineering Report (App M) and BAR	The quality of any water reaching the estuary will be treated effluent water and then only if issued a WUL from BOCMA. The intention had been to use filtered greywater for garden irrigation, not as irrigation runoff directed to the estuary. The on-site sewage treatment plant will be installed upfront and treated effluent will be recycled in a closed system until a WUL is issued by BOCMA for irrigation with any surplus treated effluent water.

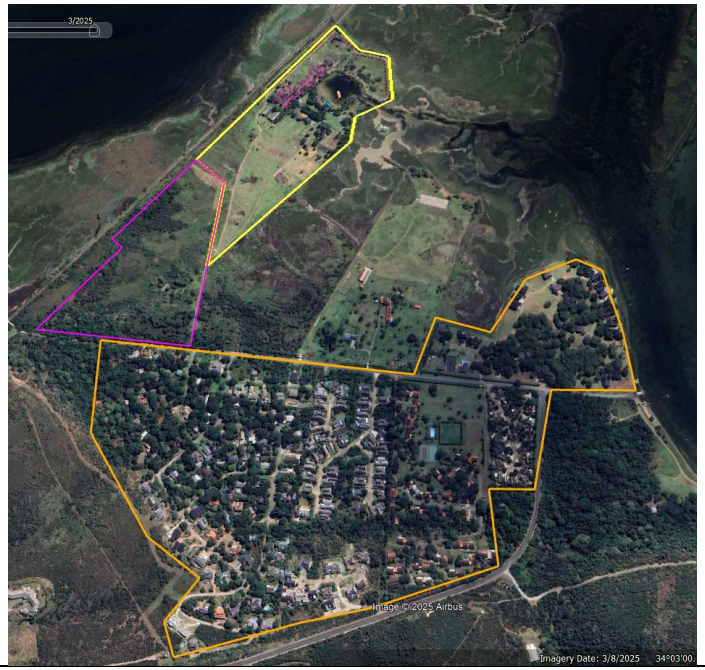
approve a plan to... "use... grey water... to irrigate lawn areas". The developer's approved engineering plan is in direct violation of their own specialist's core mitigation advice. The EAP has identified a critical risk, been told exactly how to prevent it ("no irrigation run-off"), and then approved a plan that guarantees it will happen.	
4. Flawed Legal Process 4.1 A Basic Assessment is Legally Insufficient for This Level of Risk The developer has provided a draft Basic Assessment Report (BAR), which is intended for activities with predictable and easily manageable impacts. The potential impacts are clearly not easily manageable (as described above) and are potentially irreversible. i) This project is located inside the legal buffer zones of one of South Africa's most sensitive estuaries ,which is home to Endangered and Critically Endangered species. This triggers multiple NEMA activities(such as Activity 12 and 17), specifically as it is located within the 32m and 100m buffer zones of the estuary. ii) The land is on artificial infill, increasing further the existing risk of run-off iii) The proposed engineering solutions are high-risk (grey-water irrigation) and logistically flawed (1.5-day sewage capacity). The "Basic Assessment" process is insufficient for this level of risk. The development must be subjected to the far more rigorous process of a full Scoping and Environmental Impact Report (EIR), which has not been completed	The legal process required in terms of NEMA is based on the activities that are triggered. Activities in listing notice 1 and 3 require the Basic Assessment Process while activities in listing notice 2 require a Scoping EIA process. No activities in listing notice 2 are triggered and as such the legally required process is for this application is that of a Basic Assessment process as required in terms of NEMA. Activities 12 and 17 are Listing Notice 1 activities – which legally require a Basic Assessment Process. Artificial infill does not "further increase the risk of run-off" - the fill material has been on site in excess of 40 years and is stable and vegetated. Any irrigation water used will be for plant use and is not directed into a soak away. Scoping EIA is **not** the regulated process for the activities taking place.
4.2 Violation of NEMA Principles The proposed development is in direct violation of the National Environmental Management Act(NEMA) Section 2 Principles: - The Precautionary Principle: This principle states that where there is a threat of "serious or irreversible damage" (like to the seahorse habitat), a lack of full scientific certainty cannot be used as a reason to postpone measures to mitigate risk. The risk is too high to approve this project. - Duty of Care (Sec 28): The developer has a legal duty to prevent pollution and	The precautionary principle has been applied. The WUL application is in progress and a closed system treatment plant is proposed until the WUL determines the release of the water and the quality of the water to be released. Duty of Care is applied – pollution will be prevented through the proposed closed system to be installed, lights – low level solar lighting proposed, noise – limited noise associated with a small

ecological degradation with a burden of proof to show zero negative impact. This development will almost certainly cause degradation with pollution, light, noise etc.	camp site where guests expect peace and tranquillity.
- Public Trust Doctrine: The estuary is a natural resource held in trust by the government for the public. This development represents a degradation of this public asset for private gain. In addition to the estuary, the local village, public roads and services will be negatively affected by an additional high volume of traffic. Lake Brenton is within a Conservancy with bushbuck, bushpigs, snakes and birds. Many of these animals are killed on the local roads already, and any increase in traffic is highly likely to lead to more deaths.	The addition of 25 seasonal traffic visits by guests coming to experience the peace and tranquillity, is unlikely to impact on wildlife. Speed is limited to 30km/h through the Conservancy and speed is limited to 10km/h on the property.
4.3 Knysna Spatial Development Framework (SDF) This application contradicts the Knysna SDF which in principle is to protect critical biodiversity areas and prevent incremental tourism intensification in residential environments. While this area is remote, it borders onto a small residential community of Lake Brenton which has expended to the full extent of the original residential zone.	The application is compatible with the SDF – camping is a consent use on agricultural land. The camping area is limited to a small area of garden around the homestead which is away from the neighbouring residential area.
5. Inadequate Social & "Sense of Place" Assessment **5.1 The Community are against a Resort** A clear majority of the local Lake Brenton community are opposed to this development. This is a valid socio-economic impact that the EAP must legally consider. The EAP must have recorded all the community's concerns in the "Appendix E: Public Participation Process (PPP)" report. The BAR dismisses social impacts (like noise, traffic, safety, and visual impact) as "low". The objections from the community demonstrate as direct evidence that the EAP has underestimated the negative social impact. We also challenge "Appendix F: Visual Statement" as 25 campsites will permanently damage the "sense of place" and natural character of Lake Brenton. This is a quiet village with no shops, restaurants, resorts or similar. Many of the residents moved here and continue to live here for that exact reason. A new resort is not in character with the village and detrimental to the village way of life. The developer is degrading our quiet existence for their financial gain. Many of the residents would prefer the property was reinstated to original estuarine wetlands, not put a resort onto it.	The resistance to the small camping site by a group of local residents is noted. Substantial change to the proposed camp site have been made specifically due to the community's reaction which originated in response to the planning application for a camping area of 105 sites. Change to a small "more exclusive" camping area for 25 sites, on raised wooden decks, restricted to the area around the existing homestead, where there are large screening trees and a substantial distance between the node and the Lake Brenton Community, is specifically in response to the community reaction. The visual assessment takes change proposed into account. The small camping area will not affect the character of the village. The "developer" is a permanent resident and member of the "village" and is wanting to share the beauty and tranquillity of the property with a few guests at a small camping area. Lake Brenton was historically a holiday camping area destination, however the historical camp sites have all been converted into permanent residential areas as part of Lake Brenton's change over time. The owner has already invested heavily in removal of alien vegetation on the property as part of the restoration.

5.2 Impact of similar applications Since Brenton Cove made its intent known to build a Resort, other consultations and applications are now underway. The neighbouring property is also applying for DFFE approval for 7 log cabins and another farm further up the hill has completed a consultation for a similar 25 units. All of these properties have Agriculture I zone and many have an additional restrictive title condition which explicitly prohibits camping. The accumulative effect of these applications will mean a significant and remarkable reduction in habitat for the local wildlife. Applications cannot be assessed individually.	Property ownership changes over time and planning legislation is in place to guide consent use and rezoning applications on Agricultural land. The authorities, both the municipality and DFFE, consider applications wholistically and site specifically.
6. Inadequate Fire Risk Management The proposed plan has significant fire management risks and contradictions. **6.1 The Flawed "Low Risk" Classification** The entire mitigation strategy is based on a false premise. The Engineering Report classifies the development as "Low Risk Group 4". This classification is the lowest possible and explicitly "relies on Municipal firefighting services". This classification is completely inaccurate and indefensible for the Knysna region. The Basic Assessment Report (BAR) itself, in the camping rules, acknowledges this, stating: "Knysna had an incredibly destructive fire on the 7th June 2017 and any fire must be very carefully monitored". It is fundamentally contradictory and negligent to classify a new commercial campsite (with 25 designated campfires) as "Low Risk" in a region that is infamous for being one of the highest fire-risk areas in South Africa, a fact the developer's own report acknowledges. This flawed classification invalidates their entire fire safety plan, which defaults to "rely on the municipality".	The fire risk is determined based on set criteria. The property owner's additional water storage for backup fire security is included in the plan. The removal of extensive alien vegetation which was adding to the fire risk of the area has almost totally been removed and the ongoing management of the property to reduce fire risk is included in the alien control plan. The addition of 25 tented camps within the garden between the trees does not increase the fire risk.
6.2 The "Interim Plan" Has No Fire Mitigation The developer's full plan (on paper only) depends on a Water Use License they don't have. It mentions a 100,000-litre water bladder, fire hydrants, and a "petrol-powered pump". The interim plan, which is the only plan being applied for, makes no provision for any firefighting infrastructure. The 10,000L of domestic water (which the report says will be consumed in a single day is the only water on site, leaving zero dedicated water for firefighting.	The owner's intention is to store additional water as indicated and pump to be in a position to use the water. The borehole, which has an 18 000 litre per hour flow rate, is existing. A Water Use License is not required to use borehole water on a farm and that use can be for fire fighting should the need arise. Pumping directly out of the tidal pond is also possible should an emergency arise.
6.3 Inadequate Reliance on Municipal Services The Interim plan includes only two 5,000-litre tanks fed from the municipal connection for domestic supply. While writing this document (on 20/11/2025), Lake Brenton has no municipal water, so the municipality supply is not guaranteed or reliable. This proposal in insufficient and inadequate for the high risk. The entire plan, for both the interim and full development, is dangerously reliant on external help. Both the "Low Risk Group 4" classification and the BAR itself state the plan is to supplement" the municipal fire fighting provisions". This site is in a remote location	The services reports have been updated. The owner's pump and water for fire fighting are additional to any municipal supply or fire-fighting provisions and having additional fire fighting capacity on this property could be of assistance to the neighbouring residential area during an emergency situation like the 2017 fires.

accessed via servitude roads. In a major fire event (like the one in 2017), municipal services will be completely overwhelmed and unable to access the property. A new commercial development in a high-risk area cannot be approved on the assumption that municipal services will be available to protect it or the local residents neighbouring it.	
6.4 Missing Specialist Fire Risk Assessment The Basic Assessment Report (BAR), the primary document for the environmental application, does not contain a specialist Fire Risk Impact Assessment. This is a significant procedural failure and places both the proposal and local residents at fire risk. Given the site's location and history, the failure to commission a specialist fire impact assessment to model the risk and define robust, built-in mitigation(like firebreaks, automated sprinklers, and guaranteed water supply) is a fatal flaw in the NEMA process.	A fire risk assessment is not a requirement in terms of the NEMA process. The property is a member of the FPA, firebreaks are in place on the property and are regularly managed, alien vegetation is being and has been removed to reduce the fire risk. The legal requirements for firefighting are contained in the engineering report and the municipality will include any additional firefighting requirements in their conditions of approval through the planning application. The owner's additional fire "readiness" is as a response to the 2017 fire.
Addition by Jacqui Drobczyk Finally, with the current water shortages, which are already hampering our ability to lead a normal life, we cannot afford to have more visitors using our resources at will. This may be a temporary issue at the moment, but with climate changes, this could be a fact in the future. Even if water is being drawn from the ground, the water table may be insufficient to cater for all. This happened the last time the Western Cape had a drought. As far as I am concerned, Knysna has plenty of opportunities to accommodate visitors, and we, in my opinion, do not need more, and certainly not in Lake Brenton.	The application for camping includes the water requirements and recycling of water to make the application sustainable and to rely less on municipal water. The ground water supply has been tested. The author is entitled to have this opinion, however there is a demand for accommodation and the need, the landowner is entitled to make an application to provide a small camping tourist venue.
Alistair Reid, 5 December 2025 I&AP provided similar comments to the above, however some additions have been made, therefore are repeated below.	
1. The "Low Sensitivity" and "Low Risk" Claim is Incorrect The developer's application is based on a logical flaw: claiming the site footprint has low sensitivity while ignoring its impact on the highly sensitive area it sits in. The application rests on a claim of "avoiding all sensitive habitats." Uitzicht 216 Portion 152 is situated in the Buffer Zone of the Garden Route National Park (GRNP), and in the Knysna Protected Environment (KPE), with some parts of the property situated in the KPE Development Control Area (DCA). The Estuarine Functional Zone (EFZ), Coastal Management Line (CML), and Coastal Protection Zone (CPZ) all extend well landward of Portion 152. Rating this portion of lan as "low sensitivity" is wholly inaccurate given the location and context of the property. The Knysna Estuary is one of the most important and	The sensitivity of the Knysna Estuary is recognised in the reporting, the Estuary Functional Zone, Buffer Zones, DCA and KPE are all included and indicated in the report. The "Site" sensitivity, is specifically that, it relates to the physical location where the activity is proposed – the garden lawns. The camping "site" has not been proposed on top of sensitive plants or within an area that supports intact habitat or where it will impact on any rare or endangered species.

ecologically sensitive estuaries in South Africa.	
1.1 Under-scoring Risk - Footprint versus Context The Site Sensitivity Report (SSVR) states "it is verified that the aquatic theme has LOW sensitivity for the site itself". The same report then confirms the site is "adjacent to" the Knysna Estuary, which is rated "Very High" sensitivity and is home to the "endangered Knysna seahorse Hippocampus capensis and Critically Endangered false limpet Siphonaria compressa". These species are extremely vulnerable to any changes in water quality, siltation, or human disturbance. The application fails to acknowledge the high risk neighbouring property (owned by Mr Naidoo) which has a large area of protected grass owl and forest buzzard habitats very close to the proposed development site. This property is also applying for DFFE approval for a resort. The cumulative affect of these applications is a significant negative impact on these habitats. Even limited construction and ongoing noise and light pollution is enough to degrade habitats and reduce breeding success. Given this site a "low risk" score while ignoring the high risks immediately adjacent is a dangerous and misleading distinction. A development's impact is not confined to its footprint. This is like claiming a lit candle has "low sensitivity for the match itself" while ignoring that it is "adjacent to" a pool of petrol. It is acknowledged that the site was in-filled in the late 1950's and this is being used as the basis for a low sensitivity assessment. The "low sensitivity" infill in fact poses more significant risks as it is a platform to discharge pollution directly into the "Very High Sensitivity" estuary and adjacent wetlands. By compartmentalising and limiting the risk to only the footprint of the site, the BAR has significantly and erroneously underestimated the actual risk and environmental impact. The site is not low risk; it has been underscored and is a very high risk property.	The inclu sion of the site in context of the surrounding areas and surrounding sensitivities is specifically to include and assess the cumulative impacts and ensure that the activity "on site" will not have an impact on the surrounding areas. The camping area within the existing gardens of the existing homestead will not have a detrimental impact on the neighbouring grass owl habitat. Ongoing "adjacent activities" within Lake Brenton and on the property can be expected to continue. Noise and light "pollution" are existing factors which impact the owl habitat. See response to similar comment above.
1.2The "Cumulative Impact" Assessment is Limited and Flawed The developer knowledges the presence of neighbouring protected wetland, but the single and only proposed mitigation is to... "shift the proposed conservancy tank". This specific action itself is inadequate, but furthermore, there are no other assessments or risk mitigation measures considering the actions of the neighbouring farm land (Tait farm) and current application by neighbouring land owners such as Mr Naidoo. The developer has completely failed in all regards to assess the true cumulative impact of placing a high-intensity tourism camp, with its associated pollution, on artificial infill directly next to a known sensitive wetland and protected grass owl habitat. High-impact human activity (camping) will cause direct and indirect impacts through "edge effects," such as polluted water run-off, waste and litter, human disturbance, light and noise pollution.	The shift of infrastructure was specifically in response to the adjacent sensitivity. Application for 7 cottages on the neighbouring property is assessed in their application to DFFE. The application for 25 camp sites on this property is assessed in this application to DFFE. Neither the 7 cottages or the 25 tents can be considered to be "high intensity or high impact" activities. Portions 192 and 152 cover an area of nearly 20ha cumulatively and in this area portion 192 proposes 7 cottages and portion 152 proposes 25 tents. Together the two properties are just less than half the size of the developed Lake Brenton village. There is an approximately 500m wide corridor for wildlife movement and activity between Lake Brenton and the proposed 25 tents which are within the already established homestead node on the property.

	
1.3Planning and Zoning Contradictions In 2024 the developer submitted a planning application (ref Kny 216/152) which included a Consent Use for Camping under the existing Agriculture I zoning. This application is currently awaiting a tribunal date (at the time of writing these comments), however the application is fundamentally incorrect and fit for the proposed use. According to Western Cape by-laws, Consent Use for camping only allows for up to 15 people and this Use cannot be the primary use of the property, which must remain Agriculture I. The developer is now applying for Environmental Authorisation for a Resort, which will require a full new municipal planning application for re-zoning to Resort. A Resort cannot be operated under Consent Use for Camping. The current application and previous consultation is not sufficient for the latest Resort plans.	The planning application for 25 tents is a consent use application on agricultural land. The environmental application is to be able to accommodate more than 15 tourists (25 tents) for the consent use application agricultural land.

PROPOSED CONSENT USE, REMOVAL OF RESTRICTIVE TITLE CONDITIONS & SITE DEVELOPMENT PLAN: PORTION 152 OF FARM UITZIGT NO. 216, KNYSNA Notice is hereby given in terms of Section 45 of the Knysna Municipality By-law on Spatial Planning and Land Use Management (2021) that the abovementioned application has been received from: Applicant's Name: Rudi's Roses CC Contact Person: c/o VBGD Town Planners Email: lloyddruce@mweb.co.za Reference number: Application number 3300 Property Description: Portion 152 of the Farm Uitzigt No. 216, Knysna Nature of application: (i) Application for a **Consent Use** in terms of **Section 15(2)(o)** of the Knysna Municipality By-Law on Spatial Planning and Land Use Management (2021) to allow a "Camping Site" as indicated under the "Agricultural Zone I" zoning; (ii) Application for the **Removal of Restrictive Title Deed** conditions 1.C.2 & 1.D.1 & 2.C.2 applicable to Title Deed T16920/2022 of Portion 152 of Farm Uitzigt 216, Knysna, in terms of **Section 15(2)(f)** of the Knysna Municipality By-Law on Spatial Planning and Land Use Management (2021); and (iii) Approval of **Site Development Plan** in terms of **Section 15(2)(g)** in compliance with the Knysna Zoning Scheme By-law (2020).	
1.4SANParks expertise is being ignored As part of the consultation for the above planning application (KNy216/152), Dr vanessa Weyer (Head of Planning at Sanparks, provided comments on the proposed development. Cathy Avierinos at Hilland Environmental was copied into this response.	SANParks comments are included above.
2. The "Transformed Land" : The Site is Unsuitable for Development The developer states the project is only on "existing transformed areas", specifically calling it a garden. The developer's specialist report (App H) states the "property was originally part of the estuarine area which was in-filled in the 1950's". The "private lagoon" was created in the 1980s. The Site Sensitivity Report (SSVR) confirms the original vegetation was "estuarine..." and that the "habitat that currently occurs on site is entirely man-made". The (BAR), when discussing the neighbouring plot (Portion 192), states that "their specialist identified a wetland area" and that "it is assumed that that wetland would have extended over the applicants property... had the area not been disturbed". This in-filling, while environmentally destructive, happened before the current environmental laws (like NEMA, 1998) existed, however this cannot be used as legal basis to further degrade or risk the area. Had this in-fill or dredging of the private cove occurred after 1998, the current land owner would have a duty to completely	The site where the 25 tents are proposed is within the existing garden. See similar comment above.

reinstate the property to its original estuarine state. This "existing transformed land" is not a stable, low-sensitivity garden. It is artificial, unconsolidated in-fill dumped on top of a highly sensitive estuary wetlands. The land is not "low sensitivity". It is a *destroyed* "Very High Sensitivity" wetland. This artificial infill has no natural indigenous soil structure and no established capacity for natural water filtration. In addition, this in-fill poses significant risk to the estuary which is why it would be illegal if it was completed today. The developer is proposing to "irrigate lawn areas" with 8,600 litres per day of nutrient-rich grey-water. These lawn areas consists of porous, unconsolidated artificial infill with no natural soil structure or filtration capacity. This makes it completely unsuitable for the high-impact sewage and grey-water plan proposed. The proposal will directly leach high risk water into the adjacent, legally-protected wetland (on Portion 192) and the Knysna Estuary. This plan *guarantees* the pollution that the specialists warn against.	The history of the site is included in the report. Irrigation is proposed with treated effluent.
3. The Sewage & Greywater Plan (Appendix M) The developer's plan for handling 8,600 litres of daily wastewater is unworkable, high-risk, and a direct threat to the estuary. The developer admits that getting a full Water Use License is a "lengthy process". They are therefore proposing an "interim services solution". As this is the plan that will be implemented, it must be considered as the primary plan as there is no guarantees the developer will obtain a water licence or then implement the long term solution and as such the application must be assessed according to the interim plan only.	See similar comments and responses above.
3.1Unsuitable Grey-water Plan The plan explicitly states: "Wastewater from the development will be separated into grey water and sewage. The grey water will be used to irrigate lawn areas..." . This is a proposal for a direct pollution pipeline into the surrounding wetlands and estuary which guarantees pollution. The site is low-lying, flat, and consists of porous man-made infill. Irrigating lawns with grey-water (containing phosphates, nitrates, fluorides, faecal coliforms and other chemicals from soaps, detergents and toothpaste etc) on this site will leach these pollutants directly into the groundwater, wetlands and estuary. The Knysna Estuary is a highly sensitive "oligotrophic" (nutrient-poor) system. Any nutrient enrichment is known to cause algal blooms which kill the Eelgrass (*Zostera capensis*) and destroy the habitat for the Endangered Knysna Seahorse and False Limpets.	The proposal to separate the grey and black water has been amended. The treatment plant will be installed from the outset – see response above to similar comment.

High nitrate levels are also highly toxic to fish. The man-made cove has established itself as a crucial part of the estuary and has transformed into a safe breeding ground for many endangered fish species. Any nitrates leaching into the cove will degrade the water quality and fish stocks. The cove is also sealed off (from replacement water) for up to 18hours per day, and as such excess nitrates will build up in this semi-enclosed environment, compounding the problem further.	
3.2Unfeasible Sewage/Blackwater The plan is to collect sewage in a "12000 litre conservancy tank" , which will be "emptied by the Municipal sewage tanker service... as required". This is logistically unfeasible and presents a high risk of overflow. The report's *own data* shows the development (25 sites at 2+ people/site + 10 staff) will generate 8,600 litres of sewage per day. This means the 12,000 litre tank will be full in less than 36 hours (under 1.5 days) or even less during peak season. The idea of a "honeysucker" truck navigating the site every single day (including holidays and peak season) is unsustainable. The risk of a tank overflow during a rain event or a missed collection is unacceptably high and would pump raw sewage directly into the estuary. Knynsa Municipality does not have the resources to adequately provide this service efficiently or effectively. It has a long track record of failed service delivery including an already existing problem of sewage collection from the Woods in Lake Brenton where overflow and spillages are common.	The treatment plant will be installed – see response to same comment above.
3.3No Specialist Flood Risk Assessment and Climate Change Risks No specialist flood risk assessment has been completed, yet the property is below the 5m contour and within the Coastal protection Zone (CPZ) and the Coastal Management Line (CML). **CPZ:** As per NEM: ICMA Section 16(1)(d)(i) the CPZ extends 1km of the high-water mark and therefore Uitzicht 216, Portion 152 falls within the CPZ. Section 62 and 63 of NEM: ICMA are relevant in authority decision-making to prevent harm to and afford protection to the CPZ. **CML:** The proposed CML extends well landward of Portion 152. Although the CML has not officially been established by the MEC for the Knysna Estuary, it has been included in the Knysna Spatial Development Framework, is shown on the Knysna GIS Viewer and the Western Cape Environment and Development Planning Atlas and must therefore be considered as determined and is a relevant factor. Risks associated with developing in this area are known and have been published. A notice (GNR. No. 3668, 14 July 2023, in terms of NEM: ICMA) describes matters pertaining to developing in the CML in the GRNP. Section 4 describes development	The historic infilling has changed the flood risk of the property. The application has been amended to have all 25 tents on a small raised wooden deck. The treatment plant will be protected from flood risk through bunding protection. The property, as with much of Knysna, falls below the 5m contour and within the Estuary Functional Zone.

risk management measures applicable for new infrastructure seaward of the CML and existing infrastructure in areas at risk to dynamic coastal process. Uitzicht 216 Portion 152 falls wholly below the 5m contour and watermark line, making it highly susceptible to climate change risks, particularly unpredictable storm surges and flooding. This makes the nature of the in-fill land exceptionally high risk. The plan to disperse large amounts of nutrient rich grey water (by sprinklers) poses significant risks. These pollutants will accumulate in the soil and are almost guaranteed to be released en-mass into the estuary and neighbouring wetlands at some point in the future with increasingly more common high water events. In addition, SANParks has specifically quoted that "Further infilling of the property would not be supported by SANParks." This is not a risk that can be mitigated by further raising of the property. **Erosion:** Should coastal erosion stabilisation structures be required to safeguard any buildings/ infrastructure now or in the future, the landowner's attention is drawn to Section 15 of NEM: ICMA, which states: (1) No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or such other coastal public property, or of land adjacent to coastal public property, unless the erosion is caused by an intentional act or omission of that organ of state or other person. (2) No person may construct, maintain, or extend any structure, or take other measures on coastal public property to prevent or promote erosion or accretion of the seashore except as provided for in this Act, the National Environmental Management Act, or any other specific environmental management Act.	 CPZ and CML - Correct – that is why Coastal Management have provided comment on this application. There will be no irrigation with grey water. There is no proposal for any further infilling. There is no proposal for erosion stabilization structures.
3.4Report Contradictions The BAR Report Contradicts Its Own Specialist's Advice. This is a critical procedural and scientific failure. The EAP (HilLand) has ignored the primary warning from their own experts. The BAR (Section 10) *quotes* their own specialist's recommendation that the "Quality of water in the estuary must be protected by not allowing... irrigation run-off into the estuary". The EAP's Contradiction: The Engineering Report (App M) and BAR approve a plan to... "use... grey water... to irrigate lawn areas". The developer's approved engineering plan is in direct violation of their own specialist's core mitigation advice. The EAP has identified a critical risk, been told exactly how to prevent it ("no irrigation run-off"), and then approved a plan that *guarantees* it will happen.	See response above to same comment.

4. Flawed Legal Process **4.1A Basic Assessment is Legally Insufficient for The Level of Risk** The developer has provided a draft Basic Assessment Report (BAR), which is intended for activities with predictable and easily manageable impacts. The potential impacts are clearly not easily manageable (as described above) and are potentially irreversible. i) This project is located inside the legal buffer zones of one of South Africa's most sensitive estuaries , which is home to Endangered and Critically Endangered species. This triggers multiple NEMA activities (such as Activity 12 and 17), specifically as it is located within the 32m and 100m buffer zones of the estuary. ii) The land is on artificial infill, increasing further the existing risk of run-off iii) The proposed engineering solutions are high-risk (grey-water irrigation) and logistically flawed (1.5-day sewage capacity). The "Basic Assessment" process is insufficient for this level of risk. The development must be subjected to the far more rigorous process of a full Scoping and Environmental Impact Report (EIR), which has not been completed.	See response above to same comment.
4.2Violation of NEMA Principles The proposed development is in direct violation of the National Environmental Management Act (NEMA) Section 2 Principles: - The Precautionary Principle: This principle states that where there is a threat of "serious or irreversible damage" (like to the seahorse habitat), a lack of full scientific certainty cannot be used as a reason to postpone measures to mitigate risk. The risk is too high to approve this project. - Duty of Care (Sec 28): The developer has a legal duty to prevent pollution and ecological degradation with a burden of proof to show zero negative impact. This development will almost certainly cause degradation with pollution, light, noise etc. - Public Trust Doctrine: The estuary is a natural resource held in trust by the government for the public. This development represents a degradation of this public asset for private gain. In addition to the estuary, the local village, public roads and services will be negatively affected by an additional high volume of traffic. Lake Brenton is within a Conservancy with bushbuck, bushpigs, snakes and birds. Many of these animals are killed on the local roads already, and any increase in traffic is highly likely to lead to more deaths.	See response above to same comment.

4.3 Knysna Spatial Development Framework (SDF) This application contradicts the Knysna SDF which in principle is to protect critical biodiversity areas and prevent incremental tourism intensification in residential environments. While this area is remote, it borders onto a small residential community of Lake Brenton which has expended to the full extent of the original residential zone.	See response above to same comment.
5. Inadequate Social & "Sense of Place" Assessment **5.1The Community are against a Resort** A clear majority of the local Lake Brenton community are opposed to this development. This is a valid socio-economic impact that the EAP must legally consider. The EAP must have recorded all the community's concerns in the "Appendix E: Public Participation Process (PPP)" report. The BAR dismisses social impacts (like noise, traffic, safety, and visual impact) as "low". The objections from the community demonstrate as direct evidence that the EAP has underestimated the negative social impact. We also challenge "Appendix F: Visual Statement" as 25 campsites will permanently damage the "sense of place" and natural character of Lake Brenton. This is a quiet village with no shops, restaurants, resorts or similar. Many of the residents moved here and continue to live here for that exact reason. A new resort is not in character with the village and detrimental to the village way of life. The developer is degrading our quiet existence for their financial gain. Many of the residents would prefer the property was reinstated to original estuarine wetlands, not put a resort onto it.	See response above to same comment.
5.2Impact of similar applications Since Brenton Cove made its intent known to build a Resort, other consultations and applications are now underway. The neighbouring property is also applying for DFFE approval for 7 log cabins and another farm further up the hill has completed a consultation for a similar 25 units. All of these properties have Agriculture I zone and many have an additional restrictive title condition which explicitly prohibits camping. The accumulative effect of these applications will mean a significant and remarkable reduction in habitat for the local wildlife. Applications cannot be assessed individually.	See response above to same comment.
6.Inadequate Fire Risk Management The proposed plan has significant fire management risks and contradictions.	See response above to same comment.
6.1 Missing Specialist Fire Risk Assessment The Basic Assessment Report (BAR), the primary document for the environmental application, does not contain a specialist Fire Risk Impact Assessment. This is a significant procedural failure and places both the proposal and local residents at fire risk. Given the site's location and history, the failure to commission a specialist fire impact assessment to model the risk and define robust, built-in mitigation (like	See response above to same comment.

firebreaks, automated sprinklers, and guaranteed water supply) is a fatal flaw in the NEMA process.	
6.2 The Flawed "Low Risk" Classification The entire mitigation strategy is based on a false premise. The Engineering Report classifies the development as "Low Risk Group 4". This classification is the lowest possible and explicitly "relies on Municipal firefighting services". This classification is completely inaccurate and indefensible for the Knysna region. The Basic Assessment Report (BAR) itself, in the camping rules, acknowledges this, stating: "Knysna had an incredibly destructive fire on the 7th June 2017 and any fire must be very carefully monitored". It is fundamentally contradictory and negligent to classify a new commercial campsite (with 25 designated campfires) as "Low Risk" in a region that is infamous for being one of the highest fire-risk areas in South Africa, a fact the developer's own report acknowledges. This flawed classification invalidates their entire fire safety plan, which defaults to "rely on the municipality".	See response above to same comment.
6.3 The "Interim Plan" Has No Fire Mitigation The developer's full plan (on paper only) depends on a Water Use License they don't have. It mentions a 100,000-litre water bladder, fire hydrants, and a "petrol-powered pump". The interim plan, which is the only plan being applied for, makes no provision for any firefighting infrastructure. The 10,000L of domestic water (which the report says will be consumed in a single day) is the only water on site, leaving zero dedicated water for firefighting.	See response above to same comment.
6.4Inadequate Reliance on Municipal Services The Interim plan includes only two 5,000-litre tanks fed from the municipal connection for domestic supply. During the consultation period 8/11/25 to 5/12/12 (at time of writing), Lake Brenton has had two instances both lasting over 12 hours where there no municipal water. The municipality supply is not guaranteed or reliable. This proposal in insufficient and inadequate for the high risk. The entire plan, for both the interim and full development, is dangerously reliant on external help. Both the "Low Risk Group 4" classification and the BAR itself state the plan is to supplement "the municipal fire fighting provisions". This site is in a remote location accessed via servitude roads. In a major fire event (like the one in 2017), municipal services will be completely overwhelmed and unable to access the property. A new commercial development in a high-risk area cannot be approved on the assumption that municipal services will be available to protect it or the local residents neighbouring it.	See response above to same comment.
Annemarie Luck, 7 December 2025 I&AP provided similar comments to the above, but not identical, therefore it was repeated	
1. The “Low Sensitivity” Argument Is Fundamentally Misleading The developer’s submission is built on a flawed premise: it emphasises the supposed low sensitivity of the site’s immediate footprint while entirely overlooking the highly sensitive ecological setting in which that footprint exists. The application suggests that all sensitive habitats are being avoided—an assertion that is simply impossible given the site’s proximity to the Knysna Estuary, one of South Africa’s most ecologically important and sensitive estuarine systems and part of the Garden Route National Park.	See response above to same comment.

1.1 Footprint vs Context: Downplaying Real Risk The Site Sensitivity Verification Report (SSVR) asserts that the aquatic theme for the site itself is of "LOW sensitivity." Yet, the same document confirms that it lies adjacent to the Knysna Estuary, rated as "Very High" sensitivity and home to critically vulnerable species such as the endangered Knysna seahorse (*Hippocampus capensis*) and critically endangered false limpet (*Siphonaria compressa*). These species are exceptionally susceptible to siltation, water quality deterioration, and human disturbance. Furthermore, the report sidesteps the presence of a neighbouring property containing large sections of protected grass owl and forest buzzard habitat—areas already under threat and facing their own development pressure. Even moderate construction or ongoing human activity (light, noise, pollution) could severely disrupt these species' breeding and habitat stability. The logic used in the BAR is equivalent to describing a lit match as having "low sensitivity for the match it-self" while ignoring the petrol it rests beside. While the footprint may be small, the environmental consequence is not. The BAR has underrepresented the true risk by isolating the site from its environmental context. This is not a low-risk property; it is a high-risk one that has been mischaracterised.	See response above to same comment.
1.2 Cumulative Impacts Are Minimised and Poorly Assessed Although the developer acknowledges the adjacent protected wetland, the only mitigation suggested is to relocate the conservancy tank. This gesture is insufficient and does not constitute a proper cumulative im-pact assessment. The proposal fails to evaluate the combined effect of a tourism-intensive camp and on-going pollutant discharge on infill immediately next to a vulnerable wetland ecosystem. Shifting one tank does nothing to address the fact that 8,600 litres of greywater per day will still be irrigated directly into porous artificial soil with no natural filtration capacity. Human activity on a site labelled "adjacent to" very high-sensitivity salt marshes brings unavoidable "edge effects": pollution, light disturbance, noise, foot traffic and waste. These are not accounted for meaningfully in the BAR.	See response above to same comment.
2. Misrepresentation of "Transformed Land": The Site Remains Unsuited for Development The developer repeatedly describes the site as "existing transformed areas," notably a garden. Yet the specialist report (App H) states the land originally formed part of the estuary before being artificially filled during the 1950s, with the private lagoon excavated in the 1980s. The SSVR confirms the original vegetation was estuarine, and that the habitat currently present is entirely artificial. The BAR itself, when discussing the neighbouring Portion 192, notes that "their specialist identified a wet-land area" and that it is "assumed that that wetland would have extended over the applicant's property had the area not been disturbed." Although these historic alterations occurred before NEMA (1998), they cannot be used to justify further degradation. If such filling occurred today, the owner would be legally required to restore it.	See response above to same comment.

This land is not a natural, stable garden—it is an artificial, unconsolidated infill over what was a highly sensitive wetland. It has no indigenous soil structure, no filtration capacity and represents a legally significant risk to the estuary. The plan to irrigate lawns with 8,600 L/day of nutrient-rich greywater on such material is inherently unsafe. Pollutants will leach directly into surrounding wetland and estuarine systems. This proposal virtually guarantees the very pollution specialists warn must be avoided.	
3. Sewage & Greywater Plan (Appendix M) The wastewater plan, particularly the interim solution, is unworkable and environmentally unsafe. The developer notes that obtaining a Water Use Licence is lengthy and therefore proposes an "interim" plan. But since there is no guarantee a licence will ever be granted, the interim plan is effectively the plan and must be assessed as such.	See response above to same comment.
3.1 Greywater Risks The proposal explicitly states that greywater will be reused to irrigate lawn areas. Given that the site sits on porous artificial infill, this is effectively a direct pollution pathway into the estuary and adjoining wetlands. Greywater contains phosphates, nitrates, soaps, detergents, and faecal contaminants. The Knysna Estuary is an oligotrophic (nutrient-poor) system where even slight nutrient enrichment triggers algal blooms, smothers eelgrass (Zostera capensis) and destroys habitat crucial to the Knysna seahorse and false limpet. Fish species breeding in the man-made cove will also be threatened, particularly because the cove is closed off for long tidal periods, causing nutrient build-up.	See response above to same comment.
3.2 Sewage / Blackwater Sewage is proposed to be stored in a 12,000 L conservancy tank and emptied by municipal truck "as re-quired". But the development will generate 8,600 L per day, meaning the tank will fill in under 36 hours—or sooner in peak season. Expecting daily vacuum truck access is unrealistic. A single missed collection or heavy rainfall event rais-es the likelihood of overflow, which would send raw sewage into the estuary. Knysna Municipality already battles service delivery issues, including sewage management failures in nearby Lake Brenton.	See response above to same comment.
3.3 Contradictions in the Reports The BAR quotes its own specialist's requirement that water quality must be protected by preventing irrigation runoff into the estuary. Yet the approved engineering plan authorises the irrigation of lawns with grey-water. This is a direct contradiction of the specialist's key mitigation measure.	See response above to same comment.

4. Procedural and Legal Deficiencies **4.1 Basic Assessment Is Not Sufficient** A Basic Assessment process is inappropriate given: 1. The site falls within legally defined 32 m and 100 m buffer zones of a highly sensitive estuary. 2. The land consists of high-risk artificial infill. 3. The wastewater and sewage plans present significant, possibly irreversible risks. A full Scoping and Environmental Impact Report (EIR) is required but has not been undertaken. **4.2 Contraventions of NEMA Principles** The proposal conflicts with core NEMA requirements: • Precautionary Principle: The risk of irreversible damage to endangered species cannot be ignored. • Duty of Care (Sec 28): The burden is on the developer to prove zero harm. This proposal demonstrably cannot meet that standard. • Public Trust Doctrine: The estuary is a public asset. The proposal threatens to degrade it for private commercial benefit. Additionally, increased traffic would harm wildlife in the Conservancy, where roadkill is already a concern.	See response above to same comment – the process is defined in the regulations.
4.3 Inconsistency with the Knysna Spatial Development Framework The SDF emphasises protecting biodiversity and preventing incremental tourism densification within residential contexts. Although the site is relatively remote, it borders a small, fully utilised residential community-ty that would experience significant impacts.	See response above to same comment.
***5.* Insufficient Social and "Sense of Place" Considerations** **5.1 Community Opposition** The majority of Lake Brenton residents are against the proposed resort, and this opposition must be reflected in the Public Participation Process. The BAR's classification of social impacts (noise, traffic, safety, visual intrusion) as "low" contradicts the documented objections. The Visual Statement (Appendix F) is also challenged: 25 campsites will permanently change the character of Lake Brenton, a quiet area without commercial resorts. Residents chose this environment precisely for its tranquillity. Many would prefer restoration of the natural wetlands rather than new tourism development.	See response above to same comment.
***5.2* Precedent and Cumulative Impact** Since the Brenton Cove proposal surfaced, multiple neighbouring properties are pursuing similar tourism developments, despite restrictive zoning conditions. When	See response above to same comment.

combined, these proposals represent a substantial cumulative loss of wildlife habitat and cannot be assessed in isolation.	
6. Inadequate Fire Risk Management **6.1 Incorrect "Low Risk" Classification** The engineering report classifies the development as "Low Risk Group 4," which assumes reliance on municipal firefighting services. This is wholly inappropriate in a region with one of the most severe fire histories in the country—the BAR itself references the devastating 2017 fires. The classification undermines the entire fire management strategy. **6.2 Interim Plan Lacks Fire Protection Infrastructure** The long-term plan includes fire hydrants, pumps and a 100,000 L bladder—but the interim plan (the only guaranteed plan) includes none of these. The available 10,000 L of domestic water will be used up daily, leaving no dedicated firewater source. **6.3 Unreliable Dependence on Municipal Services** The interim design includes only two 5,000 L tanks. At the time of writing, municipal water in Lake Brenton was unavailable—further proving the unreliability of external firefighting support. In a major fire, municipal services would be overwhelmed and unable to reach this remote site. **6.4 Missing Specialist Fire Assessment** The BAR fails to include a specialist fire risk assessment despite the region's history and vulnerability. A development of this type requires expert modelling of fire behaviour and mitigation measures. The omission is a serious procedural flaw.	See response above to same comment.
Glen Polley, 30 November 2025 I&AP comments are similar to the above, but not identical, therefore it was repeated	
1. The "Low Sensitivity" Claim is flawed. The developer's application incorrectly asserts that the site has low sensitivity, overlooking its impact on a highly sensitive area. The claim of "avoiding all sensitive habitats" is unrealistic, given the property's location within the Knysna Estuary—one of South Africa's most crucial and ecologically delicate estuaries, located in the Garden Route National Park.	See response above to same comment.
1.1 Under-scoring Risk - Footprint versus Context The Site Sensitivity Report (SSVR) states that "it is verified that the aquatic theme has LOW sensitivity for the site itself." However, the same report acknowledges that the site is adjacent to the Knysna Estuary, which is classified as having "Very High" sensitivity and supports endangered species such as the Knysna seahorse (*Hippocampus capensis*) and the Critically Endangered false limpet (*Siphonaria*	See response above to same comment.

compressa). These species are highly susceptible to alterations in water quality, increased siltation, and human disturbance. Furthermore, the application does not address the significant risk associated with a neighbouring property that encompasses extensive protected habitats for grass owls and forest buzzards, situated in close proximity to the proposed development. This adjacent property is also seeking DFFE approval for resort development. The combined impact of these proposals poses a considerable threat to these vulnerable habitats, as even minimal construction activity along with ongoing noise and light pollution can degrade them and adversely affect breeding success. It is problematic and potentially misleading to distinguish impact based solely on the development footprint. The environmental consequences of a project extend beyond its immediate boundaries. Designating the area as "low sensitivity" without adequately considering its proximity to a "Very High Sensitivity" estuary may enable pollutants to directly enter sensitive ecosystems. By restricting risk assessment to just the project footprint, the Basic Assessment Report (BAR) underestimates the actual level of environmental risk and impact. Contrary to the designation, this site should not be considered low risk; rather, the cumulative factors indicate it is a high-risk property.	
1.2 The "Cumulative Impact" Assessment is Limited and Flawed The developer acknowledges the nearby protected wetland but proposes only to shift the conservancy tank, an insufficient measure with no additional risk assessments. The cumulative impact of a high-intensity tourism camp beside a sensitive wetland, including irrigation of 8,600 litres of grey-water, has not been properly addressed. Although the BAR labels the site as "low sensitivity," it is next to "Very High Sensitivity" estuarine habitats, making it vulnerable to pollution, waste, disturbance, and other edge effects from increased human activity.	See response above to same comment.
2. The "Transformed Land" : The Site is Unsuitable for Development The developer states the project is only on "existing transformed areas", specifically calling it a garden. The developer's specialist report (App H) states the "property was originally part of the estuarine area which was in-filled in the 1950's". The "private lagoon" was created in the 1980s. The Site Sensitivity Report (SSVR) confirms the original vegetation was "estuarine..." and that the "habitat that currently occurs on site is entirely man-made". The (BAR), when discussing the neighbouring plot (Portion 192), states that "their specialist identified a wetland area" and that "it is assumed that that wetland would have extended over the applicants property... had the area not been disturbed". This in-filling activity, although environmentally detrimental, took place prior to the implementation of current environmental legislation such as NEMA (1998). Nevertheless, this does not provide a legal justification for further degradation or endangerment of the area. If the in-fill or dredging of the private cove had	See response above to same comment.

occurred after 1998, the current landowner would be obligated to restore the property fully to its original estuarine condition. The so-called "existing transformed land" is not a stable, low-sensitivity garden; rather, it consists of artificial, unconsolidated fill placed atop a highly sensitive estuarine wetland. This area cannot be classified as "low sensitivity"—it represents a significantly altered "Very High Sensitivity" wetland. The artificial infill lacks both natural indigenous soil structure and established capacity for water filtration. Furthermore, this infill continues to present considerable risks to the estuary, which is why such activities would be considered illegal under current regulations. The developer's proposal involves irrigating lawn areas with 8,600 litres per day of nutrient-rich greywater. These lawn areas are composed of porous, unconsolidated artificial infill, without the benefit of natural soil structure or filtration capability, making them unsuitable for the proposed high-impact sewage and greywater management plan. As a result, the proposal is likely to directly discharge high-risk water into the adjacent, legally protected wetland (on Portion 192) and the Knysna Estuary, thereby ensuring the very pollution that specialists have cautioned against.	
3. The Sewage & Greywater Plan (Appendix M) The developer's plan to manage 8,600 litres of daily wastewater is impractical and poses significant risks to the estuary. Since obtaining a full Water Use License is a lengthy process, the developer proposes an "interim services solution" as the primary plan. As there is no guarantee the license or long-term solution will be implemented, the application should be evaluated based solely on this interim plan.	See response above to same comment.
3.1 Greywater: The plan specifies: "Wastewater from the development will be separated into grey water and sewage. The grey water will be used to irrigate lawn areas." This approach effectively proposes the introduction of pollutants into the adjacent wetlands and estuary. The site is characterised by its low elevation, flat topography, and composition of porous artificial infill. Using grey water—which may contain phosphates, nitrates, fluorides, faecal coliforms, and various chemicals from household products—to irrigate lawns in this context can result in the direct leaching of these substances into the groundwater, wetlands, and estuarine system. The Knysna Estuary is recognised as a highly sensitive oligotrophic (nutrient-poor) ecosystem. Any increase in nutrient levels is documented to promote algal blooms, which can lead to the decline of Eelgrass (*Zostera capensis*) and subsequently diminish habitat availability for endangered species such as the Knysna Seahorse and False Limpets. Elevated nitrate concentrations are also known to be toxic to fish populations. The man-made cove at the site has developed into an important component of the estuary, serving as a safe breeding area for several threatened fish species. Introduction of nitrates into this environment may further degrade water quality and negatively impact aquatic life. Furthermore, the cove is isolated from fresh water inflow for up to 18 hours each day, increasing the risk of nitrate accumulation and exacerbating ecological concerns within this semi-enclosed system.	See response above to same comment.

3.2 Sewage/Blackwater The plan to use a 12,000-litre conservancy tank emptied by municipal services is logistically impractical and risks frequent overflows. With 25 sites, staff, and an estimated 8,600 litres of sewage generated daily, the tank would fill in under 1.5 days—faster during peak times. Relying on daily "honeysucker" trucks is unsustainable, especially given the municipality's history of inadequate service and existing overflow issues at Lake Brenton. Any missed collection or rain event could result in raw sewage entering the estuary.	See response above to same comment.
3.3 Report Contradictions The report contradicts its own specialist's advice, which is a significant procedural and scientific flaw. While the BAR cites an expert's recommendation to prevent irrigation run-off from reaching the estuary, the approved engineering plan allows grey water irrigation, directly violating this advice and ensuring the identified risk persists.	See response above to same comment.
4. Flawed Legal Process **4.1 A Basic Assessment is Legally Insufficient for This Level of Risk** The developer's draft Basic Assessment Report (BAR) is not suitable, as the project's impacts are significant and potentially irreversible. i) The site lies within legal buffer zones of a highly sensitive South African estuary that supports Endangered and Critically Endangered species, triggering several NEMA activities due to its location within the 32m and 100m zones. ii) The land consists of artificial infill, increasing runoff risks. iii) Proposed engineering solutions are high-risk (grey-water irrigation) and logistically inadequate (only 1.5-day sewage capacity). Given these factors, a full Scoping and Environmental Impact Report (EIR) is required; the Basic Assessment process is insufficient.	See response above to same comment.
4.2 Violation of NEMA Principles The proposed development violates NEMA Section 2 Principles: • The Precautionary Principle: Measures to mitigate threats to the seahorse habitat must not be postponed due to scientific uncertainty; approving this project poses a high risk. • Duty of Care (Sec 28): Developers must prevent pollution and prove zero negative impact, but this project is likely to cause ecological degradation. • Public Trust Doctrine: The estuary, a public resource, would suffer for private gain. Increased traffic will harm local roads and services, further endangering wildlife such as bushbuck, bushpigs, snakes, and birds, especially in the Lake Brenton Conservancy.	See response above to same comment.
4.3 Knysna Spatial Development Framework (SDF) This application goes against the Knysna SDF's aim to protect key biodiversity areas and limit tourism growth in residential zones. Although the area is remote, it borders	See response above to same comment.

Lake Brenton, a small community that has reached its original residential capacity.	
5. Inadequate Social & "Sense of Place" Assessment **5.1 The Community are against a Resort** A clear majority of Lake Brenton's residents oppose this development, which is a legitimate socio-economic impact that the EAP is legally required to consider. All community concerns should have been documented in the "Appendix E: Public Participation Process (PPP)" report. The BAR categorizes social impacts—including noise, traffic, safety, and visual changes—as "low," but ongoing objections from residents provide direct evidence that these negative effects have been underestimated by the EAP. We also dispute the findings in "Appendix F: Visual Statement," as constructing 25 campsites will permanently alter Lake Brenton's unique sense of place and natural character. Lake Brenton is a tranquil village, lacking shops, restaurants, resorts, or similar amenities; many residents chose and remain here precisely because of its peaceful atmosphere. Introducing a new resort would be inconsistent with the village's character and harmful to its way of life. The developer's plans threaten our quiet lifestyle for financial gain, whereas many locals would rather see the land restored to its original estuarine wetlands than turned into a resort.	See response above to same comment.
5.2 Impact of similar applications Following Brenton Cove's announcement to develop a resort, nearby properties have begun seeking DFFE approval to build additional units, including 7 log cabins and 25 more on another farm. Although these sites are zoned Agriculture, most have restrictive title conditions prohibiting camping, the combined developments will greatly reduce local wildlife habitat. Applications should not be reviewed in isolation.	See response above to same comment.
6. Inadequate Fire Risk Management The proposed plan has significant fire management risks and contradictions. **6.1 The Flawed "Low Risk" Classification** The mitigation strategy is flawed because it classifies the development as "Low Risk Group 4," which relies on municipal firefighting services. This classification does not fit the Knysna region, known for being one of South Africa's highest fire-risk areas—a point even acknowledged in the Basic Assessment Report referencing the destructive fire of June 7, 2017. Labeling a new campsite with 25 campfires as "Low Risk" is inconsistent and undermines the credibility of the fire safety plan, which merely depends on municipal response.	See response above to same comment.
6.2 The "Interim Plan" Has No Fire Mitigation The developer's full plan, which relies on a Water Use License not yet obtained, includes a 100,000-litre water bladder, fire hydrants, and a petrol-powered pump. However, the interim plan being submitted excludes firefighting infrastructure, with just 10,000L of domestic water—expected to be used in one day—and no dedicated supply for firefighting.	See response above to same comment.
6.3 Inadequate Reliance on Municipal Services The Interim plan includes just two 5,000-litre tanks for domestic use, relying on an	See response above to same comment.

unreliable municipal connection—Lake Brenton currently has no municipal water supply. This proposal does not adequately address the high fire risk and depends too heavily on external support. Both the "Low Risk Group 4" classification and the BAR note reliance on municipal fire fighting services, but the site's remote location and servitude road access mean these services would be unavailable during a major fire event. Approving new commercial development in this area cannot be justified on assumptions of municipal service availability for protection.	
6.4 Missing Specialist Fire Risk Assessment The Basic Assessment Report (BAR) for the environmental application lacks a specialist Fire Risk Impact Assessment. This omission poses a procedural problem that endangers both the proposal and local residents. Failing to model fire risk and specify mitigation measures such as firebreaks, sprinklers, and water supply is a critical flaw in the NEMA process, especially considering the site's location and history.	See response above to same comment.
Kevin Mullin, 7 December 2025 I&AP comments are similar to the above, but not exactly the same therefore repeated	
I strongly oppose this approval, as do the vast majority of residents in this community, due to the significant environmental, ecological and social harm it would cause while primarily serving only Mr Neething's private financial interests. Below are a list of some of my reasons:	Noted
1. The "Low Sensitivity" Claim is a Fundamental and Dangerous Flaw The developer's application is built on a critical logical error: it claims the **development footprint** has "low sensitivity" while completely ignoring the **highly sensitive ecological context** in which the site is located. The application rests on the assertion that the project "avoids all sensitive habitats", which is impossible given the location. The Knysna Estuary is one of the most ecologically significant estuaries in South Africa and forms part of the Garden Route National Park. Any development adjacent to this system must be assessed as **high risk by default**, regardless of how the immediate footprint is classified.	See response above to same comment.
1.1 Artificial Distinction Between "Footprint" and "Context" The Site Sensitivity Verification Report (SSVR) states that "the aquatic theme has LOW sensitivity for the site itself", while simultaneously confirming the site is **adjacent to the Knysna Estuary**, which is rated **"Very High Sensitivity"** and is habitat for the **Endangered Knysna Seahorse *(Hippocampus capensis)*** and the **Critically Endangered false limpet (*Siphonaria compressa*)**. In addition, the application ignores the adjacent neighbouring property which contains known **protected grass owl and forest buzzard habitat**, and which is itself	See response above to same comment.

the subject of a tourism development application. The **cumulative impact** of these developments has not been meaningfully assessed. Even limited construction activity, as well as ongoing noise and light pollution, will degrade these sensitive habitats and reduce breeding success. The logic used is dangerously misleading. Environmental impact does not stop at a property boundary. Claiming "low sensitivity" for the site while ignoring the surrounding ecosystem is comparable to claiming that a lit match is safe because it is "low risk to itself" while it lies next to a pool of fuel. By artificially compartmentalising risk, the BAR has **systematically underestimated the true environmental risk**. This is not a low-risk site. It is a high-risk location that has been deliberately under-scored.	
1.2 The "Cumulative Impact" Assessment is Superficial and Inadequate While the developer acknowledges nearby wetlands, the only mitigation proposed is to **move the conservancy tank**. This is wholly inadequate. There has been no meaningful assessment of the combined impact of placing a high-intensity tourism operation — with wastewater, lighting, noise, vehicle traffic and human disturbance — directly adjacent to a sensitive wetland system. The proposal to irrigate **8,600 litres of greywater per day** into the ground near a protected wetland fundamentally contradicts the claim that impacts will be managed. Relocating a tank does nothing to mitigate this risk. The BAR itself acknowledges that although the site is described as "low sensitivity", it is adjacent to**Very High Sensitivity estuarine and salt marsh habitats**. The project introduces textbook "edge effects": polluted runoff, litter, light pollution, sound disturbance, and habitat fragmentation.	See response above to same comment.
2. The "Transformed Land" Argument: The Site is Inherently Unsuitable The developer describes the area as "existing transformed land" and refers to it as a "garden" .However, their own specialist report confirms: - The land was **in-filled in the 1950s** - The private lagoon was artificially created in the 1980s - Original vegetation was estuarine in nature - The existing habitat is entirely **man-made** The BAR itself admits that a wetland would originally have extended across this site had it not been disturbed. The fact that this damage occurred before current legislation does **not** make the site suitable for further degradation. If such infilling were attempted today, reinstatement would be a legal requirement. This is not a stable or low-risk soil system. It is unconsolidated artificial infill, lacking indigenous soil structure and **lacking any natural filtration capacity**. This makes it **entirely unsuitable** for wastewater irrigation or intensive human use. The proposal to discharge **8,600 litres per day** of nutrient-rich greywater onto this porous artificial surface guarantees leaching into the adjacent protected wetland and estuary. This outcome is not hypothetical — it is inevitable.	See response above to same comment.

3. Sewage and Greywater Plan (Appendix M) The proposed wastewater system is unworkable, high-risk, and directly threatens the estuary. The applicant proposes an "interim solution" in lieu of a Water Use License. As there is no guarantee a permanent license will ever be obtained, the interim solution must be treated as the **actual operational plan**. **3.1 Greywater Risks** The plan clearly states that greywater will be used for lawn irrigation. On this site, with: - Flat, low-lying topography - Porous artificial infill - No natural filtration …this is effectively a **direct discharge pipeline into the wetland and estuary**. Greywater contains phosphates, nitrates, detergents, pathogens and chemicals. The Knysna Estuary is an oligotrophic system, meaning it is extremely sensitive to nutrient enrichment. Even small increases cause algal blooms, which destroy **eelgrass (*Zostera capensis*)** — the primary habitat of the endangered Knysna seahorse. The private cove is a semi-enclosed breeding refuge for fish. Because it is isolated from tidal flushing for up to 18 hours a day, pollutants will **accumulate and concentrate**, magnifying ecological damage. **3.2 Sewage (Blackwater) Risks** The conservancy tank is 12,000 litres. Daily sewage production is acknowledged by the applicant as**8,600 litres per day**. This means the tank will be full in **less than 36 hours**. The idea that municipal vacuum trucks can service this site daily — including peak holiday periods —is unrealistic and unsafe. The risk of overflow is extremely high. Knysna Municipality has a documented history of sewage failures, including regular overflows at Lake Brenton. A single missed collection or rain event could result in raw sewage discharging directly into the estuary. **3.3 Internal Contradictions** The specialist report explicitly recommends: **"No irrigation runoff into the estuary."** Yet the engineering plan directly approves greywater irrigation of lawns. This is a fundamental scientific and procedural failure. The EAP has ignored its own specialist's mitigation requirements.	See response above to same comment.
4. Flawed Legal Process	

4.1 Basic Assessment is Legally Insufficient A Basic Assessment is intended for projects with predictable, low-risk impacts. This proposal involves: - Protected buffer zones of a nationally significant estuary - Endangered species habitat - Artificial infill with elevated pollution risk - High-risk sewage handling proposals This triggers listed activities under NEMA and requires a **full Scoping and Environmental Impact Report (EIR)**. The current process is legally inadequate. **4.2 Violation of NEMA Principles** The proposal violates: **Precautionary Principle** – The risk of irreversible damage is too high. **Duty of Care (Section 28)** – Pollution and degradation will almost certainly occur. **Public Trust Doctrine** – The natural environment is being degraded for private gain. In addition, local **public roads and community safety** will be negatively affected by increased traffic. Lake Brenton is within a Conservancy and is home to bushbuck, bushpigs, reptiles and birdlife. Wildlife fatalities already occur on local roads, and any increase in traffic significantly increases animal deaths.	See response above to same comment – this is a legally regulated process -
4.3 Inadequate Main Road Access and Fatality Risk **T**he main access road to and from Lake Brenton is not designed or capable of safely accommodating the increased traffic volume associated with this development. This road is: • Narrow • Winding • Lacks pedestrian infrastructure • Shared by residents, wildlife, cyclists and walkers The proposed resort will dramatically increase: • Daily vehicle movements • Service vehicles • Delivery trucks • Municipal vacuum tankers These vehicles will be large, frequent, and operating in low visibility and night-time conditions. Given the established presence of free-roaming wildlife — including bushbuck, bushpigs, snakes, tortoises, birds, and domestic animals — the increase in fast,	The increase in traffic for 25 tents which will be seasonally occupied has been evaluated by the engineer and will not result in any significant change which requires assessment. All vehicles are subject to the traffic regulations and the assumption that the few visitors to the property will speed or be dangerous is unfounded.

heavy vehicles makes animal fatalities inevitable. The lack of safe passing zones, wildlife crossings, speed-control infrastructure, and emergency response capability means the risk to human life is also materially increased. This risk has not been assessed, not modelled, and not mitigated in the BAR. This is a serious omission and renders the assessment incomplete and unsafe.	
5. Inadequate Social and "Sense of Place" Assessment **5.1 Community Opposition** A clear majority of the Lake Brenton community opposes this development. This is a material socio-economic impact that must be formally considered. The BAR dismisses noise, traffic, safety and visual impact as "low", directly contradicting lived community experience. The proposed development is incompatible with the character of Lake Brenton, which has no commercial tourism infrastructure. A resort permanently degrades the "sense of place" and rural character. Many residents would prefer ecological restoration of the property rather than commercial exploitation.	See response above to same comment.
5.2 Cumulative Development Risk Additional resort-style developments are now emerging in the area. These properties are zoned Agriculture I and many have title deed restrictions prohibiting camping. These applications cannot be assessed in isolation. The cumulative impact will result in significant and permanent habitat loss.	See response above to same comment.
6. Fire Risk is Inadequately Addressed **6.1 Incorrect "Low Risk" Classification** The classification as "Low Risk Group 4" is indefensible in a region that experienced one of South Africa's most destructive fires in 2017. This contradiction invalidates the fire management plan.	See response above to same comment.
6.2 Interim Plan Has No Fire Infrastructure The interim plan has: • No firefighting water reserve • No on-site fire infrastructure • No guaranteed pump systems All domestic water is consumed daily, leaving zero firefighting capacity. 6.3 Unsafe Reliance on Municipal Services Municipal water supply is already unreliable. This site is remote and accessed via servitude roads. During a major fire event, municipal services will be overwhelmed and unable to respond. 6.4 No Specialist Fire Assessment	The engineers have evaluated the proposal and indicated the risk classification of the proposal. The owner's intention is to however store additional water as indicated and pump to be in a position to use the water. The borehole, which has an 18 000 litre **per hour** flow rate, is existing. A Water Use License is not required to use borehole water on a farm and that use can be for fire fighting should the need arise. Pumping directly out of the tidal pond is also possible should an emergency arise. A specialist fire study is not a requirement of this process.

A specialist Fire Risk Assessment is absent. This is a fatal procedural omission under NEMA.	
A E Owgan, 7 December 2025	
Summary Conclusion Notwithstanding the broad claim in the BAR of supporting local and provincial development objectives and the need for ECO Tourism development, when weighing risk vs benefit, the risk of damage to a unique and sensitive environment vs. the benefit that a commercially focussed tourist enterprise will bring, only the developer benefits from this proposed development. No value or benefit accrues to the region, environment or the residents of Lake Brenton. The need for a camping site in Lake Brenton cannot be justified. Comments with reference to the Basic Assessment Report for your consideration as follows	Noted -
1. **Historic claims**, Reference to the historic existence of camping facilities in the Knysna Area and the loss thereof, may well be true but it is misleading to suggest or imply that this could be grounds for the creation of another camping site in the area, in particular, with reference to the Lake Brenton area, for the following reasons 1.1The Lake Brenton Caravan park of old, now developed into a residential estate, was the only known commercial camping establishment in the Lake Brenton area and was established in the days when the area wasn't under the development pressure Lake Brenton has experienced in subsequent years. Only the Lake Brenton "village" and other privately low intensity habitation existed at the time. 1.2 The reality today is that, due to the attractive and appealing character of Lake Brenton, numerous housing estates have emerged since that time. This has put pressure on the surrounding environment. Lake Brenton has become a residential area set in a sensitive natural area. These residential complexes have become the permanent homes of the residents who are attracted to this area and appreciate and value the area for its quiet, peaceful and natural character. This is, I believe, a direct consequence of Lake Brenton not being a commercial centre driven by tourism. **The Lake Brenton local residents do not want this development**	As reflected in the BAR The aesthetics of the area and the wish to share this beauty, peace and tranquility with not just the fortunate few residents, is one of the main drivers that has motivated the landowner to want to invite guests onto his property.
2. **Environmental and operational risk issues**. The report in my view underestimates the potential hazards to the environment of the Brenton Cove proposed development and overestimates the availability and capability of local govt. and other entities to provide the necessary services and risk management required for the development. Damage to the environment could be long lasting and will impact a very sensitive, valuable and unique estuarine system.	The project will be largely self-sufficient and not reliant on the municipality or their services.

2.1 **Grey Water, Sewage(Black water) management**. 2.1.1 Grey water distribution on the previously disturbed (transformed) estuarine areas as a means of disposal, on the basis that it is a "low sensitivity" area and therefore acceptable, is false. The area is adjacent to highly sensitivity estuary and it is short sighted, to assume that run off from the so called low to the highly sensitive areas will not occur. The estuary is a national, if not a world, treasure and we should all be reminded of this fact.	Grey water use amended. Only treated effluent proposed to be used for irrigation.
2.1.2 Blackwater containment in a 12000 litre conservancy tank may seem like a good plan except that it relies on regular/frequent emptying, a service to be provided by the local govt. Knysna. At the projected rate (peak assumed) of black water generation 8600/day in the BAR, it will need to be emptied every 1.5 days or so by a Honey Sucker service. I do not believe it is feasible, and therefore unrealistic, for the developer to rely on the Knysna municipality honey sucker service as a solution to sewage management. The municipality is barely able to cope with the present sewage load produced by the already established developed area, (Ref 1.2 above). A small package plant, properly sized, installed, maintained and operated, may be able to cope with the Brenton Cove sewage but comes with the attendant risk of failure. In both the honey sucker and small package plant proposals, failure and consequent pollution of adjacent highly sensitive areas will result. (Ref 2.1.1)	The proposed system will be professionally managed by a paid service provider in order to ensure no pollution risk.
2.2 Fire risk Management 2.2.1. Fire hazard. Camping is associated with the making of fires for braaing and therefore fire risk is a reality. The area falls within a high risk area generally and cannot seriously be considered low risk. The proposal does not offer any meaningful mitigation strategies. On site storage of water for domestic use is not a safe backup for fire fighting given that it could already be depleted by domestic use. Reliance on municipal fire fighting services is entirely inadequate as a solution to the fire risk. The availability of such is not guaranteed and access to the site is also not easy, given the location of the development.	As every property in Lake Brenton is likely to also partake in having the occasional 'braai', the risk is no different to any other property in the area. Braai facilities will be strictly controlled. The onsite firefighting capability takes additional storage for fire fighting into account as well as standby pumps etc.
3. Increase of movement of vehicles and people The proposed 20 (25 according to pg 21 in the services summary of services section) camping sites can, when fully booked, and assuming only one vehicle per campsite up to an additional 20 t0 25 vehicles using the full length of Capt. Duthie road. Estimating 2 persons per campsite 20 (or 25) sites ie. 40 to 50 20 seems low when one can realistically expect families of 4 to 5 in the holiday season. This can have a marked effect on the estimates made in the BAR of the need for water and sewage management	The tents will all be fixed specified sites accommodating a couple. The services indicated in the services report take this into account

4. Trends and Precedent The Brenton Cove development cannot be looked at in isolation. The adjacent and other properties in the area applying for DFFE approval must be included in arriving at a decision regarding approvals. The cumulative negative impact of such developments on this sensitive area, given their proximity to the estuary, would be great and cannot be ignored.	The authorities, both DFFE and Municipality, take all planning applications into account when considering an application. The BAR takes the known cumulative impacts into account.
Andrew Moffat, 11 November 2025	
I would like to know the following: Where will the waste water/ sewage be stored and what is the long-term plan for the management, considering this property us under the 100 year high water mark?	**11 Nov 2025 reply by HilLand Environmental:** *As indicated in the draft BAR the sewage will be collected in a conservancy tank and that will be pumped out via honey sucker and transported to the municipal waste water treatment works for processing. In the long-term they are considering installing a package plant to treat sewage on site to a standard that can be used for irrigation purposes. This will be subject to a water use licence which will need to be issued by BOCMA as their process is undertaken. | Grey water and black water will be separated and grey water will be filtered and used for garden irrigation.* Change to this reply is that the grey and black water will no longer be separated – the treatment plant will treat all the water.
Where will the guests / campers be launching their boats, as the slipway at Brenton on Lake (during season) is already congested. .	*– as indicated in the draft BAR, guests will not be permitted to bring motorboats to the camp site (camp site rules). Access to the water on site will be in the form of non-motorised vessels (canoe/kayaks) only.*
Beverley and Clive Bradnick, 7 December 2025	
Please note below my formal detailed objection, outlining my concerns regarding the proposed tourism development in Brenton-on-Lake	Noted
I have recently purchased property in Brenton on Lake. This proposed project does NOT sit right with me. The approval of this rezoning will set a precedent for similar applications from surrounding landowners. Once a tourism-based rezoning is approved in this environmentally sensitive area, it will open the door to multiple developments, leading to incremental urbanisation around Brenton-on-Lake. This contradicts the long-standing conservation and low-density character of the Brenton area. I care deeply for our Biodiversity and Sensitive Habitats and I do not approve the proposed rezoning. There is no way that all the construction work, followed by the increase in footfall of tourism will protect the fans and flora this area. It will also destroy the peace and quiet of our beautiful neighbourhood!	Any landowner is permitted to apply in terms of both environmental and planning regulations. And the authorities need to consider applications as they are submitted. There is no "tourism based rezoning" being applied for – the application is a consent use for camping on agriculturally zoned land. The zoning remains agricultural and no "urbanisation" can take place on agricultural land.

I feel it also necessary to point out that said new tourists will feel the need to wonder around our houses, for a look see. This is unacceptable on all levels - security, and privacy being two major issues here that will be at risk!!	It is not clear how the author anticipates that tourists coming to stay in a tent on a property are going to now "wonder around our houses, for a look see". Any member of the public is free to drive and walk on any public street, but they are not permitted onto private property for a "look see".
So, as a new owner in this beautiful piece of paradise, I STRONGLY object to this project going ahead.	Noted
Doug and Anne Davis, 08 December 2025	
We hereby lodge our repeated concerns and objections to the revised Brenton Cove proposal for 25camping sites. We strongly believe that all the previous reasons presented to the municipality for not allowing the proposed development are still valid. The position of the proposed area is a unique and vital natural area frequented by the last of the free roaming natural wildlife, that has made the Lake Brenton and Western Heads Conservancy such an important environmental area. Animals such as bushbuck, blue buck, bushpig, porcupine, Dune mole rats, mongoose, gennet, caracal, otter and numerous rodents as well as the snakes, insects including so many wetland creatures habitat and birds will still be under great threat as 25 camping sights will, if not directly on the proclaimed sensitive areas, will still be dangerously close and have a potentially huge negative impact on the movement and habitat of both the land, intertidal and aquatic creatures of the area. The constant movement of vehicles and people, especially children that camping activities bring about cannot be controlled sufficiently to protect this fast dwindling of nature. The Western Cape and particularly the Garden Route, especially along our coast and around our few estuaries is far losing the last of its pristine natural areas to housing estates, holiday resorts and informal settlements.....which especially at this time of global warming/climate change and the potential of becoming a water limited area....as we are experiencing right now, cause further negative impacts on the indigenous fauna and flora of this area. Please let us not see further distruction of this vulnerable and precious piece of land and its surrounds. Let us preserve something for the future wellbeing of the animals still here.	Noted The free roaming wildlife will continue to free roam in the garden as they currently do. The tents are exclusive and accommodate a couple and are not family focused units.
Edward, 25 November 2025	
I am a resident of Lake Brenton, I am opposed to this application on the following grounds: **1.** Even though this is a scaled down version of the first application, I do believe that 5 camping Pods and 20 camping pitches for visitors tent to be erected is too much for the environment to sustain. Especially in terms of water requirements, waste sewage and noise and little pollution.	The application is self-sustainable. Largely own water, own electricity and own sewage treatment are proposed.

2. Every year around every holiday period, Easter and Christmas, more animals, are killed, especially the Bush Buck, than any other time of the year, this is because despite all warnings, visitors do not take notice of speed limits and are not aware of this very special environment that we live in. We should resist any plan to commercialise this special area, once commercialisation takes place on this scale is allowed to take place, it will increase unabated and eventually destroy this very special part of the Western Cape.	Awareness of the uniqueness of the area for local wildlife is one of the main reasons people visit Lake Brenton. As such, it is anticipated that guests visiting the tents will be socially responsible drivers, as are all the residents of Lake Brenton.
3. Please look at the number of tents at Africamps Wilderness site, there are 8 in total (https://africamps.com/farm/wilderness-africamps-oakhurst/) way less proportionally given the land area, than this proposed development.	Noted – the owner is making application for 25 sites, different Africamps have different densities or numbers of tents. The planning authorities are in a position to limit the numbers should they so desire.
4. In many ways I would actually support a high end site with say only 5 tents and no camping pitches.	There will be no self-pitch tent sites. The application has been modified so that all the tents are on raised decks. Support for 5 high-end tents is noted.
I am opposed to the development as laid out in this specific application	Opposition to this layout noted.
F Z Meneses, 2 December 2025	
I, …, hereby lodge this formal objection to all three components of the Knysna Municipality application for "The Camping Site: Portion 152 of Farm Uitzigt No. 216", as notified in your letter dated 07 November 2025. Although the application materials and site plan are professionally prepared, the proposal remains wholly unsuitable for Brenton-on-Lake. My objection is based on the combined grounds set out below, which draw on the information supplied in your notification and the planning/environmental reports for the wider Farm 216 proposals.	Objection noted
1. Application components objected to I object to the following three parts of the application in their entirety: 1. Removal of title deed restrictions that expressly limit the property to residential and/or agricultural use and prohibit hotels, boarding houses, restaurants or any trading/business uses. Application for consent to establish a camping site (25 camping sites as described in the Draft BAR). Approval of the attached site plan which formalises the layout and infrastructure for the proposed camping operation.	Objection noted
2. Core objections and reasons **A. Title deed protections must be retained** The existing deed restrictions preserve Brenton-on-Lake's low-density, conservation-focused character. Removing these protections will set a dangerous precedent that invites further commercialisation and tourism-driven rezoning across the subdivided portions of Farm 216. Residents rely on these restrictions when choosing to live here; their removal would	Similar title conditions applied to the whole area – application to remove old title deed conditions that are no longer appropriate can be lodged by any property owner.

be an unjustifiable change to settled expectations and planning intent.	
2. 3. B. Camping is incompatible with the site's ecological sensitivity The Draft BAR proposes up to 25 campsites within garden/transformed areas adjacent to estuarine and wooded habitat. Camping activity is well-known to cause localised but serious environmental impacts including: • soil compaction, erosion and altered runoff/hydrology; • trampling and loss of vegetation and seedlings; • spread of invasive plants; • disturbance of wildlife through noise, light and human presence; • increased risk of contamination to watercourses from human waste and greywater; • elevated fire risk in an area with a history of destructive fires. This site lies within the ecological matrix of the Knysna estuary fringe and adjacent natural habitat; introducing transient, high-intensity recreational use here is inappropriate and unsafe for biodiversity and residents.	- Tents are on raised decks – no compaction - Tents are over lawns – no loss of sensitive vegetation or seedlings - The owner is systematically removing alien vegetation from the property, guests are not going to bring in alien plants. - The tents area and use is designed for low impact, low light, low noise use. - The sewage treatment plant will ensure that waste is treated and no contamination occurs. - The proposal does not elevate the risk of fire, fire management is part of the management of the farm as a whole. The tourism use of an area adjacent to the GRNP is compliant with the uses indicated in the GRNP Management Plan - see quiet zone uses
C. Cumulative impacts with neighbouring applications This application must be assessed in conjunction with other proposals on subdivided portions of Farm 216 (including the recent Portion 192 rezoning / "Knysna Lake Cabins" proposal). Approving multiple tourism uses will produce cumulative impacts far greater than the sum of single, isolated applications — adversely affecting habitat connectivity, noise regimes, light pollution, road/parking pressure, and local fauna (notably birdlife and species of conservation concern reported in ecological assessments).	Each application is assessed based on its merits and cumulative impacts are also included in the consideration of the applications. In relation to the application for tourist cabins on the neighbouring property and the camping area on this property: Habitat connectivity – there is no fragmentation of habitat or corridors between the two properties – they will remain as they currently are. Noise regimes, light pollution, local wildlife – these will be no different to any other homes or living arrangements within Lake Brenton. Effectively 25 additional bedrooms at Brenton Cove and the 7 cabins proposed next door. Low level lighting, rules to limit noise. Wildlife moves freely as they currently do through the areas.
D. Protections required under environmental law — development conflicts with statutory duties This objection invokes the following legal and policy instruments: • Environmental Conservation Act 73 of 1989 — to prevent deterioration of the natural environment, safeguard animal conservation, and protect vulnerable aquatic/estuarine ecosystems. • National Environmental Management Act (NEMA) 107 of 1998 — including principles of precaution, avoidance, and sustainable use; and its related instruments (Biodiversity Act, National Water Act, Protected Areas considerations). The proposed campsite is inconsistent with the precautionary and conservation obligations of these statutes and the obligations set out in local and provincial spatial plans to protect CBAs and wetland systems.	ECA – this Act was replaced by NEMA other than for the OSCAE regulations which remain in force and are addressed in the application. NEMA – this application addresses The application addresses and takes these principles and obligations into account.

E. Site-plan inadequacies and mitigation shortfalls While the site plan claims to use "existing transformed areas," the broader ecological and social effects are not adequately mitigated. Measures such as limiting vehicle access, lighting curfews, waste containment, and strict limits on visitor numbers cannot fully eliminate the documented risks of camping activities in this sensitive location. Furthermore, site-plan approval would normalise the commercial use of land historically and legally reserved for residential/agricultural purposes.	Approvals will be linked to strict conditions of approval which will protect these aspects.
3. Evidence and supporting material • The Draft BAR and notification (07 Nov 2025) describe the proposal and the 30-day comment period; I object within this statutory window. (Uploaded file: /mnt/data/KNY25.1157.07 - Notification letter I&APs.pdf). • Related planning/environmental material for other portions of Farm 216 (e.g., Portion 192 'Knysna Lake Cabins') indicate presence of wetlands and species of conservation concern — illustrating the landscape-scale sensitivity and the dangers of piecemeal approvals. (Uploaded file: /mnt/data/11 Appendix 5.6 Planning Report.pdf). • I reserve the right to supply further supporting evidence (photographs, species observations and expert comment) should the Municipality require it.	Objection and comments noted.
4. Requested outcome On the grounds set out above I respectfully request that: 1. 2. 3. The removal of title deed restrictions be refused and that the historic residential/agricultural limitations be retained. The consent application for a camping site be refused as contrary to environmental law, planning policy and the interests of residents and biodiversity. The site plan be refused and/or returned for substantial reworking only within a framework that ensures no expansion of tourism, no transient campsites, and no commercial uses contrary to title restrictions.	The various competent authorities will take your various objections into account.
5. Please note, Brenton-on-Lake's ecological integrity, quiet residential character and the wellbeing of its residents depend on careful land-use control and strict protection of wetlands, estuarine margins and critical biodiversity areas. Approving this campsite would undermine those protections and create irreversible harm to the environment and the community. Please confirm receipt of this objection and that it will be included in the public record for the Draft BAR and associated processes. I ask that all future correspondence regarding this application be copied to me at the contact details above.	The camping area aims to fit into the quiet nature-orientated character of the area. The camping is concentrated into a single node around the existing homestead so as to not expand out into the surrounding sensitive areas. The comment is included in the revised Draft BAR.
The Fred Human Family Trust represented by Freddie Human. 07 December 2025	
This letter of comments/objections is filed by the abovementioned Trust (owner of Erf 373 Brenton on Lake) as an interested and affected party by the proposed removal of restrictions on the land known as Portion 152, Farm Uitzig No 216 Lake Brenton Knysna and the development thereof.	The landowner is entitled to request removal of restrictive title deed conditions. Such an application is in progress.

1. Overall Picture The land is situated in a High Sensitivity area not suitable for development of any kind. Proceeding with ay development thereof will inevitably require the removal of restrictive conditions in the title deed. There is an remain good reasons why restrictive conditions were inserted in the Title deed a long time ago (approximately 1956) and carried forward to the current Title Deed (T000016920/022) under which deed the property is currently held. Paragraph C subsection 2 provides: *"2. The land shall be used purely for residential and/or agricultural purposes which shall particularly not include the carry (on) of an Hotel, Boarding House, Restaurant or used for any trading or business purposes whatsoever."* [this restrictive condition is again repeated under paragraph D subsection 1] Nothing could be clearer than that. There personal rights cannot simply be ignored. It is questionable whether the Municipality has the authority to override personal rights of the nature in question.	
2. Effect on surrounding areas The Knysna Estuary is highly sensitive and already suffering from sewerage overflow in several areas. Allowing grey water usage on the property will inevitably leach into the estuary exasperating the problem.	The sensitivity of the estuary is acknowledged and known and there is no intention for additional sewage "stress" to reach the estuary. The sewage treatment plant proposed will treat water to ensure that there is no release of contaminated water to the system. Release of water will be limited to the conditions of the WUL (still to be issued).
3. Sewerage and garbage collection Knysna Municipality is struggling to cope with the existing sewerage system and lack of tanker availability for both sewerage and garbage collection. Dumping an extra 8600litres of sewerage into the system will simply put too much pressure on Knysna Municipality. It would simply not cope with the few sewerage tankers and garbage removal vehicles available. As recent newspapers reports confirm, Knysna Municipality had to utilize vehicles from George Municipality. Coping with additional wastage is not feasible, now or in the long term.	There will be no reliance on the municipality for sewage collection - private contractor service will be used if and when necessary.
4. Scoping and environmental impact report Given the sensitivity of the area a Scoping and Environmental is mandatory. No such report has been submitted.	The NEMA process is regulated and the listed activities triggered require a Basic Assessment process to obtain environmental authorisation. Scoping EIA is not applicable to this application.
5. Section 28 of Nema The development will certainly cause pollution and have a huge impact on the	No pollution from the application is anticipated or required to be authorised.

ecology. Therefor section 28 of Nema must be complied with.	
6. Section 33(4) of Lupo This section requires the Council to have regard to whether the removal of restriction would be in the public interest. There is no evidence that the proposed removal will benefit the public nor the surrounding community. The community is dead against the removal of the restrictive and the development to follow. They have expressed their views on this in numbers as can be seen from the objections to the previous application.	The municipality is considering the removal of restrictions application.
7. Irreversible Precedent Allowing the removal of the restriction which have been in place for decades and for good reason to be removed will open the floodgates to all landowners on the pristine Western head of Knysna and permanently rob it of the unique and sensitive environment to precious wildlife which it current is.	Noted – and will be considered by the local authority
Gavin Whitfield, 1 December 2025	
1. **Knysna Estuary has an East and a Western Head.** Generally speaking, the Eastern Head is highly built up and populated, far more than that of the Western Head. This places the Western Head in a far more natural state being quiet and allowing the sensitive Estuary ecosystem to continue undisturbed. The Western Head biodiversity is all Knysna Estuary has left in a natural environment. Most of the Lake Brenton community value this natural state, quiet and serenity. We are the protectors of the Western Head to keep it in its natural state.	Noted.
2. If we allow caravan parks and camping facilities to be constructed by greedy developers, the fragile Estuary will collapse due to excessive human intervention. Tourists will have no reason to visit Knysna. The wild animals, Seahorses, and bird life will disappear, the Estuary will be overfished, and the vagrants will move in and trash what is left of the natural beauty of the Western Heads.	These highly emotive concerns are addressed through the specifics of the proposal – there are 25 tents which will be installed by the landowner who lives on the property (not a greedy developer). There are rules and regulations relating to the use of the property as well as tourist access to the adjacent Garden Route National Park – please see the requirements from SANParks for the adjacent "quiet zone" which is covered by the Estuary Management Plan.
3. Most Lake Brenton residents bought property here due to the quietness and natural beauty of this area. If these applications are allowed, the area will be subject to noise pollution, trash, overfishing, E. coli from the huge amount of extra sewage that can only find itself flowing into the Estuary one way or another. The infrastructure (roads, water, sanitation etc.) is presently under huge stress with the existing population. If we allow more people to reside in this area the seams will burst and there will be ecological disasters on many fronts. This in turn will require a huge financial burden on the already bankrupt Knysna municipality who will never be able to fund a return to a clean and healthy ecosystem.	The landowner also bought due to the quietness of the area and the proposed consent use camping area is to be able to share this with a few select tourists. Services are such as to not place pressure on the municipal system or the estuary.
4. Fire risk will be greatly elevated due to the large number of camping sites proposed. This is a numbers game, it will not be "if", it will be "when" we have Knysna Fires episode 2. The safety risk is huge.	Fire safety is part of the application. The property is already a member of the FPA and has firebreaks in place. Additional water storage for fire safety is proposed as well as a private pump for fire fighting if and when necessary.

5. Suddenly there are other developers jumping on the gravy train, planning to develop similar sites into camping establishments on this sensitive eco system of ours. If one of these developments is allowed, how are we going to deny the other developers standing in the queue? The consequence will be disastrous.	All landowners are entitled to make applications in terms of planning and environmental regulations.
6. This document holds the reasons to my **permanent objection** to any further development of this property.	Objection noted.
Lauren Brauer, 8 December 2025	
1. This Site Is Absolutely the Wrong Place for a Resort Before getting lost in technical reports and specialist terminology, let's just make one thing clear: this piece of land sits right next to one of the most sensitive estuarine systems in the entire country. The Knysna Estuary isn't just "important"—it's home to endangered species that react badly to even small shifts in water quality or disturbance. Trying to argue that the footprint itself is "low sensitivity" while it literally touches land classified as Very High Sensitivity is misleading. The application slices the property into neat little boxes to make it seem harmless, but nature doesn't work in boxes. You can't dump a development on artificial infill next to a protected wetland and pretend the wetland won't feel it.	Sensitivity of the estuary is acknowledged and has been considered. The site has to be assessed, and it is low sensitivity as it is a transformed garden area. Residual and cumulative impacts are also assessed and every effort made to avoid impacts or mitigate impacts.
2. "Low Sensitivity"? Not really? The Site Sensitivity Report claims the land itself is low sensitivity. Then in the same breath, it explains the property used to be part of the estuary before humans filled it in decades ago. So let's call it what it is: a destroyed estuarine wetland sitting on artificial, porous material with zero natural filtration capacity. If someone tried to create this infill today, it would be 100% illegal under NEMA. But because the damage was done long ago, the developer is now using it as a loophole for brand-new development. That's not how environmental law works. And now this unstable man-made platform is supposed to handle 8,600 litres of greywater per day? Irrigated straight into lawns that sit on infill with no proper filtration? That wastewater goes straight into the groundwater and then into the estuary. It's basically a direct pollution pipeline.	The history of the site is included in the assessment. The sewage treatment plant will be installed upfront, and any water used for irrigation will be treated effluent as per the WUL still to be issued by BOCMA.
3. The Greywater & Sewage Plan Is a Disaster Waiting to Happen **Let's break this down simply:** • **Greywater irrigation:** The plan is to spray nutrient-rich wastewater onto lawns. This guarantees leaching into the estuary, which is an oligotrophic system (nutrient-poor). Adding nutrients means algal blooms, dying eelgrass, and a direct hit on the endangered Knysna Seahorse and Critically Endangered false limpet.	The sewage treatment will no longer be separated into greywater and blackwater – see revised report.

The cove is often closed off for long hours at a time, so pollutants will simply accumulate. • **Sewage:** A single 12,000L tank for a resort generating 8,600L/day? That tank fills up in under 36 hours. That means a sewage truck must arrive daily—including weekends, holidays, and peak season. And this assumes no missed collections, no municipal failures (which already happen regularly), and no overflows. One overflow = raw sewage in the estuary. • The developer calls this an "interim" plan, but this is the only plan actually being applied for. There's no guarantee a Water Use Licence will ever be granted, so this is the real plan, and it's unworkable and unsafe. On top of all this, the BAR directly contradicts its own specialist who warns that no irrigation runoff must reach the estuary. Yet the approved plan guarantees runoff. The inconsistency speaks for itself.	Water Use Licence application is now in progress.
4. Cumulative Impact Has Basically Been Ignored There's a neighbouring property with protected wetland and grass owl/forest buzzard habitat. Another farm up the road is also looking at a 25-unit development. These areas are meant to be agricultural, not tourism hubs. A bunch of resorts popping up in a conservancy zone is going to destroy wildlife corridors and dramatically increase pollution, traffic, noise and light disturbance. This application looks at everything in isolation, which is the opposite of what NEMA requires.	The cumulative impacts are included in the application and consideration processes by both environmental and planning authorities. Tourism is a consent use within conservation areas and does not necessarily result in destruction of wildlife.
5. The Social & "Sense of Place" Impact Is Being Downplayed The vast majority of Lake Brenton residents do not want this development. This village is quiet, nature-driven and residential. There are no shops, no hotels, and no resorts—and that's exactly why people live here. The Visual Impact Statement claiming low impact is unrealistic. Twenty-five campsites permanently change the character of this village. The sense of place is not something you can paper over with a few visual simulations. Many residents would actually prefer the land to be restored back to wetland—certainly not turned into a resort.	Noted The village previously had a resort which has been converted to urban use. The visual impact and sense of place of the village will not be altered at all as the application is not in the village. The 25 tents are proposed on an agricultural property that is near the village and the tents are located within the existing homestead area on that property. Lake Brenton residents that have an elevated view over the property will be able to see the tents between the trees in context of being able to see the rest of Knysna and the estuary.
6. Fire Risk Has Been Totally Undersold This is honestly one of the most alarming parts. Knysna experienced one of the most destructive fires in South African history. The area is well-known for high fire risk. Yet the engineering report classifies the resort as	The engineering report indicates the regulations. The property owner is a member of the FPA and has included additional fire fighting readiness on

Low Risk Group 4, which relies almost entirely on municipal firefighting response. That's not just inaccurate—it's reckless. The "interim" plan (again, the only real plan) has no dedicated firefighting water supply at all. Only 10,000L of domestic water for the entire resort. The municipality is often unable to supply water reliably to Lake Brenton as it is. No specialist fire assessment. No firebreaks. No hydrants. No realistic emergency plan. This alone should be grounds for sending the application back.	the property which includes firebreaks, alien vegetation removal, additional water storage and pumps.
7. The Wrong Legal Process Was Used A Basic Assessment may be acceptable for low-risk, predictable projects. This project is neither. Because it triggers buffer-zone activities, endangered species risks, pollution concerns, and cumulative impacts, it should absolutely be going through a full Scoping and Environmental Impact Report (EIR). The current BAR does not meet NEMA's minimum standard of precaution, duty of care, or public trust obligations.	The process is a legally regulated process for activities in listing notices 1 and 3 a Basic assessment process is required.
8. It Conflicts With Knysna's Spatial Development Framework The SDF clearly discourages tourism intensification inside sensitive ecological zones and established residential areas. This development goes against the spirit and the letter of the SDF.	The application is compatible with the SDF – the property is not in an established residential area – it is an agricultural property close to the residential area. Camping is a consent use on Agricultural land.
Conclusion **This application:** • Downplays environmental sensitivity • Bags high-risk engineering solutions as "mitigation" • Contradicts its own specialists • Ignores cumulative impact • Fails to address major safety hazards • Uses the wrong legal assessment process • Overrides community sentiment • And puts the Knysna Estuary at direct risk For all these reasons, this development should not be approved in its current form, and a full EIR should be required if the applicant wishes to continue.	- The sensitivity of the site has been accurately assessed - Mitigation measures proposed are appropriate to the impact - Specialist recommendations are not contradicted. - Cumulative impacts are assessed - There are no "major" safety hazards - The required NEMA EIA process has been complied with - Community sentiment will be recorded in the report - Knysna Estuary is not at direct or indirect risk It is not certain what is meant by "in its current form" – is there an "alternative form" that the author would support. The required Basic Assessment process has been followed. The revised Draft BAR is available for a further 30-day comment after which it will be submitted to DFFE for consideration.

Lee Theresa Blasich, 5 December 2025	
I am writing to formally lodge my objection to the above-mentioned campsite development proposal. After careful consideration of the application, I have identified several critical concerns that I believe render this development unsuitable and unsustainable for our area. **1. Traffic Congestion and Road Safety** The proposed development will result in a significant influx of traffic to an area that is not equipped to handle increased vehicle volumes. The current road infrastructure is inadequate for the additional traffic that would be generated by campers, their vehicles, and boat trailers. This will create safety hazards for existing residents and visitors, particularly during peak periods, and will negatively impact the quality of life in our community.	Objection noted. The increase in vehicle volumes will not be a significant increase. The camp site is expected to be fully occupied during season and partially occupied out of season. 25 vehicles will have an insignificant negative impact on the quality of life in the Lake Brenton community. Please note that the assessment clearly states that no boats will be permitted – reference to boat trailers is therefore incorrect.
2. Environmental Impact and Ecosystem Disturbance The development poses a serious threat to the local ecosystem. The increased human activity, noise pollution, and physical disturbance associated with a campsite operation will adversely affect local flora and fauna. Our area's natural environment is delicate and requires protection, not increased commercialization that will lead to habitat destruction and disruption of wildlife patterns.	There is no habitat destruction associated with 25 camp sites. Noise will be limited – it is a quiet area for high-end camper. Rules and regulations are in place by SANParks to control access to the estuary and camping rules will be in place by the management. Guests making use of the facility are coming for the peace and tranquility of the area.
3. Inadequate Sewage Infrastructure The municipality is currently unable to cope with existing sewage removal demands. Adding a campsite with multiple visitors will place an unbearable strain on an already failing system. The proposal does not adequately address how sewage will be managed, and there is a real risk of environmental contamination and health hazards if the existing infrastructure is further burdened. No credible solution has been presented to address this critical shortcoming.	The property will have its own sewage treatment plant treating sewage to General Standard and recycling the treated effluent for flushing toilets.
4. Insufficient Water Supply The water supply in our area is already under pressure. The proposed development fails to demonstrate how adequate water will be provided to campers without further depleting resources needed by existing residents. There appear to be no controls or monitoring systems in place to regulate water usage, which could lead to shortages and conflicts over this essential resource.	The current Knysna water supply issues are unrelated to this application. The property will be making use of own supply of water through rainwater harvesting and borehole water as is being applied for in the Water Use Licence. The current municipal water supply to the property will be a backup supply. Recycling treated effluent reduces the water demand substantially.
5. Lack of Visitor Controls and Management The proposal indicates approximately two people per campsite, but there is no clear framework for monitoring or controlling visitor numbers. Without proper oversight, there is nothing to prevent overcrowding, antisocial behaviour, or breaches of campsite rules. Who will be responsible for managing visitors on a daily basis? The absence of a comprehensive management plan is deeply concerning.	Visitor numbers are controlled through the management of the property when bookings are done. Overcrowding is not possible as bookings are linked to the availability of accommodation. The owner will be managing his property. Just like any tourism establishment, Airbnb, guest house etc the owner will have the right to request guests vacate the premises if they are not abiding by the rules -
6. Refuse Removal and Waste Management The municipality is currently unable to collect refuse on a regular and reliable basis. Adding a campsite that will generate substantial amounts of waste is irresponsible without a concrete plan for waste management. The proposal does not address	The owner and his management will be responsible for the property. In the event that the municipal waste collection does not happen, the owner will have to take waste to the municipal waste site just like any other resident in Lake Brenton.

who will be responsible for refuse disposal if municipal collection fails, which is a frequent occurrence. This will inevitably lead to littering, illegal dumping, and environmental degradation.	The owner has spent a fortune cleaning up the property form the previous owner and will be running a high-end accommodation facility – he is unlikely to allow any waste or litter problems as this would detract from the property's aesthetics.
7. Inadequate Boating Infrastructure The current jetty is insufficient to accommodate the existing demand for boat launching. The proposed campsite will bring additional boats and watercraft, placing impossible demands on this already inadequate facility. There is no provision in the proposal for upgrading the jetty or for managing the increased boating activity. This raises serious safety concerns and will lead to congestion and conflicts among water users.	The guests at the property will make use of canoes supplied by the venue. The existing jetty on site will be used by the guests. No motorised boats are permitted on the property or can be brought to the property. There will be no conflict at the public launch site associated with this application as guests will not be making use of that facility at all.
Conclusion This development proposal is fundamentally flawed and fails to address the basic infrastructure and environmental requirements necessary for a sustainable campsite operation. The cumulative impact of inadequate sewage systems, water supply constraints, traffic congestion, poor waste management, insufficient visitor controls, and limited boating facilities makes this proposal untenable. I strongly urge the planning authorities to reject this application in its current form. Should the developers wish to resubmit, they must provide comprehensive solutions to all the issues raised above, supported by independent expert assessments and guarantees of adequate infrastructure and management systems. I trust that you will give this objection due consideration and look forward to confirmation that these concerns will be properly evaluated in the decision-making process.	Sustainable campsite operation – guests will arrive by vehicle to their fully serviced tent. Services on site include self-sufficiency and recycling – Own water, own sewage and own solar power. Waste will be sorted for recycling and will be collected by the local authority. Access makes use of existing roads and tracks on the property. Traffic increase will be limited to the small camp site with seasonal guests and occupancy. The sewage treatment plant will be managed by a private commercial entity not the municipality.
Mark Ackermann, 5 December 2025	
I am submitting a formal objection to the proposed Resort Development on Portion 152 of Farm 216(Brenton Cove). I am a resident of Lake Brenton and deeply concerned about the severe environmental, legal and safety implications of this application. My objections are based on clear procedural errors, violations of NEMA principles and demonstrable risks to the Knysna Estuary and surrounding community.	Objection noted.
1. The Basic Assessment Process is Legally Inadequate The site falls within the 32m and 100m buffer zones of one of South Africa's most sensitive estuaries, home to the Endangered Knysna Seahorse and Critically Endangered False Limpet. These triggers, combined with the high-risk nature of the engineering solutions proposed, legally require a full Scoping and Environmental Impact Report (EIR), not a Basic Assessment. The potential impacts are neither low nor easily manageable and the BAR does not comply with the requirements of NEMA for a development of this risk level.	The regulated NEMA process for listing notice 1 and 3 activities are for a Basic Assessment as has been followed. Allegations of the incorrect process are unfounded and incorrect.
2. Violations of NEMA Section 2 Principles Precautionary Principle: The risk of serious and irreversible damage to sensitive estuarine habitat is clear and uncertainty cannot justify approval. Duty of Care (Section 28): The developer must show that pollution and ecological degradation will be entirely prevented. The current plan fails this requirement. Public Trust	The proposed sewage treatment plant will be installed from the outset and treated effluent will be managed accordingly. The assertion of "unstable artificial infill" is unfounded – the site is stable and the infilling occurred in

Doctrine: The Knysna Estuary is a protected public resource and approval of a resort situated on unstable artificial infill would compromise this asset for private commercial gain.	excess of 40 years ago – there are no "stability" issues on site.
3. The Site is Environmentally Unsuitable for Development The land is not "low sensitivity," as claimed. It is unconsolidated, artificial infill dumped over historically destroyed wetland. This ground has no natural filtration capacity and is entirely inappropriate for the proposed greywater irrigation and sewage solutions. Pollution into the adjacent protected wetland and estuary is unavoidable.	Greywater separation, filtration and irrigation will no longer take place and all water will be directed to the sewage treatment plant. Treated effluent will be recycled for flushing toilets and once a WUL for irrigation with treated effluent has been issued, excess water will be used for irrigation.
4. High-Risk Sewage and Greywater Plan The proposal generates ±8,600 litres of wastewater per day.• The "interim" sewage plan (12,000L conservancy tank) will fill in under 36 hours, creating an unacceptable risk of overflow directly into the estuary. • Greywater irrigation contradicts the recommendation of the specialist report, which states that no irrigation run-off may enter the estuary .• The plan will directly introduce nitrates, phosphates, detergents and faecal contaminants into an oligotrophic estuarine system, threatening endangered species and water quality. This alone is sufficient grounds for refusal.	The sewage treatment plant will be installed from the outset, and no pollution will reach the estuary.
5. Cumulative Impacts Not Assessed Neighbouring properties have simultaneously applied for resort approvals. The cumulative impact on wetlands, owls, raptors, estuarine species, traffic, noise and light pollution has not been assessed, contravening NEMA requirements.	Cumulative impacts have been assessed. The report has been expanded in relation to the neighbouring application and potential cumulative impacts. Neighbouring property applications are evaluated by the authorities from planning and environmental affairs and cumulative impacts are addressed in their decision making.
6. Non-Compliance with the Knysna Spatial Development Framework The SDF explicitly restricts intensified tourism activities in conserved and residential areas and prioritises the protection of critical biodiversity areas. This development is inconsistent with those objectives.	The application is compatible with the SDF – the property is not in an established residential area – it is an agricultural property close to the residential area. Camping is a consent use on Agricultural land.
7. Inadequate Fire Risk Management **The Knysna region is one** of the highest fire-risk zones in the country, as demonstrated in 2017.Despite this: • No specialist Fire Risk Impact Assessment was conducted. • The proposal is incorrectly classified as "Low Risk." • The interim plan contains no dedicated firefighting water supply, relying entirely on unreliable municipal services. This is an unacceptable and dangerous omission.	A fire risk assessment is not a requirement of the EIA process. The proposal is classified according to the engineering standards which dictate the "class of risk". The owner is already a member of the FPA, has firebreaks in place, has removed the excessive fuel load linked to alien invasive vegetation and will be storing additional water for the purpose of fire fighting in addition to having a pump for fire fighting purposes.
8. Social, Traffic and Sense-of-Place Impacts Are Misrepresented The vast majority of the Lake Brenton community opposes this development. The BAR incorrectly categorises the social and visual impacts as "low," despite clear evidence to the contrary. The proposal would permanently and negatively alter the quiet residential nature and ecological character of the Western Heads Conservancy.	The community opposition to the application is noted. The social NIMBY objections are noted and will be considered by the authorities as required. The visual assessment assesses the impact of the proposal, and the impact is assessed as "low". The fact that private properties higher lying in Lake Brenton look down over the property and may see the tent roof in the garden between the trees around the main homestead, has no negative impact on the sense of place of Lake Brenton.

	The application will have no impact on the quiet residential nature or ecological character of the Western Heads Conservancy. – the application is for 25 quiet tents with guests, in a garden setting, far from the urban area of Lake Brenton, in a transformed garden area, where additional indigenous trees will be planted over time and where the property owner has been systematically cleaning the property from past mismanagement and alien infestation.
Conclusion For the reasons above - procedural inadequacies, environmental risks, non-compliance with NEMA principles, insufficient specialist studies, flawed engineering proposals and strong community opposition - I respectfully request that the Department reject this Basic Assessment and require a full Scoping & EIR, or refuse the application entirely. Protecting the Knysna Estuary and Western Heads Conservancy is of the highest public interest. Approval of a high-impact resort on unstable artificial infill adjacent to a critically sensitive ecosystem would set a dangerous precedent and cause irreversible environmental harm. Thank you for considering this objection.	The concerns raised have been responded to and addressed in a revised draft BAR. Community opposition – it may be useful to have a meeting with the members of the community who are objecting to the proposal to visit the site and see the proposal in context. The NEMA Basic Assessment process is continuing in accordance with the required NEMA EIR regulations. Protecting the Knysna Estuary and sharing it with others is one of the motivating factors of the owner in establishing the small accommodation proposal. The proposal is not "high-impact" but is a low-impact eco-tourism opportunity.
Michelle Zeidler, 25 November 2025	
I hereby submit a formal objection to the proposed camping resort on Portion 152 of Farm 216,Brenton-on-Lake, as outlined in the Draft Basic Assessment Report. **1. Environmentally inappropriate location** The entire site lies within the Estuarine Functional Zone, one of the most sensitive and legally protected ecological areas in South Africa. The proposed infrastructure (camping decks, bathrooms, lapa expansion, sewage systems) falls within 32m and 100m of the High Water Mark, an area where development should be avoided, not expanded.	The site is transformed garden. The area is within he EFZ as is all property below the 5m contour which includes large areas of Knysna. The proposal takes the sensitivities of the area into account. Timber decks are appropriate installation methods within the proximity to the HWM.
2. High risk to salt marshes and estuary health The property was originally salt marsh, and sensitive estuarine habitat remains adjacent to the site. Any sewage failure, stormwater runoff, or human disturbance poses a direct pollution risk to the Knysna Estuary, which is already ecologically stressed.	The proposal is located in transformed garden area. The proposed sewage treatment plant will ensure that there is no pollution threat . Tents on a fixed raised wooden decks on the lawns will not generate any stormwater runoff Human "disturbance" will be limited to a small camp area adjacent to the Knysna Estuary where the SANParks rules and regulations ensure that tourism activities are controlled and limited. Non-motorised access to the water will be possible via canoe.
	The system

3. Sewage and wastewater systems present unacceptable risk The use of conservancy tanks, pump stations, and a future package plant within the estuary buffer zone is unsafe. Sewage spills or overflows would cause irreversible harm to the estuary.	is designed to ensure safe operational conditions. The system will be managed by a private commercial enterprise and not the municipality, ensuring that there is sound maintenance and operation. It will be subject to a Water Use Licence and monitoring to ensure operational excellence.
4. Negative impacts on wildlife and neighbourhood character Brenton-on-Lake is a quiet, sensitive conservancy area with free-roaming wildlife (including bushbuck and sensitive bird species). A high-turnover tourism facility will increase noise, traffic, lighting, disturbance, and roadkill risk, undermining the character and safety of the area.	The property lies adjacent to the Brenton-on-Lake residential area and the free-roaming wildlife are regular "residents" on the property. As with the wildlife co-existing with the residents in the village, the tourists making use of the 25 tents will enjoy the peaceful co-existence with the resident bushbuck and rich birdlife. The facility is not a "high-turnover" tourism facility, it is a small quiet, high-end tourist "retreat. The lighting is low level solar lighting, the character is one of peace and tranquillity and the guests will be driving according to the speed limits of the area, taking special care of the surrounding wildlife.
5. Cumulative impacts have been inadequately assessed The Knysna Estuary is already under significant environmental pressure. Adding a commercial campground intensifies human impact and contradicts SANParks conservation priorities.	The location of a small area of tourist accommodation adjacent to the Estuary where the ethos and focus is on eco-tourism will not contradict the SANParks conservation priorities.
6. Not aligned with planning intent The property is zoned Agriculture I, not tourism. The scale of the proposed development exceeds a low-impact agricultural consent use and is inappropriate for the surrounding residential and conservation environment.	Camping is a consent use in Agricultural I zoning. The activity is intended to be low-impact agricultural consent use camping with no impact on the surrounding residential and conservation environment. It is uncertain what "scale" would be considered appropriate – no alternative noted.
Request On the basis of the environmental sensitivity, sewage risks, incompatibility with the protected area, and negative impact on wildlife and community character, I respectfully request that Environmental Authorisation be refused. Please acknowledge receipt of this objection and include it in the official Public Participation Process	The concerns raised have all been addressed.
P. Papadakis, 14 November 2025	
I, **P. Papadakis**, owner of **Erf 404, Dolphin Avenue, Brenton-on-Lake**, hereby formally submit my objection to **all three components** of the Knysna Municipality application for the proposed **Camping Site on Portion 152 of Farm Uitzigt No. 216**, as detailed in your notification letter dated 07 November 2025. While the application and presentation are well-prepared and clearly structured, the **fundamental environmental, ecological, and community concerns remain unchanged**. As stated in my previous objection regarding another subdivided portion of the same parent farm (Portion 192), the **core issues of biodiversity loss, wildlife disturbance, environmental degradation, and disruption to residential character still apply**—and the new proposal does not mitigate these impacts. The proposal is therefore **not suitable for Brenton-on-Lake**, regardless of	Objection noted. See responses to the same comments above. Biodiversity loss – there will be no biodiversity loss associated with 25 raised wooden decks with a tent on a lawn area around the main homestead. Wildlife disturbance – there will be limited to no disturbance to wildlife as the character and ethos is one of living with nature – no different to the homeowners living alongside the same wildlife within the village

presentation or layout.	Environmental degradation – the property owner is busy restoring the site which has been degraded over time. Disruption of residential character – the small camping area is located in the gardens around the existing homestead on this 11ha agricultural portion. This homestead is located away from the urban residential area of Brenton-on-Lake and will have no impact on the residential character of the village.
1. Objection to the Removal of Title Deed Restrictions The application seeks to remove critical land-use restrictions that currently ensure the property may be used only for **residential and/or agricultural purposes**, explicitly prohibiting commercial or tourism-related activities. These restrictions: • preserve the long-standing **low-density, conservation-based character** of Brenton-on-Lake; • protect residents' expectations and investments based on the area's legal land-use framework; • prevent commercial tourism creep into a sensitive ecological zone. Removing them will set an **irreversible precedent**, effectively opening the door for other landowners to apply for similar developments. This would unravel decades of conservation-focused planning and permanently alter the character and ecology of our village.	Landowners are entitled to apply to remove historic and restrictive title deed conditions that no longer comply with the planning scheme regulations. The local authority will consider the application and make a decision. The character of the site will remain low-density, conservation-based -25 small tents on 11 ha = 1.1% of the property. Residents expectations and investments based on the areas legal land-use framework will not be affected in the least. Residents are within the urban area, restricted by the urban land use framework and the tourists making use of the facility will be governed by the legal framework associated with a consent use for camping on an agricultural portion of land. Tourism "creep" is covered by the various planning documents and scheme regulations. The camping area is not an ecologically sensitive zone. Title deed restrictions or the removal of them, will not impact the "character and ecology" of the village. The village is separated from the site which is rural and agriculturally zoned.
2. Objection to the Consent Application for a Camping Site Even if agricultural zoning allows for a campsite with consent, it is not appropriate in this location, which is: • environmentally sensitive, • residential in character, • closely integrated with estuarine, wetland, and forest ecosystems. Camping sites are scientifically documented to cause: • soil compaction, erosion, runoff changes; • trampling and loss of vegetation, including seedlings; • spread of invasive species; • disturbance to wildlife through noise, light, and human presence; • increased risk of fire; • potential water contamination through greywater and human waste.	The location of the camp sites is not environmentally sensitive Camping is not residential in character The site is integrated with the surrounding estuary and wetlands and thicket and there will be not change to this integration by the addition of 1250m^2 of raised wooden decks (1.1% of the property). No compaction – raised decks No trampling – raised decks over lawn Alien species are being systematically removed from the site and are not linked to future camp sites. Wildlife will continue to free-roam through the property as they do currently and as they do through the neighbouring urban environment. The proposal does not increase the fire risk. Potential water contamination has been removed.

Introducing **25 camping sites** in this setting will: • negatively impact wildlife, bird species, and natural habitats; • degrade the tranquillity and privacy residents rely on; • increase transient activity, noise, and traffic; • compound environmental pressures already arising from other proposed developments on subdivided portions of Farm 216. I therefore object to the consent application in its entirety.	The proposal will not negatively impact wildlife, birds species or natural habitats The proposal will not degrade the tranquility and privacy of residents – it is over 500m away from the nearest resident in the village The increase in traffic will be negligible Each development application must be evaluated on its merits
3. Objection to the Approval of the Site Plan The site plan does not adequately mitigate: • cumulative ecological impacts, • increased human pressure, • habitat disturbance, • the shift from low-density residential use to commercial tourism. Approval of this site plan would effectively endorse **commercial tourism infrastructure** in a conservation village where such uses have historically been prohibited.	Cumulative ecological impacts and increased human pressure is addressed There is no habitat disturbance linked to the proposal The density of the application takes up 1.1% of the property. Only 1250m^2 which is only just slightly larger than 1 erf within the village which is indicated as "low density" residential. It is unclear if the author is against commercial tourism or is displeased that commercial tourism has been previously refused in the residential area?
4. Legal and Environmental Grounds for My Objection **Environmental Conservation Act 73 of 1989** The proposal conflicts with mandates to protect: • the natural environment, • surrounding ecosystems, • local and marine/estuarine species. **NEMA Act 107 of 1998** The development is inconsistent with key NEMA-associated statutes, including: • Biodiversity Act, • Protected Areas Act, • Air Quality Act, • National Water Act. Under NEMA, the principles of **precaution, sustainability, and impact avoidance** must be applied—yet the proposed campsite introduces preventable and	ECA – this act has been repealed other than the OSCAE regulations which are covered in the assessment. The proposal does not impact on the natural environment, the surrounding ecosystems or the local marine / estuarine species. This statement is false The site is compliant with the Biodiversity Act The site is adjacent to a Protected Area and the proposal is consistent with the requirements indicated in the Knysna Estuary Management Plan The air quality is not affected. The National Water Act is being complied with. The proposal is sustainable, impacts have been avoided and the precautionary principle has been applied.

unacceptable risks.	Preventable risks have been prevented and there are no unacceptable risks associated with the application.
5. Scientific Evidence of Camping Impacts Camping activities are known to cause: • soil and hydrological disturbance, • loss of vegetation and habitat alteration, • wildlife disruption, • waste-related contamination, • increased wildfire risk. Such impacts are incompatible with an ecologically sensitive and conservation-oriented area like Brenton-on-Lake.	- The proposal is for tents on raised wooden decks – no soil or hydrology disturbance other than during construction which is a temporary impact that is easy to mitigate. - There is no loss of vegetation or habitat alteration -the proposal is on the grass in a garden. - There is no disruption to wildlife – wildlife will continue to free-roam as it currently does and as it does throughout the residential area - Waste-related contamination is avoided. - There is no increased wildfire risk associated with the proposal. The application is ecologically sensitive and conservation orientated.
6. Unsuitability for Brenton-on-Lake Although the proposal is well-presented, it remains fundamentally unsuited to: • the environmental sensitivity of Portion 152, • the conservation ethos of Brenton-on-Lake, • the low-density residential character of the area, • and the legal land-use framework residents depend on. Residents have chosen to live here specifically because of these protections. Changing them now would cause **irreversible damage** to the environment and community. For all the reasons above, I formally request that the Knysna Municipality reject: 1. The removal of title deed restrictions, 2. The consent application for a camping site, 3. The approval of the site plan. The proposal poses unacceptable risks to biodiversity, wildlife, environmental stability, and the lived experience of Brenton-on-Lake residents. Thank you for acknowledging and recording my objection.	The sensitivity of portion 152 has been assessed and the application supported. The application is not contrary to the conservation ethos of Brenton-on-Lake – open space will be retained, alien species are being removed, areas are being restored, indigenous forest vegetation is being planted. The application is extremely low density – the total transformation area of the 25 decks is only just slightly larger than one erf in Brenton-on-Lake. The legal land use framework provides for consent use camping on a property. The application is not proposing to make any changes to the residents community or urban area. The application is not in Brenton-on-Lake, it is in a surrounding agricultural portion in the rural area. Reasons noted – however the Knysna municipality is not considering the NEMA application. The proposal does not pose unacceptable risk to biodiversity, wildlife, environmental stability and the lived experience of Brenton-on-Lake residents.
Sean, 3 December 2025	
I am supportive of Brenton Cove proposed development, subject to the below, having witnessed the investment by the owner in improving his property with a strong focus on bettering the natural environment. My concerns are two-fold:	Your support is noted.

1. Management of sewerage: not convinced on the sustainability of what I understand the solution to be, along with its scalability.	Sewage management has been changed to include the installation of the sewage package plant and recycling of the treated effluent.
Future scale of accommodation: not clear on where the end game of the project will/could be e.g. could the development in time be expanded, without further public participation to200 camps sites/chalets along with the traffic, noise, environmental impact etc that would bring.	The application is for 25 permanent desks on which a tent and bathroom is installed. There is no opportunity to expand on the 25 without undergoing an additional Environmental assessment process in terms of NEMA as expansion of a tourism facility is a listed activity which needs to be authorised. In addition, the municipality would need to approve an expansion, and it is likely that the department of Agriculture would not support further expansion into agricultural land and would require a rezoning. The applicant can choose to implement fewer camp sites than what gets finally approved, but they may not increase without a process and subsequent approvals.
2. If I could get the requisite comfort on the above I would be supportive as it would benefit the local economy and sustainability of the greater area. 1.	Noted
Rodney Zeidler, 25 November 2025	
I hereby submit a formal objection to the proposed camping resort on Portion152 of Farm 216, Brenton-on-Lake, as outlined in the Draft Basic Assessment Report. I hereby submit a formal objection to the proposed camping resort on Portion 152 of Farm 216, Brenton-on-Lake, as outlined in the Draft Basic Assessment Report. I hereby submit a formal objection to the proposed camping resort on Portion 152 of Farm 216, Brenton-on-Lake, as outlined in the Draft Basic Assessment Report.	Objection noted
1. Environmentally inappropriate and highly sensitive location The site lies entirely within the Estuarine Functional Zone, one of the most sensitive environmental areas in the region. The proposed infrastructure—including decks, bathrooms, sewage lines, and lapa extensions—falls within 32m and 100m of the High Water Mark, where development should be avoided.	The site is transformed garden. The area is within he EFZ as is all property below the 5m contour which includes large areas of Knysna. The proposal takes the sensitivities of the area into account. Timber decks are appropriate installation methods within the proximity to the HWM.
2. Serious risk to salt marshes and estuary systems The property was historically salt marsh, and the area still contains highly sensitive estuarine habitat. Any sewage failure, stormwater runoff, or human disturbance poses a direct and irreversible risk to the Knysna Estuary, which is already under ecological pressure.	The manmade tidal pond and inlet connects to the estuary and the sensitivity of this has been acknowledged and impacts to this area and link are managed accordingly. The sewage system proposed is unlikely to fail and will be maintained to ensure no risk of failure. There is little to no stormwater runoff linked to the application. Human disturbance – it is not clear how this poses a "direct and irreversible risk" to the Knysna Estuary. The estuary has an estuary management plan which includes various use zones and specifically indicates the adjacent quiet zone as a medium to high intensity use zone for tourists making use of non-motorised vessels. There is no difference in the use of the estuary by 25 camp sites as proposed, to all the residents in Brenton-on-Lake making use of the estuary. All users are subject to the same rules and restrictions.
3. Unsafe sewage and wastewater proposal The reliance on a conservancy tank, pump station, and a future package plant in a flood-prone estuarine zone presents an unacceptable risk. A single failure would	The sewage system proposed has been changed to avoid the risk. The package plan design takes flood risk into account in its design in order to ensure no risk to the estuary.

result in contamination of the estuary.	
4. Increased disturbance to wildlife and the residential conservancy Brenton-on-Lake is a quiet conservation area with free-roaming bushbuck and sensitive bird species. A high-turnover tourism facility will increase traffic, noise, lighting, and disturbance, which conflicts with the character and safety of the neighbourhood.	The free-roaming bushbuck and sensitive bird species can continue to free roam over the property without interference from the guests. The facility is not a "high-turnover" facility. There will be limited noise (less than any home in Brenton-on-Lake), lighting is low level solar lighting, and disturbance will be avoided through awareness and avoidance. The wildlife currently frequent the property (despite the noise of continued alien clearing and building renovations) and there is no reason for this to change with the addition of 25 tents.
5. Cumulative impacts not adequately assessed The Knysna Estuary is already heavily pressured. Adding a commercial camping operation worsens the cumulative ecological load and is not aligned with SANParks conservation goals.	The commercial camping operation will not worsen the cumulative ecological load. The total environmental pressure or impact on an ecosystem over time will not significantly increase based on the addition of 25 tents accommodating guests. SANParks conservation goals are for expansion of the GRNP through co-operation agreements with private landowners assisting to manage and conserve the biodiversity while still making use of their property. The owner is currently removing alien vegetation, clearing up the property from previous degradation and restoring the landscape and ecology where possible. The pontoon in the manmade tidal inlet is supporting an entire estuarine faunal nursery beneath it and the estuarine life in the inlet has increased. Management of the property will be in accordance with the SANParks Estuary Management Plan Zonation.
6. Planning misalignment The property remains zoned Agriculture I, not tourism. The scale and intensity of what is proposed exceed a low-impact agricultural consent use and are inappropriate for the surrounding residential and conservation environment.	The zoning remains Agricultural with a consent use for camping – there is no definition of the scale and intensity. Fewer than 10 camp sites do not require a consent use application. More than 10 sites require a consent use application. The proposal must not impact the agricultural use of the property, and a site development plan must be approved. The municipality will define the number of campsites, number of guests and associated services in their conditions of approval. Although typical "farm style" camp sites range between 6 – 12 units, 15 – 20 sites is viewed as appropriate in consent use applications and generally more than 20 sites is considered special circumstances.
Request Given the environmental sensitivity, sewage risks, wildlife disturbance, and overall incompatibility with the protected area, I respectfully request that Environmental Authorisation be refused.	The sensitivity of the site is low, the sewage risk has been reduced and the disturbance to wildlife will be minimal. The use is not viewed as incompatible with the surrounding protected area.
Rowan Strydom, 7 December 2025	
1. INTRODUCTION I submit this objection as a resident and homeowner in Lake Brenton who is directly and materially affected by the proposed rezoning and development of Portion 152 of Farm 216 ("Brenton Cove"). This letter sets out clear environmental, ecological, social, legal, and practical reasons why the application must be rejected outright. The proposed development is incompatible with the ecological sensitivity of the Knysna Estuary, the nature-	Objection noted.

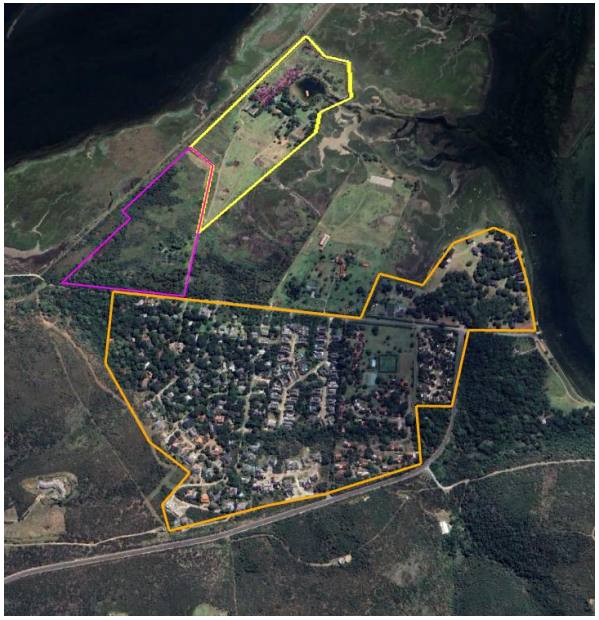
driven character of Lake Brenton, and the safety and wellbeing of the neighbouring community. This objection draws on objective environmental and legal concerns outlined in the shared community document prepared for local residents, and on the lived reality of those who call Brenton home.	
2. THE ESSENCE OF THE OBJECTION **The rezoning and proposed tourism resort are entirely inappropriate for this location.** The development poses **unacceptable risks** to: ● The **Knysna Estuary**, one of South Africa's most ecologically important and sensitive systems; ● The **quiet, low-impact, conservation-oriented character of Lake Brenton**; ● The **sense of place** cherished by residents and integral to the settlement's identity; and ● The **community's safety**, with major concerns around sewage management, grey-water disposal, and fire risk. This development does not enhance or complement Brenton. It threatens to redefine it—permanently and detrimentally. I therefore request that this rezoning application be **rejected in full**.	The application will not create unacceptable risks to the Knysna estuary The quiet, low-impact, conservation-orientated character of Lake Brenton will not be affected – the area transformed is just over the size of one residential erf in Lake Brenton. The intent of the application is for low-impact, conservation-orientated camping. There will be no change to the sense of place of Lake Brenton – the application is not in Lake Brenton residential area in order to change its character or sense of place. There is no risk to the community's safety, sewage management has been refined. There is no increase to fire risk. This is a subjective comment.
3. PRESERVATION OF THE QUIET, ECOLOGICALLY SENSITIVE CHARACTER OF BRENTON Lake Brenton is a small, nature-driven settlement within a Conservancy, characterised by: ● low human impact ● indigenous vegetation ● vulnerable wildlife ● quiet, slow-paced living ● residents who chose this area *because* of its sensitivity and tranquillity The proposed resort introduces: ● high-intensity tourism activity ● constant turnover of visitors	The proposed camp site sits on 11ha of which only 1.1% will be transformed within the existing gardens around the homestead. The camping will be a small, nature-driven camp site. There will be low human impact The landowner is removing alien vegetation in order to allow the indigenous vegetation to return and planting more indigenous vegetation over time. The free-roaming wildlife will remain There will be a quiet, slow-paced holiday Guests will choose this site because of its sensitivity and tranquility The camping site is - Not high-intensity tourism – only 25 sites. - The turnover of visitors is unknown – likely to be longer stay seasonal guests

● increased artificial lighting ● amplified noise ● traffic through narrow servitude roads ● permanent degradation of the village's character	- The lighting is low level solar lighting. - The camping area will be a quiet zone – noisy guests not tolerated. - The traffic will follow the narrow servitude roads and onsite tracks retaining the farm character - There will be no change or degradation to the village character as the application is not in the village but in a surrounding agricultural portion.
This is not a location suited to a commercial holiday resort. It is a conservation-oriented residential environment that relies on maintaining extremely low disturbance levels.	The location is well suited to tented camp guest accommodation as it is close to and has access to the estuary, is secluded from the surrounding residential area, has existing established garden lawn areas with planted trees to screen the camping area and disturbance will be limited.
Allowing a development of this nature here would fundamentally alter the fabric of the community and contradict the clear environmental intent of the Conservancy.	The Conservancy does not extend onto the affected property although there is an opportunity to extend the conservancy and include the property.
4. NEGATIVE IMPACT ON SENSE OF PLACE & COMMUNITY	
The Basic Assessment fails to acknowledge the **overwhelming community opposition** to this development. Residents did not choose Brenton as a resort destination; they chose it precisely *because it is not*.	The Draft BAR was published in order to request public comment. It cannot acknowledge "overwhelming community opposition" prior to requesting comment and receiving the "opposition. The comments received can now be assessed, responded to and included in the revised draft BAR and can shape and change the proposal where appropriate. Knysna is a holiday destination, the choice to live in Brenton, whether permanently or while "on holiday" is the choice of the individual – Brenton-on-Lake is a residential area with unique charm due to its close association with the forest and wildlife. It is certainly a desirable choice and it is part of the reason why the landowner chose to purchase this property close to Brenton-on-Lake.
A resort of 25 campsites: ● dramatically changes the identity of the area ● increases noise, night-time activity and light pollution ● compromises safety on local roads already frequented by wildlife ● introduces traffic and infrastructure pressure not suited to the area ● permanently disrupts the community character that residents have built their lives around	The intent is not to change the identity of the area but to share it with a few guests. The intent is not for noise or night-time activity and light pollution The intent is not to compromise on safety on local roads frequented by wildlife. The intent is not to introduce traffic and infrastructure pressure not suited to the area. The intent is not to permanently disrupt the community character that residents have built their lives around but to live in harmony with the neighbours while still sharing this beauty with select guests.
The Visual and Social Impact assessments presented by the applicant severely underestimate this transformation. The proposal does not respect or preserve the "sense of place" that defines Brenton.	The visual assessment clearly indicates the location of the tents within the trees and garden around the existing homestead, which is located at least 500m from any surrounding residential areas. Some residents do "look down" onto or over the property and their view may change slightly, that does not change the sense of place that defines Brenton.
5. PROTECTION OF THE KNYSNA ESTUARY: A HIGH-SENSITIVITY SYSTEM The Knysna Estuary is classified as a **"Very High Sensitivity"** ecological system. It is	The application acknowledges and has assessed the impact on the estuary.

home to: ● the **Endangered Knysna Seahorse (*Hippocampus capensis*)** ● the **Critically Endangered False Limpet (*Siphonaria compressa*)** ● nutrient-sensitive eelgrass beds essential for ecological function	
Any pollution—especially nutrients, detergents, sewage leakage or siltation—has the potential to cause **irreversible ecological collapse**.	The sewage treatment plant is designed to prevent and limit any pollution of the system and will recycle the treated effluent to flush toilets. Once a WUL is issued, excess water may be used for irrigation.
Although the developer asserts the footprint itself is of "low sensitivity", this is a flawed and misleading argument ● The land is artificial infill dumped on a destroyed wetland. ● The development is *physically adjacent* to extremely sensitive estuarine habitat. ● Edge effects (run-off, light, human disturbance) extend well beyond the footprint. ● Sensitivity cannot be compartmentalised by property lines.	The footprint of the development is low sensitivity as it is evaluated based on the current state – not the state it was in 1950's. The history of infill is documented The adjacent sensitive estuarine habitat is included The edge effects are within the buffer zones contained on the property. Sensitivity extends beyond property lines and has been included in the assessment.
Rezoning cannot be approved when the surrounding natural environment is of such high conservation importance and the risk of ecological harm so significant.	There is no rezoning application.
6. SEVERE GREY-WATER & SEWAGE RISKS The proposed wastewater management plan is unworkable and high-risk: **6.1 Grey-Water Irrigation** The engineering plan proposes irrigating lawns with **8,600 litres per day** of nutrient-rich grey-water.	The proposal has been amended to include the sewage treatment plan at the outset and no separation of grey and blackwater.
But the property: ● consists of **porous, unconsolidated man-made infill** ● has **no natural filtration capacity** ● lies immediately beside sensitive wetland and estuarine habitat	The nature of the soil is acknowledged, and the majority of the treated effluent will be recycled. Irrigation with treated wastewater will be subject to a WUL and the treatment standard of water to be released will be set by BOCMA.
This guarantees leaching of: ● phosphates ● nitrates ● detergents ● faecal coliforms into the estuary. This is explicitly contradicted by the developer's own specialist, who warns that **no irrigation run-off must be allowed**.	No irrigation runoff is proposed.

6.2 Blackwater / Sewage The 12,000L conservancy tank will fill in **under 36 hours**. This means: ● daily municipal "honeysucker" traffic ● extremely high risk of overflow ● reliance on a municipality with an ongoing history of sewerage service failures ● potential catastrophic raw sewage release into the estuary The sewage plan alone is grounds for refusal.	Treatment plant and no conservancy tank – proposal amended.
7. THIS DEVELOPMENT IS INCOMPATIBLE WITH NEMA PRINCIPLES The National Environmental Management Act requires: ● **Precautionary decision-making**, ● **Prevention of pollution**, and ● **Protection of ecological integrity**. This proposal fails all three. The risks are high, irreversible, and inadequately mitigated. A Basic Assessment is not sufficient; but even with a full EIR, the core constraints of the site remain insurmountable.	No decision has been made – but the precautionary principle is always applied. No pollution through the proposed treatment of wastewater. Protection of the ecological integrity is included in the application. Impacts have been assessed and constraints indicated.
8. VISION FOR BRENTON: A LOW-IMPACT, NATURE-DRIVEN SETTLEMENT Brenton's identity is defined by: ● quiet residential living ● natural landscapes ● estuarine conservation ● wildlife habitat ● ecological stewardship A resort does not align with this vision. It undermines it. Residents are not anti-development; we simply ask that development respects the environmental framework and character of this unique and irreplaceable area. This resort does not.	The proposal can be defined by a similar vision. • Quiet guest accommodation in a tent • Natural landscapes surrounding garden with indigenous planting • Estuarine conservation with an important nursery area on the property where observation of the conservation can easily take place. • Free-roaming wildlife on the 11.1 ha farm surrounding the guest accommodation where habitat restoration can take place. • Ecological stewardship – there is the possibility to join into a stewardship
9. FORMAL REQUEST **I formally request that the rezoning application for Portion 152 of Farm 216 be rejected outright**, on the grounds of: ● unacceptable ecological impact	This application is not for rezoning.

● unmanageable wastewater risks ● violation of the conservation principles governing the area ● incompatibility with the spatial character and community identity of Lake Brenton ● non-compliance with NEMA's precautionary principles This is not an appropriate site for a tourism resort. It should not be rezoned for one.	
ANNEXURE A: SUMMARY OF KEY OBJECTIONS 1. **Ecological Risk** ○ Adjacent to "Very High Sensitivity" estuarine habitat ○ Threat to endangered species ○ Destroyed wetland area built on artificial infill 2. **Grey-Water & Sewage Failures** ○ Guaranteed nutrient leaching ○ 12,000L tank insufficient (fills in <36 hours) ○ Reliance on unreliable municipal services ○ High risk of raw sewage overflow 3. **Loss of Sense of Place** ○ Incompatible with Lake Brenton's quiet, conservation-based character ○ Overwhelming community opposition ○ Permanent degradation of a peaceful residential village 4. **Traffic & Safety** ○ Increased accidents involving wildlife ○ Dangerous reliance on narrow servitude-access roads 5. **Legal & Procedural Concerns** ○ Contradiction of specialist recommendations ○ Inadequate Basic Assessment ○ Violation of NEMA precautionary obligations 6. **Cumulative Development Pressure**	The application site is adjacent to a very high sensitivity estuarine habitat – as is the rest of Brenton-on-Lake residential area. There is no threat to endangered species as assessed by the specialist Historic infilling was destructive but it is the status quo. Restoration is in progress where possible and has been ongoing since the owner purchased the farm. Sewage system is amended to address the concerns raised. The guest accommodation in a tent is not incompatible with Lake Brenton's quiet, conservation based character – it will have the same quiet conservation-based character. The overwhelming community opposition is noted but not completely justified. There is no degradation of a peaceful residential village – the application is not in the village and having 25 cars drive through on a public road to an adjacent farm for overnight accommodation in an eco-friendly peaceful setting, cannot be classified as "degradation". Traffic and safety – there is no link between 25 additional vehicles and an assumed increase in accidents involving wildlife. Guests travelling to an eco-based accommodation, through an area where wildlife can be seen quietly grazing and browsing on the sidewalk, are hardly likely to speed – they are more likely to stop to take photos. Quiet driving down a narrow farm servitude is part of the charm of the eco-destination. The report has been revised to avoid any contradictions that were not intended. The draft report has been revised to include the concerns raised. There is no "violation" of NEMA precautionary obligations – there has been no decision making

○ Multiple concurrent resort applications in the same sensitive area ○ Severe combined impact on wildlife and natural habitat **CONCLUSION** For all the reasons outlined above—and in alignment with the collective concerns of the Lake Brenton community—I respectfully request the **full and final rejection** of this rezoning and development application. Lake Brenton must remain what it was always meant to be: **a quiet, ecologically sensitive, nature-driven sanctuary—not a commercial resort hub.**	Multiple concurrent applications is unusual but fortuitous as it allows decision makers insight into a wider region to better evaluate cumulative impacts. Looking at the cumulative impacts of the two adjacent proposals that are known to the EAP, it is unjustified to label it as "severe combined impact on wildlife and natural habitat" – the adjacent property portion 192, is proposing 7 small tourism cabins in the least sensitive area of their property, while the camping accommodation is proposed in the least sensitive area of portion 152. Between the two properties, they cover an area of nearly half the size of the Brenton-on-Lake community, while they propose development and transformation on only a fraction of the property while ensuring the long-term conservation of the very habitat that the Brenton-on-Lake wildlife frequent. The camping proposal will alter 1250m^2 of garden while the proposal on portion 152 area is approximately 2200m^2 in area. Between the two applications the area to be transformed is the equivalent of 4 erven in Brenton-on -Lake, while they conserve / retain approximately 19 ha. Objection noted  Note that the two properties combined conserve / retain approximately 19ha of open space between them

Note the proximity of the homes in Lake Brenton Residential Estate to the highwater mark of the estuary and salt marshes.

Stuart Charles Doig, 25 November 2025

I, **Steuart Charles Doig**, owner of **Erf 404, Roman Avenue, Brenton-on-Lake**, hereby lodge this formal objection to all three components of the Knysna Municipality application for **"The Camping Site: Portion 152 of Farm Uitzigt No. 216"**, as notified in your letter dated **07 November 2025**.

Although the application materials and site plan are professionally prepared, the

Objection noted

- See responses to **F Z Meneses** above – the comments are the same

proposal remains wholly **unsuitable for Brenton-on-Lake**. My objection is based on the combined grounds set out below, which draw on the information supplied in your notification and the planning/environmental reports for the wider Farm 216 proposals. **1. Application components objected to** I object to the following three parts of the application in their entirety: 1. **Removal of title deed restrictions** that expressly limit the property to residential and/or agricultural use and prohibit hotels, boarding houses, restaurants or any trading/business uses. 2. **Application for consent to establish a camping site** (25 camping sites as described in the Draft BAR). 3. **Approval of the attached site plan** which formalises the layout and infrastructure for the proposed camping operation.	
2. Core objections and reasons **A. Title deed protections must be retained** The existing deed restrictions preserve Brenton-on-Lake's low-density, conservation-focused character. Removing these protections will set a dangerous precedent that invites further commercialisation and tourism-driven rezoning across the subdivided portions of Farm 216. Residents rely on these restrictions when choosing to live here; their removal would be an unjustifiable change to settled expectations and planning intent.	See responses to **F Z Meneses** above – the comments are the same
B. Camping is incompatible with the site's ecological sensitivity The Draft BAR proposes up to **25 campsites** within garden/transformed areas adjacent to estuarine and wooded habitat. Camping activity is well-known to cause localised but serious environmental impacts including: • soil compaction, erosion and altered runoff/hydrology; • trampling and loss of vegetation and seedlings; • spread of invasive plants; • disturbance of wildlife through noise, light and human presence; • increased risk of contamination to watercourses from human waste and greywater; • elevated fire risk in an area with a history of destructive fires. This site lies within the ecological matrix of the Knysna estuary fringe and adjacent natural habitat; introducing transient, high-intensity recreational use here is inappropriate and unsafe for biodiversity and residents.	See responses to **F Z Meneses** above – the comments are the same
C. Cumulative impacts with neighbouring applications This application must be assessed in conjunction with other proposals on subdivided portions of Farm 216 (including the recent Portion 192 rezoning / "Knysna Lake Cabins" proposal).	See responses to **F Z Meneses** above – the comments are the same

Approving multiple tourism uses will produce cumulative impacts far greater than the sum of single, isolated applications — adversely affecting habitat connectivity, noise regimes, light pollution, road/parking pressure, and local fauna (notably birdlife and species of conservation concern reported in ecological assessments).	
D. Protections required under environmental law — development conflicts with statutory duties This objection invokes the following legal and policy instruments: • **Environmental Conservation Act 73 of 1989** — to prevent deterioration of the natural environment, safeguard animal conservation, and protect vulnerable aquatic/estuarine ecosystems. • **National Environmental Management Act (NEMA) 107 of 1998** — including principles of precaution, avoidance, and sustainable use; and its related instruments (Biodiversity Act, National Water Act, Protected Areas considerations). The proposed campsite is inconsistent with the precautionary and conservation obligations of these statutes and the obligations set out in local and provincial spatial plans to protect CBAs and wetland systems.	See responses to **F Z Meneses** above – the comments are the same
E. Site-plan inadequacies and mitigation shortfalls While the site plan claims to use "existing transformed areas," the broader ecological and social effects are not adequately mitigated. Measures such as limiting vehicle access, lighting curfews, waste containment, and strict limits on visitor numbers cannot fully eliminate the documented risks of camping activities in this sensitive location. Furthermore, site-plan approval would normalise the commercial use of land historically and legally reserved for residential/agricultural purposes.	See responses to **F Z Meneses** above – the comments are the same
3. Evidence and supporting material • The Draft BAR and notification (07 Nov 2025) describe the proposal and the 30-day comment period; I object within this statutory window. *(Uploaded file:* */mnt/data/KNY25.1157.07 - Notification letter I&APs.pdf)*. • Related planning/environmental material for other portions of Farm 216 (e.g., Portion 192 'Knysna Lake Cabins') indicate presence of wetlands and species of conservation concern — illustrating the landscape-scale sensitivity and the dangers of piecemeal approvals. *(Uploaded file: /mnt/data/11 Appendix 5.6 Planning Report.pdf)*. • I reserve the right to supply further supporting evidence (photographs, species observations and expert comment) should the Municipality require it.	See responses to **F Z Meneses** above – the comments are the same
4. Requested outcome On the grounds set out above I respectfully request that: 1. The removal of title deed restrictions be refused and that the historic residential/agricultural limitations be retained. 2. The consent application for a camping site be refused as contrary to environmental law, planning policy and the interests of residents and biodiversity.	See responses to **F Z Meneses** above – the comments are the same

3. The site plan be refused and/or returned for substantial reworking only within a framework that ensures no expansion of tourism, no transient campsites, and no commercial uses contrary to title restrictions.	
5. Please note, Brenton-on-Lake's ecological integrity, quiet residential character and the wellbeing of its residents depend on careful land-use control and strict protection of wetlands, estuarine margins and critical biodiversity areas. Approving this campsite would undermine those protections and create irreversible harm to the environment and the community. Please confirm receipt of this objection and that it will be included in the public record for the Draft BAR and associated processes. I ask that all future correspondence regarding this application be copied to me at the contact details above.	See responses to **F Z Meneses** above – the comments are the same
Ulrike Strydom, 7 December 2025	
1. Fundamental Misrepresentation of Environmental Sensitivity **1.1 A Critically Flawed Assumption: "Low Sensitivity" of the Site** The application relies on an incorrect and misleading premise—that the development footprint is of "low sensitivity" while conceding that it lies directly adjacent to one of South Africa's most ecologically sensitive estuaries: the Knysna Estuary, a recognised priority conservation area within the Garden Route National Park. The Site Sensitivity Verification Report acknowledges that although the footprint is classified as "low sensitivity", it borders the "Very High Sensitivity" estuarine system supporting Critically Endangered and Endangered species (e.g., *Hippocampus capensis* and *Siphonaria compressa*). These species are exceptionally vulnerable to disturbance, pollution, and changes in water quality. The attempt to isolate "footprint sensitivity" from the broader ecological context is irrational and scientifically unsound. A development's impacts are not confined to the physical boundaries of its infrastructure. The situation is comparable to arguing that a lit match is "low risk" while ignoring the pool of petrol beside it. By narrowing the risk assessment only to the transformed infill footprint, the BAR has grossly underestimated the true environmental risk. The site must correctly be identified as high risk due to its proximity to irreplaceable natural systems.	The site has been assessed in terms of its site sensitivity – the position of the development proposed on the property avoids all sensitive habitats which lie mostly on the surrounding properties – SANParks and private. The impacts on the surrounding sensitive areas have been assessed and avoided and function within the SANParks Estuary Management Plan use zones – Quiet zone and Limited Intensity zones that are near to or adjacent to the property are respected and complied with. Camping on a transformed garden area clearly indicates avoidance of sensitive areas. The whole Knysna Estuary is home to the endangered Knysna Sea Horse including them living within the channels within Thesen Island. 25 camping sites where the campers may take a canoe onto the water following the rules of the GRNP and Quiet Zone, is not a significant impact on the sea horse or the lagoon. The water quality in the inlet is tidal and linked to the rest of the estuary. The sewage on site will be treated and managed to ensure that it does not result in pollution to the system. Such is the cased with sewage from every property in the entire Knysna basin and the problems with the municipal system are well known and documented and as such this small camping site will be operating an on site sewage treatment plant to ensure that there is no pollution entering the estuary from this property. The sewage treatment plant will be managed by a private company on contract and reporting will be required to both the municipality and BOCMA in terms of the WUL. The habitat of the grass owl is likely to expand due to the alien clearing on the property which will be a nett positive outcome and planting of additional forest thicket tree species will increase the habitat of the forest buzzard. Breeding success by camping sites on the front lawn is not going to be impacted. All impacts are evaluated with the "cumulative and residual impacts" on the adjacent estuary and sensitive habitats and avoidance is key to the assessment. The impacts associated with 25 camp sites in a transformed garden area where cumulative and residual impacts have been considered and avoided and mitigated, does not render the activity "high risk" – if the intention was to develop a fuel station on the property the "match and pool of

	petrol" scenario would be more appropriate.
1.2 Inadequate and Flawed Assessment of Cumulative Impacts The application acknowledges a neighbouring protected wetland but proposes only a superficial mitigation measure: shifting the conservancy tank. This does nothing to address: • cumulative degradation from nearby proposed tourism developments • noise, light, and human disturbance • increased nutrient load and polluted runoff • habitat loss affecting species such as grass owls and forest buzzards The BAR fails to evaluate cumulative impacts meaningfully, despite NEMA's explicit requirement to do so.	There is no further cumulative degradation to the adjacent wetland from nearby proposed tourism developments Noise, light and human disturbance will be limited to the area around the homestead. The sewage will be treated to avoid nutrient loads and polluted runoff There will be no habitat loss to the grass owl or forest buzzard as a result of this proposal – there may be habitat expansion through management on site and planting of indigenous trees.
2. Mischaracterisation of the Site as "Transformed Land" Suitable for Development The developer claims that because the area was infilled in the 1950s and subsequently altered, it can now safely support high-impact tourist infrastructure. This conclusion is fundamentally incorrect. **2.1 Artificial Infill Does Not Equal Stability or Low Sensitivity** Specialist reports confirm: • the property was originally estuarine wetland • all existing habitat is entirely man-made • infilling would be illegal today under NEMA and national estuary protection laws Artificial infill has no natural filtration capacity, no indigenous soil structure, and is inherently porous. These characteristics make it incompatible with the proposed wastewater and greywater system. Any irrigation or seepage will infiltrate directly into the groundwater and surrounding wetland.	The proposal is not "high-impact" tourism The sewage package plant will be treating the effluent water prior to recycling or possible future irrigation use (once WUL is issued)
2.2 Guaranteed Pollution Pathway The developer's plan to irrigate lawns with 8,600 litres/day of greywater on unconsolidated fill creates a direct contamination route into: • the adjacent protected wetland (Portion 192) • the Knysna Estuary • the semi-enclosed artificial cove, which is a nursery for threatened fish species This proposal guarantees nutrient enrichment (nitrates, phosphates), algal blooms, and habitat degradation, especially in an oligotrophic estuary where even minor pollution is ecologically catastrophic.	There will be no irrigation with greywater. Irrigation is proposed for excess water after recycling from the sewage treatment plant if the WUL for such irrigation is issued.
3. Unworkable and High-Risk Sewage & Greywater Management **3.1 Greywater Irrigation Conflict With Specialist Advice**	Greywater management has been altered accordingly.

The Engineering Report proposes irrigating 8,600 litres of greywater per day onto lawns. Yet the BAR itself quotes its specialist stating: "Quality of water in the estuary must be protected by not allowing irrigation runoff into the estuary." The approved plan contradicts the specialist's core mitigation requirement and therefore fails proper NEMA risk mitigation standards.	
3.2 Sewage Management is Logistically Impossible The plan proposes a 12,000-litre conservancy tank, while the development generates 8,600 litres/day of sewage. This means: • the tank fills in under 36 hours • municipal collection would be required daily, including peak season • any missed collection or rainfall event risks immediate overflow • overflow would discharge directly into the estuary Knysna Municipality historically struggles to service nearby conservancy systems (e.g., The Woods at Lake Brenton). Reliance on daily municipal intervention is neither realistic nor safe.	Sewage treatment plant will be installed upfront to avoid these issues.
3.3 Interim Services Plan Must Be Assessed as the Primary Plan The developer admits that obtaining a Water Use Licence will be lengthy. Thus, the only plan likely to operate for years is the interim plan, which is high-risk and noncompliant. The application must be evaluated on this basis.	The Water Use Licence application is in progress, and the sewage treatment plant will be installed upfront.
4. Procedural and Legal Deficiencies **4.1 A Basic Assessment Process Is Legally Inappropriate** Given: • location within 32m and 100m estuarine buffer zones • potential irreversible ecological harm • high-risk engineering systems • pollution pathways A Basic Assessment (BAR) is insufficient and inappropriate. This project clearly requires a full Scoping and Environmental Impact Assessment (EIR) as provided for under NEMA.	This statement is incorrect. Activities in listing notice 1 and 3 require a Basic Assessment Process as per the NEMA EIA regulations. There are no activities from Listing notice 2 proposed and a Full Scoping and EIA is therefore not required.
4.2 Violations of NEMA Section 2 Principles The development contradicts several binding environmental management principles:	The precautionary principle has been applied. The WUL application is in progress and a closed system treatment plant is proposed until the WUL determines the release of the water and the quality

• Precautionary Principle: High uncertainty and high risk prohibit approval. • Duty of Care: Pollution is unavoidable under the current proposal. • Public Trust Doctrine: The estuary is a public natural asset and cannot be degraded for private benefit. The proposal would diminish regional biodiversity, degrade local infrastructure, increase traffic, and endanger wildlife within the Lake Brenton Conservancy.	of the water to be released. Duty of Care is applied – pollution will be prevented through the proposed closed system to be installed, lights – low level solar lighting proposed, noise – limited noise associated with a small camp site where guests expect peace and tranquility. The addition of 25 seasonal traffic visits by guests coming to experience the peace and tranquility, is unlikely to impact on wildlife. Speed is limited to 30km/h through the Conservancy and speed is limited to 10km/h on the property.
4.3 Contradiction of the Knysna Spatial Development Framework The SDF expressly aims to: • protect Critical Biodiversity Areas • prevent tourism intensification within residential or conservation-adjacent areas This application conflicts with the SDF's core policies.	There are no CBA's on the property. The application is compatible with the SDF – camping is a consent use on agricultural land. The property is not residential or conservation zoned land. The camping area is limited to a small area of garden around the homestead which is away from the neighbouring residential area.
5. Deficient Social Impact Assessment and "Sense of Place" Considerations **5.1 Community Opposition Is Significant and Legally Relevant** A clear majority of Lake Brenton residents oppose the development. This must be recorded and reflected in Appendix E (Public Participation Process). The BAR minimises impacts on: • noise • traffic • visual intrusion • safety • village character These assessments are contradicted by community feedback and therefore unreliable. The visual character of Lake Brenton—a quiet, natural, residential conservancy—is entirely incompatible with a commercial campsite of 25 stands.	Community opposition is noted. – a "clear majority" is relative, as those residents from Lake Brenton who have not commented have not been "counted." The PPP report includes all comments and responses. The BAR has not minimised impacts on - Noise – the proposal is for a quiet, nature orientated tented camp experience, not a loud, noisy experience. - Traffic – the addition of 25 additional vehicles or trip generations linked to the proposal is not a significant change to the traffic - The visual intrusion was found by the specialist to not be significant - Safety – there is no change to the safety of the Brenton-on-Lake community as a result of this application. - There will be no change to the village character – the application is not in the village. Looking down towards the property in the distance and possibly seeing the canvas of a tent is not a "visual intrusion". - The community feedback is in many instances emotional. Being able to see something does not mean that there is a negative impact. - A quiet, natural, eco-tourism facility on a farm near the estuary is not incompatible with the nearby Lake Brenton residential conservancy.
5.2 Influence of Adjacent and Parallel Resort Applications Since the Brenton Cove proposal became known, neighbouring properties have initiated additional resort applications. Many are zoned Agricultural I and explicitly prohibit camping. Cumulative impacts on biodiversity, wildlife movement, and neighbourhood character cannot be ignored. NEMA requires a holistic, not piecemeal, assessment.	The authorities, both planning and environment, have the benefit of having sight of all applications. The neighbouring application has been taken into account in this application and cumulative impacts on biodiversity, wildlife movement and neighbouring character incorporated.
6. Severe and Unaddressed Fire Risks **6.1 Incorrect Fire Risk Classification**	The engineering report indicates the regulations which classify the risks based on set criteria. The municipality will indicate if they require any additional fire fighting equipment.

Classifying the development as "Low Risk Group 4" is indefensible in the Knysna context. The BAR itself references the devastating 2017 fires. A commercial campsite with 25 fire points in one of the highest fire-risk regions in South Africa cannot be considered low risk. This misclassification invalidates the proposed mitigation plan. **6.2 Interim Plan Has No Firefighting Infrastructure** The interim plan—again, the only realistic plan—provides: ・ no firefighting water ・ no hydrants ・ no suppression system ・ only 10,000 litres of domestic-use water, insufficient even for daily consumption This places both guests and neighbours at serious risk.	The property owner is a member of the FPA and has included additional fire fighting readiness on the property which includes firebreaks, alien vegetation removal, additional water storage and pumps. It is assumed that every home in the residential area of Brenton-on-Lake has a fire point, they do not however have firebreaks, may not have additional water storage or pumps.
6.3 Unreliable Dependence on Municipal Fire Services The site is remote, accessed via narrow servitude roads. In a major fire event, municipal services would be: ・ overextended ・ delayed ・ unlikely to access the site Reliance on municipal intervention is dangerously unrealistic.	The landowner is not relying on the municipal fire services – see above
6.4 Absence of a Specialist Fire Risk Assessment A specialist fire study is standard for developments in high-risk zones. Its omission represents a procedural defect that undermines the validity of the BAR. Conclusion For the reasons summarised above, the proposed Brenton Cove Campsite: ・ poses unacceptable ecological risk, ・ relies on unworkable engineering solutions, ・ contradicts its own specialist advice, ・ misapplies environmental legislation, ・ ignores cumulative and social impacts, ・ fails to meet NEMA's precautionary, duty of care, and sustainability principles, and ・ presents a serious fire hazard to the community. This application cannot be authorised through a Basic Assessment. A full Scoping and Environmental Impact Assessment is legally and environmentally required, and the development should not be approved in its current form.	A specialist fire study is not a requirement of this process. The engineers have evaluated the proposal and indicated the risk classification of the proposal. The owner's intention is to however store additional water as indicated and pump to be in a position to use the water. The borehole, which has an 18 000 litre **per hour** flow rate, is existing. A Water Use License is not required to use borehole water on a farm and that use can be for fire fighting should the need arise. Pumping directly out of the tidal pond is also possible should an emergency arise. The NEMA process is regulated – Scoping EIA is not the legal requirement for this application.

Wynand and Leonie du Preez, 13 November 2025	
Our comment is more of a suggestion/comment as we have lived for 20 years next to the conservancy tank in Captain Duthie of The Ridgewood and Woods development in Lake Brenton . This development was approved on the condition in 2005 that this tank will be connected by pipeline to Belvidere. 20 years later and this have still not happened which have resulted in many over spills of the tank into the road and stormwater channels . Knysna Municipality use honeysuckers to empty the tank presently . Your assessment states that the applicant will be making use of KM to empty the tank by honeysuckers . In reality this all sound 100 % BUT believe us this does not happen always ! Knysna Municipality don't have enough working honey suckers Knysna Municipality relies on a private contractor to empty the conservancy tanks The waste water site in Brenton on Sea is presently not working so sewer have to be taken to town with every trip Knysna Municipality must service Sedgefield also with the 3 working honeysuckers Spillage of the tank will definitely flow into the lagoon from portion 152 The noise from the honey suckers are above the allowed decibel They arrive any time of the day or night The smell is unbearable Drain covers are left open overnight sometimes which is a danger to humans and animals Knysna Municipality don't come and clean the spilled sewer and it smells for days Knysna Municipality don't have the funds to buy more honey suckers and have refused any funding or help from The Western Cape Government.	Thank you for these constructive comments, linked to the concern relating to using filtered greywater. The applicant has made the decision to install the sewage treatment plant on site upfront and not to make use of a conservancy tank. The honey sucker would only be required for the occasional maintenance to the system where sludge needs to be removed which is said to be necessary approximately every 3-5 years.
Our suggestion is make this a pump station on portion 152 as well as the one at our Development and the proposed development on neighbouring portion 192. Pump the sewerage to a sewerage plant. This plant can be built on the Municipal land that is situated on Captain Duthie just before the railway line. From there it can all go by pipeline to Belvidere. In the interim the honeysucker can go and remove the sewer from this site and all the above points will not be in place as the land is not close to residential property or the lagoon. If this proposed sewerage plant is not considered we can predict many disasters of spilled sewer into the lagoon as well all the points above . We have years of correspondence to show should you like to meet.	The municipality may in the long run consider linking the area and pumping to Belvidere's sewage treatment plant. The applicant will however install their own private sewage treatment plant to treat the sewage effluent on site to a standard that is acceptable for recycling and release through irrigation.

Registrations received without additional comment being submitted.	
Brendan, 25 November 2025	
Objecting to the proposed Brenton cove development	No further comments received, objection is noted.
Chris, 7 December 2025	
I hereby voice my Objection to Brenton Cove Development, for Various reasons, same as in previous objection. Environmental Issues, plus if this goes ahead it will open the Floodgates to every piece of Serene farmland property to be converted for "Resort purposes, resulting in Total Chaos during Peak seasons, let alone Disturbing of peace, Crime, undesirable characters, ect, ect, ect	Noted and addressed throughout comments received Please note that the camping will not be attracting "undesirable characters" – the guests will be high end guests coming to enjoy an eco-tourist experience.
Hester Hickey, 26 November 2025	
Objection to resort that will worsen the lack of infrastructure to the area.	No further comments received, objection is noted. The proposal will be self-sufficient and not relying on the infrastructure of the area.
Jakes van der Merwe, 3 December 2025	
I reside at Lake Brenton Eco Estate. I shall appreciate detailed information about the sewerage management for the project. Sewerage management must be optimal and soak-away or greywater discharge should not be accepted. Please revert.	**HilLand Environmental reply - 3 Dec 25** Thank you for the registration and comments. All services are explained in the Basic Assessment Report and engineering report (appendix M) available on the website. Note that the proposed sewage treatment has been updated subsequent to the reply sent in December.
Lianda Magson, 25 November 2025	
I would like to object to the Brenton Cove Development application. Please provide next steps.	No further comments received, objection is noted.
Info Email, Magda Smit Properties, 25 November 2025	
We are strongly opposed to this development. The roads and all infrastructure will not be able to handle this kind of development. Sewerage is a huge issue already, toilets pushing up and overflowing on a daily basis. PLEASE DON'T ALLOW THIS.	Objection noted Infrastructure – the proposal is designed to be self-sufficient.
Elizabeth Avril Paterson, 25 November 2025	
Objection to above	No further comments received, objection is noted.
Rodger Clay, 20 November 2025	
Lake Brenton does not have the infrastructure to support such an application.	Noted – the proposal is designed to be self-sufficient.

CONCLUSION

In light of the above, the following process has taken place:

Potential stakeholders have:

- Read through the BAR which contains all the relevant information pertaining to the proposal;
- Registered as an I&AP and submitted comments, recommendations, concerns and or issues to the EAP within the 30-day comment period.
- Declared interest in the matter and disclosed any direct business, financial, personal or other interest which that party may have in the approval or refusal of this application.

I&AP's, Organs of State and State Departments have submitted comment on the application.