
Re: 1157 I&AP Request BRENTON COVE PROPOSAL

From Inge Delpont <environmental2@hilland.co.za>
Date Fri 11/21/2025 10:41 AM
To Alana Mitchell <alanamitchell@protonmail.com>
Cc Cathy Avierinos <cathy@hilland.co.za>

Hi Alana

Thank you for your comments, it will be responded to through the process.

Have a lovely day

Kind regards/ Vriendelike groete

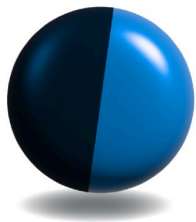
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EAPASA 2019/1689
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HilLand Environmental

Environmental Assessment Practitioners

From: Alana Mitchell <alanamitchell@protonmail.com>
Sent: Friday, November 21, 2025 10:32 AM
To: Inge Delpont <environmental2@hilland.co.za>; Admin | HilLand <admin@hilland.co.za>
Subject: Re: 1157 I&AP Request BRENTON COVE PROPOSAL

Dear Inge,

Thank you so much.

With regards to the proposal for development at Brenton Cove I feel very strongly against this. It will severely impact the wildlife and environment. Even without this development, the pressures of human activity already create issues we are trying to correct within our community. Nevermind the destruction of the environment and then even more visitors who come for a holiday and have no sense of responsibility or accountability for what they do.

Herewith the comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove, put together by our local community members :

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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer knows 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.

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 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.

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.

3.1 Greywater:

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.

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.

3.2 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 "honey sucker" 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. Knysna 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.

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 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

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 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.

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.

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.

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.

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".

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.

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 is 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.

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.

Kind regards,
Alana Mitchell

----- Original Message -----

On Friday, 11/21/25 at 10:12 Inge Delpont <environmental2@hilland.co.za> wrote:

Good morning,

Hope you are doing well

Thank you for your registration. All comments to reach us by 08 December 2025.

The report and various associated appendices can be downloaded from HillLand Environmental's website at: <https://hilland.co.za/public-processes/brenton-cove/>

Alternatively, follow the Google Drive Link:

https://drive.google.com/drive/folders/1c3DfLKOF3xnMdp7TKKT6l3B4_HvRrS8G?usp=sharing

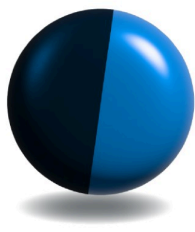
Have a lovely day

Kind regards/ Vriendelike groete

Inge Delport
EAPASA 2019/1689
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HillLand Environmental
Environmental Assessment Practitioners

From: webmaster@hilland.co.za <webmaster@hilland.co.za>
Sent: Friday, November 21, 2025 8:32 AM
To: Info | HillLand <info@hilland.co.za>
Subject: I&AP Request

Hi, you have a new I&AP request from hilland.co.za. See details below

Email: alanamitchell@protonmail.com
Project: Brenton Cove
Contact Number: 0826370633

Message:
Message will be sent via email.

Kind Regards

Comments relevant to the proposal to establish a camping site, referred to as Brenton Cove, on Portion 152 of the Farm Uitzicht 216, Knysna.

Submission made by A E Owgan, RSA ID 4711115057083, property owner of 322 Elft Avenue in Lake Brenton, Knysna.

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

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

1.1 The 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**

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.

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.

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)

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.

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 to 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

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.

A E Owgan

Owner Erf 322 Lake Brenton

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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.


A E Owgan 5/12/2025
Owner Erf 322 Lake Brenton

05/12/2025

Alistair Reid

428 Dolphin Ave, Lake Brenton

076 751 3711

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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 land as "low sensitivity" is wholly inaccurate given the location and context of the property. The Knysna Estuary is one of the most important and 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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

1.3 Planning 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.

**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:	lloydruce@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).

1.4 SANParks 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.

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 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.

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.

3.1 Unsuitable 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.

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.

3.2 Unfeasible 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 "honey sucker" 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. Knysna 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.

3.3 No 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 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.

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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.

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4.1 A 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.

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 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.

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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 expanded to the full extent of the original residential zone.

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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.

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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.

6. Inadequate Fire Risk Management

The proposed plan has significant fire management risks and contradictions.

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 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".

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.

6.4 Inadequate 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 is 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.

RE: portion 152 Farm 216 Knysna comments

From Cathy Avierinos <cathy@hilland.co.za>

Date Tue 11/11/2025 10:04 AM

To amoffat@agridistributors.com <amoffat@agridistributors.com>; finance@agridistributors.com <finance@agridistributors.com>

Cc Inge Delport <environmental2@hilland.co.za>

Hi Andrew

Thank you for your registration as an I&AP.

In response to your questions, the following is applicable

1. *Where will the wastewater/ sewage be stored and what is the long-term plan for the management, considering this property is under the 100 year high water mark? – 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.*
2. *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.*

I hope this addresses your concerns.

Kind regards

Cathy Avierinos

Director

EAPASA 2019/1053

HillLand Environmental (Pty) Ltd

166 Mountview Farm, Victoria Heights

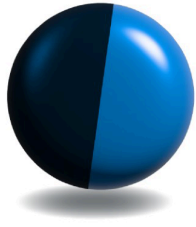
George

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Mobile: +27 (0) 825586589 - Office: +27 (0) 44 8890229 - Fax: +27 (0) 86 5425248



Hilland Environmental

Environmental Assessment Practitioners

Environmental Services since 1992

From: amoffat@agridistributors.com <amoffat@agridistributors.com>

Sent: Tuesday, November 11, 2025 8:58 AM

To: Admin | Hilland <admin@hilland.co.za>

Cc: Gitte Moffat <finance@agridistributors.com>

Subject: portion 152 Farm 216 Knysna comments

To whom it may concern

I would like to know the following:

1. Where will the waste water/ sewage be stored and what is the long-term plan for the management, considering this property is under the 100 year high water mark?
2. Where will the guests / campers be launching their boats, as the slipway at Brenton on Lake (during season) is already congested.

I look forward to your comments and reply.

Kind Regards

Andrew Moffat

DIRECTOR

Worcester: Tel: 023 2300 595 N1 North, Bergsig, Worcester, South Africa

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Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Adrian Young – 6 Ridgewood Close, Lake Brenton

Date: 3rd December 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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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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 is 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.

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Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Annemarie Luck

Date: 7 December 2025

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.

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 itself” 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.

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 impact assessment. The proposal fails to evaluate the combined effect of a tourism-intensive camp and ongoing 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.

2. Misrepresentation of “Transformed Land”: The Site Remains Unsited 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 wetland 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.

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.

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.

3.2 Sewage / Blackwater

Sewage is proposed to be stored in a **12,000 L conservancy tank** and emptied by municipal truck “as required”. 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 raises 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.

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 greywater.

This is a direct contradiction of the specialist’s key mitigation measure.

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.

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 that would experience significant impacts.

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.

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 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.

Re: 1157 Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

From Inge Delport <environmental2@hilland.co.za>
Date Fri 11/21/2025 12:29 PM
To davenash@xsinet.co.za <davenash@xsinet.co.za>
Cc Cathy Avierinos <cathy@hilland.co.za>

Dear Ashley

Thank you for the comments, it will be responded to through the process.

Have a lovely day

Kind regards/ Vriendelike groete

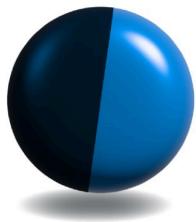
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HilLand Environmental

Environmental Assessment Practitioners

From: Ashley Burns <davenash@xsinet.co.za>
Sent: Friday, November 21, 2025 11:45 AM
To: Admin | HilLand <admin@hilland.co.za>
Subject: Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Ashley Burns

Date: 21 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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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 guarantee 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.

3.1 Greywater:

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.

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 18 hours per day, and as such excess nitrates will build up in this semi-enclosed environment, compounding the problem further.

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. Knysna 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.

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 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

4.1A 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.

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 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.

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 expanded to the full extent of the original residential zone.

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.

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.

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".

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.

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 is 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.

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.

Regards

Ashley Burns

Sent from my iPhone

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Ashley Norie, owner with Hannah Green, 59 Kingfisher Way, Lake Brenton Estate

Date: 7th December 2025

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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.

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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.

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.

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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.

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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.

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 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.

4.3 Knynsa 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 expanded to the full extent of the original residential zone.

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.

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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".

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.

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 is 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.

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.

Letter of Objection to development of Brenton Cove

From Bev Bradnick <bjbradnick@gmail.com>

Date Mon 12/8/2025 8:59 AM

To Inge Delport <environmental2@hilland.co.za>

Good morning

trust this email finds you well.

Please note below my formal detailed objection, outlining my concerns regarding the proposed tourism development in Brenton-on-Lake

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 quite of our beautiful neighborhood!

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!!

So, as a new owner in this beautiful piece of paradise, I STRONGLY object to this project going ahead.

Regards

Beverley and Clive Bradnick.



Outlook

I&AP Request

From HilLand Environmental <wordpress@hilland.co.za>

Date Tue 11/25/2025 9:36 PM

To Info | HilLand <info@hilland.co.za>

Hi, you have a new I&AP request from hilland.co.za. See details below

Email: Brendanrp@yahoo.com

Project: Brenton cove

Contact Number: 060 500 4661

Message:

Objecting to the proposed Brenton cove development

Kind Regards

From: brian paterson <tbpaterson20@gmail.com>
Sent: Tuesday, November 25, 2025 10:57 AM
To: Admin | HillLand <admin@hilland.co.za>
Subject: Objection to proposal

Sent from my iPhone

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name:

Date:

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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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.

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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..." .

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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 18 hours per day, and as such excess nitrates will build up in this semi-enclosed environment, compounding the problem further.

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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.

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I&AP Request

From webmaster@hilland.co.za <webmaster@hilland.co.za>

Date Sun 12/7/2025 3:23 PM

To Info | Hilland <info@hilland.co.za>

Hi, you have a new I&AP request from hilland.co.za. See details below

Email: chrisyoc26@gmail.com

Project: PROJECT : Brenton Cove Objection

Contact Number: 0832363553

Message:

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

Kind Regards

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Christo de Klerk

Date: 25 November 2025

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3.3 Report Contradictions

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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 expanded to the full extent of the original residential zone.

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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.

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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".

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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.

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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 is 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.

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.

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Claire Reid

Date: 20 November 2025

If this proposal is approved, it will be devastating to our community and wildlife. Please see below my comments regarding this application.

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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 infilled 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 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.

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.

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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.

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.

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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.

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Name: Corinne Geldenhuys email: corinnegeldenhuys@gmail.com

Date: 26 November 2025

Dear Sirs,

Below pls find our comprehensive response for your perusal.

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The proposed plan has significant fire management risks and contradictions.

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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 is 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.

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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.

From: Craig Barthus <kccreations23@gmail.com>
Sent: Tuesday, November 25, 2025 9:45 AM
To: Admin | HilLand <admin@hilland.co.za>
Subject: Brenton cove

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name:

Date:

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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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.

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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.

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.

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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.

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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 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.

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.

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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.

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Brenton Cove

From Danielle Davenport <danielle.davenport3@gmail.com>

Date Sun 12/7/2025 12:28 PM

To Admin | HilLand <admin@hilland.co.za>

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Danielle Smit dani@bastianva.com

Date: 7 December 2025

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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 is 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.

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.

 Bastian Visual Art

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Re: 1157 Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

From Inge Delpont <environmental2@hilland.co.za>

Date Fri 11/21/2025 12:31 PM

To daveburns@xsinet.co.za <daveburns@xsinet.co.za>

Dear David

Thank you for the comments, it will be responded to through the process.

Have a lovely day

Kind regards/ Vriendelike groete

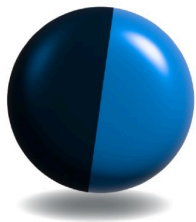
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HillLand Environmental

Environmental Assessment Practitioners

From: David Burns <daveburns@xsinet.co.za>

Sent: Friday, November 21, 2025 12:23 PM

To: Admin | HilLand <admin@hilland.co.za>

Subject: Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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.

3.1 Greywater:

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.

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 18 hours per day, and as such excess nitrates will build up in this semi-enclosed environment, compounding the problem further.

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. Knysna 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.

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 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

4.1A 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.

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 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.

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 expanded to the full extent of the original residential zone.

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.

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.

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".

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Thank you

David Burns

10 Crossberry Close, Lake Brenton

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Deon Joubert, 323 Grunter Avenue. Lake Brenton, Knysna

Date: 1st December 2025

Re : Objection by interested party

1. The "Low Sensitivity" Claim is a Dangerous Flaw in Logic

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This is an impossible claim 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.

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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.

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Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Deven Pillay (835 Brenton on Lake Estate)

Date: 7th December 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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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.

3.1 Greywater:

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.

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.

3.2 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.

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 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.

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 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.

4.3 Knynsa Spacial 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 expanded to the full extent of the original residential zone.

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.

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.

6. Inadequate Fire Risk Management

The proposed plan has significant fire management risks and contradictions.

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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".

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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.

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Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Dirk & Barbie Verster

Date: 26 November 2025

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Re: 1157 I&AP Request

From Anne Davis <annedougDavis@gmail.com>

Date Mon 12/8/2025 9:15 AM

To Info | HillLand <info@hilland.co.za>

To whom it may concern.

We hereby lodge our repeated concerns and objections to the revised Brenton Cove proposal for 25 camping 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 aswell 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 prestine 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.

Doug and Anne Davis

"Dune Forest"

385 Tuna Drive.

LAKE BRENTON.

Knysna.

On Mon, 8 Dec 2025, 8:09 am Info | HillLand, <info@hilland.co.za> wrote:

Dear Anne

Thank you for your registration. Any additional comments to reach us by the end of today, 08 December 2025.

The report and various associated appendices can be downloaded from HillLand Environmental's website at: <https://hilland.co.za/public-processes/brenton-cove/>

Alternatively, follow the Google Drive Link:

https://drive.google.com/drive/folders/1c3DfLKO3xnMdp7TKKT6l3B4_HvRrS8G?usp=sharing

Have a lovely day

Kind regards/ Vriendelike groete

Inge Delport
EAPASA 2019/1689
HillLand Environmental (Pty) Ltd
166 Mountview Farm, Victoria Heights
George

P.O.Box 590 - George, 6530 - Western Cape - South Africa
environmental2@hilland.co.za
www.hilland.co.za

Mobile:+27 (0) 825259995 - Office: +27 (0) 44 8890229 - Fax: +27 (0)86 5425248



Happy Holidays!

Our office dates are as follows:

Close: 12 December 2025

Reopen: 13 January 2026

Thank you for your support in 2025

HillLand Environmental

Environmental Assessment Practitioners

From: webmaster@hilland.co.za <webmaster@hilland.co.za>

Sent: Saturday, December 6, 2025 3:27 PM

To: Info | HillLand <info@hilland.co.za>

Subject: I&AP Request

Hi, you have a new I&AP request from hilland.co.za. See details below

Email: EMAILannedougDavis@gmail.com

Project: BRENTON COVE. OBJECT TO REGISTER FOR

Contact Number: 0723866765

Message:

We, Doug and Anne Davis would hereby like to (again)strongly object to the revised plan for the farmland of Brenton Cove

Kind Regards

Re: 1157 SMALL CAMPING RESORT, ASSOCIATED INFRASTRUCTURE AND TOURISM FACILITIES ON PORTION 152 OF THE FARM UITZICHT NO. 216, KNYSNA

From Inge Delport <environmental2@hilland.co.za>
Date Tue 11/25/2025 12:36 PM
To eddie@east13media.com <eddie@east13media.com>

Dear Eddie

Thank you for the comments it will be responded to through the process

Kind regards/ Vriendelike groete

Inge Delport
EAPASA 2019/1689
HillLand Environmental (Pty) Ltd
166 Mountview Farm, Victoria Heights
George

P.O.Box 590 - George, 6530 - Western Cape - South Africa
environmental2@hilland.co.za
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HilLand Environmental

Environmental Assessment Practitioners

From: eddie@east13media.com <eddie@east13media.com>

Sent: Tuesday, November 25, 2025 11:09 AM

To: Admin | HilLand <admin@hilland.co.za>

Subject: SMALL CAMPING RESORT, ASSOCIATED INFRASTRUCTURE AND TOURISM FACILITIES ON PORTION 152 OF THE FARM UITZICHT NO. 216, KNYSNA

Dear Sirs,

**RE: SMALL CAMPING RESORT, ASSOCIATED INFRASTRUCTURE & TOURISM
FACILITIES ON PORTION 152 OF THE FARM UITZICHT NO. 216, KNYSNA**

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.
- 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.
- 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.
- 4.** In many ways I would actually support a high end site with say only 5 tents and no camping pitches.

I am opposed to the development as laid out in this specific application

Edward

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

From Elaine Coates <elainegoldcoates@gmail.com>

Date Sun 11/30/2025 10:57 AM

To Admin | HilLand <admin@hilland.co.za>

Good afternoon,

I have registered as an interested party and these are my comments. I strongly oppose this application!

Name: Elaine Coates

Date: 30th 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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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.

3.1 Greywater:

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.

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 18 hours per day, and as such excess nitrates will build up in this semi-enclosed environment, compounding the problem further.

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. Knysna 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.

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 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.

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 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.

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 expanded to the full extent of the original residential zone.

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.

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.

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".

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.

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 is 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.

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.

Brenton Cove project comments

From Elizabeth Goodall <egoodall73@hotmail.com>

Date Tue 11/25/2025 11:55 AM

To Admin | HilLand <admin@hilland.co.za>

 1 attachment (23 KB)

Comments for Brenton Cove DFFE application.docx;

Good Day,

I'm concerned about the current and pending plans for the Brenton Cove project. Below and attached are my comments.

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Elizabeth Goodall

Date: Nov 25, 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."

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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.

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The developer acknowledges 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.

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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.

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or filtration capacity. This makes it completely unsuitable for the high-impact sewage and grey-water plan proposed.

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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.

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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.

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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. Knysna 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.

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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.

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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".

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.

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 is 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.

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.

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Elmien Lombard

Date: 7 December 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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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.

3.1 Greywater:

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.

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.

3.2 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.

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 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.

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 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.

4.3 Knynsa 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 expanded to the full extent of the original residential zone.

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.

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.

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".

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Brenton Cove formal objection "The Camping Site"

From Zandile <zandile@karootocoast.com>

Date Tue 12/2/2025 10:57 AM

To Admin | HilLand <admin@hilland.co.za>

TO:

HilLand Environmental (EAP)

For: Brenton Cove / Mr R. Neethling (Applicant)

admin@hilland.co.za

Date: 02 December 2025

Subject: Formal Objection — All 3 Components of the Application for "The Camping Site: Portion 152 of Farm Uitziht No. 216, Brenton-on-Lake" (DRAFT BAR Notification dated 07 November 2025)

Dear Hilland Environmental

I, F Z Meneses , owner of Erf 360, Dolphin 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 Uitziht 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.

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.

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.

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.

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).

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.

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.

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.

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.

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.

Regards

Zandile Meneses | Race Director | Cel: 082 851 3622 | zandile@karootocoast.com



Lions Karoo to Coast Mountain Bike Challenge

www.karootocoast.com

The Fred Human Family Trust

No 10 Ridgewood Close

Brenton on Lake

Knysna

To: HilLand Environmental (Pty) Ltd

166 Mountain view Farm

Victoria Heights

George

Attention: Ms Inge Delpont

Per e-mail: environmental2@hilland.co.za

6 December 2025

Dear Ms Delpont,

Comments on RAF and NEMA Report: 1157 Brenton Cove

[In respect of Portion 152, Farm Uitzig No 216]

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.

1. Overall Picture

The land is situated in a High Sensitivity area not suitable for development of any kind.

Proceeding with any development thereof will inevitably require the removal of restrictive conditions in the title deed.

There is and 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.

These 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.

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 8 600litres 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.

4.Scoping and Environmental Impact Report

Given the sensitivity of the area a Scoping and Environmental is mandatory.

No such report has been submitted.

5.Section 28 of Nema

The development will certainly cause pollution and have a huge impact on the ecology. Therefor section 28 of Nema must be complied with.

5.Section 33(4) of Lupo

This section requires the Council to have regard to whether the removal of the restriction would be in the public interest.

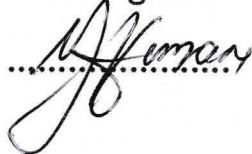
There is no evidence that the proposed removal will benefit the public nor the surrounding community.

The community is dead against the removal of the restriction 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.

6.Irreversible Precedent

Allowing the removal of the restriction which has 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.

Kind Regards

.....


Die Fred Human Familie Trust (T245/85)

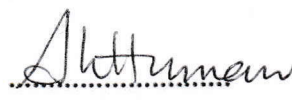
("the Trust")

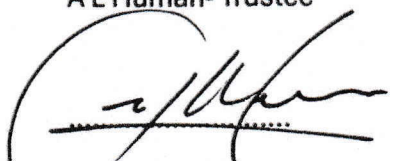
Resolutions

- 1. That the Trust as owner of Erf 737 situated at No 10 Ridgewood Close, Richwood Brenton on Lake, oppose the proposed consent use and removal of title deed restrictions on Portion 152 Farm Uitzig 216 to enable the development of a caravan park and campsite thereon; and**
- 2. That Frederick S Human in his capacity as trustee be and is hereby authorized to sign all such documents and to act herein on behalf of the trust as may be required to give effect to resolution no 1 above.**

Dated 13 November 2024


F Human -Trustee


A L Human- Trustee


NPJ Van Der Hoven-Trustee

I&AP Request

From webmaster@hilland.co.za <webmaster@hilland.co.za>

Date Mon 12/8/2025 6:02 PM

To Info | Hilland <info@hilland.co.za>

Hi, you have a new I&AP request from hilland.co.za. See details below

Email: gfl@gutneuenhof.de

Project: Brenton Cove

Contact Number: +49 (0) 1739512372

Message:

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Gabriele Freitag-Lau and Kurt Walter Lau

Date: 08. Dec. 2025

1. The "Low Sensitivity" Claim is a Dangerous Flaw in Logic

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This is an impossible claim 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.

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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.

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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.

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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.

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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. 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 18 hours per day, and as such excess nitrates will build up in this semi-enclosed environment, compounding the problem further.

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. Knysna 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.

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 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.

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 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.

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 expanded to the full extent of the original residential zone.

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.

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.

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".

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.

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 is 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.

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.

Kind Regards

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Gary Brown

Date: Nov 25, 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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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".

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Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Gary Hulbert

Date: 27/11/2025

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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.

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 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.

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 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.

4.3 Knynsa 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 expanded to the full extent of the original residential zone.

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.

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.

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".

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.

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 is 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.

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.

Gavin Whitfield,

1st Dec 2025

321 Grunter Avenue,

Lake Brenton,

Knysna,

6571.

Email: ghwhitfield@gmail.com

Mobile phone: 0745437119

Dear Sir/Madam,

My comments relating to the Proposal:

Portion 152 of Farm 216 (known as Brenton Cove)

Comments

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.

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.

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.

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.

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.

6. This document holds the reasons to my **permanent objection** to any further development of this property.

Kind Regards

Captain Gavin Whitfield

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Glen Polley – 28 Candleberry Drive, Lake Brenton.

Date: 30 Nov 2025

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.

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 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.

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 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.

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.

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.

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.

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.

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.

4.3 Knysna Spacial 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 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.

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.

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.

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.

6.3 Inadequate Reliance on Municipal Services

The Interim plan includes just two 5,000-litre tanks for domestic use, relying on an 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.

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Hannah Green, resident 59, Kingfisher Way, Lake Brenton Estate

Date: 7th December 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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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.

3.1 Greywater:

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.

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.

3.2 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.

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 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.

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 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.

4.3 Knynsa 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 expanded to the full extent of the original residential zone.

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.

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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".

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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 is 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.

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.

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Hannelie Watt

Date: 8 December 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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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.

3.1 Greywater:

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.

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.

3.2 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.

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 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.

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 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.

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Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Hendrika de Klerk

Date: 25 November 2025

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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.

Fw: Objection to Brenton Cove

From Admin | HilLand <admin@hilland.co.za>

Date Tue 11/25/2025 11:28 AM

To Inge Delpont <environmental2@hilland.co.za>

Kind regards/ Vriendelike groete

Inge Delpont
EAPASA 2019/1689
HilLand Environmental (Pty) Ltd
166 Mountview Farm, Victoria Heights
George

P.O.Box 590 - George, 6530 - Western Cape - South Africa

environmental2@hilland.co.za

www.hilland.co.za

Mobile:+27 (0) 825259995 - Office: +27 (0) 44 8890229 - Fax: +27 (0)86 5425248



Happy Holidays!

Our office dates are as follows:

Close: 12 December 2025

Reopen: 13 January 2026

Thank you for your support in 2025

HilLand Environmental

Environmental Assessment Practitioners

From: Henk van der Merwe <henkvandermerwe@ymail.com>

Sent: Tuesday, November 25, 2025 10:17 AM

To: Admin | HilLand <admin@hilland.co.za>

Subject: Objection to Brenton Cove

Good day

I am a home owner in Lake Brenton, and I object to the proposed development "Brenton Cove". I am part of the Lake Brenton Interest group, and the basis of my objection is outlined below:

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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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.

3.1 Greywater:

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.

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 18 hours per day, and as such excess nitrates will build up in this semi-enclosed environment, compounding the problem further.

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. Knysna 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.

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 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

4.1A 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.

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 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.

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 expanded to the full extent of the original residential zone.

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.

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.

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".

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Kind regards
Henk van der Merwe
0836757422

I&AP Request

From webmaster@hilland.co.za <webmaster@hilland.co.za>

Date Wed 11/26/2025 10:35 AM

To Info | Hilland <info@hilland.co.za>

Hi, you have a new I&AP request from hilland.co.za. See details below

Email: hickeyah@worldonline.co.za

Project: PROJECT TO REGISTER FOR: BRENTON COVE PROJECT

Contact Number: CONTACT NUMBER: +27823772534

Message:

Objection to resort that will worsen the lack of infrastructure to the area.

Kind Regards

Name: Isabella Erasmus email: isabellaerasmuss@icloud.com

Date: 26 November 2025

Dear Sirs,

Below pls find our comprehensive response for your perusal.

1. The "Low Sensitivity" Claim is a Dangerous Flaw in Logic

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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 is 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.

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.

Fw: Objection Portion 152 of Farm 216, known as Brenton Cove

From Admin | HilLand <admin@hilland.co.za>

Date Tue 11/25/2025 11:28 AM

To Inge Delpont <environmental2@hilland.co.za>

Kind regards/ Vriendelike groete

Inge Delpont
EAPASA 2019/1689
HilLand Environmental (Pty) Ltd
166 Mountview Farm, Victoria Heights
George

P.O.Box 590 - George, 6530 - Western Cape - South Africa

environmental2@hilland.co.za

www.hilland.co.za

Mobile:+27 (0) 825259995 - Office: +27 (0) 44 8890229 - Fax: +27 (0)86 5425248



Happy Holidays!

Our office dates are as follows:

Close: 12 December 2025

Reopen: 13 January 2026

Thank you for your support in 2025

HilLand Environmental

Environmental Assessment Practitioners

From: Jacqui Drobczyk <vitraformglass@vitraform.co.za>

Sent: Tuesday, November 25, 2025 10:49 AM

To: Admin | HilLand <admin@hilland.co.za>

Subject: Objection Portion 152 of Farm 216, known as Brenton Cove

Good day,

As a resident of Brenton on Lake, I wish to formally object to the small resort being planned at Farm 216, known as Brenton Cove.

My objections are as follows:

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 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.

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.

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.

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.

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 infilled 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 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.

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.

3.1 Greywater:

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.

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.

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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.

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 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.

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 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.

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 expanded to the full extent of the original residential zone.

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.

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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.

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".

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.

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 is 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.

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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.

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.

Kind regards,

Jacqui Drobczyk
Tel: 074 380 9675

Re: 1157 I&AP Request

From Info | HillLand <info@hilland.co.za>

Date Wed 12/3/2025 12:37 PM

To jakes@inlegal.co.za <jakes@inlegal.co.za>

Cc Cathy Avierinos <cathy@hilland.co.za>

 3 attachments (8 MB)

01. Draft Basic Assessment Report (BAR)_compressed.pdf; App M - 1. Engineering report.pdf; App M - 2. Addendum to report.pdf;

Good afternoon

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. I have attached it to this email for ease of reference.

Have a lovely day

Kind regards/ Vriendelike groete

Inge Delpont

EAPASA 2019/1689

HillLand Environmental (Pty) Ltd

166 Mountview Farm, Victoria Heights

George

P.O.Box 590 - George, 6530 - Western Cape - South Africa

environmental2@hilland.co.za

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Mobile:+27 (0) 825259995 - Office: +27 (0) 44 8890229 - Fax: +27 (0)86 5425248



Happy Holidays!

Our office dates are as follows:

Close: 12 December 2025

Reopen: 13 January 2026

Thank you for your support in 2025

HilLand Environmental

Environmental Assessment Practitioners

From: webmaster@hilland.co.za <webmaster@hilland.co.za>
Sent: Wednesday, December 3, 2025 11:33 AM
To: Info | HilLand <info@hilland.co.za>
Subject: I&AP Request

Hi, you have a new I&AP request from hilland.co.za. See details below

Email: jakes@inlegal.co.za
Project: Brenton Cove
Contact Number: 0823715799

Message:

Good day. I reside at Lake Brenton Eco Estate. I shall appreciate detailed information about the sewerage management for the project. Sewrage management must be optimal and soak-away or grey water discharge should not be accepted. Please revert. Kind Regards.

Kind Regards

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Johan Blignaut

Date: 25 Nov 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 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.

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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 effect 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.

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The developer acknowledges 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.

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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 landowner would have a duty to completely 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 wetland. 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 consist 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.

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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 are 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.

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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. Knysna 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.

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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.

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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.

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The proposed development is in direct violation of the National Environmental Management Act (NEMA) Section 2 Principles:

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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.

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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.

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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 of 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".

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.

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 is 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 firefighting 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 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 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.

OBJECTION to Brenton-on-lake Resort Approval

From kevin mullin <mydogatemysneakers@gmail.com>

Date Sun 12/7/2025 3:58 PM

To Admin | HiLand <admin@hilland.co.za>

Comments Relating to the Proposal: Portion 152 of Farm 216, Known as Brenton Cove

Name: Kevin Mullin

Date: Sunday 7th December 2025

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:

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.

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 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.

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.

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.

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.

4.3 Inadequate Main Road Access and Fatality Risk

The 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, 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.

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**.

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.

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

A specialist Fire Risk Assessment is absent. This is a fatal procedural omission under NEMA.

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: LYDIA HOLMES

Date: 08/12/2025



SIGNED ON 08/12/2025

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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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.

3.1 Greywater:

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.

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 18 hours per day, and as such excess nitrates will build up in this semi-enclosed environment, compounding the problem further.

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 "honey sucker" 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.

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 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.

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 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.

4.3 Knynsa 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.

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.

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.

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".

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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.

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 is 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.

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.

Objection Letter

Comments on the proposed development at Portion 152 of Farm 216 (Brenton Cove)

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.

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.

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 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.

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.

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.

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 **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.

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.

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.

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.

Kind regards Lauren Brauer

Fwd: Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

From Lawrence Coates <lawrence.coates69@gmail.com>

Date Sun 11/30/2025 11:07 AM

To Admin | HilLand <admin@hilland.co.za>

----- Forwarded message -----

From: **Elaine Coates** <elainegoldcoates@gmail.com>

Date: Sun, 30 Nov 2025, 11:04

Subject: Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

To: Lawrence Coates <lawrencecoates69@gmail.com>

Good afternoon,

I have registered as an interested party and these are my comments. I strongly object to this application!

Name: Lawrence Coates

Date: 30th 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 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.

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.

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.

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.

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.

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 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.

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.

3.1 Greywater:

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.

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 18 hours per day, and as such excess nitrates will build up in this semi-enclosed environment, compounding the problem further.

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.

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 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.

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 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.

4.3 Knysna Spacial 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.

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.

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.

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".

6.2 The "Interim Plan" Has No Fire Mitigation

Lee Theresa Blasich

Erf 670 Brenton

10 Brentonwood, Cpt WA Duthie Street

Lake Brenton, 6571

Email: lblasich@gmail.com

Tel No: 079 946 0976

5 December 2025

RE: OBJECTION TO PROPOSED CAMPSITE DEVELOPMENT - KNY25.1157.07 – Brenton Cove portion 152 of farm 216 Brenton on Lake

Dear Ms I. Delport

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.

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.

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.

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.

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 behavior, 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.

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 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.

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.

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.

Yours faithfully,



Lee Theresa Blasich

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Lourens Lombard

Date: 7 December 2025

1. The "Low Sensitivity" Claim is a Dangerous Flaw in Logic

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This is an impossible claim 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.

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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.

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 is 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.

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.

I&AP Request

From webmaster@hilland.co.za <webmaster@hilland.co.za>

Date Tue 11/25/2025 2:39 PM

To Info | Hilland <info@hilland.co.za>

Hi, you have a new I&AP request from hilland.co.za. See details below

Email: Info@magdasmitproperties.co.za

Project: Brenton cove

Contact Number: 0828880557

Message:

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.

Kind Regards

Re: Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

From Inge Delport <environmental2@hilland.co.za>
Date Fri 11/21/2025 11:15 AM
To mduvenage@gmail.com <mduvenage@gmail.com>
Cc Cathy Avierinos <cathy@hilland.co.za>

Dear Marcel

Thank you for your comments, it will be responded to through the process

Have a lovely day

Kind regards/ Vriendelike groete

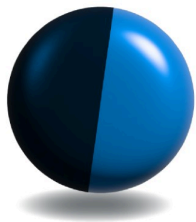
Inge Delport
EAPASA 2019/1689
HilLand Environmental (Pty) Ltd
166 Mountview Farm, Victoria Heights
George

P.O.Box 590 - George, 6530 - Western Cape - South Africa

environmental2@hilland.co.za

www.hilland.co.za

Mobile:+27 (0) 825259995 - Office: +27 (0) 44 8890229 - Fax: +27 (0)86 5425248



HilLand Environmental

Environmental Assessment Practitioners

From: Marcel Duvenage <mduvenage@gmail.com>
Sent: Friday, November 21, 2025 10:54 AM
To: Admin | HilLand <admin@hilland.co.za>
Subject: Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Marcel Duvenage

Date: 21/11/2025

I am a resident of Lake Breton and am entirely against this development, it will have a huge impact on the local environment and community.

Please find comments from myself and the community which we have all discussed and agree upon:

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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 infilled 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 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.

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.

3.1 Greywater:

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.

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 18 hours per day, and as such excess nitrates will build up in this semi-enclosed environment, compounding the problem further.

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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.

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 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.

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 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.

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 expanded to the full extent of the original residential zone.

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.

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.

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".

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.

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 is 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.

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.

Best

Marcel

Formal Objection to Brenton Cove Resort Proposal - Portion 152 of Farm 216 (BAR Submission)

From Mark Ackermann <marknackermann@gmail.com>

Date Fri 12/5/2025 10:18 AM

To Admin | HiLand <admin@hilland.co.za>

Dear Sir / Madam,

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.

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.

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 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.

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.

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.

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.

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.

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.

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.

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.

Best,

Mark Ackermann
Lake Brenton Resident
0649737198

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Michelle Botha

Date: 30 November 2025

1. The "Low Sensitivity" Claim is a Dangerous Flaw in Logic

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This is an impossible claim 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.

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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.

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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.

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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.

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".

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.

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 is 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.

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.

Brenton Cove

From Michelle Zeidler <michelle.zeidler@gmail.com>

Date Tue 11/25/2025 1:05 PM

To Admin | HilLand <admin@hilland.co.za>

Good day,

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.

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.

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.

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.

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.

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.

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

Michelle Zeidler
079 884 2685

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Noel Paterson

Date: 25/11/2025

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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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.

3.1 Greywater:

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.

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.

3.2 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.

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 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.

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 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.

4.3 Knynsa 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 expanded to the full extent of the original residential zone.

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.

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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".

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FORMAL OBJECTION LETTER

From:

P. Papadakis

Erf 404, Dolphin Avenue

Brenton-on-Lake

Knysna Municipality

Email: pavlinapapadakis@gmail.com

To:

HilLand Environmental (EAP)

For: **Brenton Cove / Mr. R. Neethling** (Applicant)

admin@hilland.co.za

Date: 14 November 2025

Subject: Formal Objection to All 3 Components of the Application for “The Camping Site: Portion 152 of Farm Uitzigt No. 216, Brenton-on-Lake”

Dear HilLand Environmental and Mr. Neethling,

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 presentation or layout.

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.

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.

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.

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.

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 unacceptable risks.

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.

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.

Kind regards,

P. Papadakis

Erf 404, Dolphin Avenue

Brenton-on-Lake

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: P Burchell and V Barsdorf

Date: 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 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.

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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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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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.

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.

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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.

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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.

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 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.

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 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.

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 expanded to the full extent of the original residential zone.

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.

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.

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".

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.

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 is 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.

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.



LAKE BRENTON RESIDENTS ASSOCIATION

www.lbra.co.za | Non Profit Organisation | Reg: 2020/616326/08



405 Roman Street

Lake Brenton

Knysna

6571

Cell: 082 571 2462

piccascene@cyberperk.co.za

8 December 2025

Subject: Formal Objection — All 3 Components of the Application for “The Camping Site: Portion 152 of Farm Uitzigt No. 216, Brenton-on-Lake” (DRAFT BAR Notification dated 07 November 2025)

Dear Hilland Environmental,

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.

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.

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, thicket, vegetation, and trees further removes essential cover used by animals for shelter and breeding, leading to significant habitat degradation.
- **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.
- **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.

- **Noise and disturbance:** Continuous human presence, vehicle movement and tourism-related noise can cause stress, leading to avoidance of key habitat areas.
 - **Environmental degradation:** Development introduces additional waste, increases water and energy consumption and may disturb soil and vegetation.
 - **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.
 - **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.
 - **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 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.

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.

- **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.
- **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.
- **Lack of Local Partnership:** Protected area management does not involve local stakeholders, which is critical for sustainable outcomes.
- **Absence of Management Plans:** There is no clear management plan detailing how the site will be monitored and maintained.
- **Need for Assessment of Management Effectiveness:** Without ongoing monitoring, it will be impossible to evaluate whether conservation objectives are being met.
- **Human–Wildlife Conflict and Compensation:** There are insufficient mechanisms to mitigate conflicts between wildlife and visitors or to compensate for wildlife losses.
- **Pollution:** Increased human activity poses risks of soil, water, and general environmental pollution.
- **Fire Risk:** The development increases the likelihood of fire, particularly during dry seasons.
- **Noise Pollution:** Tourism activities may disrupt wildlife and degrade the natural environment.

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!

<https://www.inaturalist.org/observations?nelat=-34.046702687041076&nelng=23.038298862487803&subview=map&swlat=-34.06609479823507&swlng=23.010929323217763>

[Uitzigt 216 Portion 192 - Lake Brenton · iNaturalist](#)

[Uitzigt 216 Portion 104 · iNaturalist](#)

[Uitzigt 216 Portion 152 · iNaturalist](#)

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.

Kind regards,



Picca de Bruin

LBRA Wildlife Portfolio

Re: 1157 I&AP Request

From Inge Delpont <environmental2@hilland.co.za>
Date Fri 11/21/2025 8:15 AM
To rodgerclay@gmail.com <rodgerclay@gmail.com>

 1 attachment (549 KB)
KNY25.1157.07 - Notification letter I&APs.pdf;

Good morning,

Hope you are doing well

Thank you for your registration. Associated services proposed are outlined in the Basic Assessment Report (BAR). All additional comments to reach us by 08 December 2025.

The report and various associated appendices can be downloaded from HillLand Environmental's website at: <https://hilland.co.za/public-processes/brenton-cove/>

Alternatively, follow the Google Drive Link:
https://drive.google.com/drive/folders/1c3DfLKOF3xnMdp7TKKT6l3B4_HvRrS8G?usp=sharing

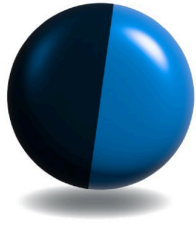
Have a lovely day

Kind regards/ Vriendelike groete

Inge Delpont
EAPASA 2019/1689
HillLand Environmental (Pty) Ltd
166 Mountview Farm, Victoria Heights
George

P.O.Box 590 - George, 6530 - Western Cape - South Africa
environmental2@hilland.co.za
www.hilland.co.za

Mobile: +27 (0) 825259995 - Office: +27 (0) 44 8890229 - Fax: +27 (0) 86 5425248



HilLand Environmental

Environmental Assessment Practitioners

From: webmaster@hilland.co.za <webmaster@hilland.co.za>

Sent: Thursday, November 20, 2025 7:52 PM

To: Info | HilLand <info@hilland.co.za>

Subject: I&AP Request

Hi, you have a new I&AP request from hilland.co.za. See details below

Email: rodgerclay@gmail.com

Project: Brnton cove

Contact Number: 083 309 7777

Message:

Lake Brenton does not have the infrastructure to support such an application.

Kind Regards

Brenton Cove

From rczeidler@global.co.za <rczeidler@global.co.za>

Date Tue 11/25/2025 1:22 PM

To Admin | HilLand <admin@hilland.co.za>

Re Brenton Cove
To whom it may concern

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. 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.

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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.

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.

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 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.

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.

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.

Request

Given the environmental sensitivity, sewage risks, wildlife disturbance, and overall incompatibility with the protected area, I respectfully request that Environmental Authorisation be refused.

Please acknowledge receipt of this objection and include it in the Public Participation.

Rodney Zeidler

082 575 4835



FORMAL OBJECTION TO THE REZONING APPLICATION: PORTION 152 OF FARM 216, “BRENTON COVE”

From: A concerned homeowner and resident of Lake Brenton

Date: 07/12/2025

Subject: *Formal Objection to the Rezoning and Proposed Development on Portion 152 of Farm 216, Brenton-on-Sea*

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-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**.

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
- increased artificial lighting
- amplified noise
- traffic through narrow servitude roads
- permanent degradation of the village's character

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.

Allowing a development of this nature here would fundamentally alter the fabric of the community and contradict the clear environmental intent of the Conservancy.

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*.

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 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.

5. PROTECTION OF THE KNYSNA ESTUARY: A HIGH-SENSITIVITY SYSTEM

The Knysna Estuary is classified as a “**Very High Sensitivity**” ecological system. It is 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**.

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.

Rezoning cannot be approved when the surrounding natural environment is of such high conservation importance and the risk of ecological harm so significant.

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.

But the property:

- consists of **porous, unconsolidated man-made infill**
- has **no natural filtration capacity**
- lies immediately beside sensitive wetland and estuarine habitat

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**.

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.

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.

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.

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
- 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

- 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.

Comments relating to the Proposal: Portion 152 of Farm 216, known as Brenton Cove

Name: Rozanne Hulbert

Date: 27/11/2025

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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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 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.

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.

3.1 Greywater:

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.

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.

3.2 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.

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 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.

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 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.

4.3 Knynsa 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 expanded to the full extent of the original residential zone.

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.

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.

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".

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.

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 is 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.

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.

Brenton Cove Development

From sean@mulcahy.co.za <sean@mulcahy.co.za>

Date Wed 12/3/2025 10:12 AM

To Admin | HilLand <admin@hilland.co.za>

Dear Sir/Madam,

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:

1. Management of sewerage: not convinced on the sustainability of what I understand the solution to be, along with its scalability.
2. 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 to 200 camps sites/chalets along with the traffic, noise, environmental impact etc that would bring.

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.

Kind regards
Sean

Get [Outlook for Mac](#)

FROM:

Steuart Charles Doig
Erf 404, Dolphin Avenue
Brenton-on-Lake
Knysna Municipality
Email: Steuart.doig@gmail.com

TO:

HillLand Environmental (EAP)
For: Brenton Cove / Mr R. Neethling (Applicant)
admin@hilland.co.za

Date: 25 November 2025

Subject: Formal Objection — All 3 Components of the Application for “The Camping Site: Portion 152 of Farm Uitzigt No. 216, Brenton-on-Lake” (DRAFT BAR Notification dated 07 November 2025)

Dear Hilland Environmental and Mr. Neethling,

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 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.

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.

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).

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.

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.

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.

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.
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.

Yours sincerely,
Steuart Charles Doig
 Erf 404, Dolphin Avenue
 Brenton-on-Lake

Comment regarding Portion 152

From Tia Naidoo <naidootia@yahoo.com>

Date Wed 12/10/2025 4:56 PM

To Inge Delport <environmental2@hilland.co.za>

Cc Melissa Mackay <r3green@outlook.com>; lee.naidoo23@yahoo.com <lee.naidoo23@yahoo.com>

Good day Inge

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.
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 portion 152

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.

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.

- 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.
- 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.
- 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.
- 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.

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.

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.

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

Regards
Tayari Naidoo

[Yahoo Mail: Search, organise, conquer](#)

Name: Tony Geldenhuys email: tony@nusolar.co.za

Date: 26 November 2025

Dear Sirs,

Below pls find our comprehensive response for your perusal.

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 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.

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.

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.

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.

1.2 The "Cumulative Impact" Assessment is Limited and Flawed

The developer acknowledges 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.

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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.

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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.

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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 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.

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 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.

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 expanded to the full extent of the original residential zone.

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.

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.

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".

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.

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 is 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.

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.

PUBLIC COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (BAR)

Proposed Campsite Development: Portion 152 of Farm 216 (“Brenton Cove”)
Submitted in terms of the National Environmental Management Act (NEMA) and associated regulations

Name: Ulrike Strydom

Date: 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.

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.

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.

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.

3. Unworkable and High-Risk Sewage & Greywater Management

3.1 Greywater Irrigation Conflict With Specialist Advice

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.

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 non-compliant. The application must be evaluated on this basis.

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.

4.2 Violations of NEMA Section 2 Principles

The development contradicts several binding environmental management principles:

- 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.

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.

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.

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.

6. Severe and Unaddressed Fire Risks

6.1 Incorrect Fire Risk Classification

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.

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.

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.

RE: Draft Basic Assessment Report (BAR) for the proposed camp resort Brenton Cove Portion 152 of Farm Uitzicht

From Crisp and Neat Knysna <knysna@crispandneat.co.za>

Date Thu 11/13/2025 7:35 PM

To Admin | HillLand <admin@hilland.co.za>

Good Day

Thank you for offering us the opportunity to comment on the abovementioned BAR

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 !

1. Knysna Municipality don't have enough working honey suckers
2. Knysna Municipality relies on a private contractor to empty the conservancy tanks
3. The waste water site in Brenton on Sea is presently not working so sewer have to be taken to town with every trip
4. Knysna Municipality must service Sedgefield also with the 3 working honeysuckers
5. Spillage of the tank will definitely flow into the lagoon from portion 152
6. The noise from the honey suckers are above the allowed decibel
7. They arrive any time of the day or night
8. The smell is unbearable
9. Drain covers are left open overnight sometimes which is a danger to humans and animals
10. Knysna Municipality don't come and clean the spilled sewer and it smells for days
11. Knysna Municipality don't have the funds to buy more honey suckers and have refused any funding or help from The Western Cape Government .

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 .

Regards

Wynand and Leonie du Preez

10 Candlewood Close , Lake Brenton

0824132720

From: Info @ LBRA <info@lbra.co.za>

Sent: Monday, 10 November 2025 19:35

To: Leonie <knysna@crispandneat.co.za>

Subject: Draft Basic Assessment Report (BAR) for the proposed camp resort Brenton Cove

Dear Leonie

Another Draft Basic Assessment Report (BAR) for a proposed small camp resort (25 camp sites), associated infrastructure and tourist facilities on Portion 152 of the Farm Uitzicht No. 216 is on the table.

The report will be available for a 30-day commenting period (07 November - 08 December 2025). Please provide us with your comments within the specified timeframe. The report and various associated appendices can be downloaded from HillLand Environmental's website at: <https://hilland.co.za/public-processes/brenton-cove/>

Alternatively, follow the Google Drive Link:

https://drive.google.com/drive/folders/1c3DfLKOF3xnMdp7TKKT6l3B4_HvRrS8G?usp=sharing

Comments are to be addressed to admin@hilland.co.za Enquiries and assistance can also be obtained by telephone: (044) 889 0229

Kind regards

Glen Stephen
Communications Officer
LBRA Committee



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