



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA · 0001 · Environment House · 473 Steve Biko Road, Arcadia, · PRETORIA

DFFE Reference: 14/12/16/3/3/1/3269

Enquiries: Ms Julliet Mahlangu

Telephone: 012 399 9320 **E-mail:** JMMahlangu@dffe.gov.za

Ms Inge Delpert/ Cathy Avierinos
Hilland Environmental
PO Box 590
GEORGE
6530

Telephone Number: 0448890229
Cell phone Number: 0825259995 / 0825586589
Email Address: Environmental2@hilland.co.za / cathy@hilland.co.za

PER MAIL / E-MAIL

Dear Ms Delpert/ Avierinos

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ECO-ESTATE ON THE REMAINDER OF PORTION 45 OF FARM UITZICHT, NO. 216, KNYSNA MUNICIPALITY, GARDEN ROUTE DISTRICT MUNICIPALITY, WESTERN CAPE

The application for Environmental Authorisation (EA) and the draft Basic Assessment Report (BAR) received on 23 February 2026 and acknowledged on the 25 February 2026, and the site visit held on the 24 March 2026 refers.

This letter serves to inform you that the following information must be included to the final BAR:

(a) Public Participation Process

- Please ensure that all issues raised, and comments received during the circulation of the draft BAR from registered I&APs and organs of state which have jurisdiction (**including this Department's Biodiversity Section, Protected Areas Management Section and Ocean and Coast, SANParks, Knysna Municipality, Cape Nature and DEA&DP**) in respect of the proposed activity are adequately addressed in the Final BAR.
- Proof of correspondence with the various stakeholders must be included in the Final BAR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.



Batho pele – putting people first



Departement van Bosbou, Visserie en die Omgewing • Department of Forestry, Fisheries and the Environment • UmNyango wezamaHlathi, zokuThiya neBhoduluko • iSelo lezamaHlathi, ezokuLoba noKusigqongileyo • Umnyango WezamaHlathi, Ezokudoba Nezemvelo • Ikgro ya Dithokgwa, Borezhiapi le Tikologo • Lefapha la Meru, Botshwat ba dithapi le Tikologo • Lefapha la Dikgwa, Dithapi le Tikologo • Litiko Letemahlatsi, Tintlanti Netendzawo • Muhasho wa zwa Vtusima-majaka, Vhureakhovhe na Mup • Ndzawulo ya Swithahla, Vunjoveri na Mbango. The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessively for the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act, and/or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

N.N

- The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.
- A comments and response trail report (C&R) must be submitted with the final BAR. The C&R report must incorporate **all comments** for this development. The C&R report must be a separate document from the main report, and the format must be in the table format. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly. Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.
- The final BAR must provide evidence that all identified and relevant commenting authorities have been given an opportunity to comment on the proposed development.

(b) Listed activities

- From the sensitivity map provided, it is noted that the property is located within a Critical Biodiversity Area (CBA). However, sublisting 12(b)(ii) of Listing Notice 3 has not been applied for or identified as a listed activity triggered by the proposed project. You are therefore requested to provide clarity on the rationale for deeming this sublisting not applicable to the proposed development while you stated that the project location is situated within CBA. Should this sublisting be applicable, both the BAR and the application form must be amended to include this specific listed activity.
- Please ensure that the relevant listed activities are applied for, and they are specific and can be linked to the development activity or infrastructure as described in the project description. Please provide a full description of how the listed activity is triggered by the proposed development, including the threshold where necessary whilst ensuring that the project description is correct and relevant to the project for each listed activity.
- Please ensure that only the applicable listed activities are included in the final BAR. Any activities that are not relevant to the proposed project must be excluded from the final BAR.
- If the activities applied for in the application form differ from those mentioned in the final BAR, an amended application form must be submitted for final review and decision making. Please note that the Department's has been amended and can be downloaded from the department's website.
- The relevant authorities must be continuously involved throughout the basic assessment process as the development property possibly falls within geographically designated areas in terms of numerous GN R. 985 Activities. Written comments must be obtained from the relevant authorities and submitted to this Department. In addition, a graphical representation of the proposed development within the respective geographical areas must be provided.
- Take note that, it is the responsibility of the Environmental Assessment Practitioner (EAP) to ensure that all listed activities triggered by the proposed project are correctly identified and included in the Basic Assessment Report (BAR). Please note that if a listed activity is omitted, it cannot be added through an amendment process. In such cases, a new application for Environmental Authorisation (EA) will be required to obtain approval for the omitted activity.

(c) Specialist Assessment

- It is brought to your attention that Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation, which were published in Government Notice No. 320 of 20 March 2020 (i.e., "the Protocols"), and in Government Notice No. 1150 of 30 October 2020, have come into effect. Please note that specialist assessments must be conducted in accordance with these protocols unless proof is provided to demonstrate that the specialist assessments were commissioned before the date on which the protocols came into effect, in which case Appendix 6 of the Environmental impact Assessment Regulations, 2014, as amended, will apply to such applications. Please indicate in the report whether the protocols were applied.
- In addition to the above, you are hereby drawn to the following:

- Specialist studies conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of proposed rehabilitation, and all other proposed structures that they have assessed and are recommending for authorisations.
- The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.
- Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate this with defensible reasons; and where necessary, include further expertise advice.
- The Specialist Declaration of interest forms must be attached for all specialist studies to be conducted in the final BAR. The forms are available on Department's website (please use the Department's template).
- Please note further that the protocols require certain specialists' to be registered with SACNASP. Proof of SACNAP Registration Certificate must be submitted and attached to relevant specialist declaration of InterestRefer to the relevant protocols in this regard.
- Please take note that, it is the duty of the EAP to ensure that the site sensitivity report for all themes and specialist identified by the screening tool be included in the BAR. Further, it is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.
- Please ensure that the Site Verification assessment, as required by the relevant environmental themes and assessments, complies with the requirements of the protocols. Should it be determined that there is a need for additional specialist studies to be undertaken based on the outcome of public participation, these must be commissioned and be included in the final BAR reports for public comment.
- The content of the BAR must include a table summarising the specialist studies required by the Screening Tool and the sensitivity rating of the Screening Tool (very high, high, medium, low), another column indicating the sensitivity of the site after the EAP/Specialist conducted the Site Verification Assessment and a column indicating whether these studies will be conducted or that compliance statement is submitted.
- Please be reminded that section 2(3) of NEMA requires developments to be socially, environmentally and economically sustainable, while section 2(4)(i) of NEMA requires the social, economic and environmental impacts of activities, including disadvantages and benefits, to be considered, assessed and evaluated.
- Summary and recommendations of all specialist studies conducted must be included in the BAR and EMPr.
- The Visual Specialist concluded that the current layout map is not supported in its existing format and recommended specific mitigation measures that must be incorporated into the layout plan. Although the findings and conclusions of the Visual Specialist Report have been included in the BAR, you have not indicated whether the final development layout was amended to take these recommendations into account. If the findings and mitigation measures proposed in the specialist report have not been implemented in the preferred layout plan, the layout plan must be amended to include the specialist's recommendations. Such amendments will result in changes to the layout that was previously subjected to Public Participation Process (PPP). Consequently, the BAR will need to be amended and subjected to a second round of PPP, in accordance with the EIA Regulations. The Terrestrial and Aquatic Biodiversity Specialist recommended that the area located west of the main road should be rehabilitated to re-establish fynbos. Evidence suggests that sand fynbos in this area can be functionally re-established and may, over time, develop relatively high species richness, including the potential re-colonisation by listed plant species (based on personal observation). The specialist further recommends that rehabilitation guidelines be included in the Environmental Management Programme (EMPr) for all open space areas, with the aim of restoring

Knysna Sand Fynbos and Thicket/Forest where applicable. You are therefore requested to provide clarity on whether the rehabilitation guidelines, as recommended by the specialist, have been incorporated into the EMPr. If they have been included, please indicate the specific section(s) of the EMPr where these guidelines appear. If the rehabilitation guidelines have not been incorporated into the EMPr, you are requested to provide the Rehabilitation Guideline or a Rehabilitation Plan as an annexure to the EMPr.

- Please ensure that the BAR indicates any recommendations of the EAP or specialists, which are to be included as conditions of authorisation, per Appendix 1(3)(1)(n).

(d) Environmental Management Programme

- Please ensure that the mitigation measures specified in the BAR and specialist reports are also incorporated into the EMPr.
- In addition, ensure that the facility EMPr complies with the content of the EMPr in terms of Appendix 4 of the EIA Regulations, 2014, as amended.
- Please also include in the EMPr, a recommended frequency for the auditing of compliance with the conditions of the EA and EMPr, and for the submission of such compliance reports to the competent authority.
- EMPr must include an environmental sensitivity map indicating environmental sensitive areas and features identified during the assessment process.
- A map combining the final layout map superimposed (overlain) on the environmental sensitivity map.
- The EMPr must include measures to protect hydrological features such as streams, rivers, pans, wetlands, dams and their catchments, and other environmental sensitive areas from construction impacts including the direct or indirect spillage of pollutants.
- Please also include in the EMPr, a recommended frequency for the auditing of compliance with the conditions of the EA and EMPr (for the construction and post-construction monitoring phases), and the submission of such compliance reports to the competent authority.

(e) Layout & Sensitivity Maps

- The layout maps provided under Section 7.3 of the BAR are not clear. This section must be amended to include clear and legible maps, with distinct colours, appropriate labels, and a comprehensive legend to ensure accurate interpretation of the layout and associated information.
- Please ensure that the layout map and other Site Development Plans to be submitted to the Department with the final BAR indicates the following:
 - Position of all proposed infrastructure including access roads, services etc
 - The location of sensitive environmental features on site e.g., CBAs, heritage sites, wetlands, drainage lines, Flood lines, protected areas etc. that will be affected.
 - Buffer areas; and
 - All “no-go” areas.
- **The above map must be overlain with a sensitivity map.** All available biodiversity information must be used in the finalisation of the map and infrastructure must not encroach on highly sensitive areas as far as possible.
- Ensure that similar colours are not used to differentiate between infrastructure. i.e., items must be easily distinguishable in the Legend.
- Google maps will not be accepted for decision-making purposes.
- These maps must be submitted as appendices of the BAR

(f) Technical details of the proposed project:

- The layout plan included in the BAR, referenced as “*Figure 16: Preferred Site Development Plan (SDP) forming part of the planning process showing the proposed footprints for homes (1–14) and the HOA maintenance erf (15)*”, contains the relevant information detailing the footprint sizes of each proposed residential unit. You are therefore requested to incorporate the full technical details of the proposed project into the BAR, including (but not limited to):
 - The footprint size of each residential unit;
 - The overall development footprint;
 - Any associated infrastructure; and
 - The layout specifications as reflected in the SDP.
- Furthermore, the Site Development Plan must be included as an appendix to the BAR to ensure the completeness of the submission and to allow for full technical review by the Department.

(g) Availability of Municipal services

- You have indicated that the proposed project will connect to existing municipal services, as the property is currently serviced by the Municipality. You are therefore requested to obtain written confirmation from the Municipality regarding the availability and adequacy of services to support the proposed development.

(h) Coordinates

- The Department notes that the centre coordinates have been provided in the BAR. You are therefore requested to supplement the submission by including the following coordinates:
 - Corner coordinates of the assessed development footprint;
 - Coordinates of the existing five (5) units that are proposed to be rebuilt;
 - Coordinates of the nine (9) additional units;
 - Start, middle, and end coordinates of the proposed road; and
 - Coordinates of all other associated infrastructure.

General

You are further reminded to comply with Regulation 19(1)(a) of the NEMA EIA Regulations, 2014, as amended, which states that: Where basic assessment must be applied to an application, the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority -

(a) a basic assessment report, inclusive of specialist reports, an EMPr, and where applicable a closure plan, which have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.”

Should there be significant changes or new information that has been added to the BAR or EMPr which changes or information was not contained in the reports or plans consulted on during the initial public participation process, you are required to comply with Regulation 19(b) of the NEMA EIA Regulations, 2014, as amended, which states: “the applicant must, within 90 days of receipt of the application by the competent authority, submit to the competent authority – (b) a notification in writing that the basic assessment report, inclusive of specialist reports an EMPr, and where applicable, a closure plan, will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the basic assessment report or EMPr or, where applicable, a closure plan, which changes or information was not contained in the reports or plans consulted on during the initial public participation process contemplated in sub-regulation (1)(a) and that the revised reports or, EMPr or, where applicable, a closure plan will be subjected to another public participation process of at least 30 days”.

Should you fail to meet any of the timeframes stipulated in Regulation 19 of the NEMA EIA Regulations, 2014, as amended, your application will lapse.

You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.

Yours sincerely



Dr Sabelo Malaza

Chief Director: Integrated Environmental Authorisations

Department of Forestry, Fisheries and the Environment

Signed by: Ms Nyiko Nkosi

Designation: Control Environmental Officer: National Integrated Authorisations Projects

Date: 24/03/2026

cc:	Mr Dale McLean	Bel Heights (Pty) Ltd	Email: dsmmprm@gmail.com
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REFERENCE: 4/10/2/K50B/UITZICHT 216/45, KNYSNA

DATE: 26 MARCH 2026

HILLAND ENVIRONMENTAL
PO BOX 590
GEORGE
6530

Attention: Ms I. Delport

RE: DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED RESIDENTIAL ECO-ESTATE ON RE/PORTION 45 OF THE FARM UITZICHT NO 216, KNYSNA

Reference is made to the above-mentioned Draft Basic Assessment Report made available to Breed-Olifants Catchment Management Agency (BOCMA) for comments.

The following are BOCMA comments relating to Draft Basic Assessment Report for the proposed residential eco-estate on Portion 45 of Farm Uitzicht 216, which should be adhered to:

1. The Breed-Olifants Catchment Management Agency has reviewed the Draft Basic Assessment and has no objections to the proposed development.
2. BOCMA notes that no watercourses are mapped on the property and the proposal is not within 500m of any NFEPA wetland areas and confirms that the proposed development falls outside the regulated area of a watercourse, therefore section 21(c) and (i) water uses are not triggered.
3. Please note that the tariffs/charges for water and sanitation services that will be supplied by the Water Services Provider (WSP) i.e. municipality, there must be an agreement between Bel Heights (Pty) Ltd and Knysna Local Municipality and tariffs must be paid directly to the municipality.
4. The harvesting of rainwater and storing in tanks does not trigger any water use(s) in terms of section 21 of the National Water Act, 1998 (Act No. 36 of 1998) and it doesn't require an authorisation.
5. No water shall be derived from a water resource and used on Portion 45 of Farm Uitzicht 216 without prior approval by means of a water use authorisation in terms of section 22 of the National Water Act, 1998 (Act No. 36 of 1998), if activities exceed Schedule 1 limits.
6. Please note that if there will be storage of oil, diesel, hydraulic fluids and grease onsite used for heavy machinery during construction; it is recommended that the storage areas for these fluids be bunded with cement and in such a manner that any spillages can be contained and reclaimed without causing any pollution to the groundwater.



7. As required by section 22 of the National Water Act, 1998 (Act No. 36 of 1998), a Water Use Authorisation is required prior to commencement with any water use activity contemplated in section 21 of National Water Act. Moreover, commencement with any water use activity without an authorisation as required by section 22 of National Water Act constitutes an offence in terms of section 151(1) (a) of the National Water Act. In terms of section 151(2) of the National Water Act, any person who contravenes is guilty of an offence and liable, on first conviction to a fine or an imprisonment of a period not exceeding five years or both such a fine and imprisonment.
8. In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of National Water Act that is associated with the proposed development.
9. Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.
10. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.
11. Should you wish to apply for a water use authorisation for unregistered water uses triggered by the proposed activities, you may apply electronically by logging onto the Department of Water and Sanitation (DWS) website at <http://www.dws.gov.za/e-WULAAS>
12. Should you have further enquiries, the office can be contacted or alternatively contact Mr. SI Ndlovu at the above-mentioned contact number or on sndlovu@bocma.co.za

Yours faithfully,

pp Si Ndlovu

MR. JAN VAN STADEN
CHIEF EXECUTIVE OFFICER (ACTING)

The EAP
HillLand Environmental
Environmental Assessment Practitioners
PO Box 590
George
6530

Attention: Ms. Cathy Avierinos

Tel: 044 889 0229
E-mail: cathy@hilland.co.za

Good day Madam

RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE DRAFT BASIC ASSESSMENT PROCESS FOR THE PROPOSED DEVELOPMENT OF A RESIDENTIAL ECO-ESTATE ON RE/PORTION 45 OF THE FARM UITZICHT NO. 216 KNYSNA, WESTERN CAPE

Your request for comment from the Sub-directorate: Coastal Management pertaining to the notice of final Basic Assessment Report for the above-mentioned application received via email on 09 February 2026, refers.

1. CONTEXT

- 1.1. The Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("NEM: ICMA") is a Specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"). The NEM: ICMA sets out to manage the nation's coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment. In terms of Section 38 of the NEM: ICMA, the Department of Environmental Affairs and Development Planning ('the Department') is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the "Management of public launch sites in the coastal zone (GN No. 497, 27 June 2014) "Public Launch Site Regulations."

- 1.2. The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme ("PCMP"). The Western Cape Provincial Coastal Management Programme ("WC: PCMP 2022-2027) is a five (5) year strategic document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the Province. This WC: PCMP 2022-2027 was adopted by the Provincial MEC for Local Government, Environmental Affairs and Development Planning on 19 May 2023 and available upon request.
- 1.3. A key priority of the PCMP is the Estuary Management Programme, which is implemented in accordance with the NEM: ICMA and the National Estuarine Management Protocol ("NEMP"). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The Department is in the process of approving a series of Estuarine Management Plans of which over 20 Estuarine Management Plans have already been approved.
- 1.4. The facilitation of public access to the coast is an objective of the NEM: ICMA as well as a Priority in the WC PCMP. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 ("PCASP") and commissioned coastal access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NEM: ICMA. The PCASP as well as the coastal access audits are available upon request.

2 COMMENT

2.1 The sub-directorate: Coastal Management ("SD: CM") has reviewed the information as specified above and has the following commentary:

- 2.1.1 The application comprises the proposed development of a low-impact residential eco-estate (14 units) on the Remainder of Portion 45 of the Farm Uitzicht No. 216, Knysna. The site is located within the Knysna National Lakes Area, west of Belvidere and Belvidere Heights (residential development within the floodplain of Knysna Estuary).
- 2.1.2 The proposed development is approximately 720 metres landward of the Knysna River estuarine bay, which is part of the Knysna Protected Environment. Therefore, the approved Estuary Management Plan (EMP) for the period 2025 – 2029 must be considered specifically in relation to the proposed development as the Knysna estuary is highly important in terms of its conservation status and ecosystems services.

- 2.1.3 The property is located within the Coastal Protection Zone (CPZ) as it is near the Knysna Lagoon and within a Protected Area. The delineation of Coastal Management Lines for the (Eden) Garden Route District Municipality, 2018 (as delineated by DEA&DP) is important to consider, as coastal risk information must be adequately considered to ensure that development is planned in a manner that responds to risks and sensitivities in the coastal zone. Furthermore, the Garden Route District Municipality Coastal Management Programme (CMP) 2023/2024 review must also be considered for the management of coastal zones.
- 2.1.4 The Garden Route National Park Coastal Management Lines (CMLs) is also applicable to this development proposal and must be considered as the development is regarded as part of the Garden Route National Park Expansion Area Initiative. The national Department of Forestry, Fisheries and the Environment (DFFE) established the CML for the Garden Route National Park in Government Notice No. R. 3668. *Government Gazette* No. 48959, 14 July 2023. This CML may be viewed on the DFFE web-based viewer via the following URL: <https://ocims.environment.gov.za/coastal%20viewer/>.
- 2.1.5 The proposed development site falls inland of the CML, as delineated by DEA&DP in collaboration with relevant organs of state and is located within the CPZ as defined in Section 16 of the NEM: ICMA and delineated by DEA&DP, available spatially on the DEA&DP web-based viewer. It should be noted that the purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes, including the risk of sea level risks. Due to the subject property's location within the CPZ, Section 63 of the NEM: ICMA must be considered where an authorisation is required in terms of Chapter 5 of the NEMA. Furthermore, Section 62 of the NEM: ICMA obliges all organs of state that regulates the planning of land to apply that legislation in a manner that gives effect to the purpose of the CPZ.
- 2.1.6 Regarding the new sewer rising main along the property boundary and potential future installation of a BIODISK inside the WasteWater Treatment Works (WWTW), an estimation of impacts from sewer infrastructure located along the coast that may be expanded in future must be provided. Sewer infrastructure located near waterbodies has huge potential to cause pollution.
- 2.1.7 The draft Basic Assessment Report (dBAR) states that the site is disturbed and has a low ecological sensitivity, but the landowners are also intending to investigate stewardship opportunities with SANParks in terms of a long-term conservation outcome (including rehabilitation). The willingness to enter into a stewardship proposal gives the impression that the indigenous vegetation is worth protecting, despite transformation. The critically endangered Knysna Sand fynbos, identified as a small remnant on the proposed site, is present on site and must be protected.

- 2.1.8 The two (2) tree species protected under the National Forest Act, 1998 (Act No. 84 of 1998) on site, namely *Sideroxylon inerme* (milkwood) and *Pittosporum viridiflorum* (cheesewood) cannot be removed without first obtaining a permit from the Department of Forestry, Fisheries and the Environment (DFFE). The SD: CM would however not support the removal of these trees.
- 2.1.9 During the 2017 Knysna Fires, four (4) of five (5) resort dwellings, were burnt down. The dBAR does not address how fire risk will be mitigated in future.
- 2.1.10 According to the Knysna Estuary Management Plan (EMP) for 2025–2029, the Knysna Estuary is currently classified as a Category B estuary. While a Category A classification would be the preferred management objective, this is not achievable due to ongoing development pressures and their associated impacts on the estuarine system, particularly along the shoreline and within intertidal areas. To attain and maintain the desired management category, specific physical, chemical, and biological attributes and processes must be achieved and sustained within the bounds of natural or near-natural variability.
- 2.1.11 Development pressure on the Knysna Estuary system remains a concern. In this regard, the Sub-Directorate: Coastal Management (SD:CM) is of the view that the proposed development is inconsistent with the purpose of a Coastal Protection Zone (CPZ) as defined in Section 17 of the NEM: ICMA. It is important to note that estuarine systems are particularly vulnerable to the impacts of climate change. Consequently, the protection and maintenance of the Estuarine Functional Zone (EFZ) and CPZ are critical measures for preventing or mitigating future flood risks. The proposed development is likely to have negative and far-reaching impacts on coastal ecological processes. Furthermore, the establishment of the proposed eco-estate is not considered essential, as it does not provide services of significant public importance that would justify its location within the CPZ.
- 2.1.12 Based on the considerations above, the SD:CM does not support the proposed development of a low-impact residential eco-estate comprising 14 units on the Remainder of Portion 45 of Farm Uitzicht No. 216, Knysna, within the CPZ. The Screening Report dated 24 November 2025, prepared by Hilland Environmental, confirms that the Aquatic Biodiversity Theme Sensitivity is rated as 'Very High' due to the presence of the Outeniqua Strategic Water Source Area (SWSA) and a Freshwater Ecosystem Priority Area (FEPA) sub-catchment. In addition, Terrestrial Biodiversity is also rated as 'Very High', owing to the same SWSA and FEPA, as well as the presence of critically endangered Knysna Sand Fynbos and the Knysna National Lake Area, all of which are expected to be adversely affected by the proposed development.

- 3 The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: "...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment..." together with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.
- 4 The SD: CM reserves the right to revise its comments and request further information from you based on any information that may be received.

Yours faithfully



Digitally signed by
leptieshaam Bekko
Date: 2026.04.02
12:57:19 +02'00'

leptieshaam Bekko
CONTROL ENVIRONMENTAL OFFICER
DIRECTORATE: BIODIVERSITY AND COASTAL MANAGEMENT
DATE: 02 April 2026

1157 Comments on the Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

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

Date Thu 3/26/2026 3:48 PM

To OCEIA <OCEIA@dffe.gov.za>

Cc Cathy Avierinos <cathy@hilland.co.za>; Tabisile Mhlana <tmhlana@dffe.gov.za>

 1 attachment (1 MB)

CPZ and CML map.jpg;

Hi Tabisile

Thank you for you email

Attached please find Google Earth Map that shows the property cadastral boundary (yellow) in relation to the CPZ and CML (both indicated in pink). The property is located within the CPZ and CML, however, in terms of NEMA, it is not located within 100m of the HWM of the estuary, nor is it located within the estuary development control area of SANParks (no SANParks approved in terms of the Protected Areas Act required). A whole residential area, Belvidere, Belvidere Estate and Belvidere Heights, separates the property from the estuary (KML of cadastral boundary attached for ease of reference).

Please do not hesitate to contact us should you require any additional information

Have a lovely day

Kind regards/ Vriendelike groete

Inge Delport

EAPASA 2019/1689

HillLand Environmental (Pty) Ltd

166 Mountview Farm, Victoria Heights

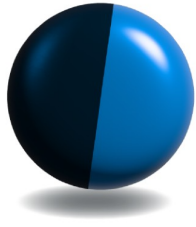
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Hilland Environmental

Environmental Assessment Practitioners

From: OCEIA <OCEIA@dffe.gov.za>

Sent: Thursday, March 26, 2026 1:57 PM

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

Cc: Tabisile Mhlana <tmhlana@dffe.gov.za>

Subject: Comments on the Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

Dear Inge,

The Draft BAR indicates that the proposed eco-estate is not located within the coastal zone, stating that the property is situated a considerable distance from both the estuary and the coastline, and is therefore unlikely to impact coastal processes. In this regard, it is noted that the property is reportedly located approximately 720 m from the Knysna Estuary and approximately 681 m from the High-Water Mark at its closest point. Furthermore, the site is indicated to be located outside of the Knysna Estuary Development Control Area.

However, it is also stated on page 34 of the report that the property falls within both the Coastal Management Line (CML) and the Coastal Protection Zone (CPZ). In light of this apparent inconsistency, the EAP is required to provide clearly delineated and legible coastal mapping that confirms the spatial extent of the CML and CPZ in relation to the proposed development footprint.

Kind Regards
Tabisile

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

Sent: Thursday, 12 March 2026 10:45

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

Subject: Re: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

Good day,

This email serves as a reminder that the commenting period on the Draft BAR for the above-mentioned project ends 26 March 2026.

Kindly provide your comments within this timeframe.

Kind regards/ Vriendelike groete

Inge Delpont

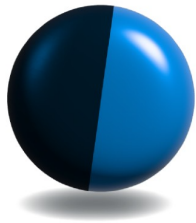
EAPASA 2019/1689
Hilland Environmental (Pty) Ltd
166 Mountview Farm, Victoria Heights
George

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



Hilland Environmental

Environmental Assessment Practitioners

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

Sent: Monday, February 23, 2026 2:09 PM

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

Subject: RE: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

RE: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

Commenting period: 23 February 2026 - 26 March 2026

Dear State Department, Organ of State or Interested and Affected Party (I&AP)

Hope you are well

Attached please find the notification letter pertaining to the availability of the Draft BAR for the proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna (a DFFE application process).

In terms of Regulations 3(4) & 40 of the NEMA EIA Regulations (2014, as amended) to notify you of the availability of the Draft Basic Assessment Report (BAR) and associated appendices for its 30-day commenting period (**23 February 2026 – 26 March 2026**).

- The report and associated appendices are available on Hilland Environmental's website at: <https://hilland.co.za/public-processes/bel-heights/>
- Alternatively, please follow the Google Drive Link: https://drive.google.com/drive/folders/1yKcd1sLh6uBFK4lv_s2wvUWm0VOT26lw?usp=sharing

Please do not hesitate to contact us should you require any additional information

Have a lovely day

Kind regards/ Vriendelike groete

Inge Delport

EAPASA 2019/1689

HillLand Environmental (Pty) Ltd

166 Mountview Farm, Victoria Heights

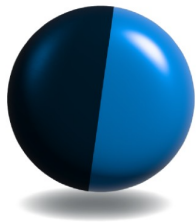
George

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HillLand Environmental

Environmental Assessment Practitioners



CML and CPZ map
property boundary = yellow
CML and CPZ - pink
SANParks development control area = red

BELVIDERE ESTATE



1 km



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Demar Centre, Main Road, Knysna, WC, Contact Number: 066 374 7795
Enquiries: TF Gwala, E-mail: TGwala@dfpe.gov.za

EIA-WC-GR-0053-2025-26

RE: BASIC ASSESSMENT REPORT (BAR) COMMENTS FOR REMAINDER PORTION 45(A PORTION OF PORTION 13) OF THE FARM UITZIGT NO 216, BELVIDERE, KNYSNA

DATE: 25 March 2026

Attention: Inge Delport
Email: environmental2@hilland.co.za
Cell/ Tel: 082 525 9995

Dear Mrs. Inge Delport

I refer to your e-mail notification of 26 February 2026

Please receive comments from the Branch: Forestry Management, Directorate: Forest Resource Protection in the Department of Forestry, Fisheries and the Environment (DFFE) on the above-mentioned proposed second dwelling application. Site inspection was conducted 25 March 2026.

The mandate of the Forestry Branch in the Department of Forestry, Fisheries and the Environment (DFFE), as a commenting authority, is to ensure control over developments that affect State forests, natural forests, forest nature reserves and protected trees.

1. The applicant must assess and quantify the anticipated impacts on protected trees. See Section 12(1)(d) of the National Forests Act, (Act No. 84 of 1998) ("NFA") and Government Notice (GN) 4496, Government Gazette No. 50291 of 13 March 2024 for the list of protected tree species. Protected trees are known to occur in the vicinity of the study site.
2. Section 15(1) of the NFA states that no person may cut, disturb, damage or destroy any protected tree; or possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, or any forest product derived from a protected tree, except under a license granted by the Minister; or in terms of an exemption published by the Minister.
3. The prohibition on protected trees applies to all trees, alive and dead. It also applies to all size classes of the species listed as protected.
4. Cutting or disturbing a protected tree without a valid Forest Act Licence is a criminal offence and a transgression of the National Forests Act, 1998 (Act No. 84 of 1998) and carries a fine or imprisonment or both.



Batho pele - putting people first

The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

5. Protected trees with active bird nests or other significant biodiversity features may not be destroyed without a valid Fauna Permit from the provincial conservation authority, the Western Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform ("DAERL"), if these would be affected.

DFFE studied the supporting documents for the above-mentioned building plan application and the following points related to Forestry's mandate i.e. the implementation of the NFA are applicable

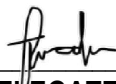
OSCAE comments

- The Forest officer from the Department of Forestry, Fisheries and the Environment (DFFE) inspected the above-mentioned property on the 24 March 2026.
- During the site visit, it was confirmed that the size of the property is about 20 hectares. Within the same hectares said above, fifteen units will be developed, and the sizes of each proposed units will vary between $\pm 1120\text{m}^2$ and $\pm 1650\text{m}^2$, the remaining portion of the land will be retained for conservation purpose. Furthermore, two tree species protected under section 15 of the National Forest Act, 1998 (Act No. 84 of 1998) were spotted on site, namely *Sideroxylon inerme* (milkwood) and *Pittosporum Viridiflorum*, (Cheesewood), these trees are falling outside proposed footprint. In addition, the Department of Forestry Mandate is not affected by the proposed development on the property said above.
- Thirteen alien invasive species were confirmed on site and, however, the landowner committed that all the invasive species mentioned above will be removed gradually to allow regeneration of the Knysna Fynbos. The Department of Forestry recommend that the landowner should plant *Sideroxylon inerme* along the corridor of the property as part of the rehabilitation plan. Furthermore, these trees will act as firebreaks once they are well mature.
- In conclusion the Department of Forestry supports the proposed development. However, this comment does not exempt the landowner from abiding by other environmental legislatures.

Note: The Department reserves the right to revise the initial comment based on any additional information that may be received

Should you wish to correspond further on this matter, quote Reference EIA-WC-GR-0053-2025-26. Enquiries may be directed to Ms. TF Gwala at TGwala@dffe.gov.za, Cell 066 374 7795.

Yours Faithfully,



SIGNATURE OF DELEGATED AUTHORITY
Department of Forestry, Fisheries and the Environment
Letter signed by: Ms. TF Gwala
Designation: Deputy Director Forest Resource Protection
Branch: Forestry Management





forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

Ref: Residential Eco-Estate on portion 45 of farm uitzicht No.216 Knysna

Enquiries: Mr. Thivhulawi Nethononda/ Awelani Matamela

Tel: 012 399 9945/9553

Email: tnethononda@dffe.gov.za

Ms Cathy Avierinos
Hilland Environmental
Victoria Heights
P.O. Box 590
George
6530

Email: cathy@hilland.co.za

Dear Ms Avierinos

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ECO-ESTATE ON THE REMAINDER OF PORTION 45 OF FARM NO.216, KNYSNA LOCAL MUNICIPALITY, WESTERN CAPE.

The Directorate Protected Areas Planning and Management Effectiveness would like to thank you for the opportunity to review the Draft Basic Assessment Report for the proposed development located on Portion 45 of Farm 216, Uitzicht, within the Knysna National Lakes Area Protected Environment in the Western Cape.

The DBAR assesses a proposed low-impact residential eco-estate on Portion 45 of Farm Uitzicht No. 216, located within the Knysna National Lakes Area Protected Environment. The development includes 14 residential erven and associated infrastructure, with approximately 79% of the property designated for conservation and rehabilitation.

The site has been historically disturbed by plantation forestry, previous resort development, and the Knysna Fires of 2017. The DBAR therefore characterises the site as having low ecological sensitivity, supported by specialist findings indicating dominance of alien vegetation and absence of significant fauna or aquatic systems. However, the property is mapped as Knysna Sand Fynbos, a critically endangered ecosystem, and falls within a Protected Environment.



Batho pele – putting people first



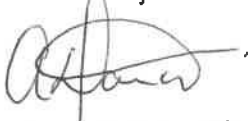
Departement Bosbou, Visserie en die Omgewing • Department of Forestry, Fisheries and Environment • UmNyango wezamaHlathi, zokuThiya neBhoduluko • iSebe lezamaHlathi, ezokuLoba noKusingqongileyo • Umnyango WezamaHlathi, Ezokudoba Nezemvelo • Kgoro ya Dithokgwa, Boreahlapi le Tikologo • Lefapha la Meru, Botshwasi ba dithapi le Tikoloho • Lefapha la Dikgwa, Dilhapi le Tikologo • Litiko Letemahlatsi, Tihlanti Netendzawo • Muhasho wa zwa Vhusima-maqaka, Vhureakhovhe na Mupo • Ndzawulo ya Swihlahla, Vunjoveri na Mbango. The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessively for the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act, and/or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

The directorate has the following comments:

1. The Directorate notes that there is an ongoing, systematic clearing of alien invasive vegetation currently being undertaken on site. It is recommended that this process be continued across the entire property in accordance with the approved Alien Invasive Control Plan and implemented using appropriate and approved clearing methodologies to ensure effective long-term rehabilitation of the site.
2. The Environmental Assessment Practitioner (EAP), as referenced on page 37 of the DBAR, has incorrectly cited Section 50(1) of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003). The appropriate provision relevant to this context is Section 51, which pertains to Protected Environments. This discrepancy should be rectified within the report, and compliance with the regulations developed in terms of this section specifically, the Regulations for the Proper Administration of the Knysna Protected Environment, 2009, must be ensured.
3. The DBAR inaccurately indicates that the property is located outside the 50 m Knysna Lake Development Control Area. This assertion requires correction to accurately reflect the pertinent buffer requirements. According to the relevant Regulations:
 - The “development control area” is defined as the region situated within one hundred (100) metres inland from the water area.
4. The South African National Parks is the management authority of the Knysna Lake Protected Environment in terms of the National Environmental Management: Protected Areas Act, 2003 (NEMPAA). Accordingly, all development-related activities within the Protected Environment must be undertaken in consultation and coordination with SANParks, as the designated management authority, and the relevant landowner(s).
5. Consequently, development must strictly comply with:
 - The provisions of NEMPAA;
 - The approved management plan for the Protected Environment;
 - The relevant environmental legislation, such as the National Environmental Management Act, 1998 (NEMA), with specific emphasis on Environmental Impact Assessment (EIA) requirements;
 - Any conditions or restrictions imposed by the Minister in terms of the Regulations for the Proper Administration of the Knysna Protected Environment; and
 - No development may proceed without the necessary authorisations and approvals, and all activities must be aligned with the conservation objectives of the Protected Environment.

The EAP is advised to address the concerns provided by the Directorate: Protected Areas Planning and Management Effectiveness, and to also consider input from other stakeholders, Interested, and Affected Parties.

Yours sincerely



Ms Amanda Dana-Mfikili

Director: Protected Areas Planning and Management Effectiveness

Date: 26 March 2026

physical 4th Floor, York Park Building,
York Street, George, 6530
website www.capenature.co.za
enquiries Megan Simons
telephone 087 087 3060
email msimons@capenature.co.za
Reference **LE14/2/6/1/6/4/216-45_Residential_Belvidere**
date **22 May 2026**

HillLand Environmental,
P.O. Box 590,
George,
6530

Attention: Ms Inge Delpont
By email: environmental2@hilland.co.za

Dear Ms Inge Delpont

THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED ECO-ESTATE ON THE REMAINDER OF PORTION 45 OF FARM UITZICHT NO.216, KNYSNA, BITOU LOCAL MUNICIPALITY, WESTERN CAPE.

CapeNature would like to thank you for the opportunity to review the above report. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application. CapeNature wishes to make the following comments:

According to the Western Cape Biodiversity Spatial Plan (CapeNature 2024)¹ the property is within the Knysna National Lake Area Protected Environment². The fine-scale vegetation map describes the vegetation as Groenvlei Coastal Forest and Rondevlei Sandplain Fynbos (Vlok *et al.* 2008)³. According to the South African Vegetation Map (Beta VegMap, 2024)⁴ the vegetation is Knysna Sand Fynbos which is listed as **Critically Endangered** (NEM:BA, 2022)⁵.

The property has non-perennial rivers with the Knysna Estuarine Functional Zone (EFZ) abutting the eastern extent. The 100 m buffer of the EFZ and the Coastal Management Line extends across the property. The EFZ is Vulnerable and Moderately protected ecosystem (Van Deventer *et al.* 2019)⁶. Furthermore, the property falls within a National Strategic Water Source Area (SWSA) for surface water in the Outeniqua region and contributes to the protection of watercourses

¹ CapeNature. 2024. 2023 Western Cape Biodiversity Spatial Plan and Guidelines. Unpublished Report

² National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003). Regulations for the proper administration of the Knysna Protected Environment. 2009. Government Gazette No. 32797

³ Vlok JHJ, Euston-Brown DIW, Wolf T. 2008. A vegetation map for the Garden Route Initiative. Unpublished 1: 50 000 maps and report for C.A.P.E. FSP Task Team, Oudtshoorn.

⁴ South African National Biodiversity Institute (2006-2024). The Vegetation Map of South Africa, Lesotho and Swaziland, Mucina, L., Rutherford, M.C. and Powrie, L.W. (Editors), Online, <https://bgis.sanbi.org/Projects/Detail/2258>, Version 2024.

⁵ National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004). The Revised National List of Ecosystems that are Threatened and in need of protection. 2022. Government Gazette No. 47526

⁶ Van Deventer, H., van Niekerk, L., Adams, J., Dinala, M.K./ Gangat, R., Lamberth, S.J., Lötter, M., MacKay, F., Nel, J.L., Ramjukadh, C.J., Skowno, A., Weerts, S. 2019. National Wetland Map 5-An Improved Spatial Extent and representation of inland aquatic and estuarine ecosystems in South Africa.

supporting the South Eastern Coastal Belt and the Knysna Estuary. CapeNature has reviewed the application and provides the following comments:

1. The Knysna Sand Fynbos is a narrowly distributed vegetation with high rates of habitat loss of which plantations were the primary pressure on this ecosystem together with cropping and alien invasions (SANBI 2022)⁷. Only 21% of the natural extent remains and this is a poorly protected ecosystem. The high rates of habitat loss over the past 28 years (and still ongoing) places this ecosystem at risk of collapsing which makes it crucial to conserve and manage the remaining areas that are still natural.
2. Although portions of the property are mapped as transformed or built-up, the remaining natural shrubland, forested areas, drainage features, and ecological corridors continue to retain ecological function and contribute toward landscape connectivity within the broader conservation network.
3. The property is also within the Western Heads Knysna Sand Fynbos Coastal Corridor and the expansion/buffer area of SANParks. Including this property will enhance ecosystem representation, ecological sustainability, and climate change resilience. CapeNature supports the expansion of the property into the conservation estate, with rehabilitation and protected area expansion identified as important biodiversity objectives.
4. The Fynbos Forum Ecosystem Guidelines⁸ references that the impacts of developments must be minimised, buildings should be clustered within fire-free zones and protected with firebreaks. Furthermore, flammable building materials must be avoided. In terms of section 12 (1) and 2 (a) of National Veld and Forest Act⁹ adequate firebreak must be prepared and maintained around the property to reasonably prevent the spread of unwanted fires in the area.
5. The proposed 14 additional residential erven, associated infrastructure, domestic activity, lighting, noise, and increased human presence may result in cumulative edge effects on adjacent natural areas and ecological functioning. The BAR appears to assess impacts primarily at a site level. However, cumulative impacts associated with ongoing low-density residential expansion around Belvidere, Brenton and the greater Knysna coastal landscape should also be considered.
6. The eradication of invasive alien vegetation must comply with the National Environmental Management: Biodiversity Act (Act 10 of 2004)¹⁰ and its associated Alien and Invasive Species Regulations¹¹. Rehabilitation of areas cleared of invasive alien species must be addressed in the management plan.
7. Recent severe storm events and flooding across the Garden Route highlight the need for stronger climate resilience and disaster risk considerations within development planning. There is a higher risk of erosion, sediment mobilisation, slope instability, and downstream impacts on aquatic ecosystems and estuarine functioning. Thus, climate resilience and disaster risk considerations should be a key component for the development footprint,

⁷ Government of South Africa (2022) South African Red List of Terrestrial Ecosystems: assessment details and ecosystem descriptions. Technical Report #7664, SANBI Pretoria, South Africa.

⁸ Cadman, M. (ed.). 2016. Fynbos Forum Ecosystem Guidelines for Environmental Assessment in the Western Cape, Edition 2. Fynbos Forum, Cape Town.

⁹ National Veld and Forest Act 1998 (Act 101 of 1998) Government Gazette: 19515

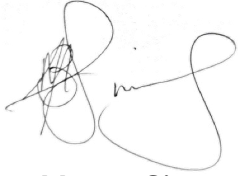
¹⁰ National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004), Government Gazette No. 26436

¹¹ Regulations under the National Environmental Management: Biodiversity Act (Act No. 10 of 2004): Alien and Invasive Species Regulations, Government Gazette No. 43735

which should be carefully aligned to avoid sensitive ecological and hydrological features wherever possible.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Megan Simons', with a large, stylized loop at the end.

Megan Simons
For: Manager (Conservation Intelligence)

Enquiries: Dr Vanessa Weyer

Tel: 044-302 5613

E-mail: vanessa.weyer@sanparks.org

Inge Delport
166 Mount View
Victoria Heights
George, 6350

Per email:
admin@hilland.co.za; cathy@hilland.co.za

Dear Madam

SANPARKS COMMENTS, DRAFT BASIC ASSESSMENT REPORT, UITZICHT 216, RE/45, KNYSNA, WESTERN CAPE

DFFE Pre-Application Ref No: 2025-12-0004

Uitzicht 216 RE/ 45 is situated in the Buffer Zone of the Garden Route National Park (GRNP), and in the Knysna Protected Environment (KPE) (**Fig. 1**). The Estuarine Functional Zone (EFZ) extends near to the eastern boundary of Uitzicht 216 RE/ 45 (**Fig. 2**), whilst the Coastal Management Line for Protected Areas (CML), and the Coastal Protection Zone (CPZ) extend over most of the property (**Fig. 3**). The CML was included in the Knysna Spatial Development Framework 2020, is shown on the Knysna GIS Viewer and the Western Cape Department of Environmental Affairs & Development Planning's (DEA&DP) Coastal Management Map Viewer. Risks associated with developing in this area are known and have been published. The CPZ is designated in terms of the National Environmental Management: Integrated Coastal Management Act (Act No. 24 of 2008) (NEM: ICMA). The CPZ is established to manage, regulate, and restrict the use of land that is adjacent to Coastal Public Property (CPP), or that plays a significant role in the coastal ecosystem.

Vegetation is mapped by Mucina and Rutherford, 2006¹ and as revised by SANBI, 2018², as Critically Endangered (CE) Knysna Sand Fynbos (FFd10) (**Fig. 4**). This vegetation status is as listed in the Revised National List of Ecosystems that are Threatened and in Need of Protection (GN. No. 2747, 18 November 2022). The SANBI mapping is based among other on conservation targets, as well as on landscape functionality and connectivity metrics, not necessarily on what vegetation is present on the property. Uitzicht 216 RE/ 45 is in the protected area expansion footprint of the GRNP and in the Knysna Sand Fynbos Coastal Corridor, which is the subject of a conservation initiative being supported by SANParks, CapeNature, Table Mountain Fund, WWF, and the Western Heads Goukamma Conservancy (WHGC). Achieving a conservation outcome on this property is important to SANParks.

¹ Mucina, L. and Rutherford, M.C. (editors) 2006. Vegetation map of South Africa, Lesotho and Swaziland: an illustrated guide. Strelitzia 19, South African National Biodiversity Institute, Pretoria.

²South African National Biodiversity Institute (2006-2018). The Vegetation Map of South Africa, Lesotho and Swaziland, Mucina, L., Rutherford, M.C. and Powrie, L.W. (Editors), Online, <http://bgis.sanbi.org/Projects/Detail/186>, Version 2018.

addo elephant
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knysna lake area
kruger
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mokala
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namaqua
table mountain
tankwa karoo
tsitsikamma
richtersveld
west coast
wilderness

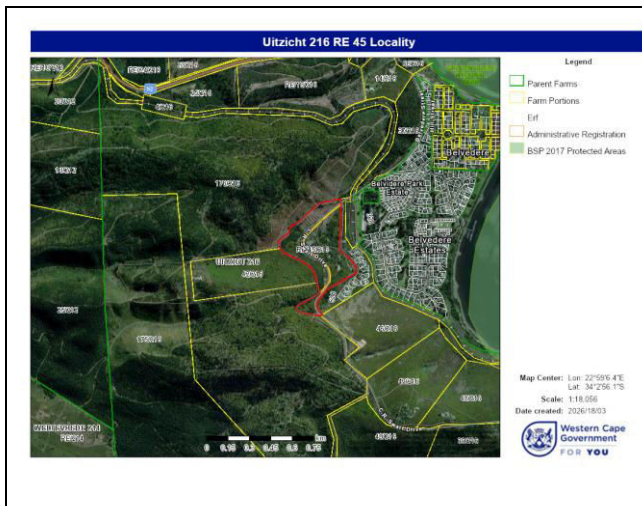


Fig. 1: Uitzicht 216 RE/ 45, location (CapeFarmMapper3).



Fig. 2: The Estuarine Functional Zone extends near to the eastern boundary of Uitzicht 216 RE/ 45 (CapeFarmMapper3).

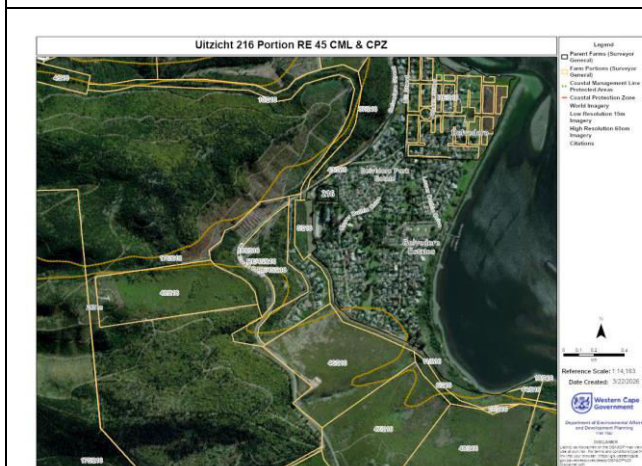


Fig. 3: The Coastal Management Line for Protected Areas (green dotted line) and Coastal Protection Zone (red line) extend over most of the property (DEA&DP Coastal Management Map Viewer).

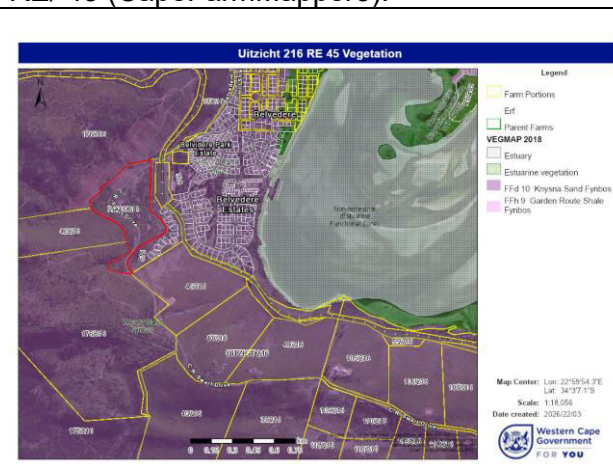


Fig. 4: Knysna Sand Fynbos (CE) (FFd10) is mapped on Uitzicht 216 RE/ 45 (CapeFarmMapper3).

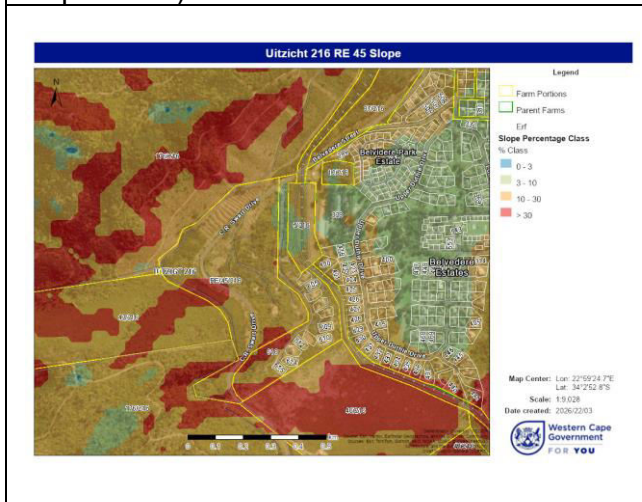


Fig. 5: Slope Percentage (%) is >30% in some sections of the property (CapeFarmMapper3).



Fig. 6: Uitzicht 216 RE/ 45 is outside the Urban Edge (Knysna GIS Viewer, SDF 2019).

Uitzicht 216 RE/ 45, Knysna is 20ha, and is zoned Resort Zone (Knysna Municipality GIS Viewer). The Landowner is Bel Heights (Pty) Ltd represented by Mr D. McLean. The property is situated on a north-east facing slope, approx. 80 to 155m.a.m.s.l, with slopes in places that exceed 30% (**Fig. 2 & 5**). The property falls outside the Urban Edge (**Fig. 6**).

Critical Biodiversity Areas (CBAs) in terms of the 2023 Western Cape Biodiversity Spatial Plan (WC BSP), which was adopted on the 13 December 2024 (Gazette Extraordinary 9017) in alignment with the Western Cape Biodiversity Act (Act No. 6 of 2021), are no longer mapped, as the area falls within the KPE, which is declared in terms of the National Environmental Management: Protected Areas Act (Act No. 57 of 2003) (NEM: PAA). Conservation status is high, due to the property's location in a Critically Endangered vegetation type, comprising the Knysna Sand Fynbos corridor.

SANParks conducted a site visit (**Figs. 7 to 10**) on the 24 March 2026, attended by Dr. V. Weyer (SANParks), Ms. N. Nkosi (DFFE), Ms. J. Mahlangu (DFFE), Mr. T. Mokobori (DFFE), Mr I. Mapakgole, Mrs. C. Avierinos (HilLand Environmental), and Ms. A. Mclean (HilLand).

	
Fig. 7: Site visit attendees, 24 March 2026.	Fig. 8: View looking towards the Knysna Estuary.
	
Fig. 9: Driveway to house that burnt in the 2017 fires.	Fig. 10: View looking towards Belvidere storage area.

The development proposal as extracted from the Draft Basic Assessment report (DBAR), HilLand Environmental, 23 February 2026 includes:

The proposed entails the establishment of a residential development on the property that will consist of 14 single residential erven, one (1) open space erf for HOA storage (garages / boats), associated services/infrastructure, internal roads and driveway while the remainder will be formally conserved (Open Space III zoning).

The erven will vary between 1 120m² and 1 650m² as indicated in the Site Development Plan and will make provision for a single dwelling, associated infrastructure and garden. Architectural Guidelines will inform all designs on the estate.

The one (1) Open Space II (private open space) erf will be used for maintenance and will include garages for the storage of boats, caravans, maintenance equipment required for the reserve etc to be used by the HOA.

The remainder of the property will be Open Space III Zone specifically for conservation and rehabilitation purposes as indicated on the site development plan. Only approved activities and disturbance as specified in the assessment and EMPr may occur within this area. The conservation zone will form 79% of the property. Approximately 21% of the property is already or will be permanently disturbed (internal roads, residential erven and open space erf for garages/stores).



Preferred Site Development Plan (SDP)

Aerial Image - NGI 2021
Cadastral Data - Surveyor General 2019

Projected Coordinate System: WGS_1984_UTM_Zone_34S

Date: 19 February 2026
Drawn By: I Delpoit
Project No: 1308



Hilland Environmental
Environmental Assessment Practitioners

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Fig. 11: Preferred Site Development Plan, Hilland Environmental, 23 February 2026.

The Municipal official in charge of Sewage Disposal has indicated that the sewage treatment plant is over extended and may require additional BIODISKS to be installed at the plant to increase its capacity. This will be addressed in the preparation of the Service Level Agreement." (Hofmeyr and Associates Consulting Engineers, 2026).

3.2.2 ELECTRICITY

With input from CMB Consulting Engineers (see Services Report, 2024 appendix M) :

The estate will connect to the existing municipal electrical supply at the RMU- Belvidere Heights. The existing municipal pole mounted transformer will be removed and replaced with a new MV underground cable from the RMU to a new 315kVA 11/0,4kV miniature substation.

This new substation will be the point of connection for the main LV underground cable and kiosks. Individual house connections will be from the 7 LV kiosks.

The municipality will take over the internal supply and a meter at each home will be installed. The municipality have confirmed availability of electrical supply.

In addition to the above, the home owners are likely to install solar PV and other energy saving measures in their design (energy saving lighting, green building design principles and energy efficient equipment) in order to increase sustainability and climate resilience of the estate.

3.2.5 STORMWATER MANAGEMENT

SUDs principles will be implemented with swales along the internal roads.

No concentration of stormwater is proposed or will be permitted to occur due to the erodible nature of the materials. Detention and retention swales will be used as required to slow water down and allow for natural infiltration.

Stormwater off the Brenton road that flows onto the property will be dealt with in the same manner – slow the water down and encourage infiltration.

3.3 DESIGN GUIDELINES

The estate will have strict architectural design guidelines that will be adapted to ensure that they comply with the mitigation measures indicated by the visual specialist.

In this regard the visual specialist recommended the following (VRM, 2026):

A review of the proposed Architectural Guidelines found them to be generally suitable but recommends additional provisions. These should include a clear requirement for verandas and pergolas on the north-facing sides of dwellings, along with measures to avoid large, unbroken wall surfaces that create dominant visual forms.

The architecture should present as single storey, using deep verandas and articulated design elements to break up strong forms and lines. While taking wildfire safety into account, the inclusion of larger shrubs and small tree landscaping near structures should be encouraged

Point 1: Conservation Stewardship

Uitzicht 216 RE/ 45 falls within SANParks' protected area expansion footprint and Land Inclusion Plan 2023 - 2026. The property is within the Western Heads Knysna Sand Fynbos Coastal Corridor, which is the subject of a collaborative conservation initiative being supported by SANParks, CapeNature, Knysna Municipality, the Table Mountain Fund, WWF, the Western Heads Goukamma Conservancy (WHGC), and landowners.

Several biodiversity stewardship categories exist that a landowner can opt into; these are described in tabular form in **Fig. 14**. Stewardship categories in the top-tier of the table require the greatest commitment level from a landowner but receive the greatest support from conservation authorities and greater financial incentives

Uitzicht 216 RE/ 45 may be considered for inclusion by SANParks through a Contract National Park (CNP) agreement (top tier). A CNP is an area of privately owned land that is declared as part of a National Park in terms of NEM: PAA. The landowner retains ownership of their property but commits the property to formal conservation and co-manages the property with SANParks. In return, the landowner may derive financial benefits, such as income tax deductions and municipal property rate exclusions.

SANParks will support the inclusion of the section of Uitzicht 216 RE/ 45 that is situated above CR Swart Road (red star areas) (Fig.13). This section provides a landscape connectivity corridor to link through the western section of Belvidere Heights into Portion 46, Uitzicht which is a SANParks CNP property. The corridor will further act as a buffer to maintain the visual tranquil character of the CR Swart Road. Fire management would further be aided. Maintaining a linkage corridor in the southern sector of the property into Belvidere Heights is also important (blue star area) (Fig. 13). The remaining lower section of the property below the road should form part of the Homeowners Association.



Fig. 13: SANParks will support the inclusion into CNP of the section of Uitzicht 216 RE/ 45 that is situated above CR Swart Road (area marked with red star).

Table 1 - Biodiversity stewardship categories

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

Fig. 14. Biodiversity stewardship categories, as extracted from Pg.3 SANBI 2018 Stewardship Guideline³.

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

The property may similarly qualify as nature reserve or protected environment status. Discussions in this regard can be held with CapeNature.

Should the landowner not wish to opt into protected area, other stewardship mechanisms are possible. These may take the form of: (1) A conservation servitude registered against the undeveloped portion of the land in favor of SANParks, CapeNature or another conservation organisation; or (2) a biodiversity agreement for the management of the undeveloped portion of the land. These options would require a legally binding conservation management plan.

It is recommended that all options are accompanied by the spot zoning of the undeveloped land as “Open Space III or IV.”

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

Should the landowner opt for a CNP stewardship agreement with SANParks, it is recommended that the landowner undertake the following steps towards declaration of the property as CNP.

Phase 1: to be completed prior to any construction activities being permitted to take place on the property should include:

- (1) Initial Commitment letter to be signed by the landowner;
- (2) SG Diagram to be prepared for the section of the property to be included, i.e., the section above the CR Swart Road;
- (3) A conservation servitude should be registered against the undeveloped portion of the land, i.e., section of the property above the CR Swart Road, in favor of SANParks;
- (4) The entire property should be re-zoned to Open Space III or IV; and
- (5) The Written Agreement required in terms of Section 20(3) of NEM: PAA should be agreed on and signed by the landowner and SANParks, pertaining to the section above CR Swart Road.

Phase 2: may be completed before or after construction activities. This would include:

- (6) The Co-management Agreement required in terms of Section 42 of NEM: PAA and the Property Operational Plan should be developed, agreed on and signed by both the landowner and SANParks, pertaining to the section above CR Swart Road; and
- (7) Declaration of the section of the property above the CR Swart Road as part of the Garden Route National Park in terms of NEM: PAA will follow.

Point 2: SDP & Zoning

The Preferred SDP and zoning intentions stated in the report by Marike Vreken, 10 February 2026 is supported, i.e., “14 single residential erven, one (1) open space erf for HOA storage (garages / boats), associated services/infrastructure, internal roads and driveway while the remainder will be formally conserved (Open Space III zoning)”.

In terms of retention of Open Space, the DBAR notes:

The preferred development proposal is depicted in Pr2459-F216Ptn45L12, dated 10 Feb 2026. The proposal is to subdivide the portion of land above (west) of the District Road off from the development site (former Portion 189) (as Open Space III), then the portion east of the district road, will be a residential development consisting of (14x) freehold single residential erven, (2x) private nature conservation areas, (1x) private open space and (2x) private street properties, as indicated on the Layout Plan.

Erf sizes of the proposed residential development will vary between $\pm 1120\text{m}^2$ and $\pm 1650\text{m}^2$. The proposed development will have access control.

A large open space portion will be retained to the south of Erven 1-4, to allow the opportunity for fynbos and forest pockets to flourish. The garage (private open space) will be neatly tucked along the existing internal roads, allowing adequate manoeuvring space to accommodate trailers, boats, HOA maintenance requirements etc.

As part of the SANParks CNP stewardship process, a property zonation plan is drafted, which uses zonation types and use zones, as described in the GRNP Management Plan (GRNP MP). Zonation types shall be applied to the SDP via discussions between SANParks and the landowner.

SANParks supports that the southern sector of the property be retained as open space with low density development to link with Belvidere Heights and Uitzicht 216 Portion 46, a SANParks CNP property.

Point 3: Site Servicing

In principle, SANParks supports that the development links into the Belvidere Estate Wastewater Treatment Works (WWTW). The WWTW should however be upgraded and maintained as suggested. SANParks requires sight of a Service Level Agreement with the Knysna Municipality and that the Belvidere Estate agree that the sewage treatment method proposed is viable. No pollution should emanate from the proposed development that may compromise the water quality of the Knysna Estuary

Sustainable Urban Drainage Systems (SuDS) principles should be implemented.

SANParks supports that sustainable building principles are followed in the design and servicing of the development. Dwellings should be designed to be off-grid and climate change smart. This may include solar panels, rainwater tanks, etc.

Point 4: Summary and Way Forward

SANParks supports the Preferred SDP and zoning intentions as proposed in the report by Marike Vreken, 10 February 2026 with the development noted as comprising of, "14 single residential erven, one (1) open space erf for HOA storage (garages / boats), associated services/infrastructure, internal roads and driveway while the remainder will be formally conserved (Open Space III zoning)".

It is recommended that the following conditions of approval are considered:

1. The landowner should commit the section of Uitzicht 216 RE/ 45 that is situated above CR Swart Road (red star areas) (Fig.13) using one of the biodiversity conservation stewardship mechanisms in Category 1 (preferred) or Category 2 (Fig. 14).

2. Should the landowner opt for a CNP stewardship agreement with SANParks, it is recommended that the landowner undertake the following steps towards declaration of the property as CNP.

Phase 1: to be completed prior to any construction activities being permitted to take place on the property should include:

- (1) Initial Commitment letter to be signed by the landowner;
- (2) SG Diagram to be prepared for the section of the property to be included, i.e., the section above the CR Swart Road;
- (3) A conservation servitude should be registered against the undeveloped portion of the land, i.e., section of the property above the CR Swart Road, in favor of SANParks;
- (4) The entire property should be re-zoned to Open Space III or IV; and
- (5) The Written Agreement required in terms of Section 20(3) of NEM: PAA should be agreed on and signed by the landowner and SANParks, pertaining to the section above CR Swart Road.

Phase 2: may be completed before or after construction activities. This would include:

- (6) The Co-management Agreement required in terms of Section 42 of NEM: PAA and the Property Operational Plan should be prepared, agreed on and signed by both the landowner and SANParks, pertaining to the section above CR Swart Road; and
 - (7) Declaration of the section of the property above the CR Swart Road as part of the Garden Route National Park in terms of NEM: PAA will follow.
3. The southernmost section of the property which adjoins Belvidere Heights should remain undeveloped, to strengthen the corridor linkage across Belvidere Heights to Uitzicht 216 Portion 46, a SANParks CNP property.
 4. The undeveloped portion/s of the property should be rehabilitated. The section of the property above the CR Swart Road is particularly important. This section is already demonstrating passive restoration of fynbos following recent alien clearing. This is supported as a recommendation in the Terrestrial & Aquatic Biodiversity, Plant Species & Animal Species Assessment Report, by Dr David Hoare, 8 August 2024.
 5. In principle, SANParks supports that the development links into the Belvidere Estate Wastewater Treatment Works (WWTW). The WWTW should however be upgraded and maintained as suggested. SANParks requires sight of a Service Level Agreement with the Knysna Municipality and that the Belvidere Estate agree that the sewage treatment method proposed is viable. No pollution should emanate from the development that will compromise the water quality of the Knysna Estuary.
 6. Permeable paving surfaces should be used where possible to limit excess surface runoff. Sustainable Urban Drainage Systems (SuDS) principals should be implemented.
 7. Visual impact mitigation and recommendation measures as proposed by VRM Africa, Visual Statement, 2 February 2026 should be adhered to. Attention should be paid towards minimising night lights and glare from windows and solar structures, visible across the estuary.

8. Any proposed fencing must be to SANParks approval. Fencing must not inhibit wildlife movement. An entrance gate and 400m fence in this area is supported. Should any other fencing be required this should be only around individual dwellings.
9. The EMPr, by HilLand Environmental, dated 23 February 2026 should be implemented.
10. A suitably qualified Environmental Control Officer (ECO) should be appointed to monitor the EMPr.
11. The landowner's attention is drawn to the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) (NEM: BA) Alien and Invasive Species Regulations, 25 September 2020, where a landowner is legally responsible for the removal of alien vegetation on their property. The owner should formalise an Invasive Alien Vegetation Control Plan as required by the NEM: BA.
12. Compliance with the National Veld and Forest Fire Act (Act 101 of 1998) is required. The owner should join the local Fire Protection Association, if not already a member. The owner should consider using non-flammable building materials, including external fittings such as aluminium gutters, and should consider an irrigation system to mitigate fire risk
13. A permit from the Department of Forestry, Fisheries & the Environment (DFFE) must be attained should any protected tree species be disturbed on the property, as per the National Forests Act (Act 84 of 1998), as amended.
14. Should any resources of suspected heritage value be uncovered during clearing, Heritage Western Cape (HWC) must be contacted immediately for instructions.
15. The disturbance footprint/no-go areas should be fenced off during the construction phase with a barrier material, such as shade cloth to prevent workers from encroaching into adjacent vegetation, and to ensure that animals are not injured on the building site.
16. An indigenous plant rescue operation should be conducted prior to site clearance.
17. Topsoil should be set-aside for reuse.
18. Confirmation is required from the relevant Competent Authorities on the need for a WUL (BOCMA).

SANParks' full comment letter must be included in the body of the Draft Basic Assessment Report, and not only in a Comments and Responses report/ table.

SANParks reserves the right to revise comments if additional information becomes available.

Yours sincerely



DR VANESSA WEYER
PRINCIPAL PLANNER
GARDEN ROUTE NATIONAL PARK

DATE: 30 March 2026

CC:	Victor Mokoena	SANParks
	Lwazi Khuzwayo	SANParks
	Elmonique Petersen	SANParks
	Jessica Hayes	SANParks
	Clement Arendse	SANParks
	Kyle Smith	SANParks
	Robin Petersen	SANParks
	Arnelle Collison	SANParks
	Marthan Theart	SANParks
	Mashudu Mudau	DFFE
	Nyiko Nkosi	DFFE
	Megan Simons	CapeNature
	Mulalo Musekene	Knysna Municipality
	Shaun Madumbo	Knysna Municipality
	Hennie Smit	Knysna Municipality
	Johan Labuschagne	WHGC

RE: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

From Lloyd Goliath Transnet Property PLZ <Lloyd.Goliath@transnet.net>

Date Mon 3/2/2026 3:24 PM

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

Cc Mark Moodaley Transnet Property PLZ <Mark.Moodaley@transnet.net>; Riaan Erasmus Transnet Freight Rail BLM <Riaan.Erasmus@transnet.net>; alanmcvitty@outlook.com <alanmcvitty@outlook.com>; Karin Munro *Transnet Property PLZ <Karin.Munro@transnet.net>; Ntokozo Maseko Transnet Property Port Elizabeth <Ntokozo.Maseko@transnet.net>; Ntombekaya Tsako Transnet Property PE <Ntombekaya.Tsako@transnet.net>

Good Afternoon

We acknowledge receipt of the BAR application for the proposed development on the remainder of Portion 45 of Farm Uitzigt No 216, Knysna, and wish to advise that the proposed development and the rail reserve (portions 5, 10 and 11 of Farm 216, Knysna) are sandwiched by Belvedere Heights (Erf 616 Belvedere). From a geospatial perspective, we have no objections to the development if it does not encroach into the rail reserve.

Kind Regards



Lloyd Goliath
Geo-Spatial Manager
Transnet Property, Geo-Spatial Services (Eastern Cape Region)
A division of Transnet SOC Ltd | North Union Street, Central, Gqeberha
T: +27 41 507 1322 **C:** +27 71 888 2659 **E:** lloyd.goliath@transnet.net
W: www.property.transnet.net

From: Karin Munro *Transnet Property PLZ <Karin.Munro@transnet.net>

Sent: Monday, 23 February 2026 14:19

To: Lloyd Goliath Transnet Property PLZ <Lloyd.Goliath@transnet.net>

Cc: Mark Moodaley Transnet Property PLZ <Mark.Moodaley@transnet.net>

Subject: FW: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna



Karin Munro
Snr. Secretary
Transnet Property - Management
A division of Transnet SOC Ltd | North Union Street, Gqeberha
M +27 (0) 60 977 1181 **E** karin.munro@transnet.net
www.property.transnet.net

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

Sent: Monday, 23 February 2026 14:14

To: Riaan Erasmus Transnet Freight Rail BLM <Riaan.Erasmus@transnet.net>; alanmcvitty@outlook.com

Cc: Karin Munro *Transnet Property PLZ <Karin.Munro@transnet.net>

Subject: RE: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

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RE: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

Commenting period: 23 February 2026 - 26 March 2026

Dear Transnet and Outeniqua Choo Tjoe,

Hope you are well

Attached please find the notification letter pertaining to the availability of the Draft BAR for the proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna (a DFFE application process).

In terms of Regulations 3(4) & 40 of the NEMA EIA Regulations (2014, as amended) to notify you of the availability of the Draft Basic Assessment Report (BAR) and associated appendices for its 30-day commenting period (**23 February 2026 – 26 March 2026**).

- The report and associated appendices are available on HillLand Environmental's website at: <https://hilland.co.za/public-processes/bel-heights/>
- Alternatively, please follow the Google Drive Link:
https://drive.google.com/drive/folders/1yKcd1sLh6uBFK4lv_s2wvUWm0VOT26lw?usp=sharing

Please do not hesitate to contact us should you require any additional information

Have a lovely day

Kind regards/ Vriendelike groete

Inge Delpont

EAPASA 2019/1689

HillLand Environmental (Pty) Ltd

166 Mountview Farm, Victoria Heights

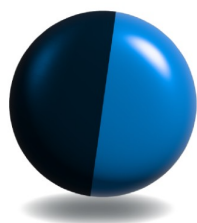
George

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Hilland Environmental

Environmental Assessment Practitioners

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REF: BL/BELV

20 March 2026

Hilland Environmental (Pty) Ltd
P O Box 590
GEORGE
6530

ATTENTION: INGE DELPORT

PER E-MAIL:
environmental2@hilland.co.za

Dear Inge

REMAINDER OF PORTION 45 OF THE FARM UITZICHT NO 216.

1. We represent the Belvidere Homeowners Association (**BHOA**).
2. The BHOA has been registered as an interested and affected party. (**refer attachment**).
3. The closing date for comments is **26 March 2026**.
4. **Services report compiled by Hofmeyr & Associates:**

4.1 Bulk water supply: additional information / clarification required:

- 4.1.1 Calculations in respect of available capacity at the two Belvidere Heights reservoirs.
- 4.1.2 Confirmation that the Belvidere Heights Home Owners Association is in agreement with the proposal in paragraph 4.1.1 above.
- 4.1.3 Confirmation regarding the **source** of bulk water supply to the application site and also Belvidere Heights.

4.2 Sewer discharge: additional information/clarification required:

- 4.2.1 Report compiled by a specialist confirming that sewer “discharge capacity” is indeed available at the Belvidere sewer treatment plant in respect of the proposed fifteen dwelling-units. The Hofmeyr & Associates report indicates in paragraph 6 that the Knysna Municipality has concerns regarding capacity issues at the Belvidere sewer treatment plant.
- 4.2.2 Estimated volume of sewer discharge **per dwelling** per day.
- 4.2.3 Proposed alignment of the “sewer route” from the site to the Belvidere sewer treatment plant.

4.3 Stormwater management:

- 4.3.1 A stormwater management plan cannot be compiled and implemented for the application site only.
- 4.3.2 Belvidere Heights and Belvidere Estate are the lower-lying properties and must be incorporated in the required stormwater management plan.
- 4.3.3 The BHOA requires a copy of the proposed stormwater management plan.
- 4.3.4 Belvidere Estate has been experiencing flooding via the railway line culvert in 2006 (despite the contents of paragraph 4.3.5).
- 4.3.5 **The Knysna Municipality approval letter (dated 20 September 2004) included a condition (c)(x) that reads as follows:**

“Stormwater must be designed and constructed in such a way that no stormwater (in respect of the application site) from the development reaches Belvidere Estate and shall comply with the requirements of the Environmental Authorisation”.

- 4.3.6 No evidence has been provided in the report compiled by Hofmeyr & Associates to address the issue raised in paragraph 4.3.5 above as the report merely refers in paragraph 4 (stormwater disposal) that detention ponds must be constructed. The locality and capacity of the detention ponds are unknown – especially when the locality of the majority of the houses are located directly to the west of Erf 328 Belvidere and in close proximity to the culvert under the railway line.

4.4 General comments:

- 4.4.1 **Kindly confirm when the town planning application will be submitted and also the dates in respect of the public participation process.**
- 4.4.2 The proposed locality of the dwelling-units does not resemble an “eco-estate”. The majority of the houses are grouped together and create the impression of a very different housing typology when compared to the adjacent Belvidere Heights development and not that of an “eco-estate”. Kindly clarify what is meant by an “eco-estate”.
- 4.4.3 Attached two different site layout options – both are labelled “preferred options”. It is not possible to present two “preferred options”. Kindly confirm.
- 4.4.4 The Hofmeyr & Associates report is generic, and it is clear that the author of the report is unaware of the present-day issues regarding water supply and sewer discharge capacity that is potentially available to the application site.
- 4.4.5 The BHOA reserves the right to appoint engineering consultants, who will verify the response in respect of this submission, with specific reference to water, sewer, stormwater and independent environmental consultants.
- 4.4.6 The BHOA also requires a 0.5 m contour survey of the site. The contours included in the “preferred options” are illegible.

5. Conclusion

5.1 Summary of (additional) information required:

- 5.1.1 Calculations in respect of the capacity at the two Belvidere Heights reservoirs.
- 5.1.2 Confirmation that the Belvidere Heights Home Owners Association is in agreement that adequate capacity is available at the reservoir.
- 5.1.3 Confirmation regarding the **source** of the bulk water supply to Belvidere Heights **and** the application site.

- 5.1.4 **Detailed** report regarding the capacity of the Belvidere sewer treatment plant.
- 5.1.5 Detailed stormwater management plan that includes the design and locality of the proposed detention ponds.
- 5.1.6 Confirmation of the “preferred” site layout.
- 5.1.7 0.5 m contour survey – the contours included in the report are illegible.
- 5.1.8 We reserve the right to supplement the submission when additional information becomes available.
- 5.1.9 Kindly address all correspondence to Breda Lombard Town Planners at breda@bredalombard.co.za.

Kindly acknowledge receipt of this submission.

Yours faithfully

BREDA LOMBARD TOWN PLANNERS



S VAN B LOMBARD
PROF TOWN PLANNER (REG NO. A/700/1992)

cc: Executive Committee: Belvidere Homeowners Association

Breda Lombard

From: Inge Delport <environmental2@hilland.co.za>
Sent: Tuesday, 24 February 2026 10:44
To: Breda Lombard
Cc: Cathy Avierinos
Subject: Re: 1308 DRAFT BASIC ASSESSMENT REPORT: REMAINDER OF PORTION 45 OF THE FARM UITZICHT NO. 216

Dear Breda

This email serves to confirm that the BHOA, represented by yourselves, has been duly registered as an Interested and Affected Party (I&AP) for the process. Please note that no individual formalised letters are issued; this email serves as the official confirmation of registration.

Kind regards/ Vriendelike groete

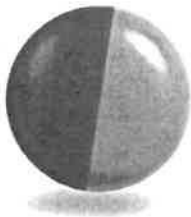
Inge Delport
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www.hilland.co.za

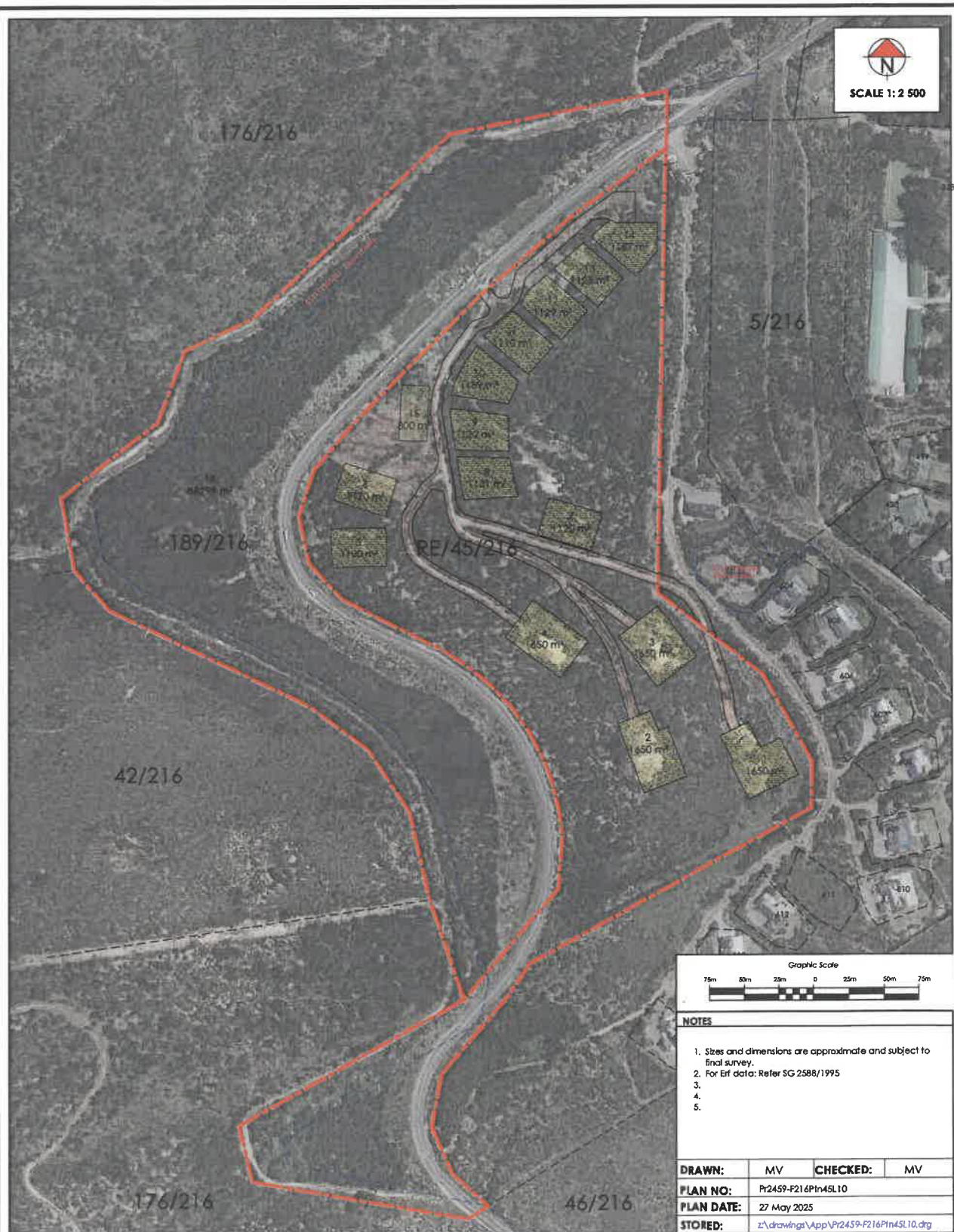
Mobile: +27 (0) 825259995 - Office: +27 (0) 44 8890229 - Fax: +27 (0) 86 5425248



Hilland Environmental

Environmental Assessment Practitioners

From: Breda Lombard <breda@bredalombard.co.za>
Sent: Tuesday, February 24, 2026 10:40 AM
To: Inge Delport <environmental2@hilland.co.za>
Subject: RE: 1308 DRAFT BASIC ASSESSMENT REPORT: REMAINDER OF PORTION 45 OF THE FARM UITZICHT NO. 216



**PORTION 45 OF THE FARM
UITZICHT NO 216, KNYSNA MUNICIPALITY**

LAYOUT PLAN (Preferred Layout)

MUNICIPAL MANAGER

DATE:



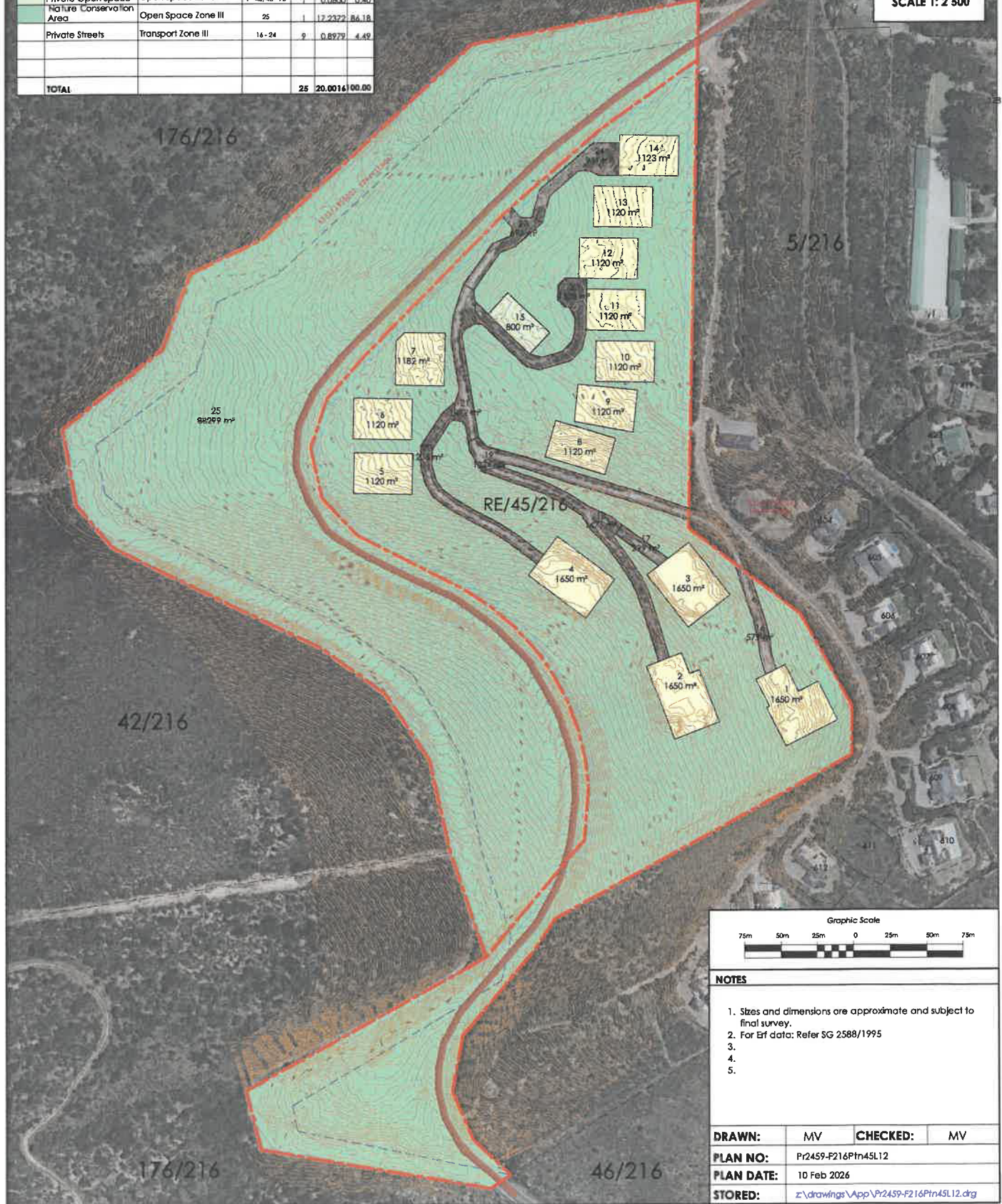
21 Trotter Street, PO Box 2180
KNYSNA 6570

(044) 382 0420
086 459 2987
e-mail: marike@vreken.co.za
www.vreken.co.za

LEGEND:						
LAND USE	ZONING	ERF NO	QTY	AREA (HA)	%	
Single Residential	Single Residential Zone I	1 - 14	14	1.7865	8.93	
Private Open Space	Open Space Zone II	1 - 46; 48 - 75	1	0.0800	0.40	
Nature Conservation Area	Open Space Zone III	25	1	17.2322	86.18	
Private Streets	Transport Zone III	16 - 24	9	0.8979	4.49	
TOTAL			25	20.0016	100.00	



SCALE 1: 2 500



**PORTION 45 OF THE FARM
UITZIHT NO 216, KNYSNA MUNICIPALITY**

**LAYOUT PLAN
(Preferred Layout)**

MUNICIPAL MANAGER

DATE:



21 Trotter Street, PO Box 2180
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086 459 2987
e-mail: marike@vreken.co.za
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WESTERN HEADS-GOUKAMMA CONSERVANCY

NPO: 285-693

81 TULBAGH STREET

KNYSNA 6571

Attention: Inge Delpont, HillLand

By email: Inge Delpont environmental2@hilland.co.za Cathy Avierinos cathy@hilland.co.za

PORTION 45 OF FARM NR.216 UITZICHT: DBAR

Reference: DFFE REF: NA

The following are comments and reservations regarding the application for DBAR & Site Development Plan pertaining to Uitzicht 45 of Farm 216 as submitted by **HillLand**.

Background

The Western Heads Goukamma Conservancy, hereafter referred to as the, “WHGC” is supported by a Table Mountain Fund (TMF) project, specifically towards strengthening one of the WHGC’s mandates for the conservation and restoration of the Critically Endangered Knysna Sand Fynbos (KSF) (FFd10).

The WHGC covers the area from the western bank of the Knysna Estuary to the eastern bank of the Goukamma Estuary, and from the beach (high water mark) inland to the N2 national highway (more at <https://westernheadsgoukamma.co.za/>).

Uitzicht 216 Portion 45

Portion 45 is situated within an exceptionally sensitive biodiversity area, with large portions of the properties and adjoining properties classified as CBA. This property falls in:

- the Buffer Zone of the Garden Route National Park (GRNP),
- the Coastal Protection Zone (CPZ) as per Integrated Coastal Management Act 24 of 2008
- the National Heritage Resources Act
- Falls outside of the urban edge as per approved Knysna SDF

Acronyms

CBA	Critical Biodiversity Area
CNP	Contract National Park
CPZ	Coastal Protection Zone
DBAR	Draft Basic Assessment Report
DFFE	Department of Forestry, Fisheries and the Environment
GRNP	Garden Route National Park
IAP	Invasive Alien Plant
KSF	Knysna Sand Fynbos
NEMA	National Environmental Management Act
PA	Protected Area
SANParks	South African National Parks
SDF	Strategic Development Framework
TMF	Table Mountain Fund
VIA	Visual Impact Assessment
WCLUPG	Western Cape Land Use Planning Guidelines
WHGC	Western Heads Goukamma Conservancy



Fig 1: The Location of Portion 45 in relation to pristine CBA neighbouring properties

Summary of Key Comments on the DBRA:

The comments on the DBAR for the development application of Portion 45 can be summarised as follows:

- 1) Lack of "Duty of care" by allowing a very high infestation of Invasive Alien Plants (IAPs) for more than 20 years. This deliberate action resulted in the degraded state of the CBA (FFd10) as reported in the specialist study (Dr Hoare). It appears that it is a strategy by landowners to deliberately degrade a CBA to enable a development agenda. The scope of the specialist studies does not include input on the rehabilitation & recovery potential. This rehabilitation and recovery potential is likely to be very high as can be observed by the neighbouring properties that have been cleared of AIS.
- 2) The original rezoning and subdivision of portion 45 (App L - Planning report) were under very specific conditions to ensure the remainder undeveloped portions being managed as a private nature reserve to ensure connectivity to the surrounding CBA of portion 46 and 42. These conditions have not been adhered to. The regulator is requested to issue more specific and binding conditions in the Environmental Authorisation.
- 3) The development proposed is clearly for permanent residence and does not match the Resort Zoning criteria or conditions. Portion 45 resort zoning approval has resulted in Belvedere Hights Estate. It seems to be a tactic by developers to use Resort Zoning that results in urban sprawl.
- 4) The Visual Impact of the proposed development could be severe if not carefully considered and mitigated measures implemented. The development is adjacent to a tourist route (DR1600 CR Swart), visible from the Knysna Estuary and bordering onto a Contractual National Park (portion 46). Many of the recommendations of the Visual Impact assessment has not been incorporated in the designs and or have not been made compulsory.

Key Impacts Summary:

- **Habitat Fragmentation and Loss:** The portion 45 has been previously rezoned and subdivided under very specific conditions to protect the endangered vegetation. This application does not consider the historical restrictions. The primary impact is the destruction and breaking up of large, continuous natural areas into smaller, isolated patches. This restricts ecosystems, limits dispersal, and reduces population sizes, making species more vulnerable to extinction.
- **“Duty of care”** as per Section 28 of NEMA has not been adhered to even after a DFFE enforcement notice was issued in 2019. The severe density of the IAPs suppresses the Critically Endangered KSF vegetation type (FFd10). The neighbouring CBA properties that are in pristine condition are being severely impacted by the spread of the AIS seeds.
- **Edge Effects:** The “edge” of a remaining habitat patch experiences increased pressure from the adjacent development, including higher light and noise pollution, air and water degradation, and the introduction of IAPs.
- **Loss of Specialised Species:** As natural ecosystems are simplified into urban or suburban landscapes, native, specialised species are displaced by, or lost to, more generalist and invasive species.
- **Biodiversity Hotspot Pressure:** Often, the most rapid expansion occurs in high-ecological value areas, such as coastal areas, wetlands and/or forests, which are subsequently lost.
- **Indirect Effects:** Beyond direct land conversion, this type of development increases resource consumption, carbon emissions, and the need for infrastructure, which impacts environments far beyond the immediate footprint.

The following specific aspects for consideration:

1. High risk for the receiving environment – Knysna Sand Fynbos

- a. The property is located within the ecological boundary of the Knysna Sand Fynbos that is classified as Critically Endangered (FFd10). Portion 45 borders onto Portion 46 and Portion 42 that have pristine Knysna Sand Fynbos. Portion 46 has entered into a Contractual National Park (CNP) agreement with SANParks to protect specifically the Knysna Sand Fynbos.
- b. The DBAR argues low ecological risk of the development based on it being a degraded CBA. However, it ignores the **systematic destruction of the endangered vegetation type** by allowing the AIS to flourish and suppress the Critically Endangered Knysna Sand Fynbos.
 - i. Various attempts were made to get the necessary action that resulted in a **DFFE Biosecurity Enforcement notice issued 2019**. We notice that the DBAR does not reference the Enforcement notice nor the progress. It appears from the Vegetation Specialist report of Dr Hoare, that he had also not been made aware of the notice.
 - ii. The subdivision and resort zoning condition dated 20th September 2004 specifically requires the owners to 1) manage the “open space zone 3” as a nature area, 2) to remove all non-indigenous vegetation and 3) undeveloped portions in a natural condition and rehabilitated – ref App L - Planning report” Appendix’s – Rezoning conditions dated 20th September 2004.
 - iii. “App L - Planning report” Appendix’s:

[xv] The “Open Space 3” portion of the property shall be rehabilitated and managed as a private nature reserve in accordance with an Operational EMP, to be submitted for approval to the Chief Directorate: Environmental Affairs, PGWC, if not a requirement of the Environmental Authorisation;

- (i) The "Open Space Zone III" zoned Portion A shall be managed by the owner/s in perpetuity as a nature area, all non-indigenous vegetation shall be removed in a controlled manner to the satisfaction of the relevant departments, and the property shall be rehabilitated to the satisfaction of Council, in consultation with the relevant conservation bodies and departments, within a period acceptable to them;

2. The infrastructure proposed is located within a Critical Biodiversity Area (CBA)/ Protected Environment (PA)

- a. The property is classified as CORE 1 according to the WC Land Use Planning Guidelines (WCLUPG) for Rural Areas that specifies as follows:
 - i. Core 1 Areas are those parts of the rural landscape required to meet targets/ thresholds for biodiversity patterns or ecological processes
 - ii. These also include areas currently not yet exhibiting high levels of biodiversity loss, but which should be protected and restored, in order to ensure that biodiversity pattern and ecological process targets/thresholds can be met, in the most efficient way possible. It also **includes essential biological corridors** vital to sustain their functionality
 - iii. Even though large portions of the property might have become "degraded by IAP's" because the owners have not acted to fulfil their "duty of care" as supported by the DFFE Enforcement Notice; it still forms still part of an essential biological corridor that is of the highest conservation concern.
 - b. The rehabilitation potential of the degraded CBA is omitted from the specialist report and studies.
 - c. The IAP Control Plan has failed, and the resulting degraded nature of the property is being used to motivate the proposed development. It must also be considered that this property was burnt down in the 2017 Knysna fires, which provided the ideal opportunity to keep it IAP free.
 - d. The property contains already disturbed footprints that could be utilised for a development that could provide ample financial gain to the owners.
 - e. The WCLUPG are specifically opposed to further transformation and degradation of a CBA.
- 3. Conservation commitment of the remaining portion of Portion 45**
- a. The WHGC is of the opinion that this application is expanding beyond the scope of the original 2004 approved Resort Zoning and Subdivision conditions. Approval of this development would set a precedent and may have a ripple / exponential effect on all other properties in the area. The landowner should commit the remaining portion of the property to a biodiversity conservation stewardship mechanism, which could comprise several options
 - b. SANParks CNP NEM:PAA declared property.
 - c. Conservation servitude registered against the undeveloped portion of the land in favour of SANParks, CapeNature or neighbouring properties.
- 4. Visual Impact Assessment (VIA) and Design principles**
- a. The re-zoning approved in 2004 as per "*App L - Planning report*", defines a maximum height restriction of 6,5m measured vertically from any point of the building. The proposal is now for 8,5m. This increased height will have a big negative visual impact. We recommend that the 6,5m height restriction should be maintained.
 - b. **The VIA clearly states that some mitigations need to be incorporated in the proposal** (Reference to App F - Visual report):

- i. The proposed units and existing access routes 'restrict adequate screening where visual exposure is strongest'. This can set a negative precedent, as this report confirms. An alternative is presented for consideration.
 - ii. The report proposes the re-location of the proposed garage, access road and the erven close to the road, which I also strongly support.
 - iii. The close proximity between the row of dwellings also limits the potential for additional planting of vegetation and reinforces the undesirable linear settlement pattern.
 - iv. Double storey units to be positioned more within the valley allowing for better site specific landscaping and visual screening.
 - v. Fig 7-9 in the report refers. The visual effect is severe, and the mitigation proposed is unrealistic. An alternative is to be presented for consideration.
 - vi. Fig 12 (From Margaret's Viewpoint) is very disturbing, it shows a massive intrusion in the landscape as well as an invasion of the scenic route.
 - vii. The report recommends an amendment of the architectural guidelines, to include setbacks, verandas and pergolas along the north-facing sides of the units and 'avoiding large unbroken wall surfaces to mitigate dominant visual forms'.
 - viii. The report recommends that the architecture that 'the architecture should present as single storey...' This statement is strongly supported.
 - ix. 'Intensive planting of fast growing, indigenous tree in the 10m buffer along the CR Swart Road should also be a condition of authorisation.' We strongly support this.
 - x. 'In conclusion, the preliminary finding is that 14 units can be accommodated in the setting, but that the current layout is not supported in its current form'. We strongly support this statement.
 - c. Units No 5,6,7,13 & 14 (Preferred Layout Plan) are very close to a declared scenic route and will have a large negative effect on the scenic route. The effect of the proposed **mitigation of trees to assist with the screening will not be effective** for many years to come and needs to be addressed. The proposal is that these units should be single storey and not double storey.
 - d. The alternative Layout Plan in the Town Planning Document is incorrectly labelled as "Layout Plan - Preferred Layout", which is to be corrected.
 - e. It is of great concern that the proposal includes development in areas steeper than 1:4, which is not suitable for development. Please see the Contour & Slope Analysis Plan.
 - f. The IAAP's would require access to the Architectural Design Guidelines for comment.
 - g. While the final outcome of Heritage Western Cape regarding the Notice of Intent to Develop has been made available, IAAP's would still need access to the actual NID submitted to HWC for comment.
5. **The sewage solution for the proposed development poses a challenge, as the Municipality Sewage Treatment Plant that service Belvidere estate is already under severe pressure.**
6. **High Fire Risk for the proposed Development**
- a. The proposed development is at high fire risk as the proposed location is adjacent to a natural Fynbos conservation area that is prone to fires.
 - b. A fire management plan is of high importance that would also protect the neighbouring fynbos properties from human activities that might cause fire.
 - c. The Provincial Road that borders the development should act as a fire break on the western side. We propose that Milk Wood trees (*Sideroxylon inerme*) form part of the "Screening trees" to assist as a fire-resistant vegetation

Conclusions

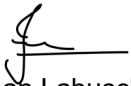
- 1) The deliberate lack of “Duty of care” by allowing a very high infestation of Invasive Alien Plants for more than 20 years has resulted in the degraded state of the CBA. It appears that it is a strategy by landowners to enable a development agenda. The specialist studies does not provide insight on the rehabilitation & recovery potential of the CBA that is likely to be very high as can be observed by the neighbouring properties that have been cleared of IAPs. The property has a **DFFE Biosecurity notice issued in 2019**, however, it was not shared on request or referenced anywhere in the DBAR.
- 2) The original rezoning and subdivision of portion 45 had conditions to ensure that the undeveloped portions were managed as a private nature reserve, but this was not adhered to. We request the regulator to consider a binding condition that commits the remaining undeveloped portion of the property to a biodiversity conservation stewardship mechanism.
- 3) The development proposed is clearly for permanent residence and does not match the Resort Zoning criteria or conditions. Portion 45 resort zoning approval has resulted in Belvidere Hights Estate. This tactic by developers to use Resort Zoning that results in urban sprawl needs to be taken into consideration.
- 4) The Visual Impact of the proposed development in its current form is severe. The proposed mitigated measures fall short and therefore an alternative is to be presented for consideration. Many of the recommendations of the VIA have not been made compulsory in the design manual.

The WHGC would be supportive of the development under the following conditions

- Removal of all IAPs before commencement of construction
- Require the owners to commit the remaining undeveloped portion of the property to a biodiversity conservation stewardship mechanism
- Incorporate the recommended VIA mitigation measures into a comprehensive updated Design Manual

The WHGC reserves the right to revise its initial comments and to request further information based on any additional information that may be received.

Your sincerely



Johan Labuschagne

Chairman – Western Heads Goukamma Conservancy

Johan@paradisefound.co.za

Date: 26 March 2026

Cell: 0836350479

Re: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

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

Date Mon 3/23/2026 8:15 AM

To johan@paradisefound.co.za <johan@paradisefound.co.za>; 'Dave Edge' <orachrysops@gmail.com>; 'Susan Campbell' <sucam@mweb.co.za>; andre@architectsetc.com <andre@architectsetc.com>

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

 2 attachments (2 MB)

Bel Heights Pty Ltd Alien Clearing Update 260322.pdf; Winde Invasive Alien Plant Control Plan.pdf;

Dear Johan

Hope you had a good weekend.

Please find the alien control documents attached.

Have a lovely day

Kind regards/ Vriendelike groete

Inge Delpont

EAPASA 2019/1689

HillLand Environmental (Pty) Ltd

166 Mountview Farm, Victoria Heights

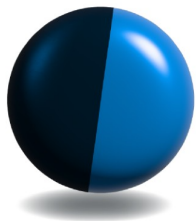
George

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



HillLand Environmental

Environmental Assessment Practitioners

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

Sent: Wednesday, March 18, 2026 8:06 AM

To: johan@paradisefound.co.za <johan@paradisefound.co.za>; 'Dave Edge' <orachrysops@gmail.com>; 'Susan Campbell' <sucam@mweb.co.za>; andre@architectsetc.com <andre@architectsetc.com>

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

Subject: Re: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

Hi Johan,

Thank you for the email,

- The DFFE enforcement notice and subsequent progress reports in regards to the IAP's - **we are waiting for the applicant to supply this as it was done prior to our involvement, will forward as soon as received**
- The Resort Zoning approval letter that contain the conditions of the resort as per Portion 45 - **I have attached App L of the BAR which is the Planning report, this document is attached as Annexure A to the planning report**
- The Sub-division (portion 45 and RE45) approval and conditions thereof - **This document is attached as Annexure C to the planning report**

Please do not hesitate to contact us should you require any additional information

Have a lovely day

Kind regards/ Vriendelike groete

Inge Delpont

EAPASA 2019/1689

HillLand Environmental (Pty) Ltd

166 Mountview Farm, Victoria Heights

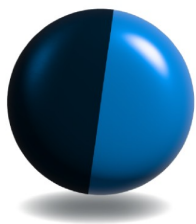
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HillLand Environmental

Environmental Assessment Practitioners

From: johan@paradisefound.co.za <johan@paradisefound.co.za>

Sent: Friday, March 13, 2026 10:17 AM

To: Inge Delpont <environmental2@hilland.co.za>; 'Dave Edge' <orachrysops@gmail.com>; 'Susan Campbell' <sucam@mweb.co.za>; andre@architectsetc.com <andre@architectsetc.com>

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

Subject: RE: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

Hi Inge,

Would you be so kind to also share the following documents that are missing:

- The DFFE enforcement notice and subsequent progress reports in regards to the IAP's
- The Resort Zoning approval letter that contain the conditions of the resort as per Portion 45
- The Sub-division (portion 45 and RE45) approval and conditions thereof

Kind regards

Johan

Johan Labuschagne

Cell +27 83 635 0479

e-mail: johan@paradisefound.co.za

6 Greenhill Lane, Knysna 6571, Garden Route, South Africa

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

Sent: Thursday, 12 March 2026 10:45 AM

To: Johan Labuschagne <johan@paradisefound.co.za>; 'Dave Edge' <orachrysops@gmail.com>; 'Susan Campbell' <sucam@mweb.co.za>

Cc: Cathy Avierinos <cathy@hilland.co.za>; Western Head conservacy brenton <whgconservancy@gmail.com>

Subject: Re: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

Good day,

This email serves as a reminder that the commenting period on the Draft BAR for the above-mentioned project ends 26 March 2026.

Kindly provide your comments within this timeframe.

Kind regards/ Vriendelike groete

Inge Delpont

EAPASA 2019/1689

HillLand Environmental (Pty) Ltd

166 Mountview Farm, Victoria Heights

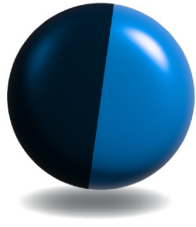
George

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Hilland Environmental

Environmental Assessment Practitioners

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

Sent: Monday, February 23, 2026 2:12 PM

To: Johan Labuschagne <johan@paradisefound.co.za>; 'Dave Edge' <orachrysops@gmail.com>; 'Susan Campbell' <sucam@mweb.co.za>

Cc: Cathy Avierinos <cathy@hilland.co.za>; Western Head conservacy brenton <whgconservancy@gmail.com>

Subject: RE: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

RE: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

Commenting period: 23 February 2026 - 26 March 2026

Dear Western Heads-Goukamma Conservancy

Hope you are well

Attached please find the notification letter pertaining to the availability of the Draft BAR for the proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna (a DFFE application process).

In terms of Regulations 3(4) & 40 of the NEMA EIA Regulations (2014, as amended) to notify you of the availability of the Draft Basic Assessment Report (BAR) and associated appendices for its 30-day commenting period (**23 February 2026 – 26 March 2026**).

- The report and associated appendices are available on Hilland Environmental's website at: <https://hilland.co.za/public-processes/bel-heights/>
- Alternatively, please follow the Google Drive Link: https://drive.google.com/drive/folders/1yKcd1sLh6uBFK4lv_s2wvUWm0VOT26lw?usp=sharing

Please do not hesitate to contact us should you require any additional information

Have a lovely day

Kind regards/ Vriendelike groete

Inge Delpont

EAPASA 2019/1689

HillLand Environmental (Pty) Ltd

166 Mountview Farm, Victoria Heights

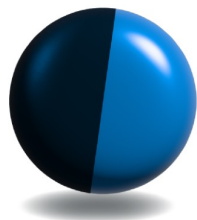
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HillLand Environmental

Environmental Assessment Practitioners

Re: 1308 - Answer to Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

From Rolf Holtmann <Rolf.Holtmann@outlook.com>

Date Mon 3/23/2026 8:51 AM

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

Cc malcolmknights53@gmail.com <malcolmknights53@gmail.com>; lizel@kdpkg.co.za <lizel@kdpkg.co.za>; doug@cestnote.co.za <doug@cestnote.co.za>; Cathy Avierinos <cathy@hilland.co.za>; Rolf Holtmann <Rolf.Holtmann@outlook.com>

 3 attachments (3 MB)

Belvidere View Conservancy Design Manual.pdf; Outlook-qbn3zb3j.png; image001.jpg;

Dear all,

Please find below our comments on the Draft Basic Assessment Report (BAR) for the proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna.

We appreciate the opportunity to review the documentation and would like to raise the following points for consideration:

Key considerations:

- We would support a development limited to **12 houses and one garage/storage unit for the homeowners**.
- The houses should not exceed **6.5 m above natural ground level**, in line with the height restriction required by the municipality for Belvidere Heights Estate. The Visual Impact Assessment already indicates potential sensitivities, given that the proposed estate is located within a conservancy area and in close proximity to one of Knysna's most iconic viewpoints.
- The new estate should provide a **completely independent freshwater supply system**, including its own reservoir. Belvidere Heights Estate was required by the municipality to construct a **150,000 l reservoir**, and a formal agreement between the municipality and Belvidere Heights Estate secures our exclusive right to the use of this reservoir. Also the existing houses had a separate feed in line.
- The building lines towards our internal road should be **set back by at least 5 m from the boundary of the plots**.
- We understand that the **sewage treatment infrastructure in Belvidere is currently operating under significant constraints**. Belvidere Estate has invested more than **R600,000** (with Belvidere Heights contributing on a pro rata basis) in upgrades to the sewage system over the past 12 months to prevent sewage spills. Additional residential units may place further pressure on the system, and this aspect should therefore be carefully considered.
- Given the **water-scarce conditions in the area**, we recommend that each plot in the proposed estate be equipped with **on-site potable water storage tanks of at least 25 kl**, together with the use of rainwater harvesting.

Additional comments:

- On page 9 of the architectural guidelines, the **top image is labelled as disallowed architecture**, whereas the same image in the BAR appears as **recommended architecture**. This inconsistency may require clarification.
- The **calculation of the reservoir capacity appears to contain an inconsistency**, as it does not include the water usage of our garages, which is included in the calculation for the proposed estate. In any event, given the considerations outlined above, we have not undertaken a detailed review of this calculation.

We trust these comments will be taken into consideration and remain available should any clarification be required. Please confirm the receipt of the email.

Best regards

Rolf Holtmann

Chairman Belvidere Heights Estate

For Belvidere Heights Estate

Am 03.03.2026 um 10:20 schrieb Inge Delport <environmental2@hilland.co.za>:

Dear Rolf,

Attached please find the draft architectural guidelines for the development. It incorporates the recommendations made by the visual specialist. The guidelines were approved by the specialist.

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

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From: Cathy Avierinos <cathy@hilland.co.za>
Sent: Tuesday, February 24, 2026 5:27 PM
To: Rolf Holtmann <Rolf.Holtmann@outlook.com>

Cc: malcolmknight53@gmail.com <malcolmknight53@gmail.com>; lizel@kdpd.co.za
<lizel@kdpd.co.za>; doug@cestnote.co.za <doug@cestnote.co.za>; Inge Delpot
<environmental2@hilland.co.za>

Subject: RE: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the
Remainder of Portion 45 of Farm No. 216, Knysna

Hi Rolf

Thank you for your email.

We can confirm that they have adjusted the layout based on the
recommendations of the visual specialist as included in the draft BAR.

We will get back to you on the architectural guidelines as soon as the applicant
replies to your query.

Kind regards

Cathy Avierinos
Director
EAPASA 2019/1053
Hilland Environmental (Pty) Ltd
166 Mountview Farm, Victoria Heights
George

P.O.Box 590 - George, 6530 - Western Cape - South Africa
cathy@hilland.co.za
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Environmental Services since
1992

From: Rolf Holtmann <Rolf.Holtmann@outlook.com>
Sent: Tuesday, 24 February 2026 16:35
To: Inge Delpot <environmental2@hilland.co.za>
Cc: malcolmknight53@gmail.com; lizel@kdpd.co.za; doug@cestnote.co.za; Cathy Avierinos
<cathy@hilland.co.za>; Rolf Holtmann <rolf.holtmann@outlook.com>
Subject: Re: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-
estate on the Remainder of Portion 45 of Farm No. 216, Knysna

Dear Inge,

Many thanks for the comprehensive information. After a first quick glance through
the docs, can you please:

- send to us the draft Architectural guidelines and
- confirm to us whether or not the BAR already includes the recommendations of the Visual Impact study in respect of the change in layout (which I believe it does).

Many thanks in advance and best regards

Rolf Holtmann
Chairman Belvidere Heights Estate

Am 23.02.2026 um 14:27 schrieb Inge Delport
<environmental2@hilland.co.za>:

RE: 1308 - Notification of Draft Basic Assessment Report (BAR): Proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna

Commenting period: 23 February 2026 - 26 March 2026

Dear Neighbouring Landowner - Belvidere Heights Estate

Hope you are well

Attached please find the notification letter pertaining to the availability of the Draft BAR for the proposed eco-estate on the Remainder of Portion 45 of Farm No. 216, Knysna (a DFFE application process).

In terms of Regulations 3(4) & 40 of the NEMA EIA Regulations (2014, as amended) to notify you of the availability of the Draft Basic Assessment Report (BAR) and associated appendices for its 30-day commenting period (**23 February 2026 – 26 March 2026**).

- The report and associated appendices are available on HillLand Environmental's website at: <https://hilland.co.za/public-processes/bel-heights/>
- Alternatively, please follow the Google Drive Link:
https://drive.google.com/drive/folders/1ykCd1sLh6uBfK4lv_s2wvUWm0VOT26lw?usp=sharing

Please do not hesitate to contact us should you require any additional information

Have a lovely day

Kind regards/ Vriendelike groete

Inge Delport
EAPASA 2019/1689
HillLand Environmental (Pty) Ltd

**166 Mountview Farm, Victoria Heights
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