CJ Meintjies Via Email (18 January 2021) on BID	
Comment	Response
 Visual concern regarding the conservancy tank. Unpleasantness regarding the conservancy tank. Negative impact on the aesthetic value of the holiday resort. 	The bulk sewer solution for the development is the provision of a holding/conservancy tank (not septic tank) design. This holding/conservancy tank shall be designed and located in such a way as for the internal network's flow to easily convert/switch to the municipal system when it becomes available. The conservancy tank will be gravity fed and has no treatment process. Sewer is accumulated in the concrete tank as holding measure only and is emptied on a regular basis by a private contractor or by the KOT. The concrete tank is highly resistant to degradation and remains stable over the long term, resulting in little maintenance costs. The tank has an underground footprint with very limited above-ground infrastructure visible, other than a manhole. The tank is supplied with odour-controlled ventilation and hence has no odour. The tank has no pumps or other mechanical parts and subsequently also has no noise pollution. Scraping or scarifying is not required. The tank has no pumps or other mechanical parts and hence has no mechanical maintenance requirements. The only operation required is the regular emptying of the tank by a private contractor or by the KOT. This will be performed by tanker, either on contract, or internally by owned equipment. Inspection of the system will be performed by the supervisor on a daily basis. The operational methodology shall be incorporated into the service level agreement (SLA) with the municipality.
 From a planning perspective, there seems to be inconsistency regarding the holistic view of the final goal 	The ad hoc planning surrounding Dwarswegstrand is an aspect that the Homeowners Association (HOA) and Kaapland Onderwys Trust (KOT) are aware of as well as the Mossel Bay

of the proposed development and surrounding existing developments of Dwarswegstrand Resort.	Municipality (which considers the different applications). Town Planner (Mr Deon Nel) is responsible to investigate the feasibility of the proposed development which takes into account the surrounding developments of Dwarswegstrand.
	It is however seen that more focus is (from a planning perspective) on the optimising of vacant land inside the urban edge (rather than land outside the urban edge) and this mostly supports this type of ad hoc developments.
 From a cost-saving perspective, a security control point just after the turnoff from Morrison Road to H.C. Botha Street will be more affordable and effective. 	It is an aspect that the Mossel Bay Municipality (H.C. Botha Street is a municipal road) and the Provincial Roads Department (Morrison Road is a provincial road) would have to determine in regards to their regulations.
	Provincial roads have a minimum distance (from an intersection) from which access control points can be placed along with various prerequisites such as the steepness/slope of the entrance road. For a access control point that will require vehicles to come to a complete halt, Provincial Roads will not easily consider such a proposal due to vehicles that would have to stop and get going again on a steep angle.
	The same applies for vehicles entering from Morrison Road driving downhill, which will take into consideration the stacking distance of vehicles that would have to wait in line at the access control point and possibly into the Provicial Road.
• Concern regarding the access to the beach area, the increase in usage of existing infrastructure and amenities as well as the change in character of the existing resort.	The proposed development includes a paved/raised walkway to allow residents from the Dwarswegstrand Holiday Resort to access the beach on foot due to the limitation of parking available as well as privacy of surrounding homeowners.

 The quality of the proposed development should be such as to not impact the existing developments in the surrounding area. 	The proposal of the applicant is for the units to be footprint units to be development in such a way as to use the existing vegetation as a buffer for visual mitigation. The architect styles will be uniform in order not to decrease the visual value of the surround area.
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Tim Bruyns Via Email (15 January 2021) on BID	
Comments	Response
 Concern regarding the place of the 10m setback line as indicated in the proposal. 	The 10m setback line is measured from the edge of the ridge towards the first set of proposed holiday units. This 10m buffer area have been identified as a mitigation measure to preserve the ecotone between the higher-lying area proposed for development and the lower-lying are to be preserved as natural open space.
The description of how the sewage will be handled is very vague.	The bulk sewer solution for the development is the provision of a holding/conservancy tank (not septic tank) design. This holding/conservancy tank shall be designed and located in such a way as for the internal network's flow to easily convert/switch to the municipal system when it becomes available. The conservancy tank will be gravity fed and has no treatment process. Sewer is accumulated in the concrete tank as holding measure only and is emptied on a regular basis by a private contractor or by the KOT. The concrete tank is highly resistant to degradation and remains stable over the long term, resulting in little maintenance costs. The tank has an underground footprint with very limited above-ground infrastructure visible, other than a manhole. The tank is supplied with odour-controlled ventilation and hence has no odour. The tank has no pumps or other

Comments	Response
Raymond Swenson Via Email (23 August 2023) on Pre-App DBAR	
 Propose a pedestrian walkway in H.C. Botha Street. Concern regarding the width of H.C. Botha Street if pedestrians would need to walk in the road. 	The proposed development includes a paved/raised walkway to allow residents from the Dwarswegstrand Holiday Resort to access the beach on foot due to the limitation of parking available as well as privacy of surrounding homeowners.
Comments	Response
Walter Leonhardt Via Ema	il (15 January 2021) on BID
 There have been problems with the sizing of the stormwater that runs through the lower property in the past and the pipe sizes will possibly have to be increased depending on how the stormwater drainage is handled. 	No stormwater accumulation will be performed. All stormwater will be handled as sheetflow over the development. All internal roads and parking areas will be constructed using grass block pavers with a high level of infiltration resulting in negligible stormwater runoff. Energy dissipation will be performed as standard practice at all rooftop drainage outlets.
	mechanical parts and subsequently also has no noise pollution. Scraping or scarifying is not required. The tank has no pumps or other mechanical parts and hence has no mechanical maintenance requirements. The only operation required is the regular emptying of the tank by a private contractor or by the KOT. This will be performed by tanker, either on contract, or internally by owned equipment. Inspection of the system will be performed by the supervisor on a daily basis. The operational methodology shall be incorporated into the service level agreement (SLA) with the municipality.
	mechanical parts and subsequently also has no noise pollutic Scraping or scarifying is not required. The tank has no pumps other mechanical parts and hence has no mechanic
	mechanical parts and subsequently also has no noise pollution

•	Concern regarding the traffic generated by the proposed development.	The capacity analysis for existing traffic (2022) to future traffic conditions (2027) concluded that the proposed development will have negligible impacts at the intersection of Morrison Road and H.C. Botha Street as well as the intersection of the proposed development and H.C. Botha Street and therefore no upgrades/changes are required for the existing road infrastructure.
		The proposed entrance will allow for sufficient stacking distance in order to reduce the amount of vehicles queuing in H.C. Botha Street during peak holiday periods. The proposed development provides sufficient parking space at communal facilities as well as a paved/raised walkway in H.C. Botha Street for residents to access the beach area.
•	Concern regarding the use of a sewerage pump station close to the entrance of Dwarsweg township on a dune above the township. Smell and spillages are real possibilities. Natural gravitation and sandy soil will cause immense damage in case of a spill.	The bulk sewer solution for the development is the provision of a holding/conservancy tank (not septic tank) design. This holding/conservancy tank shall be designed and located in such a way as for the internal network's flow to easily convert/switch to the municipal system when it becomes available. The conservancy tank will be gravity fed and has no treatment process. Sewer is accumulated in the concrete tank as holding measure only and is emptied on a regular basis by a private contractor or by the KOT. The concrete tank is highly resistant to degradation and remains stable over the long term, resulting in little maintenance costs. The tank has an underground footprint with very limited above-ground infrastructure visible, other than a manhole. The tank is supplied with odour-controlled ventilation and hence has no odour. The tank has no pumps or other mechanical parts and subsequently also has no noise pollution. Scraping or scarifying is not required. The tank has no pumps or other mechanical parts and hence has no mechanical

	maintenance requirements. The only operation required is the regular emptying of the tank by a private contractor or by the KOT. This will be performed by tanker, either on contract, or internally by owned equipment. Inspection of the system will be performed by the supervisor on a daily basis. The operational methodology shall be incorporated into the service level agreement (SLA) with the municipality.
• The applicant, who is a member of the Dwarswegstrand HOA has, to the best of my knowledge, not held any consultations with individual home owners in the area.	Meeting notes where the proposed development was discussed with the HOA of Dwarswegstrand, is available on request from the applicant.
 Dwarsweg Strand offers limited access opportunity to the beach and is already very crowded during peak season. Any further development such as that which forms the reason for this application will exaggerate the overcrowding of facilities. 	The proposed development includes a paved/raised walkway to allow residents from the Dwarswegstrand Holiday Resort to access the beach on foot due to the limitation of parking available as well as privacy of surrounding homeowners. The proposal also includes multipurpose and swimming pool facilities with parking to reduce overcrowding during peak holiday times.
• Erf 720 is situated on a dune above the pristine Kloof forest. There is already established development on one side of the Kloof. Developing erf 720 will seriously damage or destroy this natural forest with its abundant bird life.	The total development footprint was minimized to approximately 3350 square metres out of the total 4ha of Erf 720 amounting to a loss of only 8.4% (0.335ha) of Erf 720. All protected indigenous trees will remain and the development layout was compiled taking the location of these trees into consideration. It is the intention of the developer to keep the footprint of the development as small as possible with the architect style being uniform and therefore aims to change the aesthetics of Erf 720 is little as possible. An additional 10m buffer have been incorporated between the proposed development footprint and the lower lying ravine area of Erf 720 which will not be

	fragmented by a fence, therefore maintaining a natural corridor for animals.
Prinsloo Bekker Via Email (26 /	August 2023) on Pre-App DBAR
Comments	Response
 Concern regarding the damage/permanent removal of the sensitive ecosystem. Concern regarding the aesthetics of lush green vegetation which will be replaced by buildings and fences. 	The total development footprint was minimized to approximately 3350 square metres out of the total 4ha of Erf 720 amounting to a loss of only 8.4% (0.335ha) of Erf 720. All protected indigenous trees will remain and the development layout was compiled taking the location of these trees into consideration. It is the intention of the developer to keep the footprint of the development as small as possible with the architect style being uniform and therefore aims change the aesthetics of Erf 720 is little as possible. An additional 10m buffer have been incorporated between the proposed development footprint and the lower lying ravine area of Erf 720 which will not be fragmented by a fence, therefore maintaining a natural corridor for animals.
 Concern about the inflation of 3.5% to account for the time lapse between the traffic count date and the report. Concern regarding the traffic volumes during peak holiday seasons that was not considered during the traffic impact assessment. 	The trip generation of the proposed development is estimated at approximately 5 trips for the morning peak hour and 8 trips for the afternoon peak hour. The results of the analysis indicate that the development has a negligible impact on the Level of Service during both the morning and afternoon horizon year peak hours and both intersection between the entrance and H.C. Botha Street as well as the intersection between H.C. Botha Street and Morrison Road will continue to operate at a Level of Service A for both the morning and afternoon peak hours.

 Concern regarding the placement of the conservancy tank on the north-eastern side of Erf 720. Concern regarding the proper management regarding the risk of overflow and spillages when tanks are emptied. Concern regarding the noise and odour when tanks are emptied. 	The bulk sewer solution for the development is the provision of a holding/conservancy tank (not septic tank) design. This holding/conservancy tank shall be designed and located in such a way as for the internal network's flow to easily convert/switch to the municipal system when it becomes available. The conservancy tank will be gravity fed and has no treatment process. Sewer is accumulated in the concrete tank as holding measure only and is emptied on a regular basis by a private contractor or by the KOT. The concrete tank is highly resistant to degradation and remains stable over the long term, resulting in little maintenance costs. The tank has an underground footprint with very limited above-ground infrastructure visible, other than a manhole. The tank is supplied with odour-controlled ventilation and hence has no odour. The tank has no pumps or other mechanical parts and subsequently also has no noise pollution. Scraping or scarifying is not required. The tank has no pumps or other mechanical parts and hence has no mechanical maintenance requirements. The only operation required is the regular emptying of the tank by a private contractor or by the KOT. This will be performed by tanker, either on contract, or internally by owned equipment. Inspection of the system will be performed by the supervisor on a daily basis. The operational methodology shall be incorporated into the service level agreement (SLA) with the municipality. The conservancy tanks will be sized accordingly to reduce the amount of times it will need to be emptied.
 Concern regarding noise levels during the operational phase of the proposed development. 	Minimal noise is expected during construction and therefore it is proposed for construction activities to be limited to normal working hours (07:00-18:00) with no construction activities to take place on Sundays and public holidays. It is envisaged that the proposed development will not generate more noise

	compared to similar surrounding developments in close proximity to Erf 720 and that the constant noise emitted from the ocean as well as traffic in Morrison Road will overshadow any noise emitted from the proposed holiday resort.
Tiaan Boshoff Via Email (24 A	ugust 2023) on Pre-App DBAR
Comments	Response
 Concern regarding the placement of the conservancy tank with consequent odours during the emptying of the tank. Proposed that the conservancy tank be placed next to Morrison Road. 	The bulk sewer solution for the development is the provision of a holding/conservancy tank (not septic tank) design. This holding/conservancy tank shall be designed and located in such a way as for the internal network's flow to easily convert/switch to the municipal system when it becomes available. The conservancy tank will be gravity fed and has no treatment process. Sewer is accumulated in the concrete tank as holding measure only and is emptied on a regular basis by a private contractor or by the KOT. The concrete tank is highly resistant to degradation and remains stable over the long term, resulting in little maintenance costs. The tank has an underground footprint with very limited above-ground infrastructure visible, other than a manhole. The tank is supplied with odour-controlled ventilation and hence has no odour. The tank has no pumps or other mechanical parts and subsequently also has no noise pollution. Scraping or scarifying is not required. The tank has no pumps or other mechanical parts and hence has no mechanical maintenance requirements. The only operation required is the regular emptying of the tank by a private contractor or by the KOT. This will be performed by tanker, either on contract, or internally by owned equipment. Inspection of the system will be performed by the supervisor on a daily basis. The operational

	methodology shall be incorporated into the service level agreement (SLA) with the municipality. The conservancy tanks will be sized accordingly to reduce the amount of times it will need to be emptied.
 Concern regarding the stability of H.C. Botha Street where tankers would drive to empty the conservancy tanks. 	A full stability assessment of H.C. Botha Street is not required as the tankers that will be used to empty the conservancy tank will not be larger than the current traffic using H.C. Botha Street for the same purpose. Access to the proposed development has been approved by the Mossel Bay Municipality. HC Botha Street is a public municipal street.
 Concern regarding the connection with municipal sewerage network in the next 5 to 10 years. 	The municipal sewer masterplan propose that the bulk sewer network will be available in the next 5 to 10 years. A pumpstation was recently finished at De Dekke in Groot Brak River as the first phase of the sewer network. The pressure line in Morrison Road to the pumpstation still have to be developed and unfortunately the municipal sewer masterplan does not mention a specific timeframe for the project.
Dr.W. Jansen van Rensburg Via Email (03 September 2023) on Pre-App DBAP	

Comments	Response
 Concern regarding the fauna and flora on the proposed development property. Propose that the property should be cleared of alien vegetation with walkways being created for nature lovers. 	The sensitivity of the site has indeed been confirmed by Dr McDonald (botanist) and Dr Collville (faunal specialist) and their reports have been used to inform and restrict development associated with this application. The total development area for the 18 resort structure (26 keys) proposed, amounts to approximately 3350 square metres out of the total 4ha of Erf 720, amounting to a loss of habitat the equivalent of 8.4% of the site. Specifically all protected trees have been surveyed and units placed to avoid them altogether. The remainder of Erf 720 will still be left private open

space II (a higher level of conservation i.e. Open Space III or IV
could even be recommended to ensure that no further
development is considered on the rest of the open space area).
The owners of the property (Dwarswegstrand Home Owners
Association) has done a great job in maintaining invasive alien
vegetation on the site which is commendable and if the proposal
for the resort units is considered positive by the Department of
Environmental Affairs, they will be obliged to continue with
invasive alien vegetation management to ensure that the
remaining natural habitat is not impacted by alien vegetation.
One of the reasons why the Municipality designated the site for
infill/resort development in the Mossel Bay Spatial Development
Framework, is because it was previously zoned Resort Zone
since it forms part of the Dwarswegstrand Resort (from 1991 –
2016 it had this zoning which allowed for resort development). In
2016 the HOA rezoned it to private open space (the zoning
affects rates and taxes payable to the Municipality), but with the
understanding that potential future resort development would not
be excluded (in which case rezoning would be required once
more).
Your concern about the site being sensitive is duly noted and
we'll be sure to include your submission to the Department of
Environmental Affairs so that they are aware of your proposal
that the site should rather be left undeveloped with the potential
to make it accessible to the public.
Realistically nowever, since the property is privately owned by
the Dwarswegstrand Home Owners Association, it is highly
unlikely that it will be opened to the public as an alternative
recreational area (even under the status quo it remains private).
in audition to the environmental constraints of this property, it is
Important to understand that there are planning policies (at Provincial and Municipal lovel) that do support antimicing vectors
Provincial and Wunicipal level) that do support optimising vacant

land within urban areas – although this is not always supported
due to environmental constraints, the planning thinking behind
such an approach is to protect and conserve areas outside of
urban areas where development pressure is not as high. It is not
to say that all vacant pieces of land in urban area must be
developed (far from it when considering their vital role in an
otherwise fragmented environment), but the Department of
Environmental Affairs will have to weigh-up both the
environmental impacts/loss as well as the planning
policies/benefits of this application and luckily that also includes
the comments/submission such are yours and those of others
who may not be in support of the proposal.

Tim Bruyns Via Email (04 September 2023) on Pre-App DBAR

Comments	Response
 Concern regarding the present intersection at Morrison Ave. Due to its alignment and angle to Morrison ave it is a very tight intersection. Propose that the alignment and width should be relooked at. Concern regarding the capacity of H.C. Botha Street and Morrison Road (including joggers and cyclists). 	The geometric design of the development access onto HC Botha Street will be in accordance to all municipal standards and will be submitted to the Mossel Bay Municipality for approval. The proposed development will not cater for caravans but is for residential holiday units only. Access to the proposed development has been approved by the Mossel Bay Municipality. HC Botha Street is a public municipal street.
	The proposed development provides sufficient parking for the holiday resort units as well as at the communal facilities within the resort. A paved/raised walkway is proposed from the entrance of the development in the direction of the beach in H.C. Botha Street to reduce the need for vehicle usage as well as to provide sufficient space for joggers and cyclist from the proposed holiday resort.

Anton du Plooy (15 September 2023) on Pre-App DBAR	
Comments	Response
 The lack of services and specifically sewerage, ground water and related contamination. 	Bulk water connection has been approved by the Mossel Bay Municipality.
	Bulk electrical connection has been approved by the Mossel Bay Municipality.
	Bulk sewer infrastructure does not exist in the area. The bulk sewer solution for the development is the provision of a holding/conservancy tank (not septic tank) design. This holding/conservancy tank shall be designed and located in such a way as for the internal network's flow to easily convert/switch to the municipal system when it becomes available. The conservancy tank will be gravity fed and has no treatment process. Sewer is accumulated in the concrete tank as holding measure only and is emptied on a regular basis by a private contractor or by the KOT. The concrete tank is highly resistant to degradation and remains stable over the long term, resulting in little maintenance costs. The tank has an underground footprint with very limited above-ground infrastructure visible, other than a manhole. The tank is supplied with odour-controlled ventilation and hence has no odour. The tank has no pumps or other mechanical parts and subsequently also has no noise pollution. Scraping or scarifying is not required. The tank has no pumps or other mechanical parts and hence has no mechanical maintenance requirements. The only operation required is the regular emptying of the tank by a private contractor or by the KOT. This will be performed by tanker, either on contract, or internally by owned equipment. Inspection of the system will be performed by the supervisor on a daily basis. The operational

	methodology shall be incorporated into the service level agreement (SLA) with the municipality. Groundwater contamination cannot occur due to the tank being a concrete tank that cannot degrade.
 Destruction of habitat for birds and other wildlife. 	The total development footprint was minimized to approximately 3350 square metres out of the total 4ha of Erf 720 amounting to a loss of only 8.4% (0.335ha) of Erf 720. All protected indigenous trees will remain, and the development layout was compiled taking the location of these trees into consideration. It is the intention of the developer to keep the footprint of the development as small as possible with the architect style being uniform and therefore aims to change the aesthetics of Erf 720 is little as possible. An additional 10m buffer have been incorporated between the proposed development footprint and the lower lying ravine area of Erf 720 which will not be fragmented by a fence, therefore maintaining a natural corridor for animals.
 Increased noise levels, specifically around swimming pool proposed. 	Minimal noise is expected during construction and therefore it is proposed for construction activities to be limited to normal working hours (07:00-18:00) with no construction activities to take place on Sundays and public holidays. It is envisaged that the proposed development will not generate more noise compared to similar surrounding developments in close proximity to Erf 720 and that the constant noise emitted from the ocean as well as traffic in Morrison Road will overshadow any noise emitted from the proposed holiday resort.
 Security during construction and afterward, attracts criminal element. 	It will be the responsibility of the on-site contractors to assure security is of highest priority, especially with existing residential neighbourhoods and holiday resorts in close proximity to Erf 720.

A perimeter fence will be erected along Morrison Road as well
as H.C. Botha Street to prevent any unauthorised access. The
proposal has omitted any fencing on the southern boundary of
the property bordering the existing Dwarswegstrand Resort as a
mitigation measure for any fauna using the area as a corridor.
Once construction is completed, the development will ultimately
improve security for the remainder of Dwarswegstrand Resort,
as the site is not currently fenced, and pedestrians have
uncontrolled access to the property.

Susara Nortje (19 September 2023) on Pre-App DBAR	
Comments	Response
Concern regarding stormwater runoff.	No stormwater accumulation will be performed. All stormwater will be handled as sheetflow over the development. All internal roads and parking areas will be constructed using grass block pavers with a high level of infiltration resulting in negligible stormwater runoff. Energy dissipation will be performed as standard practice at all rooftop drainage outlets.
Concern regarding sewage runoff.	The bulk sewer solution for the development is the provision of a holding/conservancy tank (not septic tank) design. This holding/conservancy tank shall be designed and located in such a way as for the internal network's flow to easily convert/switch to the municipal system when it becomes available. The conservancy tank will be gravity fed and has no treatment process. Sewer is accumulated in the concrete tank as holding measure only and is emptied on a regular basis by a private contractor or by the KOT. The concrete tank is highly resistant to degradation and remains stable over the long term, resulting in

	little maintenance costs. The tank has an underground footprint with very limited above-ground infrastructure visible, other than a manhole. The tank is supplied with odour-controlled ventilation and hence has no odour. The tank has no pumps or other mechanical parts and subsequently also has no noise pollution. Scraping or scarifying is not required. The tank has no pumps or other mechanical parts and hence has no mechanical maintenance requirements. The only operation required is the regular emptying of the tank by a private contractor or by the KOT. This will be performed by tanker, either on contract, or internally by owned equipment. Inspection of the system will be performed by the supervisor on a daily basis. The operational methodology shall be incorporated into the service level agreement (SLA) with the municipality.
 Concern regarding traffic during holiday season. 	The geometric design of the development access onto HC Botha Street will be in accordance to all municipal standards and will be submitted to the Mossel Bay Municipality for approval. The proposed development will not cater for caravans but is for residential holiday units only. Access to the proposed development has been approved by the Mossel Bay Municipality. HC Botha Street is a public municipal street.
	The proposed development provides sufficient parking for the holiday resort units as well as at the communal facilities within the resort. A paved/raised walkway is proposed from the entrance of the development in the direction of the beach in H.C. Botha Street to reduce the need for vehicle usage as well as to provide sufficient space for joggers and cyclist from the proposed holiday resort.
 Where and how will access to the beach be gained for residents of the proposed development. 	Access to the beach will be via Dwaswegstrand Oord.

 Where will the residents of the proposed development that want to access the beach park their vehicles. 	The proposed development allows for sufficient parking on Erf 720 as well as a paved/raised walkway along H.C. Botha Street for residents of the proposed holiday resort to access the beach area. Therefore there is no need for residents of the proposed development to make use of vehicles to access the beach.
 Concern regarding the disturbance of protected plant and bird species. Concern regarding management and execution of building plans. 	The total development footprint was minimized to approximately 3350 square metres out of the total 4ha of Erf 720 amounting to a loss of only 8.4% (0.335ha) of Erf 720. All protected indigenous trees will remain, and the development layout was compiled taking the location of these trees into consideration. It is the intention of the developer to keep the footprint of the development as small as possible with the architect style being uniform and therefore aims to change the aesthetics of Erf 720 is little as possible. An additional 10m buffer have been incorporated between the proposed development footprint and the lower lying ravine area of Erf 720 which will not be fragmented by a fence, therefore maintaining a natural corridor for animals.
	and therefore the habitat of various bird species will remain undisturbed.
	The specialist studies aim to identify as many management/mitigation measures as possible to reduce the impact of the proposed development. All the identified mitigation measures are included in the environmental management plan that all contractors as well as the applicant will need to adhere to.

٠	Query regarding the communication between the	Meeting notes where the proposed development was discussed
	applicant and the trustees of the HOA of Dwasrwegstrand	with the HOA of Dwarswegstrand, is available on request from
	Oord.	the applicant.

Hannes van Wyk (26 Septen	ber 2023) on Pre-App DBAR
Comments	Response
 Clarity on the number of holiday units included in the proposed development. 	The proposal is for eight (8) x duette units and ten (10) x two bedroom units equalling to 18 physical buildings. However, the duette units can be seen as 16 individual units that are placed in connection with each other resulting in 8 physical duette buildings.
 Propose the use of a sewage package plant due to the uncertainty of when the sewer network in Morrison Road will be made available by the Mossel Bay Municipality. 	The use of a sewage package plant comes with various positive and negative attributes. A big positive is the reduced risk of spillage to occur as sludge buildup will only need to be removed approximately every 5 years and therefore the odour emissions are reduced as it would not require to be pumped out daily.
	The downside is that a sewage package plant is quite expensive compared to conservancy tanks. The use of treated effluent as irrigation water will have to meet the Department of Water and Sanitation's General Standards which consequently will require a full Water Usage License which is very costly and time consuming to obtain.
	A sewage package plant has been discussed in detail as secondary alternative in the engineering report. Please refer to chapter 5 and 5.3.7 in the Engineering Services Report (Appendix G6).

 Is the paved walkway in H.C. Botha Street for pedestrians wanting to go to the beach? Propose a similar walkway between the site entrance and Morrison Road for visitors wanting to go for a walk or a 	The paved/raised walkway between the proposed entrance and Dwarswegstrand Resort is to accommodate residents of the proposed development to access the beach without the need of using a vehicle.
jog.	There is a large milkwood clump located to the north-east of the proposed entrance that will need to be taken into account during the consideration of a walkway leading to Morrison Road as the proposed development aims to avoid all protected tree species. Such a walkway is therefore not preferable.

Pienaar Kloppers (22 August 2023) on Pre-App DBAR		
Comments	Response	
 Kindly provide details of the construction contractors earmarked for engagement in the development. 	The Kaapland Onderwys Trust (KOT) is still some time away from any construction, so there are no contractors identified/appointed yet.	
	The KOT must first go through the environmental application process (which can take anything from 5-6 months still), followed by the Municipal Planning decision (potentially another 3-4 months), then service level agreements and building plan approvals from the local Municipality. That's if they obtain authorisation for their proposal.	
	Contractors will only be brought onboard after all of the above processes have been finalised – which put together can easily take up to two years from.	
	At this point in time there are no contractors in the picture yet.	

•	Please let me examine the report Melanie Koen, who works for the Department of Forestry and Fisheries, produced.	Ms Koen has been notified of the development application alongside all of the relevant environmental authorities including the Department of Environmental Affairs and CapeNature.
		Ms Koen does not produce a report on the development application, however she will comment on the application and her response will then be incorporated into the Basic Assessment Report. So you will get to see the Department of Forestry's comment in the next version of the Basic Assessment Report along with all of the other comments we receive during the course of the ongoing public participation.
	In the absence of having comment from the environmental authorities just yet, the Botanical and Biodiversity Reports compiled by Dr Dave McDonald are attached for your perusal. These reports have been compiled specifically to inform the layout and development application to date and forms part of the Basic Assessment Report currently available for stakeholder review and comment.	
 When is the Socio-Economic Assessment scheduled for completion, and could you please provide details regarding the assessment protocol to be employed, as well as the specific national or international standards that will guide the process. 	When is the Socio-Economic Assessment scheduled for completion, and could you please provide details regarding the assessment protocol to be employed, as well as the specific national or international standards that	A socio-economic study has not been undertaken for this application mainly due to the small scale, compatibility of the land use with surrounding land uses and alignment with the local spatial planning for the area.
	Arriving at this conclusion required us to consider the key triggers for a socio-economic impact assessment, as these are stipulated in the Guideline for Social Impact Assessment as drawn up for the Department of Environmental Affairs by Tony Barbour (2007).	
		The purpose of the Guideline Series is specifically to provide guidance (to environmental consultants and the Department in

particular) on whether or not a specific specialist study is deemed applicable/necessary to inform decision-making.
Summary of the main triggers as stipulated per the Guideline below.
 Consideration of the nature of the receiving environment, in particular whether vulnerable community, or areas with high poverty/unemployment, or areas where livelihoods depend on existing social relationships and income generating patterns, will be affected; The study area does not qualify ito these characteristics – the area is characterised mostly by medium-high income, well-educated and employed/retired people; Areas where access to services, mobility/community
 networks are affected, or where livelihoods depend on access to and use of environmental resources and services; The Municipality has confirmed services availability and the property is not utilised for ecosystem services at a communal scale. Care has been taken to place units in areas that do not contain thicket clumps/protected trees and the remaining natural areas will continue to function as
 Areas of important tourism or recreational value should conflicting land uses be introduced:
 The coastal townships/suburbs stretching from Glentana to Great Brak is characterised by a combination of primary dwellings, secondary (holiday) homes, as well as resort type developments mainly due to its proximity to the

ocean/beach. Development of a resort is not considered a conflicting land use but rather compatible with the tourism/recreational qualities of the area;

- Compatibility of the land use (proposed) in terms of the Integrated Development Plan / Spatial Development Framework of the local Municipality;
 - Although the property is currently zoned private open space, it forms part of the greater Dwarswegstrand Resort development and had the zoning of 'Resort Zone' from 1991 2016. Reverting back to this resort zone is not deemed inconsistent with the surrounding land use. Furthermore, the Municipality has confirmed that the site is located within the urban edge according to the Spatial Development Framework (2022) and is designated specifically for urban expansion, notably medium density residential or resort type development;
- Areas where the proposed land use will alter the sense of place or character of the area, or where the project represents a significant change in land use from the prevailing use;
 - Development of a resort, adjacent to the existing Dwarswegstrand Resort, within an urban context, will not change the character of the area (although the vacant status of the property itself will change) and as such will not result in a significant change in the land use compared to the prevailing urban (prevailing) use;
- Large, high intensity type projects such as large infrastructure or civil projects; or

	 The development of 18 single storey structures with limited footprints (8 will be duette units, plus 10 single standing units) with amenities, which will be positioned to avoid thicket clumps/individual protected trees (also helping to screen the structures) on the study site, does not qualify as a high intensity or large scale project; Projects that require large workforce relative to the size of the existing workforce such as dams, railways, roads; The development will happen in phases with bulk earthworks and civils, following by units (five units per phase) over a period of time, so as to avoid needing a large workforce on the site at any one time. The recommendation is also for the property boundary fence to be erected (by hand) prior to commencing with earthworks or bulk services to ensure that construction activities, including the workforce, is restricted to the site only. Security is always a sensitive matter when projects are implemented, so the Environmental Management also specifies a number of conditions to ensure that the contractor(s) and his/her workforce do not move around or off the site when they are working on different phases.
	the need for a socio-economic impact assessment to be undertaken to inform decision-making, we determined that the proposal is not the type of activity (both in nature and in scale) for which such a study is required.
Christina Jurgens (19 September 2023) on Pre-App DBAR	

Comments	Response
 Request for Fire Risk Assessment Study and Fire Prevention Measures. 	The proposed development site is not subject to a burning regime to maintain the natural vegetation. The thicket vegetation present on the property is not a highly flammable fuel source and therefore a Fire Risk Assessment Study is not deemed necessary.
	The internal assessment of the management, building plan approvals and emergency procedures outlining strategies such as fire-resistant materials, emergency exists, fire detection and suppression systems and evacuation protocols will be submitted by the applicant to the municipality.
	Fire prevention measures have been included in the Environmental Management Programme for the proposed development that must be adhered to by the applicant and future Home Owners Association (HOA):
	The Mossel Bay Municipality (Fire, Rescue and Disaster Management Services) have been approached as part of the public participation process to provide input and comment regarding the proposed development.
Details of Contractors and Development Timeline.	The applicant must first go through the environmental application process (which can take anything from 5-6 months still), followed by the Municipal Planning decision (potentially another 3-4 months), then service level agreements and building plan approvals from the local Municipality. It is therefore premature to identify contractors at the Environmental Impact Assessment stage since further approvals will only follow after the environmental application process.

	Tender procedures to identify contractors will be held before any contractors are employed.
	Contractors will only be brought onboard after all of the above processes have been finalised – which put together can easily take up to two years from.
	The Environmental Authorisation Application applies for a 5-year period for the commencement of construction with an additional 10-year period from the commencement of construction to completion.
 Noise studies and mitigation measures. 	Minimal noise is expected during construction and therefore it is proposed for construction activities to be limited to normal working hours (07:00-18:00) with no construction activities to take place on Sundays and public holidays. It is envisaged that the proposed development will not generate more noise compared to similar surrounding developments in close proximity to Erf 720 and that the constant noise emitted from the ocean as well as traffic in Morrison Road will overshadow any noise emitted from the proposed holiday resort.
	The inclusion of a noise impact study is therefore not deemed necessary as the operational phase is associated with urban/township resort development in an urban context.
	The noise mitigation measures applicable to the development phases are included in the Environmental Management Programmes and attached as Appendix H.
 Mitigation Measures for Pedestrian Traffic and Building Material. 	The proposed development provides sufficient parking for the holiday resort units as well as at the communal facilities within the resort. A paved/raised walkway is proposed from the entrance of the development in the direction of the beach in H.C. Botha Street to reduce the need for vehicle usage as well as to

	provide sufficient space for joggers and cyclist from the proposed holiday resort. No strategy is currently devised to prevent pedestrian ingress from the resort to the non-enclosed Nature- on-Sea area. The current state of the vegetation on the eastern border of the proposed development site prevents the movement of pedestrians and will be kept in its current state.
	Building material selection will only be decided during the detailed design phase after the environmental process. The design standards will have to be approved by the municipality and align with all prescribed building guidelines.
Adequacy of the existing water pressure.	Bulk water has been approved for the proposed development by the Mossel Bay Municipality. Adequacy of water pressure will be investigated during the detail design stage as per normal detail design guidelines. Detail design drawings will not be approved by the Mossel Bay Municipality if suitable pressure is not provided, either by pressure available in the system, or by the necessary pressure boosters.
DEA&DP Biodiversity and Coastal Management (20 September 2023) on Pre-App DBAR	

DFA&DP Biodiversity and Coastal Management (20 September 2023) or	n Pre-App DBAR

Comments	Response
• It is noted that the proposed development site is located inland of the coastal management line as well as the coastal erosion risk lines as delineated by this Department.	Please refer to Appendix A2 which indicates the proposed development site (Erf 720) in relation to the coastal management line as well as coastal erosion risk lines.

•	The provisions of Section 63 of the NEM: ICMA must be addressed in the PBAR.	It is evident from the considerations regarding the NEM:ICMA mentioned, that the proposed development will not prejudice the achievement of any coastal management objectives and is not in contrary to the interests of the surrounding community. The proposed development will not cause irreversible or long-lasting adverse affects to any aspect of the coastal environment. The proposed development will not deny the public access to the coastal environment as it is private land and a private development. Please refer to Section E(7) of the Draft Basic Assessment Report for the full considerations regarding NEM:ICMA.
•	Adequate investigation of public access must be considered in the PBAR. The Department of Environmental Affairs and Development Planning (DEA&DP) supported the Garden Route District Municipality and Local Municipalities with the facilitation of coastal access by commissioning the Garden Route Coastal Access Audit. Please review the said report for consideration within the Draft BAR.	According to the Western Cape Provincial Coastal Access Audit – Garden Route Municipal District (2019), the closest access point to Erf 720 is stipulated as BOT 03, located directly to the south of the proposed development site. The coastal access report intends to assist the Garden Route Municipalities to prioritise efforts and resources. It is noted that for access point BOT 03, no conflicts, environmental damage, safety issues, needs, required maintenance or illegal activities were identified. BOT 03 was also not earmarked for further investigations. Please refer to Section E(7) of the Draft Basic Assessment Report for the full considerations regarding coastal access.
•	While it seems that from a coastal processes perspective, (based on the coastal risk modelled data) the development does not raise significant issues, it is advised that a precautionary approach be applied with the placement and design of the units.	The proposed development will be limited to higher-lying northern portion of Erf 720, therefore applying avoidance mitigation to protect the natural coastal buffer zone that could be affected by storm surge events as well as potential climate change related impacts. An environmental management programme will be adhered to for the proposed development

	which will aim to preserve/maintain the natural coastal corridor environment.	
Department of Health Garden Route District Municipality (20 September 2023) on Pre-App DBAR		
Comments	Response	
 Proper storage and disposal of waste generated (general waste and construction waste) on site. 	Recommendation included in EMPr.	
 Managing dust emanating from site by means of the most practical option available. 	Recommendation included in EMPr.	
Ensure proper toilet facilities for employees on site.	Recommendation included in EMPr.	
Mossel Bay Municipality Town Planne	rs (24 August 2023) on Pre-App DBAR	
Comments/Recommendations	Response	
 The area is located within the Mossel Bay Urban Edge as defined by the Mossel Bay Spatial Development Framework/Environmental Management Framework 2022. The area is located within an Urban Expansion Zone. The particular Expansion Area is defined as area 82 and earmarked for Resort, Medium Density Residential uses. The presented proposal is therefore in line with the use envisaged in the Mossel Bay Spatial Development 	The proposed development of a holiday resort is in line with the envisaged use stipulated in the Mossel Bay Spatial Development Framework/Environmental Management Framework of 2022	

Framework/Environmental Management Framework 2022, which is the principle guiding document for development within the Mossel Bay Municipal area. The necessary Planning applications must be lodged with the Municipality.	
Mossel Bay Municipality Electrical Services (14 September 2023) on Pre-App DBAR	
Comments/Recommendations	Response
 We confirm the availability of 100kVA electrical capacity as per our letter dated 11 Feb 2020. Depending on budget constraints, it is envisaged that the overhead line running along Morrison Rd and the northern boundary of Erf 720, will be replaced with an underground cable in the next 2-3 years. We therefore propose that allowance be made for ground mounted equipment for the bulk electrical connection to this development. 	We take note of the proposed changes to your bulk electrical infrastructure and we will make necessary adjustments to our designs and will inform our client accordingly.
Breede-Olifants Catchment Management Agency (28 September 2023) on Pre-App DBAR	
Comments/Recommendations	Response
• Please advise about the capacity of on-site conservancy tank and if the local municipality confirm the capacity to cater for additional wastewater from the resort.	The preliminary conservancy tank design will be an underground concrete tank, approxmately 21kl in size with dimension of $3m(w) \times 4m(l) \times 1.8m(d)$.

	The Mossel Bay Municipality has approved the engineering report and confirmed capacity at the Great Brak River WWTW for the 21kl/day from the proposed development.
 How ofter will the conservancy tank be emptied. 	During peak holiday periods it is envisaged that the proposed conservancy tank will be emptied twice a day (morning and evening).
 How likely that the on-site conservancy tank will overflow and pose risk to the human health and the environment. 	Sewage will be emptied from the conservancy tank by a private contractor or by the KOT. This will be with a formal contract on specified times (twice per day during peak season on specific times). The concrete tank is highly resistant to degradation and remains stable over the long term, resulting in little maintenance costs. The tank has an underground footprint with very limited above-ground infrastructure visible, other than a manhole. The tank is supplied with odor-controlled ventilation and hence has no odor. Inspection of the system will be performed by the supervisor on a daily basis. The operational methodology shall be incorporated into the service level agreement (SLA) with the municipality.
 Please ensure that no water is taken from a water resource for any purpose without auhorisation from the Responisble Authority. 	Water supply is available from a 110mm uPVC Municipal line along H.C. Botha Street along the south-western boundary of Erf 720. Water will be distributed throughout the proposed development site using HDPE pipelines ranging in diameters between 63mm and 90mm, depending on the pressure that is available and the flow required. No water will therefore be taken from a water resource. Drink water – Municipal. Construction – Untreated water sourced from Water Treatment Works.

 Please ensure that no waste or water containing waste is disposed in a manner which may detrimentally impact in a water resource without authorisation from the National Water Act, 1998 (Act 36 of 1998) and other related legislations. 	Solid waste will be collected by the Municipality and disposed at a registered landfill site. Sewage will be emptied from the conservancy tank by a private contractor or by the KOT. This will be with a formal contract on specified times (twice per day during peak season on specific times)
	The conservanct tank has to be eptied twice per day during peak season in order to mitigate risk. This arrangement provides for a 12hour contingency time during peak season, i.e. sufficient time to make an arrangement for a replacement tanker.
 No pollution of surface water or groundwater resources may occur due to any activity. Stormwater management must be adressed both in terms of flooding, erosion, and pollution potential. No stormwater runoff from the application premises containing waste, or water containing waste emanating from any activity may be discharged into a water resource without prior treatment. 	Stormwater attenuation will take place on-site. The highly permeable soils as well as the design of the internal access roads with grass blocks will increase stormwater infiltration and therefore reduce stormwater runoff from the proposed development site. Each holiday unit as well as communal facility buildings will be equipped with rainwater harvest tanks to reduce the amount of rainwater reaching the permeable soils.
	The conservancy tank has to be emptied twice per day during peak season in order to mitigate risk. This arrangement provides for a 12hour contingency time during peak season, i.e. sufficient time to make an arrangement for a replacement tanker.

Cape Nature (05 October 2023) on Pre-App DBAR

Comments/Recommendations	Response
• The Hartenbos Dune Thicket has not been critically assessed to determine the risks and pressures for this	A broader study than just on the property in question would be required to make the assessment of Hartenbos Dune Thicket in
vegetation unit and data on the ecosystems condition	terms of pressure on it as a vegetation unit. It would not rely only

(including biotic disturbances, overutilization, and altered fire regimes) is limited (SANBI 2022).	on a local site such as where the proposed development would take place at Dwarswegstrand. Such a study would require a multi-disciplined approach that would have to be conducted over a few years to be able to determine all the risks, threats and pressures that impact this vegetation type. Such a study is beyond the scope of the included botanical / biodiversity assessment.
• The proposed development site is surrounded by urban development, and it is understood that the surrounding open/ natural areas will also be developed. However, the site is partially connected to the west and to the south of the property, which will not be developed. CapeNature therefore supports the 10m buffer along the ecotone boundary.	In addition to the 10m buffer along the ecotone boundary, the proposed development has omitted any fencing on the southern boundary. Therefore the fragmentation of this faunal corridor is avoided.
 According to the WCBSP the property is within a coastal corridor (Pool-Stanvliet et.al. 2017). Coastal ecosystems are ecological infrastructures that provides a range of regulatory services to coastal communities. The foredunes play an essential role in providing physical buffering against sea storm surges and other potential climate change related impacts. Therefore, they should be in a functional near-natural state. As these areas are important corridors to maintain landscape connectivity it is crucial that no further disturbances occur, and that the area must be restored to improve connectivity and reduce landscape fragmentation. 	The proposed development will be limited to higher-lying northern portion of Erf 720, therefore applying avoidance mitigation to protect the natural coastal buffer zone that could be affected by storm surge events as well as potential climate change related impacts. An environmental management programme will be adhered to for the proposed development which will aim to preserve/maintain the natural coastal corridor environment.
 CapeNature acknowledges the indigenous protected trees will be incorporated and recommend the Department of Forestry, Fisheries and Environment 	The Department of Forestry, Fisheries and Environment (DFFE) have been approched for comment regarding the proposed development.

(DFFE) provide comments. Furthermore, these protected trees must be demarcated as No-Go areas and illustrated on a map which must be included in the EMPr.	All protected trees will be demarcated prior to any develoment taking place. A No-Go areas map is included in the EMPr for the proposed development.
• The applicant is reminded that the management of invasive alien species is a requirement of all landowners in terms of both the Conservation of Agricultural Resources Act (CARA) and the NEM:BA Alien and Invasive Species Regulations and applies to the entire property. The eradication methods of invasive aliens must be compliant with the National Environmental Management: Biodiversity Act (Act No.10 of 2004)7 and including areas outside of the proposed development area.	The management of invasive alien species is included in the EMPr for the proposed development. Invasive alien vegetation will be managed better through designated management and levies that will be allocated for environmental management inclusive of invasive alien management in particular.
• Suitable locations must be determined before the geophytes are relocated. The season should also be considered to give the plants an adequate chance to re- establish. CapeNature is of the opinion that a suitable site with similar microclimate and geological conditions must be identified, and the success rate must be confirmed. Furthermore, it will be important that an experienced Environmental Control Officer (with botanical knowledge) be appointed to oversee the removal of the plants.	A suitable location for the relocation of geophytes will be determined by a suitably qualified environmental control officer with botanical knowledge prior to any development taking place. The rescue and relocation of geophytes have been incldued in the Environmental Management Programme for the proposed development. The ECO will oversee the relocation of the geophytes.

 Fencing around the property must be animal permeable. Thus, appropriately sized fence gaps, at the ground level, must allow the movement of small mammals. These fences must be visible to wildlife, including birds, by fitting reflective or colorful weather-resistant flags (e.g., aluminum, or plastic strips) to the wire. CapeNature supports the recommendation to relocate the staircase and the proposed access road to maintain the remaining natural vegetation and landscape connectivity. 	The proposed development has omitted any fencing on the southern boundary. Therefore the fragmentation of this faunal corridor is avoided. Appropriately sized fenced gaps will be applied at regular intervals to the fence along H.C. Botha Street and Morrison Road.	
• The ECO must ensure that the mitigation measure proposed by the specialists are implemented to protect the remaining ecological process and landscape connectivity.	A suitably qualified environmental control officer will be appointed to oversee the proposed development.	
Department of Agriculture (01 November 2023) on Pre-App DBAR		
Comments/Recommendations	Response	
 The Western Cape Department of Agriculture: Land Use Management has no objection to the proposed application. 	The site does not contain any agricultural resources in the form of registered water rights or suitable soils for cultivation. The property has been zoned as a Resort since 1991 and before then it was zoned Undermined. It has not been utilised for agriculture since its rezoning to Resort.	